The Great Grid Upgrade

Sea Link

Sea Link

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Document 9.72.2: Applicant's Response to Issue Specific Hearing 1 (ISH1) Action Points – Deadline 1A

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1. About this Document

1.1 Purpose of this Document

1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) response to Action Points addressed to the Applicant arising at Issue Specific Hearing 1 (ISH1) held on 11 November 2025, in respect of the Sea Link Project.

1.2 Structure

The Examining Authority (ExA) issued a list of action points during the Hearings and subsequently published them in written form on 12 November 2025 in the document titled Action Points arising from Issue Specific Hearing 1 (ISH1) on the scope of the development held on Tuesday 11 November 2025 [EV3-007]. This document provides responses to those actions, due at Deadline 1A, that were specifically addressed to the Applicant. Where appropriate, the Applicant has made minor stylistic or grammatical adjustments to the wording of the action points for clarity; however, these changes are not considered material and do not alter the substance of the actions or the Applicant's response.

2. Applicant's Response to Issue Specific Hearing 1

2.1 The Applicant's Response to Actions Table

Table 2.1 Response to Issue Specific Hearing 1 (11 November 2025)

Action No.	ExA Description	Applicant's Response	Deadline
AP9	Explanation of approach with respect to mitigating identified cumulative intra-project significant effects. Explain all mitigations that are being considered to address those which have been described as 'No mitigation has been confirmed at this stage' in ES **Chapter 3 'Summary of Likely Significant Effects' [APP-087].** If the applicant considers that no additional mitigation is necessary or possible, the reasons for this should be clearly set out.	The residual intra-project cumulative effects reported in **Application Document 6.2.5.3 Part 5 Combined Chapter 3 Summary of Likely Significant Effects [APP-087]** all result from two or more individual effects combining to have a cumulative effect that is potentially worse than each of the effects when experienced alone. The individual effects, before they are combined, range from minor up to major. Significant individual residual effects (which for the Suffolk Onshore Scheme are mostly visual effects other than one moderate PRoW effect) have typically already been mitigated as far as reasonably practicable. There is often little more that can be done as any available opportunities to mitigate the individual significant effects have already been taken. Mitigation would therefore need to focus on reducing one or more of the minor effects; potentially to a negligible level. In EIA it is not typically considered necessary or proportionate to mitigate individual minor effects any further and so any mitigation proposed would need to be enhanced beyond the standard measures usually adopted to mitigate individual significant effects. Mitigating these minor individual effects further may be possible; however, is likely to require a greater	Deadline 1A

level of detail from the appointed Main Works Contractor including detailed working methods, proposed plant, construction phasing, and construction traffic logistics and traffic management proposals, as well as specific detail about measures such as the Best Practicable Means (BPM) proposed to be deployed to address noise effects. These measures would need to be further enhanced beyond what is ordinarily required. Given that the specific primary measures are often not pinpointed at this stage (such as with the example of BPM) it is similarly unlikely that enhanced mitigation to address intra-project/combined effects could be detailed at this stage.

For these reasons we have reported, against each of the three intra-project/combined effects, that:

- *"No mitigation has been confirmed at this stage"*

Because of this there has been no modification of the residual cumulative significance of intra-project/combined effects to account for further mitigation.

However, there are some existing commitments that are likely to help mitigate these effects during the construction stage. Examples from **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-432]** include:

- *GG27: Members of the community and local businesses will be kept informed regularly of the works through active community liaison. This will include notification of noisy activities, heavy traffic periods and start and end dates of key phasing. A contact number will be provided which members of the public can use to raise any concerns or complaints about the Proposed Project. All construction-related complaints will be logged by the contractor(s) in a complaints register, together with a record of the responses given and actions taken. This will be made available to local authorities for review on request.*

- *GG03: A suitably experienced Environmental Manager will be appointed for the duration of the construction phase. In addition, a qualified and experienced Environmental Clerk of Works (ECoW) will be available during the construction phase to advise, supervise and report on the delivery of the mitigation methods and controls outlined in the CEMP. The ECoW will monitor that the works proceed in accordance with relevant environmental DCO requirements and adhere to the required good practice and mitigation measures. The ECoW will be supported as necessary by appropriate specialists, including ecologists, soil scientists and arboriculturists.*
- *GG05: Construction workers and maintenance staff will undergo training to increase their awareness of environmental issues as applicable to their role on the project. Topics will include but not be limited to:*
    - *pollution prevention and pollution incident response;*
    - *dust management and control measures;*
    - *location and protection of sensitive environmental sites and features;*
    - *adherence to protected environmental areas around sensitive features;*
    - *working hours and noise and vibration reduction measures;*
    - *working with potentially contaminated materials;*
    - *waste management and storage;*
    - *flood risk response actions; and agreed traffic routes, access points, etc.*
- *TT03: All designated Public Rights of Way (PRoWs) will be identified, and any potential temporary and/or permanent diversions applied for/detailed in the DCO. All*

designated PRoWs crossing the working area will be managed with access only closed for short periods while construction activities occur. Any required diversions will be clearly marked at both ends with signage explaining the diversion, the duration of the diversion (for temporary diversions) and a contact number for any concerns. This is outlined in the Outline Public Rights of Way Management Plans.

- *NV03: The contractor will conduct detailed construction noise and vibration assessments to determine whether there are likely to be any new or different significant adverse effects at noise and vibration sensitive receptors and therefore whether additional measures, including site-specific Best Practicable Means (BPM), may be required. The contractor will update the OCNVMP into the CNVMP and include site specific noise and vibration mitigation, as may be required.*

Application Documents 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk. [AS-008] and 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338] already include a commitment to a Transport Coordinator, which is important given that several contributing impacts are traffic related (i.e. noise and severance):

- *"The Transport Co-ordinator will take responsibility for implementing the CTMTP and will:*
    - *implement and monitor the CTMTP to identify successful measures and areas for improvement;*
    - *promote the CTMTP to all staff and contractors travelling to and from the Site to ensure compliance with its requirements;*

- *liaise as appropriate with local transport and traffic groups, local planning authorities and the local highway authority;*
- *monitor data relating to HGV routes, timing of HGV arrivals and departures and compliance with the DMS -/ TMMS [traffic management and monitoring strategy];*
- *manage the Car Share Scheme; and*
- *discuss any issues with relevant parties and identify any amendments to the CTMTP (including measures) to ensure compliance is maintained."*

- *A Communication Strategy will be developed by the Applicant in consultation with the contractor to ensure that the measures contained within the CTMTP are communicated to the workforce. This will include an information pack setting out the contractual requirements which will be provided to the contractors. Furthermore, regular meetings will be held with contractors to discuss HGV management and to address any issues associated with travel to/from the Site as well as to relay information including any restrictions and requirements which should be followed.*

Given that noise and severance can both arise as a result of construction traffic, these CTMTP measure are important in helping to mitigate intra-project/combined effects. However, it is possible that any resulting mitigation will need to be deployed reactively, should an effect arise for a particular resident or business. This is why it is important that there are clear ways for local communities and businesses, road users and PRoW users to communicate with the construction contractors, particularly the Transport Coordinator, Environmental Manager and Environmental Clerk of Works during construction so that any specific significant intra-project/combined effects that do materialise can be considered on an individual basis and

		enhanced measures (potentially bespoke) identified to try to mitigate them further. The Applicant will continue to work with the appointed main works contractor to secure further opportunities to reduce individual sources of minor effects during construction.	
AP11	The ExA requests a thorough review of the cumulative impact assessment for shipping and navigation, with more information on the possible worst-case scenarios. This should include evidence of how the applicant has concluded that there would be no significant cumulative effects as well as any mitigation needed. A revised version of **Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084]** is required.	The Applicant has undertaken an update of **Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084]** as requested, now at Version B. This has been provided at Deadline 1A.	Deadline 1A
AP16	Provide an explanation as to what is different about Sea Link that means that horizontal directional drilling (HDD) can be used when it was not possible for Nemo Link.	As context, it should be noted that Nemo Link was not developed by National Grid Electricity Transmission. It was developed by National Grid Ventures (NGV) and the Belgian Elia group. NGV is a different business to National Grid Electricity Transmission. These businesses are legally separate, with each business having no control, influence, or special insight into the activities of the other. Indeed, business separation is a requirement of the licence under which National Grid Electricity Transmission operates. Nonetheless, National Grid Electricity Transmission has coordinated and engaged with Nemo Link to gather insights into their project (notwithstanding that the Nemo Link project was developed and consented 12+ years ago). This has informed the understanding summarised below. Publicly available planning documentation indicates that Nemo Link did not confirm its final cable installation methodology in its application. The 'worst case' assumed for ES purposes comprised an open cut methodology through the saltmarsh,	Deadline 1A

although the Marine Management Licence (MMO) licence ref: L/2013/00373, dated 23 December 2013, listed open trench and backfill, jetting, skidded plough and horizontal directional drilling as licenced activities.

The Nemo Link project (including cable installation technique) was proposed on this basis, assessed, and considered acceptable by Thanet and Dover District Councils and the Marine Management Organisation in 2013.

It should also be noted that the route and technical requirements of the Nemo Link project were different to those of Sea Link. For example, the Nemo Link cable approached the landfall from a different angle, was routed towards a different end point (the separate converter station at Richborough Energy Park), and interacted with constraints and ground conditions (including a former landfill site within Pegwell Bay Country Park) differently.

The feasibility of the Sea Link conceptual trenchless (HDD) design is assessed in **Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note [APP-321]**. The methodology for the landfall is assessed as suitable, with key geotechnical and construction risks identified.

One of the key risks identified is that of artesian chalk groundwater at the exit point. To address this, temporary coffer dams are planned to contain the groundwater and allow sealing of the installed ducts into the Thanet Formation that overlies the chalk and confines the aquifer. Further ground investigations at the exit area will inform the design of the coffer dams.

See response to AP19 for further information on the further ground investigations. The coffer dams will be removed following sealing of the ducts into the surrounding ground. The length of the HDD within the chalk bedrock is not exceptional; previous landfalls that were successfully completed in chalk include:

		• Dudgeon Wind Farm (2015), North Norfolk, 2 No. 1125m length HDDs • Dogger Bank Wind Farms A & B (2021), East Riding of Yorkshire, 4 No. 1400m length HDDs • Joss Bay Communications Cable (2022, 8.5km northeast of Pegwell Bay), over 2km length HDD As an indication of the completion failure rate for HDDs, Riggall & Associates, the trenchless consultant appointed by the Applicant on the Sea Link project, have been on site steering over 120 HDDs with only one being abandoned. The reason for failure was that the drill was up a 140m high hill with the final 440m of the 1000m length drill being unsupported by drilling fluid and affected by ground collapse as a result. Of the 260 projects that Riggall & Associates have consulted on that have been constructed, none have been abandoned. Sea Link have undertaken geophysical surveys and ground investigation boreholes with in-situ and laboratory testing along the route that provide a detailed ground model along the HDD route. The ground model and previous experience in similar conditions show that the proposed HDDs at the location are entirely feasible.	
AP18	Provide further justification for the plant selected to inform the worst-case noise assessment of HDD. Typical noise outputs from mud pumps, winches or flocculation tanks and any other noisy components should be included for comparison.	Two separate noise assessment have been completed for the HDD; an onshore one covering the onshore compound which will house the HDD drill rig and winch, and an intertidal one covering the HDD exit pits and associated works in Pegwell Bay to assess impacts on seals and marine ornithology only. The approach taken to both assessments involved the identification of the construction plant and equipment that has potential to generate the highest levels of noise (worst case). The intertidal assessment also used a maximum design scenario (MDS) to consider the proposed landfall activities and mobilisation of equipment with potential to generate the highest levels of disturbance at the seal haul out.	Deadline 1A

The MDS was based on equipment listed in **Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-094].** Sound source levels were identified from a range of sources as presented in **Application Document 6.3.3.9.B ES Appendix 3.9.B Kent Construction Noise and Vibration Data [APP-189]** including recognised British Standards BS 5228-1:2009+A1:2014, and libraries of measured data.

Typical noise outputs for all equipment have been provided in **Application Document 6.3.1.4.B Appendix 1.4 B Construction Plant Schedule** where standard sound levels are publicly available. It is noted that for certain specialist HDD equipment such as mud pumps, winches or flocculation tanks, sound source levels will be dependent on contractor equipment and construction design specifications which will be determined pre-construction.

As set out in **Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-094]** if full high pressure mud pumps are required, they typically generate noise of 77dB at 2.5 m distance and generators 71 dB at 1.0 m distance. However, where mud pumps and generators are required, these would be contained in super-silenced units, significantly reducing sound levels associated with this type of equipment. Taking this into account it has been determined that for works occurring in Pegwell Bay (HDD exit pits) the noisiest equipment would be vibropiling and excavators (as set out in **Application Document 6.3.1.4.B Appendix 1.4B Construction Plant Schedule** a 20 t excavator typically generates 99 dB(A)). At the onshore HDD compound the nosiest equipment would be the drilling rig and excavators.

Separate noise assessments have been completed to assess potential effects of construction works and activities at the HDD exit pits within the intertidal area in Pegwell Bay to reflect specific characteristics of the key receptors (seals and marine

		ornithological features). Potential effects from construction works and equipment in the onshore HDD compound were scoped out of these assessments on the basis that due to distance from Pegwell Bay the is no potential for noise levels generated at the onshore HDD compound to exceed assessed worst case noise levels within Pegwell Bay. In response to the Natural England Relevant Representation, the noise modelling completed for seals was updated to include M-weighted (i.e. specifically weighted for seal hearing sensitivity) acoustic modelling to assess construction-related noise impacts on the River Stour seals. This updated acoustic modelling is presented in **Application Document 9.49 Seals and Airborne Sound Technical Note** submitted at Deadline 1 and has been informed by information on construction plant and equipment provided in **Application Document 9.13 Pegwell Bay Construction Method Technical Note** also submitted at Deadline 1**.** The Applicant is also updating the noise modelling for marine ornithology based on assessed worst case construction plant and equipment information included in **Application Document 9.13 Pegwell Bay Construction Method Technical Note.** This updated document - **Application Document 6.2.4.5 (B) Part 4 Marine Chapter 5 Marine Ornithology** will be submitted at Deadline 2.	
AP19	Provide details of the additional ground investigation survey requirements for HDD (e.g. boreholes), including timing of surveys and their duration. Signpost to where the effects of these works are covered in the Environmental Statement and Habitats Regulations Assessment.	The application includes, and has assessed across all topics, various pre-lay seabed surveys that would be required to reconfirm seabed conditions. These include geophysical surveys, geotechnical surveys, and benthic surveys. Requirements to complete pre-construction surveys have been identified in the **Application Document APP-045 superseded by AS-018, 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project** Para 4.6.215. Some pre-construction surveys will be consented separately and are therefore not covered or assessed in the ES. These	Deadline 1A

include UXO surveys (including relocation / removal where required), and additional landfall ground investigations. This is standard practice for some pre-construction preparatory surveys as explained below.

UXO surveys have not been included or assessed in the ES due to high level of uncertainty with the number of locations of UXO along of the offshore cable route. This is recognised standard practice for UXO surveys and clearance to be subject to a separate Marine Licence. This approach to UXO surveys has been set out in **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [APP-077]** Table 4.2 NPS EN-3 requirements relevant to marine mammals and Paragraph 4.3.6.

It is also standard practice for other pre-construction preparatory surveys including landfall GI works and geophysical surveys to be consented separately, and these are therefore not covered or assessed in the ES. This is because these activities (as defined by the MMO) fall under categories of small, localised, temporary nature, of low/no impact, to be carried out in isolation from the main body of project works, therefore not contributing to any cumulative impact. This approach is designed to provide flexibility around the timing of the surveys.

These additional landfall GI surveys would be covered by a self-service marine licence given they are classified by the MMO as low-risk activities due to their localised scale and temporary extent. However, acknowledging that Pegwell Bay is subject to several nature conversation designation e.g. Thanet Coast and Sandwich Bay Ramsar, Sandwich Bay to Hacklinge Marches SSSI, Sandwich & Pegwell NNR, Sandwich Bay SAC and Thanet Coast & Sandwich Bay SPA, any self-service marine licence application will need to be prepared in consultation with Natural England.

Deep intrusive GI would be expected at each of the landfalls associated with the HDD detailed engineering, as part of the

		Principal Contractor's preparatory Works. The GI would comprise of deep boreholes and/or deep Cone Penetration Test (CPTs) to ascertain the ground conditions. At each landfall up to 4 locations would be identified, with the locations distributed at the planned exit locations and 50 to 75 m inshore of the exit points, noting for Pegwell Bay this would be 30 – 55 m east of the Saltmarsh. The depth of the borehole and/or CPT would ideally be 25 m maximum below seabed / intertidal level, with the aim of addressing specific ground condition questions. For Pegwell Bay, the conditions of interest are the upper boundary of chalk and groundwater pressure within the chalk aquifer, along with ground strength values within the Alluvium, Thanet formation, and Chalk. Each deep borehole is expected to take 1-2 days to complete (presuming 24 hr working), so the operation would be 8 days excluding mobilisation and set-up on site, and any weather effects. The most practicable solution would entail mounting the drilling rig on a grounded barge or spud leg barge (Pegwell Bay), although a Jack-up barge could be utilised. In the case of CPT-only activities a tracked unit deployed from either hoverport or a barge with ramp would acquire 1-2 sites at low tide at Pegwell Bay. Ideally, the acquisition of the GI samples would be early in the detailed engineering phase but would depend on the Principal Contractor's schedule and any constraints imposed by the DCO.	
AP20	In relation to significance of effect, construction and operational ecology and biodiversity effects are reported in both the construction and operational stage summary tables.	The Applicant has organised their response by the four questions asked in Action AP20.	Deadline 1A

Can the applicant explain why this approach does not result in double counting of the effects. For example in [PDA-017]: page 101 habitats - moderate adverse medium term and moderate beneficial long term habitat loss effects are reported. page 112 ornithology - moderate adverse, medium term effects are reported alongside moderate beneficial longer term effects. For clarity and ease of understanding and reporting, would it be possible to remove operational effects from the construction table and construction effects from the operational table? In addition, on page 99 [PDA-017], loss of functionally linked land at Sandlings Special Protection Area is minor adverse (taking account of enhancement of 6 ha of grassland). Does this mean that the original effect was actually greater than minor adverse but effectively offset by the grassland enhancement? Could this result in construction losses being undervalued? Finally, if features are fully removed during construction should this be reported and assessed as a permanent impact at the stage it occurs (i.e. construction)?	*Can the applicant explain why the approach taken in the summary tables does not result in double counting of the effects?* Habitat losses are considered under both construction effects and operational effects throughout **Application Document PDA-017 6.2.2.2 (B) Part 2 Suffolk Chapter 2 Ecology and Biodiversity** and **Application Document PDA-021 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity**, including the summary tables. Temporary losses are under construction effects, with permanent losses under operational effects. The Applicant has also considered habitat gains during both construction and operational periods. This is because although the planting of woodland, grassland and wetlands as part of the Proposed Development is permanent (rather than temporary) the amount is sufficient to offset the temporary and permanent losses combined. Paragraph 2.9.60 of **Application Document PDA-017** documents creation of in Suffolk 21 ha of woodland, 6.9 ha of species rich neutral grassland, 1.5 ha of native hedgerow and 0.8 ha of balancing pond around the Saxmundham Converter Station and Friston Substation, which is much greater than the combined temporary and permanent losses of woodland, grassland and wetland habitats. Paragraph 2.9.65 of **Application Document PDA-021** documents creation of in Kent 6.5 ha of woodland, 5 ha species rich neutral grassland, 1 km native hedgerow, and 2 ha of balancing pond around the Minster Converter Station and Substation, which is much greater than the combined temporary and permanent losses of woodland, grassland and wetland habitats. Since the planting offsets the temporary (construction) and permanent (operational) losses combined there is no double-counting.

Reporting only the negative effects of construction (temporary habitat loss) in the construction effects section of the ES Chapters would result in the reporting of significant habitat losses (until such time as replanted habitat has matured) for habitats and ornithology without any recognition of the context that not only will temporary habitat losses be replanted but the quantified temporary losses of woodland, grassland and wetlands will be more than offset by quantified gains from new planting.

In addition to general planting around the converter stations and substation, there are instances in both Suffolk and Kent where specific ecological mitigation is referenced in both construction and operation. This is because it serves functions to address impacts in both phases. These are detailed below.

In Suffolk, **Application Document PDA-017** paragraphs 2.9.76 and 2.9.187 and Tables 2.10 and 2.11 reference enhancement of 12 ha of arable land for ground nesting farmland birds, particularly skylark, regarding both construction (temporary) and operational (permanent) impacts. This is because its provision is triggered by permanent losses but its provision during the construction period will also ameliorate temporary losses of arable land, due to extent of improvement and increased ability to support farmland breeding birds compared to the habitat being temporarily lost.

In Kent, **Application Document PDA-021**:

Paragraphs 2.9.14 (construction) and 2.9.196 (operation) and Tables 2.12 and 2.13 reference enhancements to Ash Level Local Wildlife Site (scrape creation and invasive species control) as mitigation for both construction effects and operational effects. While explicitly identified in the tables as mitigation for construction impacts, these enhancements have also been referenced in the assessment of operational (permanent) impacts in reaching a judgment of ‘minor beneficial’ for the LWS because they are permanent (the scrapes will not be filled in after construction) and will enhance

habitat that is the primary reason for LWS designation, whereas the permanent losses will be from other habitat (grazing marsh).

Paragraphs 2.9.72 (construction) and 2.9.181 (operation) and Tables 2.12 and 2.13 reference enhancing 10ha of off-site arable land for golden plover and other farmland birds. This is explicitly identified as operational mitigation to address the permanent loss of habitat for golden plover from the converter station/substation. However, it is also referenced in the assessment of construction (temporary) impacts alongside all the other habitat creation, because it will be functional during the construction period, is being managed to maximise its ability to support arable birds, and therefore will help to ameliorate the short-term construction phases losses of arable land. For example, habitat for seven skylark territories will be temporarily lost (compared to just one skylark territory being lost permanently) but the impact of that will be reduced by the provision and management of the off-site arable enhancement during construction.

For clarity and ease of understanding and reporting, would it be possible to remove operational effects from the construction table and construction effects from the operational table?

The Applicant's view is that this would not aid clarity and would present an unrepresentative view of construction effects, particularly by failing to provide the relevant context in the section where these effects are discussed.

Does the reference to acid grassland enhancement in the row on loss of functionally linked land for Sandlings SPA mean that the original effect was actually greater than minor adverse but effectively offset by the grassland enhancement?

The Applicant can confirm that even without consideration of the acid grassland enhancement the effect on Sandlings SPA is

minor adverse. This is clear from paragraph 2.9.31 of Application Document **PDA-017 6.2.2.2 (B) Part 2 Suffolk Chapter 2 Ecology and Biodiversity** which draws a conclusion of minor adverse effects prior to consideration of the acid grassland being enhanced. That acid grassland enhancement (driven by the fact that acid grassland is a priority habitat rather than due to impacts on the SPA) is then mentioned for context in paragraphs 2.9.32 and 2.9.34 of **Application Document PDA-017 6.2.2.2 (B) Part 2 Suffolk Chapter 2 Ecology and Biodiversity**, with paragraph 2.9.34 noting that the acid grassland enhancement 'further supports' the conclusion of minor adverse effect.

Could this approach [to acid grassland and Sandlings SPA result in construction losses being undervalued?

No, there is no undervaluation of construction losses for the reasons set out above. The acid grassland enhancement in **Application Document PDA-017** is not considered until after the judgement of minor adverse has been reported. The acid grassland enhancement is then reported to further underline the conclusion, since it will be undertaken during construction and is likely to be used at least for foraging by woodlarks.

If features are fully removed during construction should this be reported and assessed as a permanent impact at the stage it occurs (i.e. construction)?

No, the Applicant put permanent habitat losses into the Operational Effects section of both terrestrial ecology ES chapters because of comments that have been received by stakeholders (including Natural England) on other projects. These comments indicated that permanent habitat loss should be considered an operational effect since while it arises during construction it persists throughout the lifetime of the Proposed Development, unlike temporary habitat losses. Permanent

	habitat losses were therefore reported as an operational effect to avoid them being overlooked within the larger temporary habitat losses.

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