The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.34.2: Applicant's Responses to Relevant Representations from Statutory Consultees and Bodies

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3. Detailed Responses to Statutory Consultees and Bodies

3.1.1 The Tables below comprise the Applicant's response to Statutory Consultees and other Statutory Bodies.

Table 3.1 Applicant's Response to the Relevant Representation of Cadent Gas Ltd

Reference	Summary of relevant representation	Applicant's Response
3.1.1	Cadent – affected infrastructure: Representation by Cadent Gas Limited (Cadent) to the Sea Link Development Consent Order (DCO) Cadent is a licensed gas transporter under the Gas Act 1986, with a statutory responsibility to operate and maintain the gas distribution networks in North London, Central, East Anglian and North West England. Cadent's primary duties are to operate, maintain and develop its networks in an economic, efficient, and coordinated way. Cadent wishes to make a relevant representation to the Sea Link DCO in order to protect its position in light of infrastructure which is within or in close proximity to the proposed DCO boundary. Cadent's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the order limits including should be maintained at all times and access to inspect such apparatus must not be restricted.	The Applicant welcomes Cadent's engagement with the Proposed Project and is maintaining ongoing dialogue with them regarding asset interfaces
3.1.2	Cadent – protective provisions: The documentation and plans submitted for the above proposed scheme have been reviewed in relation to impacts on Cadent's existing apparatus located within this area, and Cadent has identified that it will require adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards. Cadent has low and medium gas pipelines and associated apparatus located within the order limits which are affected by works proposed, the extent to which is still being assessed, and which may require diversions subject to the impact. Any Proposed diversions have not yet reached detailed design stage and so the positioning, land rights and consents required for these gas diversions are not confirmed. At this stage, Cadent is not satisfied that the DCO includes all land and rights required to accommodate such diversions as design studies will need to influence these requirements. Cadent will not decommission its existing apparatus and/or commission new apparatus until it has sufficient land and rights in land (to its satisfaction) to do so, whether pursuant to the DCO or otherwise. This is a fundamental matter of health and safety. At this stage, Cadent is not satisfied that the tests under section 127 of the PA 2008 can be met.	Cadent's request for bespoke Protective Provisions is acknowledged. The Applicant has undertaken a review of the identified asset interfaces as a basis for assessing the suitability of the Protective Provisions that have been put forward. Ongoing engagement with Cadent will seek agreement on the terms for asset protection, land rights and other requirements over the lifetime of the Proposed Project, and where necessary, their inclusion in the draft DCO. Issues discussed with Cadent in dialogue to date have been recorded in a SoCG

Table 3.2 Applicant's Response to the Relevant Representation of the Crown Estate

Reference	Summary of relevant representation	Applicant's Response
3.2.1	The Crown Estate requests to be registered as an Interested Party in the examination of Sea Link. Our interest in the project relates to the proposed cable route and the agreement of land and seabed rights required to deliver the project	The Applicant acknowledges the role and remit of the Crown Estate and will continue to engage with them for the land rights required over the seabed, the River Stour in Kent and the S135 consent(s).

Table 3.3 Applicant's Response to the Relevant Representation of the East of England Ambulance Service NHS Trust

Reference	Summary of relevant representation	Applicant's Response
3.3.1	East of England Ambulance Service NHS Trust (EEAST) consider that the Project (Sea Link) is likely to have a significant impact on its emergency ambulance operations, service capacity and resources (staff, vehicle fleet and estate assets) requiring appropriate mitigation and management measures to be identified and secured through either a planning obligation or Deed of Covenant. Such measures are likely to incorporate: • Assessment of increase in emergency ambulance activity (calls and attendance) as a result of this project to ensure EEAST's is provided with sufficient resources to meet this additional capacity. • EEAST to have the capability to manage the additional incidents where emergency ambulance services may be required: EEAST's staff, vehicle fleet & estate assets can prepare through all stages of the project, namely pre-construction, during and post construction and agree mitigation measures. • Establishing appropriate Terms of Reference, Membership & Communications Strategy for Transport, Community Safety, Health & Wellbeing Working Group – to include EEAST as an emergency service provider, along with its health and blue light partners such as the local Suffolk & Northeast Essex Integrated Care System, Suffolk Constabulary and Suffolk Fire and Rescue.	The Applicant welcomes EEAST's engagement with the Proposed Project and acknowledges their interests and remit in respect of the construction and operational phases in the Suffolk area. The Applicant is engaging with the EEAST to identify and agree, as appropriate, management and mitigation measures relating to the areas of concern. These discussions are ongoing and the Applicant proposes to enter into a SoCG with EEAST that will reflect the discussions between the Applicant and EEAST and identify areas of common ground.

Table 3.4 Applicant's Response to the Relevant Representation of East Suffolk Water Management Board

Reference	Summary of relevant representation	Applicant's Response
3.4.1	A part of the project corridor is within the Internal Drainage District (IDD) of the East Suffolk Water Management Board (ESWMB, or the Board). The Board is an Internal Drainage Board as defined by the Land Drainage Act 1991. ESWMB is the regulator for several elements of the proposed works which require consent as per the Land Drainage Act 1991, including the Board's Byelaws. The Board is therefore an interested party due to the potential impact of the project on the Board's ability to carry out its statutory functions relating to land drainage and reducing flood risk.	The Applicant welcomes the East Suffolk Water Management Board's (ESWMB) engagement with the Proposed Project.
3.4.2	The proposed export cable corridor will cross a small number of watercourses within the Board's IDD. Such works could require consent from the Board either under the Board's Byelaw or Section 23 of the Land Drainage Act, 1991, depending on the crossing methodology. The Board wishes to further understand the likely watercourse crossing locations and methods	The locations of watercourses to be crossed by the project and the intended methods of crossing are detailed in application document APP-089 ES Appendix 1.4.A. Through ongoing engagement and agreement of a SoCG the Applicant will clarify the consents required for works to ESWMB watercourses and the land rights that are required over the lifetime of the Proposed Project. The Applicant has updated a Design Interface document which has been shared with the ESWMB, providing the requested information in detail, along with an MoU and SoCG document, which record consultation and ongoing discussions to date.
3.4.3	The applicant intends to discharge surface water into watercourses within the IDD. Where this occurs, this will require consent from the Board under Byelaw 3. The Board considers it to be imperative that any such discharge is attenuated to the greenfield runoff rate.	The flood risk sensitivity and history of flooding in this area is acknowledged and detailed in **Application Document 6.8 Flood Risk Assessment [APP-292]**. Proposed drainage principles are set out in Appendix C of this document. Drainage methods have been sized to discharge at the greenfield runoff rate.
3.4.4	At present the draft wording of Part 4, Article 20 (page 19/20) of the Draft DCO is unsatisfactory. The draft wording implies that the provisions of the Water Industry Act 1991 are appropriate to settle any dispute relating to a proposed discharge of surface water into a watercourse. The Board finds this to be wholly unsatisfactory given that the Board are the relevant Risk Management Authority for watercourses within an IDD and the Lead Local Flood Authority are the relevant Risk Management Authority outside of an IDD. Furthermore, the use of the word drain is unnecessarily confusing within this article. Paragraph 7 of Part 4, Article 20 should include the following wording (amendments in italics) "Nothing in this article overrides the requirement for an environmental permit under regulation 12(1)(b) of the Environmental Permitting (England and Wales) Regulations 2016(a) or for consent under Section 23 of the Land Drainage Act 1991 or any byelaws made pursuant to Section 66 of the Land Drainage Act 1991." Paragraph 12 of Part 4, Article 20 should include clarification that "watercourse" has the meaning given by the Land Drainage Act 1991.	The Applicant considers that the approach to Article 20 follows the same approach taken in other recently made development consent orders. The wording in Article 20(2) which states that disputes arising from the making of connections to or the use of a public sewer or drain by the undertaker must be determined as if it were a dispute under section 106 of the Water Industry Act 1991 is well precedented wording that has been accepted on other projects. However, the Applicant would welcome an understanding of what alternative drafting ESWMB would propose. The Applicant does not consider that it is necessary to amend the wording in Article 20(7) as it is already the case that the article does not seek to override the requirement to seek consent pursuant to section 23 of the Land Drainage Act 1991 or the byelaws. Article 2(1) already provides a definition of "watercourse". Therefore, the Applicant does not consider that it is necessary to duplicate the definition within Article 20.
3.4.5	The Board currently understands that the applicant is not proposing to disapply the Land Drainage Act 1991 and associated byelaws. If the draft DCO changes to include a proposal to disapply any sections of the Land Drainage Act then the Board considers it to be imperative that a Protective Provision for drainage authorities is included within the draft DCO. The Board also considers it imperative that they are involved with the drafting of any such protective provision. The Board is supportive of the use of a protective provision for	The Applicant does not currently propose the disapplication of the Land Drainage Act 1991 or the associated byelaws. The Applicant notes ESWMB's comments regarding Protective Provisions and welcomes ongoing engagement with ESWMB on this matter.

Reference	Summary of relevant representation	Applicant's Response
	drainage authorities subject to sufficient involvement in the drafting process. Furthermore, the Board believes that an appropriate protective provision may act to avoid conflict between the planning (DCO) process and the Board's regulatory regime and consenting process (as per the Land Drainage Act 1991 and the Board's Byelaws), while assuring the Board that their interests and ability to undertake their statutory functions are safeguarded and subject to due consideration.	

Table 3.5 Applicant's Response to the Relevant Representation of the Forestry Commission

Reference	Summary of relevant representation	Applicant's Response
3.5.1	Thank you for consulting the Forestry Commission on this project. As a Non-Ministerial Government Department, the Forestry Commission provide no opinion supporting or objecting to an application. Rather we provide advice on the potential impact that the proposed development could have on trees and woodland including ancient woodland. We note that the development is in close proximity to two ancient woodlands, in particular Grove Wood, Plantation on an Ancient Woodland Site (PAWS), and that 51 veteran trees and 4 ancient trees have been identified on site. Also that several woodland areas will have sections removed.	The Applicant notes this comment and has provided detailed responses to comments on Ancient Woodland and veteran/ancient trees in their responses below.
3.5.2	Potential impacts and relevant policy - Ancient Woodland: Ancient woodlands are an irreplaceable habitat. They have great value because they have a long history of woodland cover, being continuously wooded since at least 1600AD with many features remaining undisturbed. This applies equally to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). Section 5.4.53 of EN1 – The Overarching National Policy Statement for Energy states: "*The Secretary of State should not grant development consent for any development that would result in the loss or deterioration of any irreplaceable habitats, including ancient woodland, and ancient and veteran trees unless there are wholly exceptional reasons and a suitable compensation strategy exists*." We would particularly refer you to further technical information set out in Natural England and Forestry Commission's Standing Advice on Ancient Woodland – plus supporting Assessment Guide and "Keepers of Time" – Ancient and Native Woodland and Trees Policy in England. The Standing Advice states that proposals should have a buffer zone of at least 15m from the boundary of ancient woodlands to avoid root damage which can result in loss or deterioration of the woodland. Where assessment shows impacts are likely to extend beyond this distance, you're likely to need a larger buffer zone. For example, the effect of air pollution from development that can result from a significant increase in traffic or dust from construction. We note that there will be no losses to the Ancient woodlands and that their RPA's will be protected, also that the storage and mixing of materials will not be undertaken within 5m of the Ancient Woodland buffer. However the planned size of the buffer itself is not specified. Ancient Woodlands are particularly vulnerable to air, dust and chemical pollution, therefore a minimum buffer may not be suitable, if there is a risk of spillage for example.	The minimum 15 m buffer zone is shown in Appendix A: Tree Constraints Plans Suffolk Onshore Scheme within **Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]** and Appendix E: Tree Protection Plan Suffolk Onshore Scheme within **Application Document 6.10 Arboricultural Impact Assessment Part 2 of 2 [APP-295].** Adherence to the buffer zone is also a commitment (A04) within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** which is secured by Schedule 3 Requirement 6 of the draft DCO **[AS-087]**. Two ancient woodlands have been identified in **Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]**. Great Wood is an Ancient Semi Natural Woodland and is located approximately 90 m away from the Order Limits. Old World Wood and Grove Wood is an Ancient Replanted Woodland and no development proposals (excluding construction traffic access which utilises existing hard surfaced roads) for the Proposed Project are located within approximately 20 m.

Reference	Summary of relevant representation	Applicant's Response
3.5.3	Potential impacts and relevant policy - Ancient and Veteran Trees: Ancient and veteran trees are also irreplaceable habitats. The Joint NE/FC Standing Advice states that for or ancient or veteran trees the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree's canopy if that area is larger than 15 times the tree's diameter. This will create a minimum root protection area. The Root Protection Zone (as specified in British Standard 5837) is there to protect the roots of trees, which often spread out further than the tree canopy. Protection measures include taking care not to cut tree roots (e.g., by trenching) or causing soil compaction around trees (e.g., through vehicle movements or stacking heavy equipment) or contamination from poisons (e.g., site stored fuel or chemicals). The Arboricultural Report states that construction is planned within the RPA's of 14 veteran trees. It is our view that habitat deterioration to these irreplaceable habitats is likely to occur if construction occurs within the RPA's, particularly for access roads which will potentially carry heavy equipment. Due to the irreplaceable nature of ancient woodland and ancient and veteran trees, most temporary effects will result in irreplaceable damage. The RPA should be avoided and protected, especially in the cases where there is likely to be frequent construction traffic where roots are particularly vulnerable to compaction. Any effect from the incursion into RPA's of veteran trees may not become immediately apparent and will need to be extensively monitored, even after construction.	In accordance with **Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]** no permanent access roads are proposed within the Root Protection Areas (RPAs) of veteran or ancient trees. The impacts of temporary construction access roads and monitoring and maintenance access routes are discussed in Section 6.2 and 6.3 in **Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]** for Suffolk and Kent respectively. The majority of proposed construction access roads utilise existing access roads that are currently used by agricultural machinery and are therefore likely to be heavily compacted. Where the condition of existing access roads may be negatively impacted by construction traffic, mitigation measures have been proposed which includes the use of fit for purpose ground protection, specified to the highest expected load and is detailed further in Sections 6.2 and 6.3 within **Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]**. It is considered that where fit for purpose ground protection is utilised, soil structure will be maintained, resulting in no likely negative impacts on the physiological or structural condition of the trees. Monitoring and maintenance access routes will be used periodically for pedestrian and all-terrain vehicle access only. Where feasible these utilise existing access roads however where they extend along field boundaries Root Protection Area (RPA) incursions for ancient and veteran trees are likely. In these circumstances mitigation measures include pedestrian only access or the utilisation of fit for purpose ground protection which is detailed further in Section 6.2 and 6.3 within **Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]**. Due to the existing current land use on site which is used predominantly for agricultural purposes and due to the frequency of the proposed monitoring and maintenance access for the Proposed Project it is considered unlikely that of these operations will negatively impact the physiological or structural condition of the trees.
3.5.4	Woodland Loss: Any scheme that bisects a woodland will not only result in significant loss of woodland cover, but will also reduce ecological value and natural heritage impacts due to habitat fragmentation, and will have a huge negative impact on the natural plants and animals ability to respond to the impacts of climate change.	The likely extent of tree loss for the Proposed Project is detailed within **Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]**. The areas of woodland that are likely to require tree loss include W12S, W16S and G589S in Suffolk and W526K in Kent. The part removal of the northeastern edge of W12S equates to approximately 116 m^2 which is approximately 0.26% of the surveyed woodland. Due to the location of the tree loss and the extent it is not considered likely that these works will negatively impact the landscape or amenity value of the woodland. The part removal of the southwestern edge of W16S equates to approximately 253 m^2 which is approximately 1.27% of the surveyed woodland. Due to the location of the tree loss and the extent it is not considered likely that these works will negatively impact the landscape or amenity value of the woodland. The part removal of G859S bisects the woodland and the area of tree loss equates to approximately 5,463 m^2 which is approximately 10.8% of the woodland. This woodland is comprised of a willow plantation and in accordance with **Application Document 6.2.2.1 Part**

Reference	Summary of relevant representation	Applicant's Response
		2 Suffolk Chapter 1 Landscape and Visual [APP-_048] following landowner discussions it is understood that some of the plantation woodland would be felled prior to construction of the Proposed Project and the remaining plantation woodland would be felled by the time the Proposed Project is operational . This entire area would be replanted with native woodland planting as shown in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348]**, superseded by **[AS-059]**. The part removal of W526K equates to approximately 1191 m^2 which is approximately 4.3% of the woodland. However, tree loss is only required to provide access along the corridor of an existing overhead line which bisects the woodland and is proposed to be decommissioned as part of the Proposed Project. Therefore, where required the final extent of tree loss is likely to be limited to low lying, self-set young trees that have grown beneath the overhead line and this level of tree loss is not considered likely to negatively impact the landscape or amenity value of the woodland. As identified by Forestry Commission the Proposed Project includes extensive woodland planting and areas of woodland to be lost have been surveyed for protected species including bats, birds and dormice. Impacts on connectivity are minor since there will be no permanent gaps where the cable is installed exceeding 10 m and in many cases no permanent gap at all. While mature trees cannot be planted over cables, scrub habitat can be created and this will provide valuable woodland edge and connectivity. The greenhouse gas impacts of land use change, including woodland loss, are included in the greenhouse gas lifecycle assessment in **Application Document 6.2.5.1 Part 5 Project Wide Effects Climate Change [APP-085]**. Due to the location and extent of the woodland loss, this is not anticipated to have a material impact on the natural plants' and animals' ability to respond to the impacts of climate change.
3.5.5	Tree and Woodland Planting: The application includes substantial woodland creation, particularly in areas around the substation and converter station. It is important that woodland creation is not just used as screening as strategic locations and ensures habitat connectivity across the site. In some areas where woodland will be removed, there is the potential for further woodland creation that could be planted to improve habitat connectivity between other wooded areas, providing an extra link to woodlands in the wider landscape. Advance planting may be beneficial to increase the buffer zones for affected woodlands.	Net new woodland planting, and woodland replanting in areas of tree removal have been designed to benefit ecology and ecological connectivity as well as visual screening. These proposals, developed by landscape architects and ecologists working together are set out in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348]**, superseded by **[AS-059],** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349]**. These include plans showing opportunities for advance planting.
3.5.6	Woodland Management: Active management of woodlands is essential for a host of reasons but crucially to maintain the valuable biodiversity elements of these habitats. This diversity leads to greater resilience of the woodland ecosystem. Avoiding impacts and good landscape design: To meet planning policy and Government guidance, we would recommend:	Net new woodland planting, and woodland replanting in areas of tree removal have been designed to benefit ecology and ecological connectivity as well as landscape integration and visual screening. These proposals, developed by landscape architects and ecologists working together are set out in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348]**, superseded by **[AS-059]** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349]**. These include management prescriptions and plans showing opportunities for advance planting. Areas of new woodland planting both strengthen existing woodland belts as well as provide connectivity between fragmented areas of woodland. Management of the woodland

Reference	Summary of relevant representation	Applicant's Response
	• Robust adherence to the Standing Advice, especially regarding buffer zones, to rule out loss or deterioration to the ancient woodlands or ancient and veteran trees. • Maintain and where possible improve woodland condition, especially ancient woodland. • Utilise biodiversity gains as part of avoiding woodland and tree impacts (especially ancient/veteran) which can also maximise biodiversity benefits by embracing irreplaceable and high priority habitats – for example focussing on ecological enhancements/creation of woodland edges. • Woodland creation and improvements to ecological connectivity. For example, there are potential opportunities to link fragmented woodland habitats across the site, which will increase habitat connectivity, making woodlands more resilient and benefitting biodiversity across the project area. • Overall increase in the tree canopy cover to contribute to the Government's target to increase tree and canopy cover to 16.5% of land area in England by 2050. • A UK Forestry Standard compliant woodland management plan, including deer and squirrel control, is created to ensure the long term maintenance of all new and existing woodland within the site.	around the Converter Stations would be managed for the lifetime of the assets with adaptive monitoring requirements to enable healthy, resilient woodland ecosystems to establish. These measures are set out in both of the documents noted above. The protection of ancient woodland, veteran and ancient trees is detailed within **Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]**.

Table 3.6 Applicant's Response to the Relevant Representation of Harwich Haven Authority

Reference	Summary of relevant representation	Applicant's Response
3.6.1	General: As the Statutory Harbour Authority and Trust Port, HHA has statutory duties to conserve, protect, regulate, maintain and improve the Haven . This includes providing safety of navigation to vessels using the waters within our 150 square mile jurisdiction area. Our jurisdiction covers a 12-mile approach to Harwich Harbour, the River Stour, and parts of the River Orwell. We are responsible for the conservancy of the main navigation channel into the Haven, which requires an ongoing maintenance dredging programme to maintain the depth required to accommodate the very largest and deepest container vessels in operation.	The Applicant notes Harwich Haven Authority's role and area of jurisdiction.
3.6.2	General: We operate a 24/7, 365 day a year service to provide pilotage services to five port operators in the Haven, Port of Felixstowe, Navyard, Harwich International Port, Port of Mistley and the Port of Ipswich. The continuous, and uninterrupted flow, of vessels into the Port of Felixstowe is critical to UK trade, with almost 40% of all containerised goods entering the UK via this gateway.	The importance of minimising any disruption to shipping in this area is acknowledged.
3.6.3	In the early Autumn, 2023 we completed a £130m large-scale project to deepen the navigational approach channel into Harwich Harbour to 16.0m below chart datum. The purpose of the project is to accommodate the ever-growing breed of Megamax vessels in operation that (400 metres with a draught of 17.3 metres) call at the Haven ports. With a deeper navigational channel, and new deeper berths at the Port of Felixstowe, we envisage the combined value proposition will attract many more shipping lines to use the Port of Felixstowe and therefore vessels arriving and departing the Haven will increase. The worldwide maritime industry trend for less ship movements but larger vessels carrying equivalent tonnage looks set to continue and, in time, further channel deepening will be required to meet future requirements for UK shipping. The Haven trade gateway is critical to UK PLC and our pilotage services cannot be interrupted. Delayed or missed Megamax arrivals would cause significant cost implications to Harwich Haven Authority. The ports industry is highly competitive and dissatisfied shipping lines are highly likely to look for an alternative port, potentially in Europe, if they do not receive the service standards they require.	The Applicant notes the deepened Harwich Haven approach channel and confirms that the planned Proposed Project route does not cross the Harwich channel. The Applicant can confirm that the Offshore Scheme Boundary is more than 4.5 km from the Harwich Haven approach channel at both the southwest Shipwash and south Shipwash buoys. The importance of minimising any potential disruption to shipping, including to port approaches and to pilotage, is noted. **Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]** assesses the potential for disruption to shipping and navigation from the Proposed Project and establishes mitigation measures to ensure that any potential disruption is minimised as far as possible.
3.6.4	As a Trust Port we operate commercially but we do not have shareholders, which allows us to reinvest a percentage of our surplus profits back into the Haven for the benefit of stakeholders. We define a stakeholder as anyone that uses, or has an interest in, the Haven and/or our operations. Harwich Haven Authority acts as a custodian of the Haven, and we have a duty to conserve, protect, regulate, maintain and improve our area of jurisdiction.	Harwich Haven Authority's role as a Trust Port is noted.
3.6.5	We understand that regulatory bodies such as Natural England and the Environment Agency will have been included within your consultation and urge that their comments are given due consideration to the extent that they relate to the legally protected and designated areas that exist within the Haven.	The Applicant confirms that Relevant Representations have been received from several regulatory bodies including Natural England and the Environment Agency. Response to these Relevant Representations, including those relating specifically to legally protected and designated areas will be submitted to PINS at Deadline 1 (18th November 2025).
3.6.6	Scheduling of RAM (Restricted Ability to Manoeuvre) operations: We request that no Restricted Ability to Manoeuvre (RAM) works conducted by the Sea Link project should run concurrently with RAM works already planned by the Five Estuaries, North Falls and Tarchon project developers in the Sunk area (or any other	The Applicant agrees with the Consultee that simultaneous operations (SIMOPS) between different projects undertaking RAM works would be undesirable and the Applicant will consult with the other projects on timescales and keep all of its marine stakeholders informed on any potential interactions.

Reference	Summary of relevant representation	Applicant's Response
	development projects). It is our opinion that this would cause an unacceptable level of navigational risk. Therefore, we insist that the Sea Link project liaise with other planned project teams and ourselves to avoid this situation. This requirement for no RAM concurrent works, operations or activity must be written into the DCO.	The Applicant is producing a communication protocol in the form of a Navigation Installation Plan (NIP) to address this need for communication of construction details and enable collaboration with other offshore developments. The NIP establishes the plan for communication throughout key project phases, in particular the construction phase. This is noted in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080]**. The NIP also establishes the 'Concurrent Activity Area' within which such RAM SIMOPS restrictions would apply. The Applicant has submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to the ExA's s89(3) letter dated 5 August 2025. The Applicant will undertake further discussion with other offshore projects to understand what commitment can be made on the matter of simultaneous RAM operations. The Applicant is seeking to agree to this requested commitment and discussions are ongoing with the relevant stakeholders.
3.6.7	Exclusion Zone Placement: Exclusion zone(s) must not be put in place in the Sunk area or channel that would restrict 24/7/365 vessel access requirements or pilot boarding operations etc.	The Applicant confirmed that no exclusion zones would be sought for either installation or operation of the HVDC cable system.
3.6.8	Safety Zone Restrictions: Safety zone(s) will not be able to impede vessel traffic movements within the Sunk area or normal operations such as pilot boarding.	Rolling 500 m radius Recommended Restricted Zones (RRZs) will be in place around operation fleet vessels, to protect both operation fleet vessels (restricted in their ability to manoeuvre) and passing vessels from collision, as standard practice. This should not substantially impact the Sunk pilot boarding station, as the Offshore Scheme Boundary is 2 km distant from the Sunk pilot station at the closest point. RRZs will be in force by guard vessel at all times during the operation including whilst passing through the Sunk Traffic Separation Scheme (TSS). RRZs would be established with communication to stakeholders and advanced notice to all and in liaison with Harwich Haven Authority and Sunk Vessel Traffic Service (VTS). This is detailed in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080]** and **Application Document 6.3.4.8.A ES Appendix 4.8.A Commercial Fisheries Technical Report [APP-204]**.
3.6.9	Cable Joint Placement: We suggest that no cable joints to be in locations in the Sunk area, due to extra work required in this busy shipping area, leading to increased navigational safety risk.	The Applicant notes this request and has taken this into account in the design of the Proposed Project. The Proposed Project has committed to mitigating collision risk and avoiding disruption to the Sunk anchorage area and Sunk pilot boarding area (within the Sunk TSS) during construction by minimising time spent in this region during construction and avoiding cable joints in these areas where possible. This is discussed in **Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]**.
3.6.10	Cable Burial Depth: The cable depth must take into account the draught of current and future vessels and future dredging. The DCO should provide for a maximum draught of 20m plus 10% UKC, as such minimum depth required 22m below chart datum.	These concerns surrounding under-keel clearance are noted and addressed in the **Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]**, in Section 7.6. In line with MCA guidance, it is not planned to reduce the existing navigable water depth by more than 5% along any section of the cable (with respect to Chart Datum). It is therefore expected that under-keel clearance is only reduced at a very small

Reference	Summary of relevant representation	Applicant's Response
		number of locations, which are anticipated to be located close into shore. Any anticipated areas where reductions in water depth may be greater than 5% will be discussed with relevant stakeholders including port and harbour authorities. The request for preserving a minimum water depth of 22 m below chart datum has been discussed with Harwich Haven Authority. The Applicant is in discussions with Harwich Haven to further define their precise geographic area of interest within the Sunk region. This matter is subject to further discussion and engagement between the Applicant and Harwich Haven Authority. The Applicant is working with Harwich Haven Authority and other key shipping and navigation stakeholders to reassure and find agreement on water depth concerns.
3.6.11	Operational limits for RAM Vessels: Suggest that no project vessels with Restricted Ability to Manoeuvre (RAM) (cable laying, UXO clearance, survey etc) are to operate in the wider Sunk area when visibility below nautical 2 miles.	The Applicant notes this request and has taken this into account in the Proposed Project design and planning, while noting that some operations cannot be halted once they commence. The Applicant will aim to avoid RAM activities within the Sunk area when visibility is below 2 NM. This mitigation is captured within **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080]**.
3.6.12	Cable Route Location: We note the location of the red line development area for the cable route and that this area now passes to the north of both the Storm Buoy and the W1 buoy, and south of the charted Sunk deepwater anchorage.	The Applicant appreciates the importance of the Sunk pilot station to Harwich Haven Authority's operations and has worked with Harwich Haven Authority to refine the planned offshore cable route in order to reduce such concerns and has moved the planned cable route to the north of the Sunk W1 buoy as requested.
3.6.13	Route Adjustment constraints: We reiterate that moving the cable route (and/ or associated development) south of the Storm or W1 buoys would not be considered safely achievable and would add an unacceptable level of navigational risk (not ALARP).	The Applicant notes Harwich Haven's position and has moved the planned cable route to the north of the Sunk W1 buoy as requested.
3.6.14	Coordination with Other Projects: There are several other DCO projects that are proposed within the vicinity of the Sea Link project and the Haven. The DCO should therefore reflect the need for works to be coordinated by and with HHA to ensure that there are no risks to navigational safety, particular when considered along with other projects. We are open to discussing the different mechanisms to achieve this.	The Applicant agrees that there is a need for coordination between the Proposed Project, harbour authorities and other projects. The Applicant is producing a communication protocol in the form of a Navigation Installation Plan (NIP) to address this need. This will establish the plan for communication throughout key project phases, in particular the construction phase. This is noted in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080]**.

Table 3.7 Applicant's Response to the Relevant Representation of Historic England

Reference	Summary of relevant representation	Applicant's Response
3.7.1	Both the Suffolk and Kent ends of the project (onshore) lie in a sensitive area for the historic environment. The ES confirms the proposal will impact upon a wide range of receptors both designated and undesignated. The baseline and assessment are clearly set out in the Cultural Heritage Baseline Report and Cultural Heritage chapter of the ES.	This is noted by the Applicant.
3.7.2	It was agreed during the scoping and PEIR process that detailed assessment of the impact of the proposal upon the historic environment would be required, and that the effects of the scheme could potentially be significant. The ES confirms this and identifies likely significant effects.	This is noted by the Applicant.
3.7.3	In order to provide an effective mitigation strategy, all heritage assets, including designated and non-designated assets and other known archaeological sites within the Order Limits, need to be fully assessed. Mitigation would need to be appropriate and proportionate to the asset in question but taking significance into account.	All assets where the Suffolk Onshore Scheme has the potential to result in impacts were identified in Section 6 'Assessment of Heritage Significance' of **Application Document 6.2.3.2.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]**. This assessment noted where there was the potential for significant impacts, and therefore detailed which assets would be taken forwards to full assessment, with a list of assets taken forwards for full assessment also provided in Section 7 'Conclusions' of **Application Document 6.2.3.2.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]**. The impact assessment of all designated and non-designated heritage assets with the potential to be affected by the Suffolk Onshore Scheme, within and outside of the Order Limits, is provided in Section 3.9 of A**pplication Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050}**. All assets where the Kent Onshore Scheme has the potential to result in impacts were identified in Section 6 'Assessment of Heritage Significance' of **Application Document 6.3.3.3 ES Appendix 3.3.A Cultural Heritage Baseline Report [APP-161]**. This assessment noted where there was the potential for significant impacts, and therefore detailed which assets would be taken forwards to full assessment, with a list of assets taken forwards for full assessment also provided in Section 7 'Conclusions' of the **Application Document 6.3.3.3 ES Appendix 3.3.A Cultural Heritage Baseline Report [APP-161]**. The impact assessment of all designated and non-designated heritage assets with the potential to be affected by the Kent Onshore Scheme, within and outside of the Order Limits, is provided in Section 3.9 of **Application 6.2.3.3 Part 2 Chapter 3 Cultural Heritage [APP-063]**.
3.7.4	Broadly speaking we can confirm the applicant has provided extensive pre-application archaeological investigations, both onshore and offshore. This is to be commended. They have provided a robust assessment of the location, type and significance of designated and undesignated heritage assets. Heritage receptors have therefore been considered in the design of the scheme, and a robust approach to mitigation has been proposed.	This is noted by the Applicant.
3.7.5	Historic DCO: We note a Draft Development Consent Order have been provided (Document: 3.1 Draft Development Consent Order, ref: EN020026, version A). In the event of the project being consented, we would also want to ensure that there is adequate mitigation, and that this is appropriately secured through the consent order. We will therefore be providing comments and recommendations on the DCO wording, specifically Archaeology Requirement 14 (2) and the REAC and OWSI documents.	This is noted by the Applicant

Reference	Summary of relevant representation	Applicant's Response
3.7.6	Further consideration is requested with regards to the design parameters for the Kent side Converter Station design, specifically how to ensure that historic environment issues are considered and that there is adequate consultation in the event of the DCO being granted.	The design of the Minster Converter Station is being developed in consultation with stakeholders and in line with design parameters as set out in **Application Document 7.12.2 Design Principles – Kent [APP- 367].** Design Principles CO.2 in Table 3.1 of APP-367 sets out the need to design the Minster Converter Station in response to LVIA and Heritage key views to demonstrate at the detailed design stage how the impact of the proposals has been minimised. Compliance with key design principles set out in Table 3.1 of Application Document 7.12.2 Design Principles – Kent [APP- 367] is secured through Schedule 3 Requirements 6 of the DCO
3.7.7	We would like to explore whether further consultation with Historic England could be made conditional as part of the DCO and REAC documents, and how the design parameters can be secured to ensure the harm to the historic environment is minimised.	This is noted and the Applicant will consider any further comments on the specific wording of the DCO in due course. The Applicant will consult further with HE to discuss feasible design mitigation options.
3.7.8	Historic England- Suffolk (Onshore): Majority of the archaeological evaluation work in Suffolk, such as geophysical survey and several phases of intrusive trial trench evaluation, has been already undertaken. Only partial results of trial trench evaluation are available at the moment, and some values assigned to individual heritage assets (as set out in Section 3.9 of the Environmental Statement) are only interim draft. The lack of this data is acknowledged in the ES, and we accept that evaluation was delayed by factors outside the applicant's control and that in certain areas opportunities for undertaking evaluations were limited. However, a final report on the intrusive assessment is necessary in order to provide clarity on significance of heritage assets and to set out appropriate mitigation.	The results of the Phase 1 archaeological evaluation trenching are provided in **Application Document 6.3.2.3.F ES Appendix 2.3.F Phase 1 Archaeological Trial Trenching Report (Draft) [APP-114]**, with the data summarised in **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]**, and potential impacts assessed in Section 3.9 of **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]**. The interim results of the Phase 2a evaluation trenching are also included in Section 3.9 of **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]**. Phase 2b evaluation trenching was undertaken after submission of the application. The final reports for Phase 2a and Phase 2b trial trench evaluation have been shared with Historic England in July 2025 and submitted to PINS on 16 September 2025 (refer to **Application Document 9.3.1 Suffolk Section Phase 2A Archaeological Evaluation Report [AS-135]** and **Application Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136]**). Additional cultural heritage impact assessment based on the full and final results of the Phase 2a and Phase 2b trial trench evaluation has been undertaken by the Applicant and will be submitted in due course during Examination. The results of the Phase 2b trial trenching revealed a potential Neolithic hengiform monument along the location of the HVDC cable route and access track. The Applicant has undertaken additional geophysical surveys of these areas and is in discussion with HE and the Suffolk County Council Archaeological Advisor with regards to the nature and significance of the asset, and appropriate mitigation. The Applicant has submitted a Change Notification for the Proposed Project which includes an amendment of the Order Limits at this location to allow enough flexibility to accommodate appropriate mitigation measures as required following further archaeological investigation.
3.7.9	We understand the applicant is seeking to resolve this issue however securing further intrusive evaluation (or obtaining data if evaluation was already undertaken) would be necessary in areas which were not part of the Sea Link project evaluation, such as areas designated for construction compounds to the north of the converter station. The ES and other application documents will also need to be revised when the missing evaluation information becomes available.	Available land within the Suffolk Order Limits, where there is the potential for physical impacts, was assessed through evaluation trenching. The results of this are detailed in **Application Document 6.3.2.3.F Appendix 2.3.F Phase 1 Archaeological Trial Trenching Report (Draft) [APP-114]** for Suffolk. The final reports for Phase 2a and Phase 2b trial trench evaluation have been shared with Historic England in July 2025 and were issued to PINS on 16 September 2025 (refer to **Application Document 9.3.1 Suffolk Section Phase 2A Archaeological Evaluation Report [AS-135]** and **Application Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136]**). Additional impact assessment based upon the results of Phase 2a and 2b evaluation trenching in Suffolk will be submitted in due course during Examination.

Reference	Summary of relevant representation	Applicant's Response
		Areas not available for trenching during pre and examination phases will be subject to further intrusive trial trenching as set out in Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk **[APP-343]** which will be secured in the DCO by Schedule 3 Requirement 14. The OWSI will be updated in agreement with the Archaeological Advisor to the LPA from SCCAS and will be shared with Historic England. The updated OWSI will be submitted during the Examination.
3.7.10	Historic England would be able to provide detailed comments on the ES chapter and other related documents, and we recommend an addendum is provided as the information becomes available. It does however need to be recognised that this remains an issue at this time, and we would want to ensure that the information is provided, and the ES updated.	The final reports for Phase 2a and Phase 2b trial trench evaluation have been shared with Historic England in July 2025 and were issued to PINS on 16 September 2025 (refer to **Application Document 9.3.1 Suffolk Section Phase 2A Archaeological Evaluation Report [AS-135]** and **Application Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136]**). Additional impact assessment based upon the results of Phase 2a and 2b evaluation trenching in Suffolk will be submitted in due course during Examination.
3.7.11	We understand that the surveys undertaken to date in Suffolk have not identified any sites which are of equivalent value to a designated heritage asset. This, however, should be confirmed by the final evaluation report as soon as possible	The results of Phase 2a and 2b evaluation trenching in Suffolk have been shared with Historic England in July 2025 and an updated impact assessment based on the final results will be submitted in due course during Examination. This work has identified a possible prehistoric henge feature near Friston which is considered by Historic England to be of national significance and of schedulable quality. The Applicant continues to engage with Historic England and Suffolk County Council to develop an appropriate mitigation strategy in respect of the asset. As set out in **Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]**, the Applicant is seeking to amend the Order Limits around Friston to allow the re-routing of the cable and access track to entirely avoid the location of the Neolithic hengiform monument, which would allow the Applicant to pursue a mitigation strategy of preserving the feature in situ.
3.7.12	Historic England – Kent (Onshore): One of the key issues for Historic England in relation to this application is the impact of the development upon the archaeological landscape associated with the Richborough fort. This is in relation to the Kent onshore cable access and converter station.	Potential impacts arising from change within the setting of Richborough fort have been assessed in Section 3.9 of **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]**. The impact assessment concluded that the Kent Onshore Scheme would result in a minor adverse effect, which is not significant. Supporting visualisations from Richborough fort are presented in **Application Document 6.4.3.3.8 Representative Viewpoint Visualisations [APP-262]**.
3.7.13	As one of the most important Roman period sites in England, Richborough is a place with an exceptional historic significance. It is the assumed landing point of the Claudian invasion in AD43, and it was extensively occupied throughout the Roman period. Furthermore, it is considered to be the gateway to Britain, particularly during the early Roman period. It is therefore pivotal to our understanding of the roman occupation and has a much wider historic significance. The Roman site is a scheduled monument and is a designated heritage asset with high value and significance. It is in a unique location on Richborough Bluff, now a highpoint in the shallow valley landscape that surrounds it, and it was effectively an island surrounded by water at the time of the Roman invasion. This represents an important element of its past use and therefore understanding this landscape context is key to understanding the significance of the site and its strategic location. The former Wantsum Channel, including the proposal site, is part of how we understand and appreciate the landscape. This location therefore makes an important contribution to the significance of the designated heritage asset of Richborough Fort.	The Applicant agrees with this statement and Richborough fort is assessed to be of high value in the ES. The setting of Richborough Fort is set out in the assessment provided in **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]** and acknowledges that the Wantsum Channel forms part of the setting of the fort.

Reference	Summary of relevant representation	Applicant's Response
3.7.14	Also referred to in the application is an undesignated site of potential national significance called 'Multi period complex on the Ebbsfleet Peninsula straddling the A256', which includes, amongst other things, a notable concentration of Bronze Age round barrows and a large Late Iron Age/Roman enclosure which has been considered as a potential location for Caesar's landing in 55 or 54 BC.	As noted in **Application Document 6.2.3.3 Part 3 Chapter 3 Cultural Heritage [APP-063]**, stakeholders including Kent County Council and Historic England confirmed during pre-application discussions that the Ebbsfleet Lane complex was considered to be a non-designated heritage asset of national significance. As such, in **Application Document 6.2.3.3 Part 3 Chapter 3 Cultural Heritage [APP-063]** the asset's value is assessed to be 'High' in recognition of its potential to be of national importance
3.7.15	This historic topography is therefore also important for understanding the non-designated, but potentially nationally significant, archaeological remains on what was once the 'Ebbsfleet Peninsula'; i.e. a spur of higher ground which extended to within the Wantsum Channel.	This is noted by the Applicant.
3.7.16	We consider that there is a higher level of harm to Richborough Roman Fort than has been described by the Applicant. This is because we consider that the setting of the fort contributes more to the significance and towards the understanding of the monument than is set out in the application. The visualisations provided demonstrate that the converter station will intrude into views from the amphitheatre towards the fort and in and around the fort itself.	The effect of the Proposed Project on the Roman site of Richborough Castle and associated settlement (SM1014642/LB1363256) is set out in **Section 3.9 of the Cultural Heritage ES Chapter (Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063])**. The significance of the designated heritage asset is discussed in **Section 6.1 of Application Document 6.3.3.3.A Part 3 Kent ES Appendix 3.3.A Cultural Heritage Baseline Report [APP-161].** The Roman fort occupies a prominent position in an elevated location on an escarpment on the south side of the former Wantsum Channel. While the fort now stands inland, the coastline in the Roman period meant that the fort was on an island, or at the very least a peninsula, projecting into the Wantsum Channel. As a defensive feature, and a key gateway to Roman Britain, the setting of the fort on a former island/peninsula overlooking the coastline and the mouth of the Wantsum Channel is key to its understanding and its significance. Furthermore, its scale and size would have also made it a prominent feature in the landscape, especially in its later form when the extensive outer walls were constructed. The setting of the fort, therefore, was originally coastal, and both natural processes and human reclamation of the land has resulted in the fort being positioned some 3.5 km from the coastline. The assessment of the effect of the Proposed Project on the setting of Richborough Roman Fort as set out in **Section 3.9 of the Cultural Heritage ES Chapter Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]** concluded that the magnitude of impact would be negligible. This was based on the distance between the asset and the proposed Minster Converter Station and Substation, as well as the presence of other modern development that is closer to the asset, and the fact that the Wantsum Channel, which forms a component of the asset's setting, has altered substantively as a result of silting starting in the Roman period and more formal land reclamation since the early medieval period: this silting and land reclamation of the Wantsum have considerably altered the setting of the monument. The proposed Minster Converter Station and Substation would be located on the northern side of the former Wantsum Channel, and as such would not alter the ability to understand the original setting of Richborough Fort as a shore fort overlooking the Wantsum Channel as well as the English coastline, both of which are aspects of its setting that have been largely lost as a result of changes in the coastline and the silting/reclamation of the Wantsum Channel. The positioning of the Minster Converter Station and Substation on the north side of the former Wantsum Channel would also mean that the Proposed Project would not encroach on the escarpment on which the fort is positioned. This topographical feature helps the visitor to better understand the original setting of the fort in a coastal position, and the prominence of the escarpment will not be altered. The Proposed Project would also not impact on the relationship between the associated Roman settlement (including amphitheatre) and fort, as the Minster Converter Station and Substation would not be readily noticeable in the background. This is a result of the distance between the Proposed Project and the Richborough Roman site, as well as existing screening (as demonstrated in the illustrative visualisations for Kent, and specifically the illustrative visualisation produced from VP 8 – Richborough Fort Viewing Platform, see

Reference	Summary of relevant representation	Applicant's Response
		Application Document 9.14 Supplementary Environmental Information Report – Suffolk and Kent Illustrative Visualisations). Furthermore, the Proposed Project would not sever any intervisibility that may have existed between Richborough Fort and the Ebbsfleet Lane complex, which includes a large Late Iron Age/Romano-British enclosure at the southern end of the peninsula on the north side of the Wantsum Channel. As set out in **Section 3.4 of the Cultural Heritage ES Chapter (Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063])**, a low magnitude of impact is unlikely to meet the test of substantial harm and would, more often, be the basis by which a decision maker would determine that the level of harm to the heritage significance of the asset would be less than substantial. A very low magnitude of impact is also likely to amount to less than substantial harm. As set out above, the magnitude of impact on the setting of the fort is assessed to be negligible. It is noted that impacts that amount to less than substantial harm are not considered individually in the **Heritage Statement provided as Appendix D of Application Document 7.1 Planning Statement [APP-319], superseded by [AS-057]**. In summary, therefore, the Applicant's position is that (i) the contribution of setting to the significance of the designated asset as set out above has been correctly taken into account in assessing the effects of the Proposed Development; and (ii) the level of harm to the designated asset, based on the assessment of a negligible magnitude of impact as set out in **Section 3.9 of the ES (Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]) and Section 7.5 of Application Document 7.1 Planning Statement [APP-319], superseded by [AS-057]**, would amount to less than substantial harm at the lower end of the spectrum.
3.7.17	We would like further discussion with the Applicant in order to address this concern and we recommend the ExA seek mitigation that could be successfully employed to further reduce the harm to the significance of this designated heritage asset. We do however acknowledge the that some steps have been taken in regard to this application to reduce the potential for harm to the historic environment, for example, siting the converter station in an area of topography which helps to shield it naturally from view, as well as ensuring that the roofline does not break the horizon when viewed from the fort. In order to ensure harm to the significance of Richborough Roam Fort is truly minimised, however, the final design of the converter station complex needs to be better considered within he design parameters set out in the application.	The design of the Minster Converter Station and Substation is being developed in consultation with stakeholders and in line with design parameters as set out in **Application Document 7.12.2 Design Principles – Kent [APP- 367].** Design Principles CO.2 and S.2 within **Table 3.1** and **4.1** of **APP-367** respectively, set out the need to design the Minster Converter Station and Substation in response to LVIA and Heritage key views to demonstrate at the detailed design stage how the impact of the proposals has been minimised. Design Principle CO.3 (Table 3.1) also identifies LVIA VP08 (Richborough Roman Fort) as a strategic view to assess the performance of the design of the converter station in different lighting conditions with a particular focus on how the sheen on cladding materials can affect appearance. Compliance with key design principles set out in Table 3.1 of **Application Document 7.12.2 Design Principles – Kent [APP- 367]** is secured through Schedule 3 Requirements 6 of the DCO, whilst design principles set out in Table 4.1 are secured through measure GG36 in the REAC **[APP-342]** which in turn is secured by DCO Schedule 3 Requirement 6.
3.7.18	Some of the design responses put forward at this stage (see Section 6 Doc 7.11.2 Design Approach Document- Kent) are likely to be more intrusive within the landscape and therefore would have correspondingly higher level of harm. There does not appear to be a secure route by which Historic England can provide comment on the design moving forward, and mitigation against the historic harm needs to be appropriate. Therefore, we have some concern surrounding the design commitments in the REAC (LV17) and the Draft DCO Schedule 3 Requirement (3 Converter Station Design) as drafted, as they make no explicit provision for stakeholder engagement on this issue beyond the County Council. We will provide further comment on this process in our written representation and recommend that the ExA seek further reassurances and a commitment from the Applicant to ensure that a design is chosen which reduces as far as possible harm to the significance of these heritage assets. We would also want to ensure that Historic	This is noted and the Applicant will consider any further comments on the specific wording of the DCO in due course. The Applicant will consult further with HE to discuss feasible design mitigation options.

Reference	Summary of relevant representation	Applicant's Response
	England are specifically included as consultees in this process and that reducing harm, to heritage assets is a consideration in the design parameters.	
3.7.19	We are also pleased that the applicant has undertaken extensive archaeological evaluations during the pre-application period. The results of this work have been well accounted for in the design and the risk of large impacts on the most sensitive areas of the Ebbsfleet Peninsula Complex has been largely avoided.	This is noted by the Applicant
3.7.20	However, we agree with the ES that the development is still likely to result in some harm to the Ebbsfleet Peninsula Complex. This will result in a permanent residual change and a significant effect in EIA terms to an undesignated, but potentially nationally significant, heritage asset.	This is noted by the Applicant.
3.7.21	We disagree that the ability to mitigate the effect through a programme of archaeological works would reduce the significance of the effect to 'Minor' (Table 3.12, pg 60, Doc 6.2.3.3, Environmental Statement, Part 3 Kent, Chapter 3 Cultural Heritage) as the harm here is only somewhat offset and not truly lessened by the ability to record remains prior to their removal	The Applicant acknowledges that mitigation through a programme of archaeological investigation does not reduce the magnitude of impact. The reduction in the significance of effect recognises that professional excavation and recording of archaeological remains is a compensation measure, the successful completion of which would reduce the overall harm to the asset to an acceptable level. The proposed mitigation through a programme of archaeological investigation has been agreed in principle with the Kent County Council Archaeological Officer.
3.7.22	This is in line with para 5.9.16 of EN-1 which recognises that the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted.	Whilst acknowledging paragraph 5.9.16 of EN-1, the Applicant's position is that the successful completion of professional excavation and recording of archaeological remains would reduce the overall harm to the asset to an acceptable level. The proposed mitigation through a programme of archaeological investigation has been agreed in principle with the Kent County Council Archaeological Officer.
3.7.23	We therefore recommend options are considered by the applicant to further reduce the heritage harm. We consider this could be achieved by removing site compounds and through using no-dig options	The Applicant will consult further with HE and KCC to discuss feasible design mitigation options. Site compounds are an important element of the construction process allowing space for staff welfare facilities and the lay down and storage of plant and materials. The Applicant has looked to relocate compounds away from areas highlighted as of increased value where possible however is unable to remove the compounds completely and still complete the works. A number of separate compounds have been proposed to enable the various elements of the works to be controlled safely and effectively, this involves three principal compounds adjacent to the Converter and Substation site, these are for the Converter Contractor, the Cable Contractor and the OHL Contractor. Segregation of these compounds is best practice from a Construction Design and Management perspective; the location of these main compounds has been chosen to reduce impacts on the archaeology of the area. The compounds either side of the A256 are necessary to enable the trenchless crossing of the road, with the western compound also acting as an enabling compound for the Converter contractor to allow for the access and main compounds to be constructed. The Applicant will work with our contractors to look to reduce the footprint of compounds where practicable during the detailed design process. The no dig option of installing compounds above top-soil without undertaking a top-soil strip has been considered. This option would however impact the quality of the top-soil which would then require remedial works to return it to its original condition. The Applicant considers that the remedial works would be just as impactful as the top-soil strip so would not provide a betterment.
3.7.24	Written Scheme of Investigation: Volume 7, Document 7.5.4.1 (Suffolk) and Document 7.5.4.2 (Kent) - Outline Onshore Overarching Written Scheme of Investigation (OWSI). We note that two location specific Outline Written Scheme of Investigation (WSI) have been prepared in consultation with the statutory consultees which sets out details of post-consent assessment and mitigation measures.	This is noted by the Applicant.

Reference	Summary of relevant representation	Applicant's Response
3.7.25	We welcome commitment to archaeological mitigation. We wanted to note however that these documents have not been previously shared with us. We will therefore provide further comments on this in our Written Representation. Amendments and further drafting may therefore be required	The Applicant is in the process of updating **Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]** and **Application Document 7.5.4.2 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Kent [APP-345]** in line with comments received during further consultation with the LPA's Archaeological Advisors and will issue updated versions in due course during Examination. The Applicant will respond to HE's Written Representation in due course and, in addition, will engage further with HE to consider their feedback in the updated OWSI
3.7.26	Heritage assets could be impacted either directly or indirectly by the proposed development. We are aware for example that marine geophysical survey was undertaken in 2021 and 2024, which was able to identify a range of potential archaeological anomalies within the proposed DCO Order Limits. This coupled with the assessment of desk-based data sources have highlighted the clear potential for both known and unknown heritage assets to be present. Mitigation measures to avoid, minimise and mitigate these impacts have been proposed. Our focus in the written representation will be on the mitigation, and to ensure that these measures are appropriately secured through the DCO and dMLs	This is noted by the Applicant.
3.7.27	Historic England - Offshore and Intertidal Archaeology and Cultural Heritage: Additionally, we note that additional geotechnical work undertaken in October 2024 is still in progress and has not been included within the documents submitted at this time. We acknowledge that will be submitted as a standalone report post-submission and we will reserve final comments on the suitability of the geoarchaeological assessment pending review of this report. A timetable for submission of this report would be helpful, and that this document is made a condition of the DCO and dMLs.	The results of the additional geotechnical work undertaken in 2024 are now available and are presented within Application Document **9.2 Supplementary Stage 1 and Stage 2 Marine Geoarchaeological Assessment [AS-033]** and **Application Document 9.2.1 Supplementary Stage 1 and Stage 2 Geoarchaeological Assessment - Technical Note [AS-034]**. Both documents were submitted to PINS on 12 June 2025 and provided to Historic England on 5 August 2025. Comments on **Application Document 9.2 Supplementary Stage 1 and Stage 2 Marine Geoarchaeological Assessment [AS-033]** were received from Historic England on 3 October 2025. An updated version of this document, addressing the comments received from Historic England will be submitted to PINS at Deadline 1.
3.7.28	Part 4 Marine Chapter 6 Marine Archaeology and Outline Offshore Overarching Written Scheme of Investigation: We note that these documents include changes we requested in our previous comments at the PEIR stage (see HE advice dated 19th December 2023). This represents good progress towards addressing our previous concerns and we will provide further detail on this in our written representation	This is noted by the Applicant.
3.7.29	Specialists Science Advice (onshore and offshore): Although the applicant has provided a good overall level of documentation for the DCO application, some information remains outstanding, most importantly for both the onshore and offshore area are the geoarchaeological assessments and deposit models.	The Applicant understands the comments in this section of the relevant representations relate to the Kent Onshore Scheme only due to the potential for significant deposits across the Minster Marshes area. A geo-archaeological desk-based assessment of the Kent Onshore Scheme was submitted with the application, see **Application Document 6.3.3.3.G ES Appendix 3.3.G Geo-archaeological Desk Based Assessment [APP-167]**. This was based on a scope agreed with Kent County Council (KCC) Archaeological Advisor and HE and included a review of the data collected as part of the early ground investigation (GI) works, as well as a review of relevant data from adjacent projects including the Richborough to Canterbury Connection. The Applicant continues to engage with KCC and HE to develop a scope of works to enable geo-archaeological works to be undertaken when further GI works are undertaken in late 2025/early 2026. This additional assessment will be secured in the Application Document 7.5.4.2 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Kent [APP-344],

Reference	Summary of relevant representation	Applicant's Response
		which is currently being updated, and which will be submitted at the relevant deadline during Examination.
3.7.30	Specialists Science Advice (onshore and offshore): Offshore – for this area, initial transects were drawn but we await the updated models and assessments to include additional cores taken in 2024 following the destruction of vibrocores recovered in 2021	The results of the additional geotechnical work undertaken in 2024 and updated deposit models are now available and are presented within **Application Document 9.2 Supplementary Stage 1 and Stage 2 Marine Geoarchaeological Assessment [AS-033]** and **Application Document 9.2.1 Supplementary Stage 1 and Stage 2 Geoarchaeological Assessment - Technical Note [AS-034]**. Both documents were submitted to PINS on 12 June 2025 and provided to Historic England on 5 August 2025. Comments on **Application Document 9.2 Supplementary Stage 1 and Stage 2 Marine Geoarchaeological Assessment [AS-033]** were received from Historic England on 3 October 2025. An updated version of this document, addressing the comments received from Historic England will be submitted to PINS at Deadline 1.
3.7.31	Onshore - We note a full study is proposed with further coring to supplement evidence from test pits and trail trenches. Preliminary information was obtained through Ground Investigation works but this has not been archaeological assessed. The Ground Investigation fata provides valuable baseline information towards characterisation and understanding of the archaeological potential of an area, and it is a shame these opportunities were not taken to create generate the archaeological information that is needed. This will need to be provided, and we recommend the ExA seek and understating from the applicant as to the likely delivery and format of the documents.	The Applicant notes that the GI works undertaken to date utilised techniques that would not have enabled geo-archaeological data to be collected. A geo-archaeological desk-based assessment of the Kent Onshore Scheme was therefore undertaken to inform the assessment; this is presented as **Application Document 6.3.3.3.G ES Appendix 3.3.G Geo-archaeological Desk Based Assessment [APP-167]**. This was based on a scope agreed with KCC and HE and included a review of the data collected as part of the GI works as well as data from nearby projects, including the Richborough to Canterbury Connection. The Applicant continues to engage with KCC and HE to develop a scope of works to enable geo-archaeological works to be accommodated when further GI works are undertaken in late 2025/early 2026. This additional assessment will be secured in the Application Document 7.5.4.2 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Kent [APP-344, which is currently being updated, and which will be submitted at the relevant deadline during Examination.
3.7.32	Also outstanding is an understanding of effects that changes to ground water levels and flows might have on buried archaeological and palaeoecologist assess. A detailed geoarchaeological study will help in that respect.	A geo-archaeological desk-based assessment of Kent Onshore Scheme is provided as **Application Document 6.3.3.3.G ES Appendix 3.3.G Geo-archaeological Desk Based Assessment [APP-167]**. Changes to water levels and flows and the potential impacts of these on heritage assets will be addressed as part of the geo-archaeological assessment work to be undertaken in conjunction with the next phase of GI works planned for late 2025/early 2026. The scope of this geo-archaeological assessment will be agreed with KCC and HE. This additional assessment will be secured in the Application Document 7.5.4.2 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Kent [APP-344], which is currently being updated, and which will be submitted at the relevant deadline during Examination.
3.7.33	Landscaping and biodiversity net gain designs will also need to consider impacts to heritage assets. And we will be looking to ensure that has been included in the ES.	The assessment of heritage impacts for both Suffolk and Kent as detailed in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** and **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]** takes into account potential impacts resulting from the proposed landscape and ecological mitigation proposals as described in Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] and Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [AS-059]. This includes the assumption that there would be no physical impact within the areas of grassland proposed as part of ecological mitigation measures as a result of the construction, operation or decommissioning of the Proposed Project. In these ecological mitigation areas where there would be no physical impacts, the level of impact would be 'no change'. For other areas of ecological mitigation where there is the

Reference	Summary of relevant representation	Applicant's Response
		potential for physical impacts to un-identified heritage assets, mitigation will be developed as part of the relevant OWSI.

Table 3.8 Applicant's Response to the Relevant Representation of Joint Nature Conservation Committee

Reference	Summary of relevant representation	Applicant's Response
3.8.1	Thank you for consulting Joint Nature Conservation Committee (JNCC) on the Sea Link Interconnector Project Development Consent Order (DCO) Application including the Environmental Statement (ES) and Management Plans. Notification of acceptance for examination by the Secretary of State for Energy Security and Net Zero was received on 23 April 2025.	This is noted by the Applicant.
3.8.2	The Sea Link Interconnector project is proposed by National Grid Electricity Transmission plc to reinforce the transmission network in the South East and East Anglia. The new HVDC offshore cable will be 130 km in length and is completely within the UK inshore region (within 12nm of the coast). This means that the cable falls within the jurisdiction of Natural England. However, the cable passes through two jointly managed sites (between JNCC and Natural England) described below: • The Southern North Sea (SNS) Special Area of Conservation (SAC), designated for the protection of harbour porpoise. The conservation objectives for the site are to maintain site integrity by ensuring: 1. Harbour porpoise are a viable component of the site 2. There is no significant disturbance of the species 3. The condition of supporting habitats and processes, and the availability of prey is maintained • The Outer Thames Estuary Special Protection Area (SPA), designated for the protection of red-throated diver, common tern and little tern. The conservation objectives of the site are to maintain or enhance favourable condition of the features. JNCC have therefore concentrated our comments on the features of these two designated sites.	This is noted by the Applicant.
3.8.3	The advice contained within this minute is provided by JNCC as part of our statutory advisory role to the UK Government and devolved administrations on issues relating to nature conservation in UK offshore waters (beyond the territorial limit). We have subsequently concentrated our comments on aspects of the documents that we believe relate to offshore waters and defer to comments provided by Natural England (NE) for aspects relating to inshore waters (within 12nm). Documents reviewed by JNCC for this application: • EN020026-000168-3.1 draft Development Consent Order • EN020026-000187-7.5.2 Outline Offshore Construction Environmental Management Pla • EN020026-000231-6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach • EN020026-000259-6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals • EN020026-000260-6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology • EN020026-000266-6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects • EN020026-000202-7.8 Red Throated Diver Protocol • EN020026-000402-6.6 Habitats Regulations Assessment Report • EN020026-000197-7.5.11 Outline Marine Mammal Mitigation Plan.	This is noted by the Applicant.
3.8.4	Marine Ornithology: Paragraph 5.9.9 JNCC welcome the full seasonal restriction on offshore cable burial activities within the Outer Thames Estuary SPA and a reduced seasonal restriction between January and March for landfall cable installation activities. Red Throated Diver Protocol JNCC also welcome the additional mitigation measures to reduce disturbance of non-breeding red-throated diver set out in Document 7.8 Red Throated Diver Protocol,	This is noted by the Applicant. The requirement has been secured within the DCO under Schedule 16, Deemed Marine Licence following discussions with stakeholders including Natural England and the MMO.

Reference	Summary of relevant representation	Applicant's Response
	and that this will be secured via an Offshore Construction Environmental Management Plan, secured by DCO Schedule 3, Requirement 5.	
3.8.5	EIA Approach: Paragraph 5.4.3 JNCC recognises the mitigation hierarchy (Section 5.4), which places a preference to avoidance measures, followed by minimisation, rehabilitation/restoration, and offsetting. JNCC agree with this approach as it prioritises the measures with zero impact to the environment i.e. measures that would avoid significant impacts to begin with. It would be assumed that examples of avoidance would be to, as far as possible, route the cable so that sensitive areas (such as breeding or feeding areas) are avoided.	Detail on the approach taken to identifying the route of the Offshore Scheme is provided in **Application Document 8.2 Options Selection and Design Evolution Report [APP-369]**. This includes information on the studies and stakeholder engagement undertaken to inform initial route selection, subsequent route revisions and explains how the final Marine Scheme was identified. Two of the key aspects of the evolution of the Offshore Scheme were the Applicant's decision to firstly avoid the Margate and Long Sands SAC and to then re-route a 3.2 km section of the Offshore Scheme to also avoid passing through the Goodwin Sands MCZ (the route initially was located just inside the MCZ boundary). By avoiding both the Margate and Long Sands SAC and Goodwin Sands MCZ, the cable corridor does not intersect any sites specifically designated to protect ecologically important benthic habitats including subtidal sands and gravels, *Sabellaria spinulosa* aggregations, blue mussel beds, and circalittoral rock communities. This approach is consistent with the precautionary principle and mitigation hierarchy (avoid, reduce, mitigate or compensate) as set out in National Policy Statement EN-1 (paragraphs 4.2.10 , 4.2.11, 4.3.4). As discussed in **Application Document 6.2.4.5 (B) Part 4 Marine Chapter 5 Marine Ornithology [AS-115]** where it has not been possible to physically avoid designated sites e.g. Outer Thames Estuary SPA, measures have been identified to avoid any potential significant impacts on key features including the use of seasonal restrictions for red throated diver during construction. This commitment is included in **Application Document 7.8 Red Throated Diver Protocol [APP-361]**, **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** and **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].**
3.8.6	Marine Mammals: Section 4.3, Table 4.6: This table details the comments raised in the scoping opinion in relation to marine mammals. With regard Comment ID 5.4.4, the decision was made to take a regional approach to screen marine protected sites into the assessment instead of using a prescribed distance (50 km). JNCC note the change in approach but are of the opinion that while using a regional approach can be acceptable to create a long list of sites, these should be narrowed down based on potential impact pathways / routes to impact. For marine mammal sites, this could be based upon noise propagation ranges. However, given that the Sea Link project occurs within the Southern North Sea SAC, with no other offshore marine mammal sites on the east coast of England, JNCC are content that all relevant sites within our remit have been scoped in.	This is noted by the Applicant.
3.8.7	Section 4.7: The baselines of the individual species have been described, with abundance and estimated densities provided from the SCANS IV surveys. JNCC have concerns with this being the only data source being used to provide density estimates, given the snapshot nature of the SCANS surveys. JNCC recommend a range of densities are assessed, including the Marine Mammal Management Unit (MMMU, IAMMWG (2022)) densities, SCANS IV and the data from field surveys undertaken in the area, with the most conservative for each species being taken forward for assessment.	A number of updates have been made in **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals**, submitted at Deadline 1, to clarify the approach to considering the most precautionary marine mammal density estimates. Clarifications have been made to assessment criteria, the use of harbour porpoise density estimates and at-sea seal abundance. In addition, some data sources have been updated, where more recent publications have become available since the original application was submitted. For example, seal data from the SCOS 2024 (SCOS, 2024) report has now also been referenced in the baseline and data from the SCANS 2024 Winter survey for harbour porpoise in the North Sea (Ramirez-Martinez, et al., have now been included
3.8.8	Paragraph 4.7.36: This states that the abundance and densities for the four key cetacean species are provided in Table 4.14. However, Table 4.14 states that these	The reference to SCANS III is an error as the data refer to the latest SCANS IV results. Table 4.14 has been corrected in Version D of **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [AS-095/AS-096].**

Reference	Summary of relevant representation	Applicant's Response
	are taken from SCANS III, contrary to references referred to in the text. Clarification on the table contents is therefore required.	
3.8.9	Table 4.15: This lists the designated marine mammal sites within the study area. Of these, the only one in offshore waters is the Southern North Sea (SNS) SAC, which the cable route runs through. We confirm all relevant offshore marine mammal sites have been listed and defer to Natural England in relation to inshore (territorial waters) sites	This is noted by the Applicant.
3.8.10	Section 4.8: This summarises mitigation measures that have been considered as part of the proposed project, and provides details of measures embedded into the project plan, and those that are secondary to it. The embedded measure is to consider important marine mammal areas when routeing the cable route, with additional measures to adhere to the JNCC marine mammal mitigation guidelines, as well as for vessels to adhere to regulations and to develop an offshore Construction Environmental Management Plan (CEMP), amongst others. In terms of underwater noise, the most significant measure is adherence to the JNCC marine mammal mitigation guidelines for injury, and we therefore welcome their inclusion.	This is noted by the Applicant.
3.8.11	Paragraph 4.8.4: We note reference is made to vessels complying with the International Regulations for Preventing Collisions at Sea 1972 (International Maritime Organisation, 1972), Regulation 10 which provides guidance relating to vessel speed to reduce the risk of collision with other vessels. However, there is no explanation as to how this will be beneficial to marine mammals, as implied by its inclusion in this list. A vessel management plan to support compliance with this Regulation could also include measures which would reduce the risk of vessel collision with marine mammals, but this is not considered. For example, neither the CEMP or oMMMP discuss reduced or defined vessel speeds to reduce the risk of collision with marine mammals. We do note that vessel speeds are stated within the Red Throated Diver Protocol (EN020026-000202-7.8 Red Throated Diver Protocol) but this protocol is specific to this species and the Outer Thames Estuary SPA.	The inclusion of International Regulations for Preventing Collisions at Sea 1972 (International Maritime Organisation, 1972) relates to the need for project vessels to maintain a safe speed to avoid collision with other vessels operating nearby. However, this guidance on vessel operating speeds can also be related to the avoidance of collisions with marine mammals. As described in **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals** submitted at Deadline 1, vessels typically travelling more than 14 knots are considered to result in the most lethal and serious injuries to cetaceans (Laist, Knowlton, Mead, Collet, & Podesta, 2001). In order to comply with International Regulations for Preventing Collisions at Sea 1972 (International Maritime Organisation, 1972), Project vessels will be required to maintain a 'safe speed', with transit speeds ranging from 4 - 12 knots as described in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]**. Therefore, compliance with International Regulations for Preventing Collisions at Sea 1972 (International Maritime Organisation, 1972) for safe vessel use also allows for minimisation of collision risk with marine mammals. The assessment for collision risk has been updated to reflect this (paragraph 4.9.42 in **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals** submitted at Deadline 1.
3.8.12	Paragraph 4.8.4: Not considered here is avoidance of noisy activities in the Southern North Sea (SNS) SAC during the winter season, although general reference to guidance for managing disturbance within the SAC (JNCC 2020) is referred to. The proposed cable passes through the part of the site identified as having higher abundance in the winter season (defined as October to March inclusive). Such a commitment has been proposed to avoid disturbance to red throated divers in the Outer Thames Estuary SAC. Avoiding noisy activities in this season would negate the need to consider management measures for disturbance in the HRA (see below for further comment).	This comment has been noted by the Applicant. It was concluded in **Application Document 6.6 (C) Habitat Regulations Assessment Report** that there would be no Adverse Effects on Site Integrity (AEOSI) for the Southern North Sea (SNS) SAC. The project activities that will take place within this site designated for harbour porpoise do not generate any high intensity impulsive sounds that can cause behavioural disturbance and they are also short-term, limited in extent and temporary as all activities occur from a moving vessel. For sub-bottom profiling surveys that may be needed for pre-construction surveys there is a commitment to adopt the standard JNCC mitigation measures for geophysical surveys (JNCC, 2025) as detailed in **Application Document 7.5.11 Outline Marine Mammal Mitigation Plan [APP-356].** Based on these factors the Applicant does not agree that a seasonal restriction is required for the SNS SAC. To calculate the potential for disturbance to harbour porpoise in the SNS SAC, an effective deterrent range (EDR) of 5 km (JNCC, 2020) has been used, as described in **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals** submitted at Deadline 1. On the basis that the cable passes through the SNS SAC for approximately 70 km, and an EDR of 5 km (either side of the cable, totalling 10 km), the total EDR area was calculated as 700 km^2, an area which represents less than 2% of the total SNS SAC area, greatly below the thresholds for significant noise disturbance to an SAC as defined by the JNCC (JNCC, 2020). Within the EDR

Reference	Summary of relevant representation	Applicant's Response
		area of 700 km^2, a total 581 individuals may be disturbed, using the winter harbour porpoise density of 0.83 individuals/km^2. This equates to less than 1% of the total harbour porpoise population in the UK portion of the North Sea Management Unit (IAMMWG, 2023). The Southern North Sea SAC is reported to support an estimated 17.5% of this management unit (JNCC, 2020). Whilst there is no exact value for the number of animals expected within the site, as the population varies naturally and is influenced by various factors, a precautionary calculation estimates the maximum percentage of harbour porpoise within the SAC that could be disturbed to be less than 3%. Therefore, disturbance effects are considered to be minor and small-scale, with any disturbance considered to be temporary as the project vessel will be continuously moving through the SAC. In any case, JNCC (JNCC, 2017; JNCC, 2025) guidelines for minimising injury to marine mammals during geophysical surveys will also be effective in mitigating against disturbance. As a result, a winter restriction in the SNS SAC is not considered necessary.
3.8.13	Table 4.16: This table provides a summary of the impact pathways and the maximum design scenario for each potential impact pathway. We note that underwater sound excludes that produced by UXO clearance owing to the fact that UXO clearance is not to be included within this application. If required, this shall be considered in a separate marine licence. JNCC agree with this approach given the lack of information available at this stage of the development. The underwater sound activities that have been included are pre-installation geophysical survey activities, pre-installation clearance, cable installation via a range of different methods including trenching, placement of cable protection and vessel movements. Given that UXO clearance is not to be included in this application, we recommend the applicant clarify what is being referred to with "pre-installation clearance" as it is currently ambiguous.	Underwater sound as a result of UXO clearance will be considered as part of a separate marine licence application. It is not feasible to include UXO clearance activities within the Maximum Design Scenario (MDS) for the pre-consent phase. The need for clearance is currently unknown, and attempting to assess potential impacts without defined parameters would result in unrealistic and unrepresentative scenarios. This is the basis on which the MMO developed the two-licence strategy—to avoid speculative assessments and ensure a more robust, evidence-led approach. Any necessary mitigation measures for UXO clearance will be secured through the marine licensing process and will be enforceable by the MMO. "Pre-installation clearance" refers to clearance of the route of debris and other obstacles, and sandwave levelling.
3.8.14	Table 4.20: This table presents estimated distances at which marine mammal injury thresholds will be exceeded. JNCC recommend that a dual metric approach is applied with mitigation based on the most precautionary output. The maximum estimated distances at which Permanent Threshold Shift (PTS) may occur for the different noise sources show that when using the peak Sound Pressure Level (SPLpeak) metric, injury can be mitigated using standard measures described in the JNCC guidelines (JNCC 2017). However, the assessment suggests there is a significant risk associated with sub-bottom profilers (SBP) when considering the cumulative Sound Exposure Level (SELcum) metric. Most of the predicated injury ranges are greater than the standard 500m mitigation zone, with one of the SBPs assessed potentially causing injury up to 10,000m from the source for very high frequency cetaceans (e.g. harbour porpoises).	Underwater sound propagation calculations have been undertaken using the NMFS/NOAA acoustic tools to determine the distance to which thresholds are met-(NOAA, 2025). For the most impactful noise source to be used during project activities (which excludes UXO clearance), the sub-bottom profiler (SBP), the worksheet for an impulsive, mobile source was used. The worksheet provides distances in relation to dual thresholds, one for sound pressure level (SPL_{peak}) and one for sound exposure level (SEL). The sound exposure calculations are based on cumulative exposure over a 24-hour period. For PTS this generates a distance of >10,000 m which is, for several reasons discussed below, a significant overestimate and is unsuitable for use in the determination of a marine mammal observation zone. The overestimation of the PTS distance is due to the fact that the worksheet cannot allow for the directionality of the acoustic beam from the source and the fact that the sound propagation estimates do not reflect the effect of the observation zone (significantly reducing the risk of any marine mammals being present within at least 500 m of the sound source) or the soft-start. The SEL distance also does not allow for high levels of mobility in marine mammals, and assumes exposure will last as long as 24 hours which is thought unlikely. For SBP, the acoustic beam is highly directional. The beam angle is only 30° and as such the propagation of sound out from the source in a horizontal direction is significantly lower than is estimated by the modelling. It is also recognised that sound exposure at the closest point of approach is the primary exposure contributing to a receiver's accumulated level (National Marine Fisheries Service, 2024). With the mitigation measures in place this further minimises the accumulated exposure (as measured by SELcum), and so the potential for injury from such sources is best described by the SPL metric (National Marine Fisheries Service, 2018). In particular, considering the very high directionality of the sound produced by the SBP, which minimises propagation outwards, an observation zone of 500 m is considered appropriate.

Reference	Summary of relevant representation	Applicant's Response
3.8.15	Table 4.20: We note the modelling provided results in an unrealistic worst-case scenario being assessed, as a stationary animal has been assumed and a soft-start has not been factored in. It is also unlikely that a marine mammal would be exposed for 24 hours as the vessel shall not be operating repeatedly in the same location. Furthermore, the modelling will not have considered the directionality of these types of noise sources, which result in reduced sound propagation horizontally. Given the level of precaution built into the assessment, and our experience with this type of equipment, we are content that that standard mitigation measures would sufficiently reduce the risk of injury from the equipment assessed.	The Applicant has noted this comment. However, the comment appears to contradict the comment above and states that mitigation measures are sufficient, supporting the Applicant's response to the comment above. Therefore, no further response to this comment is required. Please see above response.
3.8.16	Paragraph 4.9.24: For the continuous sound sources, e.g. support vessels and cable lay operations, JNCC agree that injury is highly unlikely and will not require any mitigation measures.	This is noted by the Applicant.
3.8.17	Marine Inter-Project Cumulative Impacts: JNCC have no comments regarding the cumulative impact assessment for marine mammals.	This is noted by the Applicant.
3.8.18	Habitat Regulations Assessment Report: The proposed project passes through the part of the SNS SAC designated as having higher abundance in the winter months (October to March inclusive). We agree with the conclusion of Likely Significant Effect (LSE) for this site with regard to underwater sound and vessel collision risk. However, as the approach to screen for LSE has focused on impact pathways rather than the conservation objectives for each site, it is unclear how Conservation Objective 3 for the SNS SAC has been considered. We advise that in its current state, insufficient information has been provided to enable the Licensing Authority to undertake an Appropriate Assessment for this site. Again, the information provided focusses on the impact pathway, with limited discussions as to how this information applies to different sites. This is particularly pertinent when considering underwater noise as the SNS SAC has management measures not applicable to other sites. There is also no clear distinction between construction and operational activities where the impact pathway is relevant to both. We note that potential for indirect effects through impacts to prey species have been considered in Section 7 (page 113-114), but not in relation to the SNS SAC. Further comment on the impact pathways screened into Stage 2 for the SNS SAC are provided below:	The Proposed Project activities are considered to be in line with all conservation objectives for the SNS SAC (JNCC, 2019). JNCC (2019) states that several operations could potentially affect the achievement of Conservation Objective 3 for the SNS SAC, with those of relevance to the current Marine Licence Application including geophysical surveys and the production of underwater sound. As described in the above responses, project specific modelling has indicated that, using the SPL metric, a permanent threshold shift (PTS) in harbour porpoise has the potential to only occur in individuals that are in very close proximity to the SBP, i.e. within 63.1 m of the SBP. All standard mitigation measures, including compliance with JNCC (-(JNCC, 2017; JNCC, 2025) guidelines will be implemented, as well as the use a marine mammal observer and a 500 m observation zone, as detailed in **Application Document 7.5.11 (B) Outline Marine Mammal Mitigation Plan,** submitted at Deadline 1. These measures minimise the chance of a marine mammal being within 500 m of the sound source at activation, significantly minimising the risk of auditory injury (PTS), The source of underwater sound in the SNS SAC will also be constantly moving and so not present within areas of higher density for long periods of time. Furthermore, the potential number of harbour porpoise which could be disturbed in the SNS SAC has been calculated as 581 individuals which is less than 1% of the total harbour porpoise population in the UK portion of the North Sea Management Unit (IAMMWG, 2023). This calculation was based on total EDR area calculated as 700 km^2 which is less than 2% of the SNS SAC total area and therefore in line with JNCC (2019) Conservation Objective 2: there is no significant disturbance of the species (harbour porpoise). Therefore, due to the negligible disturbance expected, and in line with Conservation Objective 3 of the SNS SAC, the accessibility and therefore availability of prey items and supporting habitat to harbour porpoise is not expected to be affected.
3.8.19	Underwater noise: JNCC advise insufficient information has been provided to support the conclusion of no adverse effect on the SNS SAC from this impact pathway. In addition, the assessment has been combined for harbour porpoise and seal sites. How noise is assessed and managed within these sites is different for harbour porpoise and seals so this is inappropriate.	This comment is noted by the Applicant and a detailed response regarding insufficient information for the conclusion of no adverse effect on the SNS SAC is provided above. Separate modelling has been conducted for seals and harbour porpoise, conclusions from which have been included in **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals** submitted at Deadline 1. Underwater sound modelling has been undertaken for each of the marine mammal hearing groups, such that harbour porpoise and seals have not been assessed together. However, to improve clarity of the assessment some updates to the text in Section 7.3 have been made in **Application Document 6.6 (C) Habitats Regulations Assessment Report** also submitted at Deadline 1. The conclusions of the underwater sound impact pathway have remained the same

Reference	Summary of relevant representation	Applicant's Response
3.8.20	Paragraph 7.3.15 states that several activities will be undertaken through the lifetime of the project that will generate sound, however no distinction is made in the subsequent paragraphs of how impacts from sound will be mitigated at the different stages	All standard mitigation measures, including compliance with JNCC-(JNCC, 2017; JNCC, 2025) guidelines will be implemented during geophysical surveys, including the use a marine mammal observer and a 500 m observation zone during sub-bottom profiling (SBP), as detailed in **Application Document 7.5.11 (B) Outline Marine Mammal Mitigation Plan,** submitted at Deadline 1 and secured in **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC),** also submitted at Deadline 1. As described in **Application Document 6.6 Habitats Regulations Assessment Report [APP-290]**, no other activities, including those occurring at different stages of the Proposed Project, are considered likely to generate sufficient sound source levels to result in a permanent threshold shift (PTS)/injury. Temporary threshold shift (TTS) is only likely to occur very close to the sound source when an animal is present for a prolonged period of time. However, this is also considered highly unlikely due to the mobile nature of both marine mammals and the sound sources used during the Proposed Project. Some minor behavioural disturbance may occur but this will be temporary and very short-term. Therefore, the implementation of the JNCC guidelines (JNCC, 2017; JNCC, 2025) as standard mitigation measures for any stage of the Proposed Project where SBP is used, are considered highly sufficient for avoiding auditory effects for marine mammals.
3.8.21	Paragraph 7.3.19: The applicant has only referred to injury ranges for sub-bottom profilers using the SPL metric; the injury ranges presented in Chapter 4 Marine Mammals using the cumulative SEL metric are far greater than the 63 m quoted in Paragraph 7.3.19. JNCC advise both metrics are assessed, and mitigation based on the most precautionary output. For harbour porpoise, this suggests injury could occur up to 10 km from the source. While our earlier discussion regarding appropriate mitigation concluded that standard mitigation measures would be appropriate in this instance, the assessment should be transparent and use all relevant results to form a conclusion.	Underwater sound propagation calculations have been undertaken using the NMFS/NOAA acoustic tools to determine the distance to which thresholds are met (NOAA, 2025). For the most impactful noise source to be used during project activities (which excludes UXO clearance), the sub-bottom profiler (SBP), the worksheet for an impulsive, mobile source was used. The worksheet provides distances in relation to dual thresholds, one for sound pressure level (SPLpeak) and one for sound exposure level (SEL). The sound exposure calculations are based on cumulative exposure over a 24-hour period. For PTS this generates a distance of >10,000 m which is, for several reasons discussed below, a significant overestimate and is unsuitable for use in the determination of a marine mammal observation zone. The overestimation of the PTS distance is due to the fact that the worksheet cannot allow for the directionality of the acoustic beam from the source, and the fact that the sound propagation estimates do not reflect the effect of the observation zone (significantly reducing the risk of any marine mammals being present within at least 500 m of the sound source) or the soft-start, does not allow for high levels of mobility in marine mammals, and assumes exposure will last as long as 24 hours which is thought unlikely. For example, considering the most impactful sound source, the SBP, the acoustic beam is highly directional. The beam angle is only 30° and as such the propagation of sound out from the source in a horizontal direction is significantly lower than the modelling estimates. It is also recognised that exposures at the closest point of approach are the primary exposures contributing to a receiver's accumulated level-(National Marine Fisheries Service, 2024). With the mitigation measures in place this further minimises the accumulated exposure (as measured by SEL_{cum}), and so the potential for injury from such sources is best described by the SPL metric (National Marine Fisheries Service, 2018). In particular, considering the very high directionality of the sound produced by the SBP, which minimises propagation outwards, an observation zone of 500 m is considered appropriate as it encompasses the distance to which PTS is estimated to be possible. In terms of disturbance, the thresholds for significant noise disturbance to an SAC as defined by the JNCC (JNCC, 2020) are not met and so no AEOSI is predicted.
3.8.22	Paragraph 7.3.20: We note the reference to published Effective Deterrent Ranges (EDRs) which support the management of disturbance within this site. JNCC advice is that where no sub-bottom profilers are used within the site in winter months, the spatial temporal thresholds (JNCC et al 2020) do not need to be considered in an appropriate assessment. However, no such commitment is being proposed and the thresholds have not been considered in this assessment. As previously stated winter for this site is defined as October to March inclusive, and we would expect a seasonal	This comment has been noted by the Applicant. The Applicant is in disagreement about the need for a seasonal restriction for the Southern North Sea (SNS) SAC. Excluding UXO clearance (which will be considered under a separate marine licence application and assessment) the sound sources associated with all stages of the Offshore Scheme are either non-impulsive (continuous) in nature (e.g. cable installation, vessel movements) or those associated with geophysical surveys. Whilst the key sound sources associated with geophysical survey are impulsive in nature, they generally produce sounds of much lower intensity than those associated

Reference	Summary of relevant representation	Applicant's Response
	restriction to be secured in the project consent. We note seasonal restrictions are proposed for red throated diver in the Outer Thames Estuary SPA but these would not be sufficient for the SNS SAC as they only extend between 1 November to 31 March (Paragraph 7.3.20). In addition, as these restrictions are specific to this SPA, they will not cover the full area of the cable installation within the SNS SAC. Subsequently, it is inappropriate to assume the restrictions secured in the CEMP, red throated diver protocol and draft DCO referred to in Paragraph 7.3.21 support a conclusion of no adverse effect on this site.	with windfarm construction, such as impact piling, that are of concern. Project specific modelling has indicated that, using the SPL metric, a permanent threshold shift (PTS) in harbour porpoise has the potential to only occur in individuals that are in very close proximity to the sub-bottom profiler (SBP), i.e. within 63.1 m of the SBP. Furthermore, the SBP activities will be operating from a moving vessel and therefore will not be stationary in the SNS SAC, with the receptor (i.e. harbour porpoise) also being a highly mobile species. In addition to this, standard JNCC (JNCC, 2017; JNCC, 2025) guidelines for minimising injury to marine mammals during geophysical surveys will also be implemented, including a 500 m observation zone around the vessel which will be observed by a marine mammal observer for 30 minutes and a 20-minute delayed with soft-start if a marine mammal is observed. Therefore, it is unlikely that a harbour porpoise would be within range during noisy activities for PTS to occur. To calculate the potential for disturbance to harbour porpoise in the SNS SAC, an effective deterrent range (EDR) of 5 km (JNCC, 2020) has been used, as described in **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals** submitted at Deadline 1. On the basis that the cable passes through the SNS SAC for approximately 70 km, and an EDR of 5 km (either side of the cable, totalling 10 km), the total EDR area was calculated as 700 km^2, an area which represents less than 2% of the total SNS SAC area. Within the total EDR area of 700 km^2, a total 581 individuals may be disturbed, using the winter harbour porpoise density of 0.83 individuals/km^2. This equates to less than 1% of the total harbour porpoise population in the UK portion of the North Sea Management Unit (IAMMWG, 2023). Therefore, disturbance effects are considered to be minor and small-scale, with any disturbance considered to be temporary as the project vessel will be continuously moving through the SAC. Thus, underwater sound produced in the SNS SAC (along 70 km of the corridor) will be of a very short duration. In any case, JNCC (JNCC, 2017; JNCC, 2025) guidelines for minimising injury to marine mammals during geophysical surveys will also be effective in mitigating against disturbance. As a result, a seasonal restriction in the SNS SAC is not considered necessary or proportionate to the scale of the effect.
3.8.23	Vessel collision risk: Paragraphs 4.3.27 & 4.3.28: This section has considered risks to cetaceans separately from seals and provided a standalone conclusion for the SNS SAC. However, we disagree with the assumption that harbour porpoise densities will be low when offshore construction activities occur. Harbour porpoise will be present within the winter part of the site all year round, albeit in lower numbers in the summer season. We also note that slow vessel speeds are anticipated but are not being committed to and there is no reference to managing vessel speed in the oMMMP other than a vague reference to the International Regulations for Preventing Collisions at Sea 1972 (International Maritime Organisation, 1972). We recommend vessel speeds are defined and secured as conditions of consent to support any conclusion of no adverse effect.	The number of harbour porpoise likely to be at risk within the SNS SAC has been calculated based on winter density estimates and using an effective deterrent range (EDR) of 5 km (JNCC, 2020). On the basis that the cable passes through the SNS SAC for approximately 70 km, and an EDR of 5 km (either side of the cable, totalling 10 km), the total EDR area was calculated as 700 km^2, an area which represents less than 2% of the total SNS SAC area. Within the total EDR area of 700 km^2, a total 581 individuals may be at risk, using the winter harbour porpoise density of 0.83 individuals/km^2. This equates to less than 1% of the total harbour porpoise population in the UK portion of the North Sea Management Unit (IAMMWG, 2023). As described in **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals** submitted at Deadline 1 and **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045],** and the above response regarding vessel speeds, the transit speeds of Project vessels will range from 4 - 12 knots in order to maintain a 'safe speed' in compliance with International Regulations for Preventing Collisions at Sea 1972 (International Maritime Organisation, 1972) (as secured in **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC),** submitted at Deadline 1)
3.8.24	Electromagnetic fields (EMF): Paragraphs 4.3.51 & 4.3.52: We agree the risk to harbour porpoise from EMF is low. We also note the conclusions of Chapter 3 of the ES, Fish and Shellfish Ecology, which concluded no significant impact from EMF to the fish species assessed. We agree with the conclusion of no adverse effect from this impact pathway.	This is noted by the Applicant.

Reference	Summary of relevant representation	Applicant's Response
3.8.25	In-combination effects: Section 8 provides a holistic review of potential impacts from the identified projects and overarching conclusions which refer to all European sites. Subsequently we are unable to provide advice regarding in-combination effects to the SNS SAC in relation to the proposed project.	This is noted by the Applicant.
3.8.26	The outline Marine Mammal Mitigation Plan is secured in both the DCO (Schedule 3, Requirement 6) and the deemed Marine Licence (Part 2, Condition 3). Both these requirements state licensed activities must not commence until plans have been submitted to and approved in writing by the MMO in conjunction with JNCC and others. We note both also specify approval must be provided within 16 weeks of submission rather than the applicant committing to submitting the required documents to the MMO a specified time ahead of works commencing. We question whether a commitment relating to when the documents will be submitted would be more beneficial and recommend the applicant engage with JNCC (and Natural England) ahead of submitting the plans to discuss the proposed amendments.	This comment has been noted by the Applicant. The requirement has been secured within the DCO under Schedule 16, Deemed Marine Licence following discussions with stakeholders including Natural England and the MMO. The Applicant will continue to engage with JNCC and Natural England throughout the submission process.
3.8.27	Outline Marine Mammal Mitigation Plan: Section 1.2: JNCC note this document will be updated post-consent (Paragraph 1.2.2); please refer to our previous comments on the conditions in the DCO/dML relating to this plan.	This is noted by the Applicant.
3.8.28	Section 1.4: We question why only legislation relating to territorial waters has been included here given the plan covers activities that will occur in offshore waters? Specifically, The Conservation of Offshore Marine Habitats and Species Regulations 2017. It should be clear this document covers activities in territorial and offshore waters.	**Application Document 7.5.11 (B) Outline Marine Mammal Mitigation Plan** has now been updated to include the offshore regulations, submitted at Deadline 1. The Offshore Regulations were also missing from **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [APP-077].** Therefore, a Version E of this chapter, submitted at Deadline 1, has been updated to include them.
3.8.29	Section 1.5: This section is to provide a summary of marine mammal receptors likely to be encountered during the proposed project however includes reference to the EU Habitats Directive and protection afforded to European Protected Species. This information should be included in the previous section (1.4 Relevant Legislation) and reference the relevant UK legislation not European Directives.	This comment has been noted by the Applicant and assumes JNCC are referring to Section 1.4 and Section 1.3. **Application Document 7.5.11 (B) Outline Marine Mammal Mitigation Plan** has now been updated and submitted at Deadline 1.
3.8.30	Table 1.1: JNCC agree the identified species are those most likely to be present in the study area however highlight that all cetaceans are protected under UK law as European Protected Species	This comment has been noted by the Applicant. **Application Document 7.5.11 (B) Outline Marine Mammal Mitigation Plan** has now been updated and submitted at Deadline 1.
3.8.31	Table 1.2: This lists construction activities that will generate underwater sound. JNCC notes the inclusion of UXO clearance here, however it could be clearer in this table a separate licence will be obtained should this activity be required (as stated in Section 1.11).	This comment has been noted by the Applicant. **Application Document 7.5.11 (B) Outline Marine Mammal Mitigation Plan** has now been updated and submitted at Deadline 1.
3.8.32	Section 7: Paragraph 1.7.2 highlights guidance for managing disturbance within the SNS SAC (JNCC, 2020) as a measure included in Application Document 7.5.3.1 CEMP Appendix A, Outline Code of Construction Practice. However, it is not clear how this guidance has been considered within this mitigation plan (or the CEMP other than saying it will be adhered to). Please see previous comments regarding this guidance and proposed measures for red throated divers.	This comment has been noted by the Applicant, and it is assumed the comment is relating to Section 6, Paragraph 1.6.2. This paragraph has made reference to JNCC (2019) Harbour porpoise (*Phocoena phocoena*) Special Area of Conservation: Southern North Sea - Conservation Objectives and Advice on Operations rather than JNCC (2020). **Application Document 7.5.11 (B) Outline Marine Mammal Mitigation Plan** has now been updated and submitted at Deadline 1. It is noted that JNCC (2019) defines significant disturbance as an activity that excludes harbour porpoise from more than 20% of the relevant area of a site in any given day. The number of harbour porpoise likely to be disturbed within the SNS SAC at any given time has been calculated based on winter density estimates (the most precautionary density estimate) and using an effective deterrent range (EDR) of 5 km (JNCC, 2020). On the basis that the cable passes

Reference	Summary of relevant representation	Applicant's Response
		through the SNS SAC for approximately 70 km, and an EDR of 5 km (either side of the cable, totalling 10 km), the total EDR area was calculated as 700 km^2, an area which represents less than 2% of the total SNS SAC area.
3.8.33	Table 1.3: This table details the roles and responsibilities of personal relevant to this mitigation plan. However, there is no reference to marine mammal observers or passive acoustic monitoring operators. It is possible these are meant to be included under the term 'general operatives' however, this is confusing as it does not use terminology referred to elsewhere in the document (e.g. paragraph 1.8.1) or by industry generally. This table should be amended for clarity.	Marine mammal observers and PAMs have now been added to Table 1.3 in **Application Document 7.5.11 (B) Outline Marine Mammal Mitigation Plan**, submitted at Deadline 1.
3.8.34	Section 1.10: JNCC note the commitment to follow the JNCC marine mammal mitigation guidelines for geophysical surveys (JNCC, 2017). JNCC agree this is sufficient to mitigate the predicted risk of auditory injury from the SBP equipment assessed in the ES, noting our comments above relating to predicted injury ranges. However, paragraph 1.10.2 refers to the potential need to use seismic sound sources. Such sources were not assessed in the ES and if equipment not assessed is to be used, we advise new noise modelling should be undertaken to estimate potential injury ranges to ensure the described mitigation measures will mitigate the predicted risk.	**Application Document 7.5.11 (B) Outline Marine Mammal Mitigation Plan** has now been updated, submitted at Deadline 1, to remove the potential need to use seismic sound sources as such acoustic sources are not required during the Offshore Scheme.
3.8.35	Section 1.10: We highlight that JNCC are currently updating their mitigation guidelines for geophysical surveys and the final MMMP will need to reflect the guidance available at the time.	This comment has been noted by the Applicant. **Application Document 7.5.11 (B) Outline Marine Mammal Mitigation Plan** has now been updated to include draft JNCC (2025) guidelines and submitted at Deadline 1.
3.8.36	Section 11: We note the inclusion of UXO clearance in this plan, and that it clearly states a separate marine licence will be obtained should it be required. The section will be updated accordingly at that time, however, the information currently provided is not clear. Paragraph 1.11.3 states 'Some areas are considered more important for marine mammals than others and require additional or different mitigation measures. Should detonation be required within the SNS SAC, designated for harbour porpoise, additional measures detailed below shall be considered'. It is not clear what these additional measures are, as those listed in the subsequent paragraph (1.11.4) will need to be applied regardless of where the UXO is. We also highlight the list provided in paragraph 1.11.4 do not form a process, as indicated by the preceding text.	This comment has been noted by the Applicant. **Application Document 7.5.11 (B) Outline Marine Mammal Mitigation Plan** has now been updated and submitted at Deadline 1 to make additional mitigation measure clearer.
3.8.37	In conclusion, JNCC agree with the assessment for red throated diver and welcome the proposed restrictions to mitigate impacts upon red-throated diver within the Outer Thames Estuary SPA. We agree with the conclusion of Likely Significant Effect (LSE) for the SNS SAC with regard to underwater sound and vessel collision risk. However, as the approach to screen for LSE has focused on impact pathways rather than the conservation objectives for each site, it is unclear how Conservation Objective 3 for the SNS SAC has been considered. We also have some outstanding concerns which have been highlighted above.	This comment has been noted by the Applicant. Please see responses to separate comments above regarding outstanding concerns. As described in the above responses, the Proposed Project activities are considered to be in line with all conservation objectives for the SNS SAC (JNCC, 2019). JNCC (2019) states that several operations could potentially affect the achievement of Conservation Objective 3 for the SNS SAC, with those of relevance to the current MLA including geophysical surveys and the production of underwater sound. As described in the above responses, project specific modelling has indicated that, using the SPL metric, a permanent threshold shift (PTS) in harbour porpoise has the potential to only occur in individuals that are in very close proximity to the sub-bottom profiler (SBP), i.e. within 63.1 m of the SBP. The source of underwater sound in the SNS SAC will also be constantly moving. All standard mitigation measures, including compliance with JNCC (JNCC, 2017; JNCC, 2025) guidelines will be implemented, as well as the use a marine mammal observer and a 500 m observation zone, as detailed in **Application Document 7.5.11 (B) Outline Marine Mammal Mitigation Plan,** submitted at Deadline 1. Furthermore, the potential number of harbour porpoise which could be disturbed in the SNS SAC has been calculated as 581 individuals which is less than 1% of the total harbour porpoise population in the UK portion of the North Sea Management

Reference	Summary of relevant representation	Applicant's Response
		Unit -(IAMMWG, 2023). This calculation was based on a total EDR area calculated as 700 km^2 which is less than 2% of the SNS SAC total area and therefore in line with JNCC -(JNCC, 2019) Conservation Objective 2. Therefore, due to the negligible disturbance expected, and in line with Conservation Objective 3, the accessibility and therefore availability of prey items and supporting habitat to harbour porpoise is not expected to be affected.

Table 3.9 Applicant's Response to the Relevant Representation of Marine Management Organisation

Reference	Summary of relevant representation	Applicant's Response
3.9.1	This document comprises the Marine Management Organisation's ("MMO") initial comments in respect of the above Development Consent Order application ("DCO Application") in the form of a relevant representation. This is without prejudice to any future representation the MMO may make about the DCO Application throughout the examination process. This is also without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development. The MMO's role in Nationally Significant Infrastructure Projects (NSIPs) The MMO was established by the Marine and Coastal Access Act 2009 (the "2009 Act") to make a contribution to sustainable development in the marine area and to promote clean, healthy, safe, productive and biologically diverse oceans and seas. The responsibilities of the MMO include the licensing of construction works, deposits and removals in English inshore and offshore waters and for Northern Ireland offshore waters by way of a marine licence. Inshore waters include any area which is submerged at mean high water spring ("MHWS") tide. They also include the waters of every estuary, river or channel where the tide flows at MHWS tide. Waters in areas which are closed permanently or intermittently by a lock or other artificial means against the regular action of the tide are included, where seawater flows into or out from the area. In the case of NSIPs, the Planning Act 2008 (the "2008 Act") enables DCO's for projects which affect the marine environment to include provisions which deem marine licences. As a prescribed consultee under the 2008 Act, the MMO advises developers during pre-application on those aspects of a project that may have an impact on the marine area or those who use it. In addition to considering the impacts of any construction, deposit or removal within the marine area, this also includes assessing any risks to human health, other legitimate uses of the sea and any potential impacts on the marine environment from terrestrial works Where a marine licence is deemed within a DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement and revocation of provisions relating to the marine environment. As such, the MMO has a keen interest in ensuring that provisions drafted in a deemed marine licence ("DML") enable the MMO to fulfil these obligations. Further information on licensable activities can be found on the MMO's website here. Further information on the interaction between the Planning Inspectorate and the MMO can be found in our joint advice note 11 Annex B here. Relevant Representation On the 23 April 2025, the MMO received notice under Section 56 of the Planning Act 2008 that the Planning Inspectorate ("PINS") had accepted an application made by National Grid Transmission (the "Applicant") for a DCO Application (MMO ref: DCO/2022/00008; PINS ref: EN020026). The DCO Application includes a draft development consent order (the "DCO") and an Environmental Statement (the "ES"). The draft DCO includes, at Schedule 16, a draft Deemed Consent under Part 4 (Marine Licensing) of the Marine and Coastal Access Act 2009 (the "Deemed Marine Licence")("DML").	The Applicant acknowledges the MMO's engagement with the Proposed Project and their role and remit regarding the development consent process. Responses to the detailed comments provided by the MMO are set out in the sections below.

Reference	Summary of relevant representation	Applicant's Response
	The DCO Application seeks authorisation for the construction, operation and maintenance of the Sea Link interconnector ("Sea Link") compromising of approximately 122 kilometres ("km") High Voltage Alternating Current ("HVAC") cable between the Suffolk landfall location (between Aldeburgh and Thorpeness) and the Kent landfall location at Pegwell Bay.	
3.9.2	Main DCO Part 2 Principal powers Benefits of the Order: The MMO objects to the provisions relating to the process of transferring and/or granting the DML set out in the draft DCO. The MMO does not consider that the 2008 Act allows the DCO to make a provision to transfer the benefit of the DML in the way that is proposed. As such, all references must be removed.	The Applicant notes these concerns and will include additional wording at article 7 (consent to transfer the benefit of Order) within the draft DCO for submission at Deadline 1. This wording is precedented in the East Anglia One North and East Anglia Two DCOs and other DCOs which consented offshore wind farms. The additional wording requires the undertaker to obtain the written consent of the Secretary of State for the transfer or grant of the benefit of the provisions of the DML. The Secretary of State will consult the MMO in any decision by the Secretary of State. This approach is well precedented across other Orders.
3.9.3	Main DCO Part 5 Acquisition of Subsoil or airspace only: Town and country planning act 1990 should be "1990 act"	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.4	Main DCO Part 6 Miscellaneous And General Arbitration: It must be made expressly clear that the MMO is not to be subject to the arbitration provisions. This must be amended to specifically exclude the MMO, as below: "Any matter for which the consent or approval of the Secretary of State of the MMO is required under any provision of this Order is not subject to arbitration"	The Applicant notes the arguments made in relation to arbitration on other development consent orders. Therefore, this suggested wording requested by the MMO will be amended within the next version of the DCO in line with the MMO's comments, removing the MMO from the requirements of arbitration.
3.9.5	DML Part 1 – Licenced Marine Activities Definition: "Buoy" This must be changed to "buoys" as the singular is not used in the DCO.	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.6	"Cable crossings" This must be changed to "cable crossing" as the plural is not used in the DCO.	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.7	"Outline marine mammal mitigation plan" AND "outline invasive non-native species management plan" These are not used within the DCO, they are also out of alphabetical order.	The definitions of these documents have been amended within the DML. These documents were previously listed in Requirement 6 (Construction Management Plans to be approved). However, to ensure consistency and avoid duplication, those documents which are purely marine are now listed and secured within the DML under condition 4 rather than secured by requirement.
3.9.8	"JNCC Guidance" The MMO recommends that this be removed as it is not referred to in the DCO.	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.9	"LAT" The MMO recommends that this be removed as it is not referred to in the DCO.	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.10	"Statutory nature conservation body" The MMO recommends that this be removed as it's only referred to in the JNCC definition which is not used within the DCO.	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.11	"Statutory historic body" The MMO queries if this is the same definition for Historic England, and if so the MMO recommends it be deleted.	This will be amended within the next version of the DCO in line with the MMO's comments, the definition of "Historic England" has also been amended to address any future successor in function.
3.9.12	After "Section 66(1)" the MMO recommends adding "(licensable marine activities)".	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.13	The MMO notes the DML includes a list (pp 131-132) of the licenced activities permitted under the DML. The MMO has reviewed this list but wish to remind the applicant that it is their responsibility to ensure that all licenced activities are included.	This is noted by the Applicant.

Reference	Summary of relevant representation	Applicant's Response
3.9.14	DML Part 1 – Details of licenced marine activities 7. Substances and objects authorised for deposit at sea: The MMO notes the list of substances and objects authorised for deposit, however the final point (i) is too broad a term. The MMO requests that an additional point (j) be included and include the following: "any other substance or article to the extent that the effects of its deposit at sea are will not give rise to any materially new or materially different environmental effects from those assessed in the environmental statement."	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.15	DML Part 1 – Details of licenced marine activities 10. Section 72 of the 2009 act: After "section 72" the MMO considers that "(variation, suspension, revocation and transfer)" must be added. The MMO also highlights the line on benefit of the order and highlights our previous comments under 6. Benefits of the order, above.	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.16	DML Part 1 – Details of licenced marine activities 12 Amendments to the details, plan or scheme: The MMO does not consider "unlikely" to be sufficiently robust. This must be changed to "will not".	This wording is consistent with other recent DMLs such as North Falls and Five Estuaries. Use of the words "will not" is considered overly prescriptive and does not allow for unforeseen circumstances to be accounted for. It may not be possible to definitively confirm a project will not give rise to materially different effects. Paragraph 12 requires agreement from the MMO and therefore does not present a risk of amendments occurring without appropriate scrutiny.
3.9.17	Part 2 – Conditions 2 Extension of time periods: The MMO does not agree with the inclusion of this and requests that it is removed. The wording is not included in a standard marine licence and the MMO does not consider it necessary. All conditions within the DML should include all information relevant to that condition, including in relation to time periods. Further explanation should be provided by the Applicant as to why paragraph 2 is considered necessary within the DML.	The inclusion of extensions of time periods for the submission and discharge of documents secured as part of the DML as an appropriate measure to enable greater flexibility to suit all parties. This inclusion does not weaken any of the conditions included within the DML, as it is only implemented on the agreement of both the Applicant and the MMO. It therefore only provides the potential for increased flexibility should the appropriate need arise.
3.9.18	Part 2 – Conditions 3. (1) (b) Notifications and Inspections: After "copy of this licence" the MMO considers that "and any subsequent amendments or revisions" should be added.	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.19	Part 2 – Conditions 3. (1) (b) Notifications and Inspections: After "copy of this licence" the MMO considers that "and any subsequent amendments or revisions" should be added.	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.20	Part 2 - Conditions 3. (6) Coastal office: The MMO notes that while the coastal office addresses are included on the DML, "Coastal office" should be defined within the definition section with references made to the offices in Part 1 Section 1 Para 4 (b) & (c).	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.21	Part 2 – Conditions 3. (8) Notice to Mariners: The wording of this condition does not make clear what responsibility the undertaker has. The MMO recommends that the condition be amended to include the responsibility of the undertaker to issue the notice.	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.22	Part 2 – Conditions 3. (6) Timescales for notifications: The MMO has reviewed the timescales for notification under 3. (6) – (12). The MMO is satisfied with the timescales given but would suggest that the UK Coastguard notification under 3. (9) is sent no later than seven days prior to the commencement of the activities.	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.23	Part 2 – Conditions Pre-construction plans and documentation 4. (1) Cable Specification and Installation Plan timescale:	Time frames for determinations on key consent documents are common within DMLs and are an essential aspect of this project to provide certainty on project delivery. Delays for consent approval could put at risk the delivery of the Proposed Project by 2030 in line with the ASTI

Reference	Summary of relevant representation	Applicant's Response
	It is inappropriate to put timeframes on complex technical decisions of this nature. The time it takes the MMO to make such determinations depends on the quality of the application made, and the complexity of the issues and the amount of consultation the MMO is required to undertake with other organisations to seek resolutions. The MMO's position remains that it is inappropriate to apply a strict timeframe to the approvals the MMO is required to give under the conditions of the DML given this would create disparity between licences issued under the DCO process and those issued directly by the MMO, as marine licences issued by the MMO are not subject to set determination periods. Whilst the MMO acknowledges that the Applicant may wish to create some certainty around when it can expect the MMO to determine any applications for an approval required under the conditions of a licence, and whilst the MMO acknowledges that delays can be problematic for developers and that they can have financial implications, the MMO stresses that it does not delay determining whether to grant or refuse such approvals unnecessarily. The MMO makes these determinations in a timely manner as it is able to do so. The MMO's view is that it is for the developer to ensure that it applies for any such approval in sufficient time as to allow the MMO to properly determine whether to grant or refuse the approval application.	programme. Time frames provided have been determined to provide sufficient and reasonable time for any consultation requirements and determination decisions. Time frames for decisions by the MMO are also consistent with other recently granted DMLs. In order to mitigate any challenges to approvals, the Applicant has included condition 2 in the DML (see response above for Part 2 – Conditions 2 Extension of time periods) that allows for extensions of time frames for either party when agreed by both, and would not be unduly withheld.
3.9.24	Part 2 – Conditions Pre-construction plans and documentation 6. (1) Compass deviation: The MMO requests that "Licence Holder" is amended to "The undertaker" this is to align with the other conditions within this DCO.	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.25	Part 2 – Conditions Pre-construction plans and documentation 7. (2) Aids to Navigation: The MMO notes the provision on aids to navigation set out in 7. (2). The MMO requests that a further clause be added to this section with the following wording: "(3) The undertaker must keep Trinity House informed of progress of the authorised development seaward of MHWS by way of issuing it with— (i) notice of commencement of construction of the authorised development; (ii) notice of any aids to navigation being established or relocated by the undertaker; and (iii) notice of completion of construction of the authorised development."	
3.9.26	Part 2 – Conditions Chemical, drilling and debris 8. (1) General: At the end insert "as amended."	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.27	Part 2 – Conditions Chemical, drilling and debris 8. (6) Rock material: At the end insert "and containing minimal fines"	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.28	At the end insert "and containing minimal fines"	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.29	Part 2 – Conditions Chemical, drilling and debris 8. (8) dropped object procedure form: The MMO considers that this should not have the first letters capitalised as it is not a defined term.	This will be amended within the next version of the DCO in line with the MMO's comments.
3.9.30	Part 2 – Conditions Chemical, drilling and debris 9. (1) Force majeure: The MMO does not consider provisions on Force Majeure to be necessary as Section 86 MCAA 2009 provides a defence for action taken in an emergency in breach of any licence conditions. The defence under Section 86 of MCAA has two limbs, and in the event that the undertaker fails to notify the appropriate licensing authority, in this case	The Applicant disagrees that 9(2) is not necessary as it is covered by the dropped object procedure. The purpose of the force majeure condition is that it will apply in an emergency scenario. Section 86 of the MCAA provides a defence for actions taken in an emergency whereas this condition is about notifying of a deposit in those circumstances. It does not overlap with s86, which will still apply. The wording is well-precedented in other made DCOs with a deemed marine licence and no change to the draft DCO is proposed.

Reference	Summary of relevant representation	Applicant's Response
	the MMO, within a reasonable time of their actions (Section 86(2) "matters") the defence cannot be relied upon in the event of any enforcement action. If the Applicant maintains that the proposed provision does not duplicate Section 86 MCAA and instead introduces a reporting requirement which did not previously exist, we would advise that it should be made clear that this provision is in addition to Section 86 and its requirements.	
3.9.31	Conditions Chemical, drilling and debris 9. (2) Force majeure: The MMO notes that 9. (2) is covered under the dropped object procedure outlined in 8. (8) and is not required.	See response to 'Part 2 – Conditions Chemical, drilling and debris 9. (1) Force majeure' above.
3.9.32	Part 2 – Conditions Chemical, drilling and debris 12 Maintenance: The MMO has reviewed the provisions set out in section 12 relating to maintenance activities. The MMO requests that those maintenance activities identified in 12. (2) should be expanded to include more information in particular cable repairs. The MMO requests that 12. (1) be amended to read: "The undertaker may at any time maintain, and carry out works of maintenance in connection with, the authorised development except to the extent that— (a) this licence provides otherwise; (b) it is likely to give rise to any materially new or materially different effects to those that have been assessed in the environmental statement or in any environmental information supplied under the 2017 EIA Regulations." The MMO also notes that there is no provision within section 12 for cable inspection surveys, nor notification or reporting in place to inform relevant agencies or bodies that activities are being carried out. The MMO requests this be included. The MMO also requests that regular maintenance reports be submitted post construction and requests that a separate section "Post consent monitoring" be included within the DML which states: "1) An annual maintenance report must be submitted to the MMO in writing within one month following the first anniversary of the date of commencement of operation of the authorised project, and within one month of every subsequent anniversary until the permanent cessation of operation of the authorised project. (2) Each report to which sub-paragraph (1) refers must, unless otherwise agreed in writing with the MMO, provide a record of the licensed activities carried out during the preceding year, the timing of those activities and a summary of the methodologies used in relation to them. (3) Within one month following every fifth anniversary of the date of commencement of operation of the authorised project, the undertaker must submit to the MMO a consolidated maintenance report, which— (a) includes a review of licensed activities undertaken during the preceding five years with reference to the reports submitted in accordance with sub-paragraph (2); (b) reconfirms the suitability of the methodologies and frequencies of the licensable activities permitted by this licence for the remaining duration of this licence."	The maintenance works described in 12 (2) will be expanded to include additional likely maintenance works, including cable repairs and cable inspections, within the next version of the DCO in line with the MMO's comments. Thee applicant will engage further with the MMO regarding notifications for maintenance work and to identify if there are other relevant bodies to be included. The wording the MMO suggests be added as 12(1)(b) is not necessary as the definition of maintain already includes this wording and states that maintain includes '.... *provided such works do not give rise to any materially new or materially different environmental effects to those identified in the environmental statement*.' The Applicant does not agree to the requirements for annual maintenance reports to be submitted under the heading of a "post consent monitoring" section. This is because, unlike offshore wind projects, that require regular maintenance programmes with replacements of component parts and to which this condition usually applies, there is little maintenance anticipated of a protected interconnector cable. Maintenance will only be required if the cable becomes exposed or there is a cable fault. The current schedule of post installation survey campaigns is not determined but will not be a regular annual basis. The Applicant is engaging further with the MMO to consider further the requirements for maintenance reporting.
3.9.33	Conditions Chemical, drilling and debris 13 Deployment of Cable Protection: The MMO notes the provision of this section. The MMO has concerns over the installation of new protection outside of areas where protection has already been installed. The MMO will consider its position on this and provide a response during examination.	This is noted by the Applicant.
3.9.34	Coastal Processes (Part 4, Chapter 1):	This is noted by the Applicant.

Reference	Summary of relevant representation	Applicant's Response
	The MMO agrees with the conclusions regarding what has been scoped in and out. We note that these have been outlined in Document 6.2.4.1, Section 1.3.5 with no major aspects being scoped out of the assessment.	
3.9.35	Table 1.18 summarises the physical environment effects and the significance of impacts. All have been categorised as either negligible; not significant or minor effect, not significant. The MMO agrees with these findings and finds the discussion on the assessment of Impacts in Section 1.9 to be well reasoned.	This is noted by the Applicant.
3.9.36	The MMO notes the comprehensive list of data sources provided for the desk study (Section 1.4.5, Document 6.2.4.1) alongside data gathered in intertidal, subtidal and geophysical surveys. The MMO also notes that no site-specific field measurements of waves, currents or sediment concentrations have been collected along the offshore scheme, which, as noted in the ES, is a minor limitation to the assessment. Modelled and empirical datasets from sources have instead been used, which the MMO considers acceptable.	This is noted by the Applicant.
3.9.37	The MMO notes the select amount of Embedded Mitigations in Section 1.8 (Document 6.2.4.1) and management measures mentioned, including best practices for vessels, construction techniques and the need for a Construction Environmental Management Plan (CEMP) to be in place. These are all reasonable measures and as there is no significant impact predicted for physical processes the MMO considers this is sufficient.	This is noted by the Applicant.
3.9.38	Dredge and Disposal: The MMO notes that Section 1.7.123 states that a survey of sampling was undertaken in 2022 which comprised 32 grab samples – the report then briefly discusses some of the results. No significant detail is provided as to the location of the sample sites, however based on the description of one of the sample stations as being "5km southeast of…Ramsgate", the MMO assumes that this survey is intended to characterise the cable corridor, whilst the intertidal survey report (Appendix 4.2.C) evidently characterises the cable landfall areas in Kent and Suffolk. The MMO has been unable to identify a copy of the report and requested this from the Applicant. However, at time of writing the report has not been received.	This is noted by the Applicant. The MMT Survey Report (2022) referenced in this section is included in the application as Application Document 6.3.4.2.A Benthic Characterisation Report (Original Report). This survey was undertaken in October 2021. An additional survey has also been undertaken by Next Geo between 22/08/2024 – 03/09/2024 to supplement this data to sample 5 areas along the offshore route where the Offshore Scheme Boundary deviates from the 2021 survey area. This includes areas identified for pre-sweeping.
3.9.39	Therefore, the Applicant must provide the survey report for review, as qualitative information is insufficient to characterise the material in terms of contaminant risk. They must also ensure that the contracting laboratory is highlighted. These data must, ideally, be presented in the MMO Results Template as the data aim to characterise dredging and disposal activity which is a relevant activity under the London Protocol and OSPAR Convention.	This is noted by the Applicant. A draft version of the 2024 survey report including results was sent over to the MMO for review on 29th May 2025. All analysis in this report was conducted by MMO approved laboratories. The final report for this additional offshore survey from 2024 can be submitted as supplementary information- if required~~on XX if required~~.
3.9.40	The MMO notes the qualitative information lightly discusses some contaminants, such as the background levels of certain metals which are known to exceed Cefas Action Level 1 in North Sea Sediments. The MMO agrees with this. Total Hydrocarbon Content (THC) is referred to as exceeding a Dutch sediment standard, however, the MMO recommends disregarding any THC data altogether as it can provide no real indication of contaminant risk.	This is noted by the Applicant.
3.9.41	Intertidal samples were collected in line with the MMO guidelines and analysed by SOCOTEC for an expanded list of trace heavy metals, THC and 2 – 6 ring aromatic Polycyclic Aromatic Hydrocarbons (PAHs) and the Environmental Protection Agency (EPA) 16 list of PAHs. Ten samples were collected from the Kent site, and 6 samples were collected from the Suffolk site. This is noted by the Applicant. The scope of this	This is noted by the Applicant. The scope of this intertidal survey was to acquire baseline habitat and environmental information of both Suffolk and Kent Landfalls to inform our assessment. The initial range of samples were collected to inform understanding of conditions at the landfall sites but were subsequently supported with further samples across the corridor route and were agreed with the MMO and assessed in line with their requirements.

Reference	Summary of relevant representation	Applicant's Response
	intertidal survey was to acquire baseline habitat and environmental information of both Suffolk and Kent Landfalls to inform our assessment. The initial range of samples were collected to inform understanding of conditions at the landfall sites but were subsequently supported with further samples across the corridor route and were agreed with the MMO and assessed in line with their requirements. Total Organic Carbon and Total Organic Matter were also tested for, as well as Particle Size Analysis (PSA). The MMO notes that SOCOTEC are in the process of finalising validation for this analysis however the MMO notes that at the time, SOCOTEC were not validated for this analysis.	
3.9.42	At the Kent site, samples were predominantly sand, except for sample L2 which was predominantly silt, however, this site is located within the Lagoon area (hereafter referred to as the "Lagoon sample"). Metals are entirely below Action Level (AL) 1 in each sample except for the single Lagoon sample, which somewhat or marginally exceeds AL1 for mercury, nickel and lead. Zinc is also notably closer to its AL2 value than to its AL1 value (zinc content = 600 mg/kg). Copper exceeds AL2 (copper content = 565 mg/kg). The non-Lagoon samples indicate low TOC, whilst the Lagoon sample indicates high TOC (i.e. above 2.5%). This aligns with the PSA data (where the finer-grained samples have higher TOC) and is also broadly consistent with the trend in PAH content, wherein the lowest TOC samples also have low PAH results. There are outliers however, such as sample PT2U which has comparable PAH results to the Lagoon sample, which is unexpected considering the very different TOC content (0.49 vs 3.36% respectively).	This is noted by the Applicant.
3.9.43	Section 4.6.179 states that Bentonite will be used as a drilling fluid and that: *"Bentonite is listed by the Centre for Environment, Fisheries and Aquaculture Science (CEFAS) as non-CHARMable (Chemical Hazard Assessment and Risk Management), and it is on the Pose Little or No Risk to the Environment (PLONOR) list. To condition the water to the correct pH, soda ash is added at <0.1% of the fluid volume. Small amounts of environmentally approved additives may also be used to fine tune the fluid properties"* Whilst this chemical might be listed as non-CHARMable, this relates only to its use at a generic oil and gas installation and has no utility in any other offshore activity. The modelling undertaken during chemical assessments is parameterised very specifically to typical use in oil and gas infrastructure. The Offshore Chemical Notification Scheme (led by Cefas) very clearly states that use of its resources is not appropriate for any non-oil and gas project. On this basis, this section must be corrected. Whilst on the OSPAR PLONOR list the risk from fracking/break out and smothering must also be considered.	This is noted by the Applicant. The reference to CEFAS classifications of drilling fluid is intended to illustrate the low risk to the marine environment posed by drilling fluid discharges in the absence of an alternative regulation scheme appropriate to the case of landfall HDDs. It should be noted that drilling fluid discharges from oil and gas installations are an order of magnitude larger than those from landfall drills. The risk of drilling fluid frac out/break out will be assessed through the use of hydrofracture modelling; please refer to Application Document 7.3 Design Development Report – Appendix A Landfall HDD Feasibility Technical Note, Sections 2.3.6 and 3.3.5 [APP-321]. Additionally, there are commitments to assessing and managing the risk of drilling fluid surface frac out / break out provided in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** which is superseded by an updated version of the REAC **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 1**.** • Measure B09 includes seven specific measures to manage the risk of frac out. These include: - Ensuring sufficient surveys have been undertaken to understand the ground conditions to inform the final design; - Design a profile sufficiently deep for the methodology and conditions, with hydrofracture modelling used to check that there is sufficient factor of safety; - Use of a drilling fluids engineer to design and monitor the fluid properties; - Ensure that the trenchless bore is sufficiently clean of cuttings during drilling - Monitoring fluid pressures in the bore, and returns to the entry pit during drilling;

Reference	Summary of relevant representation	Applicant's Response
		- The use of "spotters", personnel stationed above the onshore drill line to look for any frac out or break out; and - If drilling fluid losses occur, lost circulation material (LCM) may be added to seal the ground. As a last resort, cementitious grout may be used to seal fractures • Measure GH10 commits to the provision of a HDD drilling fluid management plan which includes drilling fluid breakout mitigation measures to be developed by the contractor and included within the Offshore and Onshore CEMPs. All relevant permits will be obtained or exemption/exclusions registered by the Main Works Contractor(s) for the use of drilling fluids / additives, as applicable. • Measure LVS05 includes specific methods for avoidance of risk to the marine environment from the discharge of drilling fluid. Please note that while bentonite drilling fluid released to freshwater environments has the potential for smothering benthic flora and faunal breeding sites, in the marine environment the combination of rapid saltwater degradation of the drilling fluid combined with currents and wave action, disperse the drilling fluid, preventing smothering.
3.9.44	The MMO therefore requests the Applicant provide a chemical risk assessment including clarification on the volumes to be used and discharged to the marine environment and the content of the bentonite product that will be used. The MMO also requests clarification on the approval regime the Applicant is referring to when they refer to "environmentally approved additives" as the MMO is not aware of any such environmental approval regime for use in cabling.	This is noted by the Applicant. Chemical risk assessments are typically produced by the Marine Contractor / HDD Contractor at the detailed design phase of the project. The assessments will include chemical contents contained within the bentonite-based drilling fluid. It is understood that any chemical additives used in HDD for offshore wind farms do not need to be on the CEFAS approved list, and an offshore chemicals permit is not required. However, the activity may still need to be covered by the relevant licence and any conditions that are specified in this license will need to be adhered to. A commitment is included in **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 1 in relation to trenchless landfall works at both Suffolk and Kent. This requires contractor(s) to: • Notify NE of changes to landfall HDD depth or any changes to the location of landfall exit pit • Prepare a HDD landfall Method Statement and Drilling Fluid Management Plan which are to be shared for information only with NE Undertake HDD landfall hydrofracture modelling which is to be shared for information only with NE when completed.
3.9.45	Benthic ecology (Part 4, Chapter 2): The MMO considers that all relevant benthic ecology receptors have been scoped into the assessment and all relevant impacts from the Project have been considered. The MMO agrees with the conclusions reached.	This is noted by the Applicant.
3.9.46	The MMO defers to the relevant Statutory Nature Conservation Bodies ("SNCBs") regarding the potential impacts of the proposed development on the conservation features of designated protected areas.	This is noted by the Applicant.
3.9.47	Fish & Shellfish ecology (Part 4, Chapter 3): The MMO considers that all relevant fish and shellfish receptors have been scoped into the assessment and all impacts from the project have been considered. The MMO agrees with the conclusions reached.	This is noted by the Applicant.
3.9.48	The MMO considers the evidence base for fishery impacts to be appropriate. The Applicant has used the spawning and nursery ground maps by Coull et al. (1998) and	This is noted by the Applicant.

Reference	Summary of relevant representation	Applicant's Response
	Ellis et al. (2012) to identify areas of potential sensitivity for commercially important fish species. For the habitat suitability assessments for spawning herring and sandeel, the Applicant has followed the methods described by MarineSpace (2013a & 2013b). The Applicant may wish to note for future reference that these methods have recently been updated (see Kyle-Henney et al., (2024) and Reach et al. 2024 for further information on herring and sandeel, respectively).	
3.9.49	The data used to create the 'heat' maps for potential herring spawning habitat and sandeel habitat include European Marine Observation and Data Network ("EMODnet") seabed sediment data, vessel monitoring system (VMS) data and 10 years of International Herring Larvae Survey (IHLS) data for the years 2008 - 2017. Ordinarily, the MMO would expect the Applicant to use the most recent 10 years of IHLS data to inform their assessment (IHLS data up to 2024 are available). The MMO notes the Applicant's comments that *"more recent IHLS data do not include the field 'number of larvae caught per m2 ".* Furthermore, there was no reference to the International Council for the Exploration of the Sea ("ICES") Statistical Rectangle division to which each haul ID could be referenced which would allow a contour plot to be produced as per MarineSpace *et al.*, (2013a; 2013b) guidance. For future reference, for IHLS data up to 2017, the table of downloaded data includes a column for number of larvae per m2, but in post-2017 IHLS data, this column is not included. However, the number of larvae caught per m2 in post-2017 data can still be calculated by dividing the numbers of larvae by the volume and multiplying this by the max. depth of the sampler (n.b. do not use the water depth). The coordinates for the locations of the IHLS survey stations are available from ICES.	This is noted by the Applicant.
3.9.50	PSA data acquired during the project's benthic survey has been interpreted appropriately according to their sediment classification (as per Folk, 1954) and categorised in terms of their suitability as herring spawning habitat and sandeel habitat, following the methods described by Reach et al. (2013) for herring and Latto et al. (2013) for sandeel. The data have been presented in mapped form in Appendix 4.3.A to support the habitat suitability 'heat' maps.	This is noted by the Applicant.
3.9.51	The cable route is shown to pass to the west of the Downs herring spawning ground (as per Coull et al. (1998) with a small section of the cable corridor passing through 'preferred' herring spawning habitat based on the EMODnet data, whilst the majority of 'preferred' herring spawning habitat lies beyond the project boundary. There is also a reasonable correlation between the EMODnet data with some of the PSA data from the project's site-specific benthic survey. The IHLS data used in the potential herring spawning habitat 'heat' map show that lower concentrations of herring larvae are found in the project boundary, compared with the established spawning ground (as per Coull et al. (1998)) further east, where higher concentrations of larvae occur. The Applicant notes that larval drift due to strong North Sea currents is understood to explain the presence of larvae in the project area, rather than due to the presence of spawning habitat. The MMO generally agrees with this statement, though given the suitability of the seabed sediments in some areas of the project boundary, it cannot be ruled out that some spawning by herring may occur within the boundary, albeit at a lower intensity.	This is noted by the applicant**. Application Document 6.3.4.3.A Part 4 Marine Chapter 3 Appendix A Herring and Sandeel Assessment** identified the presence of potential herring spawning habitat within the central sections and nearshore area in the south, as identified by the EMODnet data and MMT benthic characterisation survey. As stated by the MMO, the suitability of these seabed sediments in these locations cannot rule out the potential of spawning, noting that it is of lower intensity. A precautionary approach has been taken within **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology** and has assessed the potential effects to these habitats, accordingly, concluding no significant effects.
3.9.52	The MMO notes that a seasonal restriction from 01 November – 31 March inclusive will be implemented for all offshore cable installation activities, excluding the pre-lay grapnel run (PLGR), and a restriction of 01 January to 31 March inclusive for landfall works to protect red-throated diver in the Outer Thames Estuary SPA. This period coincides with the spawning season for Downs herring (November – January) and	This is noted by the Applicant.

Reference	Summary of relevant representation	Applicant's Response
	spawning and hibernation period for sandeel (November – February) so may limit adverse impacts during these sensitive periods, particularly to sandeel which have widespread habitat in these locations	
3.9.53	Marine Mammals & underwater noises (Part 4, Chapter 4): The MMO notes that Unexploded Ordnance (UXO) clearance may be required as part of the seabed preparation works. This would be undertaken via separate marine licence application (one for exploration and one for clearance). The MMO considers that the impacts from UXO on underwater noise should be assessed at the time of those marine licence applications.	This is noted by the Applicant.
3.9.54	Marine Ornithology (Part 4, Chapter 5): The MMO defers to the relevant SNCBs regarding the potential impacts to marine ornithology and will maintain a watching brief on anything that may fall within the MMO's remit, such as DML conditions	This is noted by the Applicant.
3.9.55	Marine Archaeology (part 4, chapter 6): The MMO defers to Historic England regarding the potential impacts to marine archaeology that may occur and will maintain a watching brief on anything that may fall within the MMO's remit, such as DML conditions.	This is noted by the Applicant.
3.9.56	Shipping and Navigation (Part 4, Chapter 7): The MMO defers to the Maritime and Coastguard Agency, Trinity House, and relevant Harbour Authorities regarding the potential impacts on shipping and navigation that may occur because of the Project.	This is noted by the Applicant.
3.9.57	The MMO will maintain a watching brief on anything that may fall within the MMO's remit, such as DML conditions.	This is noted by the Applicant.
3.9.58	Commercial Fisheries (Part 4, Chapter 8): The MMO agrees with the embedded mitigation measures and proposed mitigation measures for commercial fisheries including the appointment of a Fisheries Liaison Officer and the implementation of a process for claims on lost / damaged gear.	This is noted by the Applicant.
3.9.59	The MMO defers to other fishery stakeholders for further impacts but will maintain a watching brief on anything that may fall within the MMO's remit, such as DML conditions.	This is noted by the Applicant.
3.9.60	Other Sea Users (Part 4, Chapter 9): The MMO defers to the Ministry of Defence regarding the potential impacts on military activity and munitions that may occur because of the Project.	This is noted by the Applicant.
3.9.61	The MMO defers to the Royal Yachting Association and relevant Inshore Fisheries and Conservation Authorities and Harbour Authorities regarding the potential impacts on recreational boating and sailing, diving and water sports, and recreational fishing and aquaculture that may occur because of the Project.	This is noted by the Applicant.
3.9.62	The MMO will maintain a watching brief on anything that may fall within the MMO's remit, such as DML conditions.	This is noted by the Applicant.
3.9.63	Other matters:	This is noted by the Applicant.

Reference	Summary of relevant representation	Applicant's Response
	The Applicant has correctly identified that the proposed development is within the East Marine Plan area and provided a Marine Plan Policy Assessment. The MMO will review and provide comments on this document at Deadline 1.	
3.9.64	The MMO has some concerns in relation to both the details within the ES and the content of the draft DCO and DML. We strongly recommend that the Applicant engage with the MMO throughout the process in order to ensure the assessment is as smooth as possible and agreements can be reached through a Statement of Common Ground.	This is noted by the Applicant. Specific comments have been addressed above.

Table 3.10 Applicant's Response to the Relevant Representation of National Highways

Reference	Summary of relevant representation	Applicant's Response
3.10.1	Strategic Road Network: To understand the proposals impact upon the SRN in both Suffolk and Kent.	***Suffolk*** The anticipated impact upon the Strategic Road Network (SRN) in Suffolk as a result of the Suffolk Onshore Scheme is detailed in **Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122]**. The Seven Hills Interchange (A14 Junction 58) is the nearest SRN junction to the Suffolk Onshore Scheme, located approximately 27 km south of the Order Limits. This junction connects the A14(T) with the non-trunk portion of the A12. The forecast SRN distribution is that up to 85% Heavy Goods Vehicles (HGVs), 45% Light Goods Vehicles (LGVs) and 45% staff could potentially travel via the A12/ A14 Junction 58 (Seven Hills Interchange) based on the worst-case assumptions from the main assessment work presented within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, where the majority of HGVs are expected to enter/ exit the study area via the A12 to the south. The distribution of staff is based on a simple gravity model which considers construction workers living within a 60-minute catchment of the site who could theoretically be employed by the Proposed Project. The distribution of LGVs is expected to be similar to staff, and the same distribution has therefore been adopted. Utilising the above distribution, on the busiest construction day in terms of construction vehicle movements, the total forecast SRN movements are 344 total daily vehicle movements (arrivals + departures) which includes staff vehicles, LGVs and HGVs. The weekday peak hour flows on the SRN (8am-9am and 5pm-6pm) are however well below 30 vehicles per hour (18 and nine vehicles respectively), which is the typical threshold that is adopted to determine whether further appraisal may be required. Where forecast flows exceed this level, these will occur during the 'shoulder' peak hours (7am-8am and 6pm-7pm) and managed through the measures set out within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]**. There will be fewer construction vehicle trips on the SRN than the levels assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** for the local highway network within the Study Area (which will accommodate all construction vehicle movements). Therefore, based on the main assessment in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, which concludes that there are not expected to be any significant effects on the highway network as a result of the Proposed Project, the lower levels of forecast construction vehicle movements on the A14(T) are similarly not expected to have any likely significant effects on the SRN. Furthermore, the SRN is likely to accommodate higher baseline traffic flows than the local highway network and proportional increases as a result of construction traffic will therefore be lower than the levels assessed for the Proposed Project elsewhere. Further details to inform the above conclusions are set out within **Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122]**. ***Kent*** The anticipated impact upon the SRN in Kent as a result of the Kent Onshore Scheme is detailed in **Application Document 6.3.3.7.A ES Appendix 3.7.A Transport Assessment Note [APP-175]**. The M2 Junction 7 with the A2 (circa 35 km east of the Order Limits) and A2/A256 junction in Dover (circa 23 km south of the Order Limits) are the two nearest SRN junctions to the Kent Onshore Scheme. The forecast SRN distribution is that up to 10% HGVs, 10% LGVs and 15% staff could potentially travel via the A2 / A256 junction and that up to 90% HGVs, 65% LGVs and 50% staff could potentially travel via the M2 Junction 7, based on the assumptions from the main assessment

Reference	Summary of relevant representation	Applicant's Response
		work presented within **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**. The distribution of staff is based on a simple gravity model which considers construction workers living within a 60-minute catchment of the site who could theoretically be employed by the Proposed Project. Utilising the above distributions, on the busiest construction day in terms of construction vehicle movements, total forecast SRN movements are 60 total daily vehicle movements (arrivals + departures) for the A2 (south) and 340 total daily vehicle movements for the M2 (west). The peak hour flows on the SRN (8am-9am and 5pm-6pm) do not exceed 30 vehicles per hour for the A2 (south) or M2 (west), which is the typical threshold that is adopted to determine whether further appraisal may be required. Where flows exceeding this are forecast, these will occur during the 'shoulder' peak hours (7am-8am and 6pm-7pm) and managed through the measures set out within **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]**. There will be fewer construction vehicle trips on the SRN than the levels assessed within **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]** for the local highway network within the study area (which will accommodate all construction vehicle movements). Therefore, based on the main assessment in **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**, which concludes that there are not expected to be any significant effects on the highway network as a result of the Proposed Project, the lower levels of forecast construction vehicle movements on the A2 (south) and M2 (west) are similarly not expected to have any likely significant effects on the SRN. Furthermore, the SRN is likely to accommodate higher baseline traffic flows than the local highway network and proportional increases as a result of construction traffic would therefore be lower than the levels assessed for the Proposed Project elsewhere. Further details to inform the above conclusions are set out within **Application Document 6.3.3.7.A ES Appendix 3.7.A Transport Assessment Note [APP-175]**.

Table 3.11 Applicant's Response to the Relevant Representation of Network Rail Infrastructure Limited

Reference	Summary of relevant representation	Applicant's Response
3.11.1	The Scheme involves construction of converter stations, HVAC and HVDC underground cables, and connections to offshore HVDC cabling. Network Rail (NR) is a statutory undertaker responsible for rail infrastructure across Great Britain.	Comments noted.
3.11.2	Affected Network Rail assets include Kent: 14 plots where NR is owner/occupier; 22 plots where NR has rights. Suffolk: 3 plots where NR has rights. All plots are subject to proposed compulsory acquisition powers. Assets affected include operational railway land (Chatham and Southeastern line), bridges, and level crossings.	The Applicant welcomes Network Rail's engagement with the Proposed Project and seeks to maintain ongoing dialogue with them regarding identified asset interfaces.
3.11.3	Discussions are ongoing with the Promoter. A Memorandum of Understanding and Basic Asset Protection Agreement are in place. Agreement is yet to be reached on the detail of the proposals and this will be required before Network Rail can withdraw their objection to the Scheme.	The Applicant acknowledges that further engagement is required to provide Network Rail with further details of the Proposed Project and negotiate Protective Provisions accordingly. Issues discussed with Network Rail in dialogue to date have been recorded in a SoCG.
3.11.4	Network Rail's Concerns and Position on the Scheme include: Safety & Operational Impact: • Network Rail is focused on ensuring the Scheme does not negatively affect bridges, crossings, or railway operations during construction, operation, or decommissioning.	The Applicant is cognisant of Network Rail's assets that interface with the Proposed Project and its concerns about how these are addressed in the draft DCO. However, the Applicant is seeking to agree terms that will provide suitable assurances for these assets and land rights over the lifetime of the Proposed Project.
3.11.5	Traffic Management Concerns: • Suffolk: 638 vehicle movements/day at peak, including 346 HGVs. • Kent: 508 vehicle movements/day at peak, including 216 HGVs. • No details provided on decommissioning traffic impacts. • Network Rail requires control over vehicle movements near railway infrastructure to ensure safety.	The Applicant will maintain ongoing dialogue with Network Rail regarding its concerns about potential effects arising from the Proposed Project. The Traffic and Transport assessments, including those in **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan — Suffolk [APP-337]** and **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan — Kent [APP-338]**, have considered vehicle movements. The assessments conclude that, with the proposed mitigation, no significant adverse effects are anticipated. Nonetheless, the Applicant has committed to ongoing dialogue with the Local Highway Authority to ensure that any concerns are addressed through detailed construction planning and coordination.
3.11.6	Review & Engagement: • Engineers are reviewing the Outline Construction Traffic Management Plans (CTMPs). • Discussions with the Promoter are ongoing	Comments noted.
3.11.7	Objection to Compulsory Powers: • Network Rail sees no compelling public interest case for compulsory acquisition of its land. • Believes such powers would cause serious detriment to its operations, with no alternative land available to offset the impact. • Objects to all compulsory powers affecting its property and interests	The Applicant acknowledges Network Rail's views on this matter which will be discussed through ongoing dialogue relating to the agreement of Protective Provisions. Dialogue on land/property has been fairly limited at this stage, however, the Applicant has received NRIL's standard Heads of Terms for review.

Reference	Summary of relevant representation	Applicant's Response
3.11.8	Conditions for Withdrawal of Objection include Formal Agreements with the Promoter to regulate: • Acquisition of rights and execution of works on railway property. • Protection of Network Rail's statutory undertaking during nearby works. • Use of bridges and crossings by construction and operational traffic. • Promoter's liability for repairs/upgrades to affected infrastructure. • Safe systems for movement of large or slow vehicles. Protective Provisions: • Must be included in Schedule 15 of the draft Development Consent Order (DCO). • A draft has been provided to the Promoter. • Framework Agreement: • Still to be provided, adjusted, and agreed upon. Ongoing Review: • Network Rail continues to assess the Promoter's plans and documents. • Constructive engagement is ongoing to resolve outstanding issues. Safety Assurance: The Examining Authority and Secretary of State must be satisfied that railway safety and operations will not be compromised.	The Applicant welcomes Network Rail's commitment to ongoing, constructive engagement. Ongoing dialogue will maintain progress towards resolving the identified matters of concern, as addressed in the responses to comments above and will be captured in the SoCG, Protective Provisions, Framework Agreement, and other agreements as necessary.

Table 3.12 Applicant's Response to the Relevant Representation of Northumbrian Water Limited

Reference	Summary of relevant representation	Applicant's Response
3.12.1	We are instructed by Northumbrian Water Limited (NWL) in relation to the application for a Development Consent Order (DCO) in respect of the Sea Link Project (the Project). NWL are landowner, statutory undertaker and a Statutory Party for the purposes of The Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015. For the avoidance of doubt, NWL hereby give notice that it wishes to be considered an Interested Party for the purposes of this matter pursuant to Section 89(2A)(b) of the Planning Act 2008.At present, no protective provisions and/or asset protection agreements have been agreed with NWL, and as such NWL cannot confirm that it will not suffer serious detriment to the carrying on of its undertaking as a result of the compulsory acquisition of land or as a result of the acquisition of rights over land by the Applicant.	The Applicant welcomes Northumbrian Water Limited's (NWL) engagement with the Proposed Project and seeks to maintain ongoing dialogue with them.
3.12.2	NWL is unable to agree the Protective Provisions set out in Schedule 15 to the Draft Order. As a result of the above, NWL must register its objection to the proposed DCO pending the agreement of suitable protective provisions and/or asset protection agreement. We will endeavour to reach agreement in respect of the above with the Applicant's representatives at the very earliest opportunity.	The Applicant acknowledges NWL's request for bespoke Protective Provisions and has undertaken a review of the identified asset interfaces as a basis for further discussion on this matter. The Applicant will continue to engage further with NWL to seek agreement on the terms for asset protection and compulsory acquisition and their inclusion in the draft DCO. The Applicant has recorded the issues discussed with NWL in dialogue to date and will seek to issue a SoCG

Table 3.13 Applicant's Response to the Relevant Representation of the Port of London Authority

Reference	Summary of relevant representation	Applicant's Response
3.13.1	1.1 The Port of London Authority (the "PLA") is the statutory harbour authority for the tidal Thames (the "River"). The River covers approximately 95 miles from Teddington to the North Sea between Clacton in Essex and Margate in Kent. The PLA's statutory functions include responsibility for conservancy, including dredging and improvement of the River; managing public navigation and ensuring navigational safety and controlling vessel movements. Its consent is required for the construction or carrying out of all works in the River, which includes dredging of the River. The PLA's area of jurisdiction and regulatory powers are found primarily in the Port of London Act 1968 (the "1968 Act"). The proposed project lies outside of the PLA's landownership and limits under the 1968 Act; however the southern part of the cable route is within the PLA's Vessel Traffic Services ("VTS") area where the PLA oversees traffic management. The PLA's functions include the promotion of the use of the River for freight and passengers as an important and sustainable transport corridor and access to the River is therefore a key concern for the PLA.	The Applicant acknowledges the Port of London Authority's (PLA) role and spatial extent, and notes that the PLA's Vessel Traffic Services extend across the southern part of the Proposed Project cable route.
3.13.2	1.2 The River is home to the Port of London which is the country's biggest port and its contribution to international trade is critical, handling over 50 million tonnes of goods each year. The Port is expected to grow and by 2050 between 70-80 million tonnes will be handled at the Port annually (which represents around a 30-60% increase on 2022 levels). The port and river complex delivers an annual gross value added economic contribution of £4.5 billion with investment between 2020 and 2025 projected to exceed £1 billion. This approach is supported by the National Policy Statement for Ports (January 2012) and furthermore by the 'Proposal for a revised National Policy Statement for Ports' published in June 2025 which encourage the promotion of successful major port developments which are essential for trade and economic growth long-term. It is supported specifically in respect of the River by the PLA's Thames Vision 2050, which in relation to the theme "Trading Thames" sets out priorities to enable future growth of the Port. In addition, the River is the UK's busiest inland waterway for the movement of freight, thus facilitating sustainable transport of goods within the UK.	The national and commercial significance of the Port of London is noted by the Applicant.
3.13.3	1.3 It is therefore imperative that the existing and future capacity and operation of the Port of London are not compromised during construction and operation of the Sea Link Project.	The Applicant acknowledges the importance of minimising any disruption from the Proposed Project's construction or operation and maintenance phases to the operation of the Port of London. Assessment of potential impacts can be found within **Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]**.
3.13.4	1.4 The PLA has reviewed the application documents and has comments on the draft Development Consent Order [APP-007] **("dDCO")** and other application documents referenced in this Representation. Full details of the PLA's concerns will be provided in its Written Representations to the Examination and will include the broad issues set out below. The PLA reserve the right to alter, amend or expand on its concerns through the Examination process.	The Applicant will anticipate the PLA's Written Representations and will continue to engage with the PLA through the Examination process. A Statement of Common Ground (SoCG) between the Applicant and the PLA has been drafted, capturing matters discussed to date.
3.13.5	Shipping and navigation: 2.1 The Sea Link Project is outside of the PLA's landownership and statutory limits under the 1968 Act, including its licensing area, but as set out above, the southern part of the cable route is within the PLA's VTS area. Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment [APP-203] and Figure 6.4.4.7.A Ports and navigation [APP-283], highlight how there are multiple ports and harbour authority areas which overlap with the shipping and navigation study area including the Port of	The Applicant notes the PLA's recommendation to seek views from the Port of Tilbury and the London Gateway, and can confirm that the Applicant has received Relevant Representations from both of these stakeholders. Responses to these Relevant Representations will be submitted to PINS at Deadline 1, in addition to this response. The Applicant can confirm that London Gateway was specifically engaged early on at the start of the project but that these two ports fall outside of the Sea Link 10 NM shipping and navigation

Reference	Summary of relevant representation	Applicant's Response
	London. The Port of Tilbury and London Gateway Port do not appear to have been engaged with prior to the submission of the application and itis unclear whether any terminals or shipping lines have been engaged with. The PLA would recommend as a minimum that views of the Port of Tilbury and London Gateway are sought on the proposed project.	study area, however, we have and will continue tol seek to engage further with these two ports.
3.13.6	2.2 Of great significance is the route and depth of the proposed offshore cables which forms Work No. 6 and its proximity to: · Channels used to enter and exit the Port of London · Pilot boarding stations (which are general areas where the boarding and landing of pilots takes place) and · Anchorages	Nearby navigational features including pilot boarding stations and anchorages are identified in **Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]**. These highlighted concerns are noted by the Applicant.
3.13.7	2.3 Sea Link has the potential to cause short and long term impacts to navigation and to the capacity and operation of the Port of London, particularly from the works associated with the offshore HVDC cable. These impacts include: · Permanent impacts because of the depth of the offshore cables; · Temporary impacts from cable laying and repair; · Temporary impacts from pre construction surveys and activities and post construction surveys; · Permanent impacts from interaction with third party schemes (cable crossings); · Temporary impacts from interaction with third party schemes (simultaneous operations); and · Temporary and permanent impacts from dredging	The Applicant notes the concerns raised by the PLA. These potential impacts to shipping and navigation are assessed within **Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]**. Specifically, regarding the potential impacts of simultaneous operations and cable crossings, these matters are subject to further discussion and engagement between the Applicant and key shipping and navigation stakeholders. The Applicant is working with shipping and navigation stakeholders to reassure and find agreement on simultaneous operations and water depth concerns. Additionally, the Applicant is producing a communication protocol in the form of a Navigation Installation Plan (NIP) to enable collaboration with other offshore developments. The NIPi establishes the plan for communication throughout key project phases, in particular the construction phase. This is noted in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080]**. The NIP also establishes the 'Concurrent Activity Area' within which restrictions would apply to simultaneous Restricted in Ability to Manoeuvre (RAM) vessel operations with other offshore developments. The Applicant has submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to the ExA's s89(3) letter dated 5 August 2025. Discussions are ongoing with shipping and navigation stakeholders on the extent of impacts identified to water depth from cable burial and potential interactions with future dredging to be agreed and resolved.
3.13.8	2.4 The range of impacts vary from vessel displacement and delays to placing a constraint on the size of vessel that can enter the Port of London and therefore the capacity of the Port of London. The Sea Link application needs to provide clarity and confidence that long term access/egress to the Port of London would be maintained and that short term impacts during construction and maintenance would be kept to a minimum.	The Applicant acknowledges the PLA's point about needing to provide clarity and confidence surrounding long term access to the Port of London and seeks to engage further with the PLA to provide assurance on this matter and provide greater clarity. The Applicant has been working with the PLA to understand areas where the PLA wishes to safeguard water depth to ensure long term access to the Port of London and will continue to do so through pre-Examination with the goal of reaching agreement on this matter and minimising potential impacts.
3.13.9	Permanent impacts as a result of the offshore cable depths: 2.5 Part 4 Marine Chapter 7 "Shipping and Navigation" of the Environmental Statement [APP-080] notes that in line with MCA guidance, it is not planned to reduce the existing navigable water depth by more than 5% along any section of the cable (with respect to Chart Datum). It is therefore expected that under-keel clearance is only reduced at a	The Applicant agrees with this summary of the current Proposed Project position on any potential reduction in water depth.

Reference	Summary of relevant representation	Applicant's Response
	very small number of locations, which are anticipated to be located close into shore. The same chapter of the ES also states that anticipated reductions in water depth greater than 5% will be discussed with the MCA and other relevant stakeholders such as Statutory and Competent Harbour Authorities.	
3.13.10	2.6 The depth of the offshore cables are critical. In order to facilitate current and future access to and from the port the PLA needs to safeguard 22m below chart datum for its northern approaches and 12.5m below chart datum for its southern approaches. These water depths must therefore not be compromised in certain locations in order to facilitate access and egress for vessels over the life time of the project into and out of the Port of London. This means that there will be locations for example, at the North East Spit and at the Long Sand Head 2-way route where there cannot be a 5% reduction in water depth let alone a greater than 5% reduction in water depth.	The Applicant understands the PLA's position on this and has received the PLA's geographical information system (GIS) data of the three areas of safeguarding water depth (Sunk pilot boarding station area, Long Sand Head Two Way Route crossing area, and NE Spit area). The Applicant has been working with the PLA to understand these areas where the PLA wishes to safeguard water depth and will continue to do so through pre-Examination with the goal of providing clarity, reaching agreement on this matter, and minimising potential impacts.
3.13.11	Design: 2.7 The Other Sea Users Chapter of the ES [APP-082] states at paragraph 9.9.2 "Where burial cannot be achieved, rock backfill or external protection may be required where the soil or rock conditions are too hard to achieve effective burial, or third-party assets cross the route. Expected areas of rock backfill are located between KP 38 to KP 58, and KP 81.5 to KP 96.5."The Design and Layout Plans [APP-037] illustrate on page 61 what this could comprise and whilst no dimensions are given it is clear that there would be reductions in water depth. This would not be appropriate within the Sunk (i.e. KP38 to 58) or the North East Spit between KP 81.5 and 96.5.	The Applicant is continuing to engage with the PLA on the matter of potential water depth reductions, and will be resolved through the Statement of Common Ground process. The Applicant is working with PLA to finalise Protective Provisions to secure water depth provisions.
3.13.12	Minimum Seabed Depth: 2.8 Given the length of the offshore cable (approximately 122km) and the various Ports requirements, it is recommended a plan is produced showing the minimum seabed depths that must be safeguarded along the entirety of the offshore route. Any cable installation, maintenance and cable crossings must ensure that these minimum seabed depths are met. The plan should be linked to a specific Requirement in the DCO and a condition in the deemed marine licence (""DML"") which appears in Schedule 16 Part 2 of the dDCO [APP-007] because if not the Sea Link Project will limit the quantum of trade within the Port. The impact of this would be significant, detrimentally impacting the future of the UK's largest port. This approach would mirror the approach taken at Five Estuaries and North Falls.	The Applicant notes the PLA's request to produce a plan showing the minimum water depths to be safeguarded. This request comes as part of ongoing discussion between the Applicant and the PLA on the matter of safeguarding water depth within their three areas: Sunk Pilot boarding station area, Long Sand Head Two-Way Route crossing area, and North East Spit area. The Applicant is working with the PLA to secure suitable Protective Provisions, and will continue to engage with the PLA and aim to come to an agreement on what the Project is able to provide at this stage. These will be fully described and defined in an Outline Draft Cable Specification and Installation Plan prior to construction.
	Temporary impacts from cable laying and repair: 2.9 Pilotage is compulsory for large vessels within the London Pilotage District and its approaches and boarding and landing of pilots takes place in the general vicinity of the Pilotage Diamonds, rather than at that specific point. The actual location will be based on a number of factors, including traffic density, wind strength and direction and tidal conditions	The Applicant notes that actual pilot boarding may take place at a slightly different location that charted diamonds, and requests if the PLA is able to provide any details on locations for the specific pilot boarding stations within their area of influence.
3.13.13	Cable Burial: 2.10 The approach to cable laying needs to be clear and there must be a commitment to the quickest method of cable burial which achieves the required burial depth in the vicinity of pilotage stations to reduce the impacts to shipping during construction. Construction and maintenance vessels must not hinder access or egress into/out of the Port nor the ability to board or land pilots. Deep drafted vessels to terminals within	The Applicant acknowledges the importance of avoiding disruption to pilotage. The Project will seek the safest and most efficient methods within our means and will continue to engage with the PLA on process management plans to ensure that this can be achieved. Project operations will comply with all relevant safety regulations, as established in the Navigation and Installation Plan (NIP) and the Construction Method Statement. The Applicant has

Reference	Summary of relevant representation	Applicant's Response
	the Port of London are tidally constrained, so a small deviation to their schedule could result in them not having enough water for their passage to the berth, thus delaying them until the next tide approximately 12 hours later.	submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to the ExA's s89(3) letter dated 5 August 2025.
3.13.14	Shipping and Navigation: 2.11 The Shipping and Navigation Chapter of the ES [APP-080] refers to the potential need for aids to navigation where sections of cable are exposed for any significant lengths of time prior to burial. Further information should be provided, noting that the draft Statement of Common Ground with Trinity House [APP-333] states that they do not "always consider buoys suitable mitigation for exposed cables as they would need to be placed very close to the cable to be effective and could create an additional hazard for surface navigation"	The Applicant can clarify that the Proposed Project does not currently intend to utilise any temporary Aids to Navigation as part of the Proposed Project construction works but will liaise with Trinity House in the eventuality that they are considered.
3.13.15	Temporary impacts from Pre Construction surveys and activities and Post Construction surveys 2.12 As is common with the installation of cables a number of pre-construction activities including pre-construction surveys and monitoring may need to be carried out in order to obtain more information to inform for example, the final cable route and burial depth or to allow for the installation of the cable on the chosen route (e.g. boulder clearance, UXO clearance etc) (see table 4.13 of Chapter 4 of the ES Description of the Proposed Project for a summary of preinstallation activities) [APP-045].	The Applicant agrees that pre-construction activities may include surveys.
3.13.16	2.13 The PLA would want to approve any surveys or monitoring or pre-construction activities that affect its areas of interest because a survey vessel may pass slowly over an area or even stop to place/remove monitoring equipment which could affect shipping. Equally restrictions on how the pre-construction activity can be undertaken may need to be proposed e.g. boulders, archaeological finds and UXO cannot be relocated to or within the cable corridor but must instead be removed and no wet storage can occur in the cable corridor.	The Applicant has submitted a first draft of proposed Protective Provision wording for the DCO to PLA, and is in the process of reviewing their comments, and discussing with other relevant Stakeholders to agree future wording in regard to consultation on survey, monitoring and preconstruction/construction activities. Additionally, the Applicant is producing a communication protocol in the form of a Navigation Installation Plan (NIP) to enable collaboration with other offshore developments. The NIP establishes the plan for communication throughout key project phases, in particular the construction phase. This is noted in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080]**. The Applicant has submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to the ExA's s89(3) letter dated 5 August 2025. The Applicant can confirm wet storage is not applicable to the proposed project.
3.13.17	Permanent impacts from interaction with third party schemes (cable crossings) 2.14 Cable crossings have the potential to impact on water depths and, as set out in the in the Navigational Risk Assessment [paragraph 7.6.20 of APP-203], North Falls, NeuConnect,Gridlink, Britned, Nemo Link and Five Estuaries projects are all expected to intersect the Sea Link offshore scheme including crossings. The PLA must have confidence that where SeaLink crosses these schemes or will be crossed by these schemes that the required water depths will be maintained and that the Sea Link offshore cables will be buried at sufficient depth or placed in areas of deeper water so that any cables that cross Sea Link in the future also maintain the required water depths.	The Applicant notes the PLA's request to provide clarity and confidence surrounding cable crossings and potential impacts on water depths and seeks to engage further with the PLA to provide assurance on this matter and provide greater clarity. Discussions are ongoing with the PLA regarding commitments to safeguarding water depth at the three areas of PLA's Safeguarding Water Depth.
3.13.18	Temporary impacts from interaction with third party schemes (simultaneous operations) 2.15 Due to multiple projects being proposed in this area including North Falls, NeuConnect, Gridlink, Nemo Link and Five Estuaries and existing cables including Britned there is the potential for simultaneous operations occurring during installation	Regarding the potential impacts of simultaneous operations, this matter is subject to further discussion and engagement between the Applicant and key shipping and navigation stakeholders including other offshore developments.

Reference	Summary of relevant representation	Applicant's Response
	and maintenance. For the reasons set out above construction and maintenance vessels must not hinder access into and out of the Port of London.	The Applicant is producing a communication protocol in the form of a Navigation Installation Plan (NIP) to enable collaboration with other offshore developments. The NIP will establish the plan for communication throughout key project phases, in particular the construction phase. This is noted in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080]**. The NIP also establishes the "Concurrent Activity Area" within which restrictions would apply to simultaneous Restricted in Ability to Manoeuvre (RAM) vessel operations with other offshore developments. The Applicant has submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to the ExA's s89(3) letter dated 5 August 2025.
3.13.19	Dredging 2.16 In order to install the cable it will be necessary to dredge and the DML authorises dredging for the purposes of seabed preparation for cable laying through sandwave clearance and removal of material from the seabed required for the construction of Work No. 6. There is a concern about a lack of controls in relation to the placing of inert material within Work No. 6. This could create high spots which ultimately impact on access to the Port of London by reducing navigable depth. Consistent with the approach at Five Estuaries and North Falls, the PLA would expect the Applicant to produce and submit into the Examination an outline Sediment Disposal Management Plan which sets out the approach to dredge disposal along the cable route, with specific consideration also given to the approach within the vicinity of pilot boarding areas and anchorages.	The Applicant notes this position, and discussions with PLA are ongoing on the scope of the Sediment Disposal Management Plan.
3.13.20	Mitigation of potential impacts to shipping and navigation 2.17 Mitigation of potential impacts to shipping and navigation. To mitigate potential impacts to shipping and navigation, the applicant places a significant amount of weight on embedded mitigations and environmental actions and commitments in the Navigational Risk Assessment and the outline Offshore Construction Environmental Management Plan, the latter plan will be finalised post the making of the DCO	The Applicant agrees on the importance of the mitigations, actions and commitments made by the Proposed Project in the NRA (**Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]**) and listed in the Offshore Construction Environmental Management Plan (**Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339]**).
3.13.21	2.18 These documents, subject to amendment, could alongside (i) a certified plan and specific design Requirement in the dDCO (ii) a specific DML condition and (iii) protective provisions for the PLA, (iv) outline navigation and installation plan (v) outline cable specification and installation plan (vi) outline sediment disposal management plan provide the comfort that the PLA requires that, at the detailed design stage, the Port of London will be protected now and into the future. In the absence of these changes, decisions that are made by others in this DCO (such as MMO or MCA), particularly where there is no obligation on such bodies to consult the PLA, could have significant ramifications for the Port of London.	The Applicant acknowledges this summary of the PLAs position and requests. The Applicant will continue to engage with the PLA to work towards agreement on these matters and provide assurances as requested.

Table 3.14 Applicant’s Response to the Relevant Representation of the River Stour (Kent) Internal Drainage Board

Reference	Summary of relevant representation	Applicant’s Response
3.14.1	We have a key interest in flood risk, drainage and water level management. This development will require various Land Drainage Consents from our Board and has the potential to affect our Board's wider interests	The Applicant welcomes the Internal Drainage Board's engagement. Ongoing dialogue between the parties and development of a SoCG will capture key issues, the areas in which Drainage Consents will be required and identify the appropriate means for ensuring protection of the IDB's assets.

Table 3.15 Applicant's Response to the Relevant Representation of the Royal Mail

Reference	Summary of relevant representation	Applicant's Response
3.15.1	Construction Traffic: Royal Mail Group Limited (Royal Mail) supports National Grid Energy Transition's (NGET's) Sea Link Project, however is seeking to ensure that its road-based operations are not adversely impacted by construction traffic and any changes to local highway capacity during the scheme's construction phase.	Noted. A full assessment of construction traffic impacts was undertaken for both the Suffolk Onshore Scheme (see **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**) and Kent Onshore Scheme (see **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**), where the findings showed that no significant effects are expected on the surrounding highway network during the peak construction phase, including for the assessments of Road Safety and Driver Delay. Mitigation measures are outlined in **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337], superseded by [AS-008]** and **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]**, to reduce potential impacts on the highway network, where the construction vehicle routing has been designed to minimise impacts across the highway network. These measures will be developed and secured as part of the Construction Traffic Management and Travel Plans (CTMTPs) through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [APP-007], superseded by [AS-087]**, following further consultation with the local highway authorities. Therefore, it is not expected that Royal Mail's operations will be adversely impacted by the Proposed Project.
3.15.2	Traffic Management: Royal Mail has eight operational properties within 10km of the scheme. These operational facilities rely on frequent use of the presently heavily congested local road network on a daily basis. Accordingly, Royal Mail wishes to draw its operational obligations and requirements to the attention of NGET.	Noted. The construction vehicle routing has been designed to minimise impacts across the highway network, as set out within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337], superseded by [AS-008]** and **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]**. In addition, the proposed working hours are designed to minimise additional construction worker vehicle trips on the surrounding highway network during the weekday network peak hours. The assessments within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** and **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]** demonstrate that the construction traffic to be generated by the Proposed Project during the peak construction phase is not expected to result in any significant effects on the surrounding highway network (including with regard to Driver Delay), following the mitigation to be secured as part of the CTMTPs through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [APP-007], superseded by [AS-087]**. Therefore, it is not expected that Royal Mail's operations will be adversely impacted by the Proposed Project.
3.15.3	Registering Interest: Furthermore, Royal Mail is registering as an Interested Party to reserve its position to make further representations at the Examination, if required.	The Applicant welcomes Royal Mail's engagement with the Proposed Project.
3.15.4	Traffic Management: Under section 35 of the Postal Services Act 2011, Royal Mail has been designated by Ofcom as a provider of the Universal Postal Service. Royal Mail is the only such provider in the United Kingdom. The Act provides that Ofcom's primary regulatory duty is to secure the provision of the Universal Postal Service. Ofcom discharges this duty by imposing regulatory conditions on Royal Mail, requiring it to provide the Universal Postal Service. The Act includes a set of minimum standards for Universal Service Providers, which Ofcom must secure. The conditions imposed by Ofcom reflect those standards. Royal Mail's performance of the Universal Service Provider obligations is in the public interest and should not be affected detrimentally by any statutorily authorised project. Accordingly, Royal Mail seeks to take all reasonable steps to protect its assets and operational interests from any potentially adverse impacts of proposed development.	Noted. As above, the construction vehicle routing has been designed to minimise impacts across the highway network, as set out within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337], superseded by [AS-008]** and **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]**. In addition, the proposed working hours are designed to minimise additional construction worker vehicle trips on the surrounding highway network during the weekday network peak hours. The assessments within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** and **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]** demonstrate that the construction traffic to be generated by the Proposed Project during the peak construction phase is not expected to result in any significant effects on the surrounding highway network (including with regard to Driver Delay), following the mitigation to be secured as part of the CTMTPs through Requirement 6 of Schedule 3 of **Application Document 3.1 draft**

Reference	Summary of relevant representation	Applicant's Response
		Development Consent Order [APP-007], superseded by [AS-087]. Therefore, it is not expected that Royal Mail's operations will be adversely impacted by the Proposed Project.
3.15.5	Impact on construction traffic: Royal Mail's postal sorting and delivery operations rely heavily on road communications. Royal Mail's ability to provide efficient mail collection, sorting and delivery to the public is highly sensitive to changes in the capacity of the highway network. Royal Mail is of the view that the construction phase of this road improvement has potential to impact on its operational interests, especially when combined with the cumulative highways impact of other major developments in the area including Sizewell C and East Anglia Two OWF.	Noted. As set out above, it is not expected that Royal Mail's operations will be adversely impacted by the Proposed Project, as the assessments within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** and **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]** demonstrate that the construction traffic to be generated by the Proposed Project during the peak construction phase is not expected to result in any significant effects on the surrounding highway network including with regard to Driver Delay. It is acknowledged that the potential for cumulative highway impacts to arise in Suffolk as a result of the Proposed Project combined with other major developments including Sizewell C and East Anglia TWO Offshore Windfarm Farm (EA2) needs to be considered. Therefore, a comprehensive cumulative assessment of forecast traffic impacts of the Proposed Project with other projects on the Suffolk highway network has been undertaken within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This considers other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm (EA1N), EA2 and LionLink and concludes that no significant cumulative effects are forecast on traffic and transport receptors when the Proposed Project is considered alongside other developments. The cumulative assessment is based on the construction peaks of these projects (to provide a robust assessment), although it is considered that the construction peaks of multiple projects are unlikely to fully overlap, and that any such overlaps would be limited in duration. Nonetheless, the Applicant is actively co-ordinating with Sizewell C, National Grid Ventures (LionLink), and Scottish Power Renewables (for EA1N and EA2) to minimise highways impacts on host communities. This includes exploring shared use of facilities such as Park and Ride sites and aligning construction schedules where feasible. Further details on coordination is provided in the DCO submission, specifically in **Application Document 7.10 Coordination Document [APP-363],** which aims to minimise environmental and local community effects of the Proposed Project in combination with other projects.
3.15.6	Mitigation: In order to protect Royal Mail's position, it is requested that wording is added to the Suffolk and Kent scheme Construction Traffic Management Plans (CTMPs) to secure the following mitigations: the CTMPs should include specific requirements that during the construction phase Royal Mail is notified by NGET or its contractors at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working; where road closures / diversions are proposed, NGET or its contractors liaise with Royal Mail at least one month in advance to identify and make available alternative highway routes for operational use, where possible; and cumulative highways impact from other major developments in the Suffolk and Kent onshore areas (including those identified above) is fully addressed by NGET.	This feedback has been acknowledged and both **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337], superseded by [AS-008]** and **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]** include a commitment that where practicable, the Applicant will inform the relevant Local Authority and other relevant stakeholders (such as Royal Mail) of any road closures, diversions or access arrangements that are considered to impact their operations at the earliest possible opportunity. This is also contained within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** which is secured via Requirement 6 of Schedule 3 in **Application Document 3.1 draft Development Consent Order [APP-007], superseded by [AS-087]**. It is acknowledged that the Proposed Project will be under construction alongside other schemes in the area. The cumulative assessments within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** and **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** conclude that no significant cumulative effects are forecast on Traffic and Transport receptors when the Proposed Project is considered alongside other developments. Kent County Council (KCC) considers that all issues it had raised during the Pre-Examination stage of the DCO with respect to Highways and Transportation matters have been addressed by the Applicant. Therefore, no additional

Reference	Summary of relevant representation	Applicant's Response
		mitigation with respect to cumulative highway impacts is expected to be required in Kent. In terms of Suffolk, further coordination will be carried out with other Nationally Significant Infrastructure Projects (NSIPs) to review construction programmes, the likelihood / duration of peak construction phases overlapping, and to consider additional mitigation if necessary. The approach for any additional mitigation within Suffolk will be reviewed with Suffolk County Council (SCC) Highways in consultation with EDF (with respect to Sizewell C), Scottish Power Renewables (with respect to EA1N/EA2) and National Grid Ventures (with respect to LionLink), so that this is apportioned appropriately. However, it is not the responsibility for the Applicant to mitigate the impacts of other developments. The Proposed Project team remains in on-going dialogue with SCC Highways to ensure that the impacts of the Proposed Project are appropriately managed and mitigated.

Table 3.16 Applicant's Response to the Relevant Representation of Southern Gas Networks

Reference	Summary of relevant representation	Applicant's Response
3.16.1	Southern Gas Networks (SGN) is a licensed gas transporter under the Gas Act 1986. It operates gas distribution networks in Scotland and the South of England, serving 5.9 million customers. SGN is a statutory undertaker under the Planning Act 2008, with legal responsibilities to maintain its infrastructure.	The Applicant welcomes SGN's engagement with the Proposed Project.
3.16.2	The Applicant welcomes SGN's engagement with the Proposed Project.	The Applicant is cognisant of SGN's assets that interface with Sea Link and their concerns about how these are addressed in the draft DCO. The Applicant is seeking to agree terms that will provide suitable assurances for these assets and land rights over the lifetime of the Proposed Project.
3.16.3	SGN insists that its apparatus must be retained and access for inspection must not be restricted. The project must not adversely impact SGN's network or its statutory obligations.	
3.16.4	SGN has provided its standard protective provisions to National Grid Electricity Transmission (NGET), the project promoter. These provisions are not included in the current draft Development Consent Order (DCO). SGN is awaiting feedback from the promoter's solicitors.	SGN's request for bespoke Protective Provisions is acknowledged and the Applicant has undertaken a review of the identified asset interfaces as a basis for assessing the suitability of the Protective Provisions that have been put forward. The Applicant will engage further with SGN to seek agreement on the terms for asset protection, land acquisition and their inclusion in the draft DCO.
3.16.5	SGN may submit its own protective provisions at the start of the examination if the draft DCO is not updated. This is described as a fundamental health and safety issue. SGN is not satisfied that the requirements of Section 127 of the Planning Act 2008 are currently met.	The Applicant will seek to engage with SGN on an ongoing basis and, as noted above, agree terms that will provide suitable assurances for these assets and land rights over the lifetime of the Proposed Project.
3.16.6	SGN is committed to working with the promoter to reach agreement. It reserves the right to make further representations and attend hearings during the examination process.	The Applicant welcomes SGN's commitment to ongoing engagement towards reaching agreement on the matters of concern. Issues discussed with SGN in dialogue to date have been recorded in a SoCG.

Table 3.17 Applicant's Response to the Relevant Representation of Suffolk Constabulary

Reference	Summary of relevant representation	Applicant's Response
3.17.1	Introduction: The Suffolk Police & Crime Commissioner received Notice of Acceptance of this Application for a Development Consent Order (DCO) from National Grid Electricity Transmission plc (National Grid) on 9th May 2025. Suffolk Constabulary (SC) are the relevant Police Authority and a 'Prescribed Consultee' in this DCO process, pursuant to The Infrastructure Planning (Applications: Prescribed Forms & Procedure) Regulations 2009. SC submitted representations to the Sea Link Project Design Changes Consultation in August 2024, raising a number of areas of 'project interest and concern' as follows; ❖ Highways, traffic, transport & abnormal indivisible loads; ❖ Population increase – community safety, cohesion & policing; ❖ Blue Light Partner joint working - Transport, Community Safety & Cohesion Working Group; These considerations are set out in the SC August 2024 submission which is included as an 'Annex' to this relevant representation	The Applicant welcomes Suffolk Constabulary's engagement with the Proposed Project and acknowledges their interests and remit in respect of the construction and operational phases in the Suffolk area.
3.17.2	Project Impacts: The application documents have been reviewed, and whilst SC acknowledges the additional information now submitted, it considers that its areas of project interest and concern have not been adequately addressed to date, and raises a HOLDING OBJECTION to the DCO Application. SC therefore welcome early engagement with National Grid to address these matters - with a view to reaching agreement on a suitable range of mitigation and management measures to increase operational capacity within its Halesworth Community Policing Team (HCPT) as supported by other specialist officers such as the roads policing team, who would be significantly impacted by the Project In addition, these measures are designed to assist the management of any incidents and accidents arising during the construction stage, impacting on the capacity of SC and its Blue Light Partners. With this in mind, SC consider that a Statement of Common Ground process may be an appropriate route to setting suitable parameters for a DCO Requirement(s) and/ or a planning obligation to address the impacts arising to the HCPT, the roads policing team and its Blue Light Partners. A 'without prejudice' list of mitigation and management measures are outlined in the Parameters Table below.	Ongoing engagement with the Suffolk Constabulary will seek to understand the extent of potential impacts associated with the Proposed Project and to identify and agree, as appropriate, management and mitigation measures relating to the Suffolk Constabulary's areas of concern. The Applicant welcomes the proposed collaborative approach with other blue light services. A SoCG reflecting the matters discussed to date between the Applicant and the Suffolk Constabulary has been prepared.
3.17.3	Area of Project Interest & Concern: Abnormal Indivisible Load (AIL) origin/ destination routing strategy, movement type, numbers & timing requiring police escort *1	The Applicant met with SC to discuss AIL and acknowledges the specified Officer requirements and issues associated with capacity. Data sharing will allow SC to undertake their own assessment of the requirements generated by the AIL movements proposed

Reference	Summary of relevant representation	Applicant's Response
	1 The Outline Construction Traffic & Management & Travel Plan - Suffolk (May 2025) states that AIL led resources are required for the proposed converter station/ substation (transformer deliveries) & the HVDC cable route works (cable drum delivery vehicles/ side/rear facing trailers) with vehicle specifications ranging from 74.72 m length (transformers) to 25.44m length (cable drums) Mitigation & Management Measure: Recruitment of AIL trained officers to meet project demand over construction period 2026-31 *2 *2 SC move abnormal & indivisible loads (AIL) through the use of trained Roads Policing Officers on overtime - for this reason capacity to do so is limited & needs to be shared in a fair & equitable manner with all that may require this service. Unless it is agreed with a developer that a bespoke solution for their AIL requirements is needed and, this is agreed in a timely manner that allows for the additional resources to be stood-up, AIL loads will be moved on a business as usual basis i.e. as and when availability allows through SC baseline resources. An AIL Team consists of four officers, based on the Nationally recognised National Police Chief Council rates, at an annualised cost of circa £560,000. Notes: Funding agreed for other NSIP's based on bespoke solutions modelled from data provided by the promoters/developers – 5 days advanced notice of AIL movements to the Police *3 is insufficient as a proposed measure & does not provide additional capacity *3 Paragraph 6.3.4 of the Outline Construction Traffic & Management & Travel Plan - Suffolk (May 2025) states that once AIL movements are finalised a Special Order request should be submitted at least 10 weeks prior to the scheduled move. 5 days clear notice to be given to the Police & to Road & Bridge Authorities.	
3.17.4	Population increase – construction workers Mitigation & Management Measure: Construction worker profile/identification, communication, reporting, welfare & management information & procedures Notes: A schedule of home - based & non-home - based workers, along with appropriate supporting information may be required *4 The EIA Chapter 10 - Socio-economic, Recreation & Tourism section (March 2025) contains assumptions indicating that the Suffolk Onshore Scheme will require a peak workforce of 327 FTE staff, with an average of 86 FTE's on site over the construction period (2026-2031). 26 FTE's would be 'home - based' arising from a 60-minute drive time catchment area, with 60 'non home - based' FTE's being accommodated within the private rental sector locally	Socio economics – drafted below. NG to review and provide additional information on providing a workforce profile/schedule, welfare & management information/procedures The Applicant notes the Suffolk Constabulary's concerns regarding the anticipated population increase as a result of the influx of construction workers. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10: Socio-economics, Recreation and Tourism [APP-057]** identifies the anticipated construction workforce generation as a result of the Suffolk Onshore Scheme. As set out in Table 10.20, in the construction phase, an estimated 86 gross direct construction jobs per annum will be created by the Proposed Project. The calculation of employment generation has also accounted for leakage; the proportion of jobs taken-up by people who live inside of the Study Area, here defined as a 60-minute travel area. The leakage rate has been estimated to be 30%, given the specialised nature of the construction roles which may require sourcing labour from outside the local area. This figure has been determined using professional judgement and is informed by assumptions used in other comparable Nationally Significant Infrastructure Projects. Applying the 30% leakage rate to the average net additional employment, it is estimated that approximately 60 gross direct construction jobs per annum would be taken up by residents within the Study Area. An assessment of social infrastructure has been presented within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10: Socio-economics, Recreation and Tourism [APP-057]** to determine local primary healthcare services' capacity to respond / include / serve

Reference	Summary of relevant representation	Applicant's Response
		the anticipated temporary construction workforce who will reside within the local area. The assessment acknowledges that the construction workforce required for the Suffolk Onshore Scheme would place additional demand on the local health facilities. Taking a 'worst-case scenario' approach in which all of the average FTE gross direct workers (86 workers) register with local GP practices, the overall practice list size would increase. However considering the construction workforce slightly worsens the GP:patient ratio however the ratio remains lower than i.e. better than the recommended GP:patient ratio. As such, it is deemed that the Suffolk Onshore Scheme would not have any significant effects on social infrastructure provision locally. Given the limited scale of construction workers anticipated to resident within the Study Area and no significant effects identified on social infrastructure, there is no mitigation or management required.
3.17.5	Transport, Community Safety & Cohesion Working Group (TCS&CWG) TCS&CWG to be established with NG & Blue Light Partners to agree Terms of Reference for receiving Project updates during the construction phase & notifications concerning any on & off-site incidents & accidents & reviewing best practice protocol for construction workers Notes: Information sharing between NG & the Suffolk Blue Light Partners (Suffolk Constabulary, Suffolk Fire & Rescue Service & the East of England Ambulance Service NHS Trust is advised. We trust this is of assistance and look forward to working with National Grid to satisfactorily address the points raised in advance of the Examination	

Table 3.18 Applicant's Response to the Relevant Representation of Suffolk Local Access Forum

Reference	Summary of relevant representation	Applicant's Response
3.18.1	As the Suffolk Local Access Forum we are appointed by Suffolk County Council under the Countryside and Rights of Way Act 2000 to advise and respond to consultations which have an impact on public rights of way and access to the wider countryside. We have previously responded to the two pre-submission consultations by Sea Link and now be submitting a formal response to the DCO (to follow). SLAF is a statutory body appointed by Suffolk County Council under the Countryside and Rights of Way Act 2000 to advise and respond to various bodies on matters affecting countryside access and public rights of way (PRoW). In the past we have been consulted and responded to proposals by organisations such as Network Rail, Highways England, Natural England and EDF (Sizewell C). SLAF has in the past responded to the two consultation stages to the Sea Link Project in 2023 and 2024. Copies of these responses sent to Sebastian Stevens are attached as an Appendix to this response.	This is noted by the Applicant.
3.18.2	Landscape/Public Rights of Way Mitigation: As can be seen, at the first consultation we were particularly concerned about the impact the proposals would have on the landscape and PRoWs within the proposed Convertor Station site and beyond, and in the second we questioned the changes to the Draft Order Line which would restrict the opportunity to provide better alternative routes for diversions. SLAF are also looking to the applicant to provide funding to allow meaningful mitigation and legacy landscape, access, and PRoW improvements within a wider area around Saxmundham.	The embedded mitigation is set out in section 1.7 'Proposed Project Design and Embedded Mitigation' within the landscape and visual chapter (**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**) and the outline Landscape and Ecology Management Plan details the proposed outline landscape mitigation plans **(Additional Submission 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059])**. The landscape assessment appendix (**Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment – Suffolk [APP-097]**) sets out the detailed landscape assessment and the visual assessment appendix (**Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]**) sets out the detailed visual assessment for identified receptors including users of the PRoW network. Reductions were made during the pre-application process to the Suffolk Onshore Scheme Order Limits in response to the iterative process of design and assessment. This process ensured that all land necessary for mitigation purposes has been retained and included within the Order Limits. No land was taken out of the Order Limits that was necessary for the Proposed Project mitigation (including for landscape or PRoW matters). The area to the north of the proposed Saxmundham Converter Station was removed as the co-ordination strategy with Lion Link became clearer with the landscape across the wider site to be developed out by different developers, commensurate with the number of projects and their cumulative impacts. Opportunities remain to be considered for providing permissive access within the landscape mitigation proposals surrounding the Saxmundham Converter Station site and establishing an attractive amenity value for recreational users of this area which would connect to the permanent PRoW diversions. With regard to the Order Limits along the B1119, it is considered that there is sufficient space for the proposed hedgerow and occasional hedgerow tree planting. There is a drainage ditch alongside the B1119 which has been factored into the size of the Order Limits along with provision of a double staggered hedgerow with tree planting. This area would be considered when reviewing opportunities for advanced planting to provide early establishment of planting, as set out within the landscape and visual chapter within the landscape design principles section (**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048])** and the outline Landscape and Ecology Management Plan **(Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [AS-059]**). The Order Limits along the B1119 also allow for the proposed temporary diversion of Public Rights of Way (PRoW) E-491/006/0 which will need to be temporarily closed and diverted to avoid a

Reference	Summary of relevant representation	Applicant's Response
		converter/cable construction compound. The temporary diversion will run parallel with the B1119 heading east and rejoin the existing PRoW at the north east of the converter station location. This PRoW will be reinstated post construction, although alignment may vary slightly to align with landscaping proposals along the route. Further details are provided within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]** and this temporary PRoW diversion is also shown on **Application Document 2.7 Access, Rights of Way and Public Rights of Navigation Plans [APP-025].** The Order Limits along the B1119 do not include a permanent PRoW connection as it is not identified as essential mitigation in the Environmental Statement and therefore powers are not sought for this. The Order Limits will be sufficient to accommodate the PRoW diversions required around the proposed Converter Station site as shown on the **Application Document 2.7 Access, Rights of Way and Public Rights of Navigation Plans [APP-025]**. This includes a permanent PRoW diversion for PRoW E-491/005/0 around the Converter Station itself and a temporary PRoW diversion for PRoW E-491/006/0 to avoid a construction compound. These PRoW diversions will act in conjunction with one another to maintain PRoW connectivity with each other, as well as other existing (non-diverted) PRoW in the area. Further details are also provided within Table 5.1 of **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]**, which identifies the PRoW diversions which will be in place. The Applicant supports the delivery of community benefits associated with transmission infrastructure (the Applicant already has established programmes which deliver this) and will investigate the potential to provide a contribution towards a community/ legacy fund for PRoW improvements. For example, the Applicant operates a community grant programme which is available to nearby charities and not for profit organisations, when projects are in construction. However, community benefit is separate to compensation and mitigation. The former Government consulted on community benefit options associated with transmission infrastructure and proposed the introduction of guidance in this regard. The Applicant supports this and believes it should be flexible, allowing community benefits to respond to local and regional needs. Whilst awaiting clarity on the Government's position, the Applicant is working to understand local and regional aspirations and priorities in relation to community benefits. The Applicant welcomes the suggestions for delivering community benefits and will work with stakeholders and local communities to further inform this as the project progresses.
3.18.3	Public Rights of Way: Our response to the DCO relates particularly to the information contained in Document 2.7.1 Access, Rights of Way and Public Navigation: Volume 2 Plans and Drawings and Document 7.5.9. Outline Public Rights of Way Management Plan – Suffolk. We found the maps contained in Document 2.7.1 very difficult to interpret on an A4 page as the PRoW numbers were difficult to read and the colours and line thickness used for the various items confusing.	The Applicant welcomes this feedback. The plans are provided at a scale suitable for A0 to enable a larger geographic area to be shown on one plan at the relevant scale required for the submission. This approach is taken to avoid the need to turn through multiple sheets which can make interpreting the plans more difficult.
3.18.4	Within the Convertor Station site itself we appreciate that this would entail permanent and temporary diversions of PRoWs in the parishes of Saxmundham, Sternfield and Knodishall but would expect that the applicant would work with the County Councils' officers in order to provide a more sustainable alternative access network. For example, providing a bridleway alongside the B1119, separated from the carriageway and watercourse by planting, from where Saxmundham E-460/023 leaves the road,to Sternfield E-491/010 and possibly as far as Workhouse Lane E-491/012.	The Order Limits will be sufficient to accommodate the PRoW diversions required around the proposed Converter Station site as shown on the **Application Document 2.7 Access, Rights of Way and Public Rights of Navigation Plans [APP-025]**. This includes a permanent PRoW diversion for PRoW E-491/005/0 around the Converter Station itself and a temporary PRoW diversion for PRoW E-491/006/0 to avoid a construction compound. These PRoW diversions will act in conjunction with one another to maintain PRoW connectivity with each other, as well as other existing (non-diverted) PRoW in the area. Further details are also provided within Table 5.1 of **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]**, which identifies the PRoW diversions which will be in place.

Reference	Summary of relevant representation	Applicant's Response
		The Applicant supports the delivery of community benefits associated with transmission infrastructure (the Applicant already has established programmes which deliver this) and will investigate the potential to provide a contribution towards a community/ legacy fund for PRoW improvements. For example, the Applicant operates a community grant programme which is available to nearby charities and not for profit organisations, when projects are in construction. However, community benefit is separate to compensation and mitigation. The former Government consulted on community benefit options associated with transmission infrastructure and proposed the introduction of guidance in this regard. The Applicant supports this and believes it should be flexible, allowing community benefits to respond to local and regional needs. Whilst awaiting clarity on the Government's position, the Applicant is working to understand local and regional aspirations and priorities in relation to community benefits. The Applicant welcomes the suggestions for delivering community benefits and will work with stakeholders and local communities to further inform this as the project progresses. The Order Limits along the B1119 allow for the proposed temporary diversion of PRoW E-491/006/0 which will need to be temporarily closed and diverted to avoid a converter/cable construction compound. The temporary diversion will run parallel with the B1119 heading east and rejoin the existing PRoW at the north east of the converter station location. This PRoW will be reinstated post construction, although alignment may vary slightly to align with landscaping proposals along the route. Further details are provided within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]** and this temporary PRoW diversion is also shown on **Application Document 2.7 Access, Rights of Way and Public Rights of Navigation Plans [APP-025]**. The Order Limits do not include a permanent Public Right of Way (PRoW) connection as it is not identified as essential mitigation in the Environmental Statement and therefore powers are not sought for this.
3.18.5	SLAF would expect that Sea Link would also have regard to the Saxmundham Neighbourhood Plan Adopted in July 2025 which one of its proposals is "ensuring the successful, physical, environmental and social integration of new development in the Garden Neighbourhood with the existing community". This is a development of eight hundred homes south of Saxmundham between the A12 and the B1121 bisected by the Ipswich to Lowestoft rail line within which are several PRoWs which link to E-460/019 alongside the B1121. It is not clear why three of these, outside the Order Line are listed for temporary diversion (E-260/015,016,017).	The Proposed Project will not interact with any PRoW to the west of the B1121 Main Road, including within the area of land allocated for development to the south of Saxmundham between the A12 and the B1121. This includes PRoW E-460/019/0, E-460/015/0, E-460/016/0 and E-460/017/0 which will all be unaffected by the Proposed Project (no temporary diversions are proposed for example). In terms of PRoW E-260/015/0, E-260/016/0 and E-260/017/0, these are all located within the Order Limits to the north of Friston and do not relate to any works near Saxmundham. Further details of the proposed temporary PRoW diversions for these PRoW (nearer Friston) are provided within Table 5.1 of **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]**, which relate to the installation of the cable route and the Friston permanent access road.
3.18.6	As part of any mitigation measures, we would like to see the provision of a new PRoW using the proposed access road to the Sea Link site off the B1121 to link up the Garden Neighbourhood with the existing and proposed diverted PRoWs within the Order Line.	The Applicant welcomes the suggestion of providing a new PRoW along the proposed access road (from the B1121 Main Road) to provide a link between the Proposed Project site and the Saxmundham Garden Neighbourhood. Whilst this does not currently form part of the proposals, the Applicant supports the delivery of community benefits associated with transmission infrastructure (the Applicant already has established programmes which deliver this) and will investigate the potential to provide a contribution towards a community / legacy fund for PRoW improvements. For example, the Applicant operates a community grant programme which is available to nearby charities and not for profit organisations, when projects are in construction. However, community benefit is separate to compensation and mitigation. The former Government consulted on community benefit options associated with transmission infrastructure and proposed the introduction of guidance in this regard. The Applicant supports this and believes it should be flexible, allowing community benefits to respond to local and regional needs. Whilst awaiting clarity on the Government's position, the Applicant is working to

Reference	Summary of relevant representation	Applicant's Response
		understand local and regional aspirations and priorities in relation to community benefits and will work with stakeholders and local communities to further inform this as the project progresses.
3.18.7	Cumulative Effects: We are particularly concerned at the lack of acknowledgement of the cumulative effects in terms of traffic generation, visual intrusion, loss of habitat and impact on local communities that other proposed developments in the area which are part of The Great Grid Upgrade will bring, including: • The Scottish Power NSIP consent for the Friston substation. If this ends up being constructed as part of the Sea Link project, we expect that all conditions from that DCO to be adhered to. • The current and future off-site projects associated with the construction of Sizewell C. • The impact of the Lion Link project, which although approaching from a different direction would also use the Friston substation and require ducting to a further Convertor Station at Saxmundham. • The possibility of a third Convertor Station at Saxmundham linked to the Friston substation. For the latter two it would make sense for the ducting to be put in as part of the Sea Link DCO to avoid additional temporary PRoW diversions at a later date.	**Cumulative Assessment – Traffic and Transport** A comprehensive cumulative assessment of forecast traffic impacts of Sea Link and other projects on the Suffolk highway network has been undertaken within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This considers other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink and concludes that no significant cumulative effects are forecast on traffic and transport receptors when Sea Link is considered alongside other developments. ***Friston Substation*** The Friston Substation is included in the Sea Link DCO to ensure a comprehensive consenting position. However, it is expected to be implemented by SPR under their existing DCOs (EA1N and EA2). If SPR does not proceed, the Applicant will construct the substation using the same access and mitigation measures, under the conditions of the Sea Link DCO. Construction traffic forecasts for Friston Substation have been included in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** to ensure a robust assessment. If SPR constructs the substation, the actual traffic from Sea Link will be less than assessed; we have used worst-case assumptions in our traffic forecasts. Traffic management measures are detailed in **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]**. ***Sizewell C*** The cumulative assessment of the Sizewell C – main development site includes construction traffic during the peak construction phase (2028) for Sizewell C as requested by SCC Highways. The trip generation forecasts have been taken from the Consolidated Transport Assessment which informed the Sizewell C DCO submission, including Tables 8.7 and 8.8 which identified forecast traffic flows across the network during the peak construction phase for the weekday peak hours and across the day. These vehicle trips also include other elements of Sizewell C during the construction phase, including the Northern Park and ride and Southern Park and ride. It is therefore considered that a robust assessment has been carried out for the Sizewell C – main development site and that this has not been underestimated, by considering additional vehicle trips associated with the peak construction phase of the development which include other elements of Sizewell C. The assessment of cumulative effects for the Proposed Project and Sizewell C as presented within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** is expected to be minor and not significant on the basis that the programmes and construction peaks for these two projects are unlikely to overlap, and that any such overlaps would be limited in duration. ***LionLink*** The approach to the assessment of the LionLink Offshore Interconnector is set out within Section 9.8 of **Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122]**. A robust assessment was carried out by considering the potential number of vehicular trips associated with the construction of the LionLink converter station, on the assumption that they would be similar to the peak construction traffic forecasts for the construction of the Saxmundham Converter Station as part of the Proposed Project. This approach allowed a cumulative assessment to be carried out, in the absence of any details on forecast construction vehicle trips for the LionLink Offshore Interconnector itself, given that neither the PEIR nor the ES have been published for this development. The assessment of cumulative effects for the Proposed Project and LionLink as presented within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** is expected to be minor and not significant on the basis that the

Reference	Summary of relevant representation	Applicant's Response

programmes and construction peaks for these two projects are unlikely to overlap, with LionLink expected to commence circa two years after the commencement of the Proposed Project.

Third Converter Station at Saxmundham

In terms of the possibility for a third Converter Station, the Applicant understands this refers to NGV's Nautilus project. Following Ofgem approval in November 2024, NGV's Nautilus project announced its decision to connect to the National Electricity Transmission System (NETS) at the Isle of Grain, Kent rather than at Friston Substation in Suffolk. Irrespective of this decision, at the time of writing the Environment Statement, Nautilus still had a Point of Connection (PoC) agreement in place to connect at Friston Substation. Therefore, although it was considered highly unlikely that Nautilus' PoC agreement at Friston Substation will be realised, consideration has been given, as far as practicable, to the potential combined effects of this project with the Proposed Project as well as with Lion Link (see **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-project Cumulative Effects** for further detail).

Ducting associated with other projects

The proposals in Suffolk have been developed for the Proposed Project as a standalone project but have been designed in a coordinated way with other projects, including two potential National Grid Ventures (NGV) projects (Lion Link and Nautilus).

At statutory consultation (Autum 2023), the Proposed Project design showed the NGV works themselves at the landfall, along the cable sections and also included the entire wider site at Saxmundham, to show how three converter stations could fit at this location. This assumed a scenario where the NGV projects, whose routeing and siting work was at an earlier stage, identified the same cable and converter station sites as the Proposed Project. In March 2024, NGV's LionLink project announced that it had down selected its potential landfall at Aldeburgh and would be removing it from the LionLink proposals. LionLink is still proposing to co-locate its converter station alongside Proposed Project's near Saxmundham.

Therefore, as the design of the Proposed Project and these other projects has progressed, the approach to coordination has evolved. For the direct current (DC) cable route, this reflects the fact that LionLink no longer prefers the Aldeburgh landfall and onward cable route. For the shorter alternating current (AC) route, the Proposed Project design has been refined to remove the LionLink cables to allow NGV, whose project is at an earlier stage, to fully consider and consult on the most appropriate AC cable route. Nonetheless, the Proposed Project has been designed to allow space for the future delivery of other projects.

Cumulative Assessment - Visual Intrusion

Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060] provides a cumulative assessment for visual receptors including consideration of EA1N, EA2, Sizewell, Lionlink and a range of other projects. Regarding the cumulative effects with individual cumulative projects (Table 13.26), the potential significant adverse cumulative effects on visual receptors include with EA1N and EA2 at construction (including decommissioning) and for viewpoint 6 only at operation and maintenance, with LionLink at all project stages and with the South Saxmundham Garden Neighbourhood at construction (including decommissioning). Regarding total cumulative effects (Table 13.35), which reports potential significant adverse cumulative effects on some representative viewpoints. There is also a sequential cumulative visual assessment provided (Table 13.36) which sets out potential cumulative effects on key routes throughout the landscape and visual study area. This reports potential significant adverse cumulative effects on parts of the B1119, B1121 and PRoW within the study area when considering total cumulative effects.

Cumulative Assessment - Habitat Loss

Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060] discusses combined ecological effects including on ecology, including with EA1N, EA2, Sizewell, Lionlink and a range of other projects. Ecology

Reference	Summary of relevant representation	Applicant's Response
		assessment is specifically provided in **Tables 13.27** and **13.37** of the application document and includes a justification. This includes consideration of receptors such as bats, breeding birds and dormice. Disruption of bat commuting and other wildlife connectivity through breaks in hedgerows is discussed, along with potential for short to medium-term habitat loss will arise through removal of grassland, woodland and hedgerow habitat for temporary construction and permanent gaps in hedgerows for permanent access. Mitigation measures incorporated into the Suffolk Onshore Scheme are taken into account as is the fact that in the long-term, habitat creation around the Saxmundham Converter Station and Friston Substation mean that there will be a net increase in woodland, wetland, grassland and hedgerow due to the Suffolk Onshore Scheme. This informs the conclusion of no significant adverse cumulative effect. **Cumulative Impacts – Local communities** **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]** of the Environmental Statement assesses the cumulative impact of Sea Link alongside other Nationally Significant Infrastructure Projects (NSIPs), on private and community, recreation and tourism assets. The assessment considers the potential effects of the Proposed Project on disruption to the use of these receptors in terms of direct land take and severance impacts. The assessment identified no significant effects on residential properties, businesses premises, community facilities, open space or visitor attractions. Additionally, **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060]** also assesses the cumulative impact of the Proposed Project alongside other NSIPs, on social infrastructure capacity. Considering a worst-case scenario, whereby the peak construction workforce for the Suffolk Onshore Scheme and the construction of each of the other developments coincide, and each worker demands primary healthcare, the chapter concludes that no significant effects are expected when considering the impacts of the cumulative schemes in aggregation with the Proposed Project, and therefore no mitigation will be required. The Applicant also recognises that the potential for future environmental changes associated with the Proposed Project are of considerable concern to residents with regards to the health and wellbeing of local communities. **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]** assesses the impact of Sea Link in addition to other NSIPS and smaller applications within a Study Area based on the geographic extent of other topics for each environmental aspect of relevance to health and wellbeing. This includes landscape and visual, traffic and transport, air quality, noise and vibration, and socio-economics, recreation and tourism. The assessments conclude that there are no anticipated significant effects on health and wellbeing as a result of the Proposed Project. Each cumulative scheme has been assessed individually alongside the Sea Link project, followed by a combined assessment of all cumulative schemes together with Sea Link. The health and wellbeing cumulative effects assessment anticipates no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health. In conclusion, the overall inter-project assessment of cumulative effects has been assessed as 'not significant'.

Table 3.19 Applicant's Response to the Relevant Representation of The Corporation of Trinity House of Deptford Strond

Reference	Summary of relevant representation	Applicant's Response
3.19.1	We refer to the above application for development consent. Trinity House is the General Lighthouse Authority for England, Wales, the Channel Islands and Gibraltar with powers principally derived from the Merchant Shipping Act 1995 (as amended). The role of Trinity House as a General Lighthouse Authority under the Act includes the superintendence and management of all lighthouses, buoys and beacons within its area of jurisdiction.	The Applicant acknowledge Trinity House's role.
3.19.2	Trinity House requests to be registered as an interested party and intends to provide comments to the Examining Authority (ExA) where applicable during the examination process. Our areas of interest are the impact the development may have on the safety of navigation, vessel routeing, and the subsequent provision of aids to navigation, within Trinity House's area of jurisdiction. Trinity House is likely to have comments to make on the application and the draft DCO(s)/DML(s) throughout the process. We will assess the documentation submitted for examination to ascertain whether our requirements are adequately covered and, in particular, should the applicant propose to use alternative wording in the DCO(s)/DML(s), as is their privilege, from that typically used in comparable legislation.	Trinity House's areas of interest are noted. The Applicant will continue to engage with Trinity House throughout the Examination process, particular on the matter of provision of Aids to Navigation. Shipping and navigation impacts are assessed in **Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]**.

Table 3.20 Applicant's Response to the Relevant Representation of The Maritime and Coastguard Agency

Reference	Summary of relevant representation	Applicant's Response
3.20.1	Routeing Consultation: Statutory consultees The MCA has an interest in the works associated with the marine environment within the UK Exclusive Economic Zone, and the potential impact on shipping, safe navigation, access to ports and harbours, and any impact on our search and rescue obligations. The MCA acknowledges and appreciates the applicant's efforts to revise the originally proposed cable route in response to consultation feedback. Given the complexity of SUNK area, there is no perfect routing solution. The revised route now passes north of the W1 buoy and south of the SUNK Deep-Water Anchorage, increasing and decreasing proximity respectively. This highlights the critical importance of coordination and communication among all stakeholders. This region is highly constrained with dense maritime traffic, challenging environmental conditions, specialist pilot boarding arrangements, and the presence of deep-draught vessels potentially up to 20m in the future. The construction phase is expected to be the most disruptive. However, once installed, the cable should not adversely affect operations in the SUNK area, provided that any reduction in navigable depth is appropriately mitigated. The MCA will ensure our position is progressed through the Statement of Common Ground and secured through conditions of the Development Consent Order Deemed Marine Licence where appropriate.	The Applicant notes the MCA's interests and overview of the region and welcomes acknowledgement of coordination and communication already undertaken among stakeholders. Considering the MCA's point on the complexity of the SUNK area, the cable has been routed to minimise adverse impact, following guidance of stakeholders in regard to proximity to navigational buoys, deep water route anchorages. Potential Impacts to operations in the SUNK during all project phases including construction have been assessed in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080]**. Concerns surrounding under-keel clearance are noted and addressed in the **Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]**, in Section 7.6.
3.20.2	Consultation regarding Tongue pilot station Proximity: The MCA main areas of interest are as follows: Tongue Pilot Station Proximity The proposed cable corridor lies near the Tongue Pilot Station. This necessitates consultation with Estuary Services and the Port of London Authority (PLA), who are likely to be most affected by any potential restrictions	The Applicant notes the MCA's interest in any works proximal to the Tongue Pilot Station. The Applicant has undertaken comprehensive consultation with the PLA and will continue to do so throughout the project the pre-Examination and Examination phases. The Applicant interprets that "Estuary Services" in this context refers to "Estuary Services Ltd", which the Applicant understands is a subsidiary company owned by PLA, and thus will have had input into PLA consultation.
3.20.3	Navigation Installation Plan: Navigation Installation Plan (NIP) Full consultation on the NIP is essential. Given the complexity of the area, effective communication and timely dissemination of information between the project team, Vessel Traffic Services and port authorities are vital. The NIP must be discussed and agreed with the PLA, Harwich Haven Authority (HHA), Medway Port, and the MCA.	The Applicant has submitted a draft Outline NIP to PINS, as part of the Applicant's response to ExA's s89(3) letter dated 5 August 2025. The Applicant will continue to engage with the key shipping and navigation stakeholders, including the MCA, PLA, HHA and others to update and refine the Outline NIP through the pre-Examination and Examination phases. The Applicant wishes to keep the list of Interested Parties as streamlined as possible while including the key relevant stakeholders. The Applicant wishes to be able to update the NIP swiftly, as required, in order to get information out in a timely manner up to and throughout the construction phase. It therefore seeks to limit the list of Interested Parties only those which overlap with our Areas of Interest, including other offshore developments which may be in construction at a similar timeline through the Sunk region, and those parties identified through consultation as expressing a need for enhanced communication through the consultation phase. Medway Port does not overlap with our NIP Areas of Interest, therefore has not been added as an Interested Party, however The Applicant will engage with Medway to confirm this approach

Reference	Summary of relevant representation	Applicant's Response
3.20.4	Cumulative Impacts: Simultaneous Operations Construction and installation activities for Sea Link should not coincide with those of the Five Estuaries and North Falls Offshore Windfarm projects to avoid cumulative impacts and navigational risks. The applicant must work with the relevant ports, VTS and offshore developers to coordinate activity and address this issue. Any simultaneous activities (including survey ops) with vessels on Restricted in Ability to Manoeuvre (RAM) status near the SUNK Pilot Boarding Ground (PBG), particularly to the east of the PBG should be avoided.	The Applicant notes MCA's concerns regarding simultaneous operations. This matter is subject to further discussion and engagement between the Applicant and other developers as well as key shipping and navigation stakeholders. The Applicant is working with shipping and navigation stakeholders to reassure and find agreement on simultaneous operations. Additionally, the Applicant is producing a communication protocol in the form of a Navigation Installation Plan (NIP) to enable collaboration with other offshore developments. The NIP establishes the plan for communication throughout key Project phases, in particular the construction phase. This is noted in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080]**. The NIP also establishes the "Concurrent Activity Area" within which restrictions would apply to simultaneous Restricted in Ability to Manoeuvre (RAM) vessel operations with other offshore developments. The Applicant has submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to ExA's s89(3) letter dated 5 August 2025.
3.20.5	Navigable depth and Protective measures: Navigable Depth and Protective Measures While a 5% reduction in navigable depth referenced to chart datum is the formal trigger for further discussion, any depth reduction in areas where deep-draught vessels operate must be reviewed. Any reduction caused as a result of the cable lay or any associated cable protection measures should be discussed and agreed by the local ports and MCA and secured through consent conditions. This is especially critical near North Shipwash, the SUNK area (including W1, precautionary areas, and the Long Sand Heads two-way route), west of Thanet OWF, and approaches to Pegwell Bay. The MCA would expect a post-lay cable burial survey to be carried out to confirm where the target depths have or have not been met.	The Applicant notes MCA's concerns regarding navigable depth and protective measures, and the particular areas of concern listed which include North Shipwash, the SUNK area, west of Thanet OWF, and approaches to Pegwell Bay. The primary method for cable protection is by lowering below the seabed, therefore changes to water depth as a result of cable laying within the SUNK are not anticipated. Any change to seabed levels as a result of disturbing sediment during construction will be minor and temporary in nature. The approach to cable burial and protection is outlined in **Document PDA-039 9.21 Sea Link Cable Burial Risk Assessment.** The Applicant has been working with the stakeholders including PLA and HHA, to understand the areas where they wish to safeguard water depth, and will continue to do so through pre-Examination with the goal of providing clarity, reaching agreement on this matter, and minimising potential impacts.
3.20.6	Future Vessel Draught Considerations: Future Vessel Draught Considerations With vessels potentially reaching draughts of up to 20m, Harwich Haven Authority (HHA) recommends that the cable and any protective materials (e.g., rock armour) to be a minimum of 22m below Chart Datum. The MCA fully supports this recommendation to future-proof navigational safety.	Concerns surrounding under-keel clearance are noted and addressed in the **Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]**, in Section 7.6. In line with MCA guidance, it is not planned to reduce the existing navigable water depth by more than 5% along any section of the cable (with respect to Chart Datum). It is therefore expected that under-keel clearance is only reduced at a very small number of locations, which are anticipated to be located close into shore. Any anticipated areas where reductions in water depth may be greater than 5% will be discussed with relevant stakeholders including port and harbour authorities. The request for preserving a minimum water depth of 22 m below chart datum has been discussed with Harwich Haven Authority. The Applicant is in discussions with Harwich Haven to further define their precise geographic area of interest within the Sunk region. The Applicant is working with Harwich Haven Authority and other key shipping and navigation stakeholders to reassure and find agreement on water depth concerns. This matter is subject to further discussion and engagement between the Applicant and Harwich Haven Authority, including specifics on the geographical extent of "the Sunk Area" defined by HHA.. The Applicant intends to arrange a further meeting with Harwich Haven Authority in order to discuss this and find agreement.
3.20.7	Stakeholder Communication: The MCA stresses the importance of proactive and transparent communication with ports, harbours, and Estuary Services. Installation vessels must clearly communicate their intentions and activities to ensure safe operations in this critical	The Applicant agrees on the importance of proactive and transparent communication with ports, harbours, and Estuary Services. The Applicant is producing a communication protocol in the form of a Navigation Installation Plan (NIP) to address this need. This will establish the plan for communication throughout key

Reference	Summary of relevant representation	Applicant's Response
	area. The proposed route intersects one of the UK's key routing measures. The project team must take all necessary steps to minimise navigational risks and ensure that all activities in the SUNK region are promptly communicated to SUNK VTS and relevant port authorities. Any survey works conducted within the SUNK area must also be coordinated with the relevant port authorities and the MCA.	Project phases, in particular the construction phase. This is noted in **Application Document 6.2.4.7 Part 4 Marine Chapter 7 Shipping and Navigation [APP-080]**.
3.20.8	Electromagnetic Deviation The MCA has reviewed the Electric and Magnetic Field Compliance Report for the Sea Link HVDC cable. We confirm that the offshore section complies with our requirements; less than 3° deviation for 95% of the route and less than 5° for the remaining 5%, as detailed in Table 5.2 of the report. In nearshore areas where the cables are separated by 45m and buried to a depth of 10m (approximately 2.435 km in total—1.524 km along the Suffolk coast and 0.911 km in Pegwell Bay), no detailed EMF assessment has been provided. While this segment represents only 2% of the total route and vessel traffic is mostly perpendicular (minimising interaction), the separation may result in compass deviations exceeding 5°	The Applicant notes the MCA's request that the maximum burial depth be used throughout the trenchless phase and to consider bundled lay as much as practically possible to further reduce any potential effects on vessel navigation. The Applicant notes the MCA's request that should anything change with the current cable route, and it cannot be demonstrated that MCA deviation requirements can be met pre-construction, a post-construction compass deviation survey of the 'as laid' Offshore Cable Corridor may be required. The Applicant confirms an initial high level assessment has been undertaken in response to this Relevant Rep and we are confident that we can meet MCA requirements in this area. A full update to the EMF report will be carried out once a full analysis update had been carried out pre-construction and will be shared with the MCA at the earliest opportunity.
3.20.9	Shipping and Navigation: Although the navigational impact is expected to be minimal, the MCA requests that the project team ensure maximum burial depth throughout the trenchless phase and to consider bundled lay as much as practically possible to further reduce any potential effects on vessel navigation. Should anything change with the current cable route, and it cannot be demonstrated that MCA deviation requirements can be met pre-construction, a post-construction compass deviation survey of the 'as laid' Offshore Cable Corridor may be required.	The Applicant acknowledges the MCA's position on this matter.

Table 3.21 Applicant's Response to the Relevant Representation of the UK Chamber of Shipping

Reference	Summary of relevant representation	Applicant's Response
3.21.1	General Overview: The UK Chamber of Shipping is the trade association for the UK shipping industry, representing more than 200 members, operating around the UK and globally in excess of 1000 vessels equalling 18 million GT in capacity. The Chamber represents the full breadth of the shipping industry, including dry bulkers and tankers, passenger transport (cruise & ferry), offshore supply and construction, towage, and specialist, as well as professional service providers with shipping interests.	The Applicant acknowledges the UK Chamber of Shipping's role.
3.21.2	Shipping and navigation: The Chamber fully supports the Government's obligations to achieve Net Zero by 2050 and welcomes the development of offshore renewable energy and interconnectors to succeed in this obligation. The ports and shipping industries play an essential in enabling those targets to be achieved by providing bases and vessels for construction, operation & maintenance, and decommissioning. The Chamber also asserts that the planning process and framework must support the wider shipping industry through site selection and routeing which avoids or minimises disruption or economic loss to the shipping and navigation industries, with particular regard to approaches to ports and to strategic routes essential to regional, national and international trade, lifeline ferries	The Applicant welcomes The UK Chamber of Shipping's support of the Government's Net Zero goals and agrees that the ports and shipping industries have an important part to play, noting the importance of minimising disruption to this industry, particularly regarding approaches to ports. **Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]** assesses the potential for disruption to shipping and navigation from the Proposed Project.
3.21.3	IMO routeing measures and Clearance The Chamber has been engaged by National Grid in the planning process for Sea Link prior to DCO application and is in process of producing a Statement of Common Ground. The Chamber has made specific points, upon which we may wish to further representation, following review of the relevant documentation, in the areas of: IMO routeing measures; interaction with deep water routes and other cables (including those relating to offshore wind farms also going through PINS at present); under keel clearance, cable burial & protection plans in particular relevant to anchor snagging risk; and installation leading interaction with commercial routeing and associated risks.	Agreed that the Applicant is working with the UK Chamber of Shipping to produce a Statement of Common Ground, and notes the points raised here by the UK Chamber of Shipping. A draft Statement of Common Ground (SoCG) with the UK Chamber of Shipping was submitted with the DCO application (**Application Document 7.4.13 Draft Statement of Common Ground UK Chamber of Shipping [APP-334]**). This will be updated as further engagement takes place on these topics of concern.

Table 3.22 Applicant's Response to the Relevant Representation of UK Health Security Agency

Reference	Summary of relevant representation	Applicant's Response
3.22.1	Thank you for your letter of 8 May 2025 inviting the UK Health Security Agency (UKHSA) to make representations relating to the above Nationally Significant Infrastructure Project (NSIP). Please note that we request views from the Office for Health Improvement and Disparities (OHID) and the response provided is sent on behalf of both UKHSA and OHID. We note that we have replied to earlier consultations, as listed below, and this response should be read in conjunction with that earlier correspondence. Request for Scoping Opinion: 22 Nov 2022. On this occasion, we have no comments to provide at this stage of the NSIP application.	Comments noted. The Proposed Project Environmental Statement has been produced in line with guidance and legislation, following extensive consultation with key stakeholders and survey work to inform avoidance, mitigation or (where necessary) compensatory provision requirements. The UKHSA comments on Scoping are reflected in ES chapters **6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-03]** and **6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058].**

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