The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.34.5: Applicant's Response to Selected Relevant Representation Responses

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6. The Applicants Response to Selected Other Relevant Representations

~~The Tables below comprise the Applicant's response to selected Relevant Representations.~~

Table 6.1 Applicant's Response to the Relevant Representation of Dover District Council ~~**Table 6.1 Applicant's Response to the Relevant Representation of Dover District Council**~~

Reference	Summary of relevant representation	Applicant's Response
6.1.1	The council is generally supportive of the overall principal of the proposal, which will improve energy security, provided that the impacts of the project are adequately assessed, appropriately mitigated and compensated as required. The representation shall relate primarily to the onshore aspects of the proposal which fall within Dover District. These include overhead power lines and pylons, as well as temporary towers and a bridge crossing over the River Stour. Access to these elements of the development is proposed from the south of Dover District, however the council trusts Kent County Council, as the Highways Authority, will address this. Nevertheless, due to the close proximity to other proposed works to the District's boundary, other representation shall be made, where relevant, on other impacts of the proposal.	The Applicant welcomes the Council's support for the Proposed Project and acknowledgement of the need for new electricity transmission infrastructure. The Applicant has set out its analysis of the compliance of the Proposed Project with NPS EN-1, EN-3 and EN-5, and other policy that may be considered important and relevant in **Application Document 7.1 Planning Statement [APP-319] superseded by [AS-057]**. This includes consideration of the application against the mitigation hierarchy for onshore and offshore elements.
6.1.2	Impact of the new development in the District.	The impact of the Proposed Project has been assessed in detail in the Environmental Impact Assessment (EIA) and reported within the Environmental Statement (ES). All impacts as a result of the Proposed Project within Dover District Council are reported within Volume 6 Part 3 – Kent Onshore Scheme of the ES, refer to **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** through to **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]**. Table 3.2 of **Application Document 6.2.5.3 Part 5 Combined Chapter 3 Summary of Likely Significant Effects [APP-087]** also provides a summary of the likely significant environmental effects anticipated for the Kent Onshore Scheme.
6.1.3	The associated impacts of the proposed cable route.	The impact of the Proposed Project has been assessed in detail in the EIA and reported within the ES. Impacts associated with the proposed cable route have been considered and are reported within the ES where relevant. All impacts as a result of the Proposed Project within Dover District Council are reported within Volume 6 Part 3 – Kent Onshore Scheme of the ES, refer to **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** through to **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]**. **Application Document 2.5.2 Work Plans – Kent [APP-022]**, shows the route of the proposed cable within the context of the Dover District Council boundary.
6.1.4	The visual and landscape impact of the proposed infrastructure	The effects of the Proposed Project on landscape and visual receptors have been considered in detailed in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**

Reference	Summary of relevant representation	Applicant's Response
		and **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]**. Details regarding the embedded mitigation should be referred to within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349]**. Following the implementation of the embedded mitigation measures it is considered that the remaining significant residual adverse effects at year 15 would be limited to four representative viewpoints (viewpoints 4, 5, 6 and 11) in close proximity to the north and north west of Minster Converter Station and Minster Substation and no significant residual adverse effects at year 15 on the assessed landscape or seascape receptors.
6.1.5	The impact on ecology.	The impact of the Proposed Project on ecology in Kent has been considered in detail in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [APP-062] superseded by [AS-047]**, **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** and **Application Document 6.6 Habitats Regulations Assessment Report [APP-290] superseded by [AS-007]**. Mitigation for any potentially significant effects is set out in those documents, in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349]**. With the implementation of these measures, it is concluded that no significant adverse long-term residual effects on ecological and biodiversity receptors will remain. Overall, there will be a net increase in habitat for most ecological receptors as a result of the Proposed Project.

Table 6.2 ~~Table 6.2~~ Applicant's Response to the Relevant Representation of Thanet District Council

Reference	Summary of relevant representation	Applicant's Response
Principle		
6.2.1	The principle of the proposed development is generally not in accordance with Policy SP24 of the Thanet Local Plan (Development in the Countryside) however, it is acknowledged that National Policy Statement for Energy (EN-1) confirms that energy infrastructure such as multi-purpose interconnectors routed offshore which are directed into the NSIP regime under Section 35 of the Planning Act 2008, fall within the definition of the Critical National Priority (CNP) in which there is an urgent need for CNP Infrastructure. It is acknowledged that the Proposed Project falls within the definition of CNP Infrastructure. The development would also be in direct conflict with Policy SP26 of the Thanet Local Plan (Landscape Character Areas), meaning that the development should only be permitted if it can be demonstrated that the development is essential for the economic or social well-being of the area. The reasons for the conflict are outlined within the Landscape and Visual Impact section of this letter.	Following a direction from the Secretary of State under Section 35(1) of the Planning Act 2008, Sea Link (the 'Proposed Project') is to be treated as development of national significance for which development consent is required. As such, Section 104 of the Planning Act 2008 provides that the Secretary of State must decide such applications in accordance with the relevant National Planning Policy Statements (NPS), which are: Overarching National Policy Statement for Energy (NPS EN-1), National Policy Statement for Renewable Energy Infrastructure (NPS EN-3) and National Policy Statement for Electricity Networks Infrastructure (NPS EN-5). Therefore, Section 38(6) of the Planning and Compulsory Purchase Act 2004, which requires proposals to be decided in accordance with the Development Plan, does not apply to the Proposed Project. Policy SP24 of the Thanet Local Plan only supports new development in the countryside in a limited set of circumstances, which do not include infrastructure proposals such as the Proposed Project. However, as acknowledged by Thanet District Council (TDC), the Proposed Project is nationally significant and falls under the definition of Critical National Priority (CNP) infrastructure in NPS EN-1. It is acknowledged that the Proposed Project would conflict with the principles set out in Policy SP26 – Landscape Character Areas, by locating permanent operational infrastructure (Minster Converter Station and Substation) within the Stour Marshes (Landscape Character Area E1). The Proposed Project was designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce landscape and visual impacts and effects through the process of design development and by embedding measures into the design of the Proposed Project. Policy SP26 – Landscape Character Areas specifically mentions LCA E1 as one that should be generally kept free of development, as it is "*largely undeveloped and key to retaining the island character of Thanet".* The routeing and siting of the Kent Onshore Scheme has been informed by landscape and visual considerations to minimise effects on LCA E1 (as explained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**). Embedded measures that have been integral in reducing, and where possible avoiding, the landscape and visual effects of the Proposed Project include the principles of the landscape strategy for the converter station and substation site (**Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] superseded by [PDA-035]**) and the design of the converter station and substation, in terms of their building form and external materials (**Application Document 7.11.2 Design Approach Document – Kent [APP-365]** and **Application Document 7.12.2 Design Principles – Kent [APP-367]**). The outline landscape strategy seeks to respond to both the immediate landscape pattern of the site as well as the wider landscape character. The strategy proposes to use native woodland planting to provide structural screening to the Minster Converter Station and Substation in views from the north and northwest whilst providing containment to the Minster Converter Station and Substation site so that it appears as visually connected to the Richborough Energy Park, rather than the wider marsh landscape. It is also noted that the Minster Converter Station and Substation would be located near to the the edge of the Landscape Character Area (LCA) E1: Stour Marhses. This part of the LCA exhibits some

Reference	Summary of relevant representation	Applicant's Response
		differing characteristics to the wider marshland further to the west, reducing the alteration to the key characteristics of the LCA. Due to the location on the edge of the marshes, the operational infrastructure is considered to impact the key characteristics at a local level, including localised increase in development. The majority of key characteristics would remain largely unaffected as they are either not present in the baseline or are conserved. In conclusion, landscape impacts have been mitigated as far as possible. The process for selecting the proposed location for the Minster Converter Station and Substation, including the reasons for selecting the chosen options, are summarised in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**). Two areas for locating the proposed converter station were initially identified as part of option identification and selection, which were based on the need to be within 5 km of the network connection point: • Area A: located adjacent to and encompassed by Richborough Energy Park; and • Area B: located to the north and south of the A299 and adjacent to Manston Business Park. Area A was initially identified as preferred in the preliminary findings. Key factors for this decision include: • The area provided the opportunity to site the converter station in an area adjacent to similar infrastructure and industrial land uses (Richborough Energy Park and Richborough Port are located within Area A); • The area provided opportunity to void designated sites (such as Monkton Scheduled Monument located within Area B) and areas at greater risk of flooding; and • The area provided opportunity for a shorter High Voltage Direct Current (HVDC) route and a shorter High Voltage Alternative Current (HVAC) connection compared with Area B. Following identification of significant constraints with connecting into Richborough Substation, an alternative connection point (a new substation co-located with the converter) and a HVAC connection directly onto the existing Richborough to Canterbury overhead line was identified. Area A was refined to take account of this alternative connection point. Paragraph 5.10.5 of NPS EN-1 recognises that *"virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape"*, while paragraph 5.10.12 clarifies that "*locally valued landscapes should not be used in themselves to refuse consent, as this may unduly restrict acceptable development"*. In addition, paragraph 4.1.15 states that, "*in the event of a conflict between* [a local development plan] *and an NPS, the NPS prevails for the purpose of Secretary of State decision making given the national significance of the infrastructure*".
6.2.2	The Council notes the concern of the local community in relation to the alternative options to the Thanet landfall for the project. We invite the Inspectorate to fully consider the matters raised by the local community in this regard.	As set out in **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022) [APP-368] (CPRSS)**, the Proposed Project considered six landfall areas of search within the Kent study area. These included four areas along the north Kent coast, one area between Margate and Broadstairs and one area in Pegwell Bay, these are illustrated on Plate 5-3 of that document. For the reasons set out in **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022) [APP-368]** the north Kent coast landfall areas of search were ruled out due to significant technical and environmental constraints on the marine approaches and the landfall close to Broadstairs was ruled out due to significant constraints on the onward terrestrial route corridor. The CPRSS recognised the ecological constraints of the Pegwell bay landfall area of search but also identified that trenchless construction techniques could be used to avoid impacts on the sensitive saltmarsh habitat. As illustrated on Plate 8-1 of **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022)**

Reference	Summary of relevant representation	Applicant's Response
		[APP-368] three landfall areas within the wider Pegwell bay area of search were appraised concluding that for the reasons set out within that document, the northern most of these is preferred.
Order Limits		
6.2.3	It is considered that the works plans/parameter plans lack detail of where works will take place and it is therefore difficult to assess the overall impact of the proposed works. In addition, the extent of the works within the order limits is unclear with a lack of clarity as to the type of works that would be carried out within the order limits. Some works plans comprise an extensive list of works varying in type, effect and impact. For example, there are various access points and parts of the order limits outside the limits of deviation and it is unclear the extent of works being undertaken here or why it is within the order limits.	As highlighted in note 2 on the **Application Document 2.5.2 Work Plans – Kent [APP-022]**, the works plans show the Order Limits and potential locations for the works. Due to the need for future flexibility, National Grid are applying for Order Limits and Limits of Deviation within its Development Consent Order (DCO), within which any final alignment would lie. For clarity, only the principal elements of the works as scheduled within the DCO are shown. As highlighted in note 4 on the plans all areas within the Order Limits not identified as a Work No. are required for other elements of the authorised project as listed within Schedule 1 of **Application Document 3.1 draft Development Consent Order (DCO) [APP-007] superseded by [AS-087]**. To assist reviewers **Application Document 2.14.2 Indicative General Arrangements Plans – Kent [APP-039]** are provided to show greater detail on what the land within the Order Limits will be used for and **Application Document 2.3 Land Plans [APP-019] superseded by [PDA-005] and [PDA-006]** also identifies the proposed use of the land within the Order Limits through the assignment of classes of rights.
6.2.4	We note that there are six construction compounds proposed within the order limits in Kent. The Council considers that the extent and number of construction compounds seems excessive, particularly given the large area of some of the proposed compounds. This raises the question whether more land is included within the order limits than is necessary to deliver the DCO.	The locations of construction compounds have been selected to minimise the impact on the environment wherever possible. For instance, various construction compounds and access routes have been moved or removed to reduce archaeological impacts and avoid other utilities. The size of construction compounds depends on the specific construction needs and plant machinery required in a given location. The areas shown allow for top-soil and sub-soil stockpiles, aggregate stores and drainage along with the fenced compound area for welfare and laydown purposes. The compounds also reflect a need for a mobilisation compound near the A256 area which will be used to set up the main compounds and access to them and trenchless crossing compounds that have specific purposes and locations, increasing the overall number of compounds required. The three compound locations near the Converter Station enable the converter station contractor, cable contractor and OHL contractor to work simultaneously from separate CDM areas, this is a worst-case assessment and should the overall programme of works allow then opportunities to share compound areas will be considered. The number of compounds also reflects the areas required for use by the different contractors to build the Proposed Project. The compound areas allow for the storage of stripped topsoil and for the installation of drainage, which given the relatively high ground water level, are likely to require wide shallow swales which have an increased footprint. Construction vehicle and worker forecasts have been derived by the Front-End Engineering Design team based on the anticipated construction programme and construction compounds/ activities at each access point. When appointed, the corresponding contractor will specify more accurately vehicle and worker numbers. During construction, contractors will be required to adhere to **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** and develop their own task-specific management plans. **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] superseded by [AS-093]** outlines information on the proposed construction compounds and Proposed Project drawings indicate where construction compounds will be located, including typical compound layouts. Compound site restoration will follow a standard

Reference	Summary of relevant representation	Applicant's Response
		method that has successfully been implemented in numerous other sites, which have reverted to previous uses with no lasting adverse impacts.
Landscape and Visual Impact		
6.2.5	The Council notes that a greater number of viewpoints have been determined as experiencing significant adverse effects compared to the Preliminary Environmental Information Report (now includes Viewpoints 3, 4, 5, 6 and 11). Viewpoint 4 is the only one assessed as major adverse whilst the remaining viewpoints (highlighted above) have been assessed as moderate adverse. The Council considers that the sensitivity of some of the viewpoints (specifically those looking across the Minster Marshes) have been undervalued and the adverse visual effects identified would be greater than the assessed level. In addition, Viewpoint 13 does not appear to capture the construction compound to the north which has been added to the proposed development at a later date.	It is acknowledged that there are a greater number of viewpoints with the potential to experience residual significant adverse visual effects as reported within **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** than in the Preliminary Environmental Information Report (PEIR). This is a result of increased survey and assessment work that has been undertaken as well as design development since the PEIR was produced. Following the implementation of the embedded mitigation measures it is considered that the remaining significant residual adverse effects at year 15 would be limited to four representative viewpoints (viewpoints 4, 5, 6 and 11) in close proximity to the north and north west of Minster Converter Station and Minster Substation and no significant residual adverse effects at year 15 on the assessed landscape or seascape receptors. The Council queries the sensitivity of viewpoints looking across the Minster Marshes which are considered to include viewpoints 4, 5, 6, 10 and 11. The value of these viewpoints are reported within **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** to be 'medium'. These are not views across a locally or nationally designated landscape and are likely to be valued by the local community. Scenic qualities are typically noted in the views, however with existing influence from energy infrastructure and tall vertical features which reduce the scenic quality and therefore visual value. Even if it were deemed that the value should be higher as suggested by TDC, which is not considered to be the case by the Applicant, the overall sensitivity of the receptors is reported as being higher than 'medium' for all five viewpoints due to the higher reported susceptibility of receptors. Therefore, it is not considered that a higher value rating for the viewpoints would alter the overall conclusions relating to the significance of the effect as the sensitivity of the receptors is likely to remain the same. The assessment of the potential effects arising from the Kent Onshore Scheme are detailed within **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]** which sets out the construction stage assessment with specific reference to the construction compound (page 35).
6.2.6	The Stour Marshes Landscape Character Area (E1) has been determined as experiencing significant adverse effects during construction and year 1 of operation, however the Council considers that the impact would be significant adverse for the full duration of the project given the location, scale of development (in particular the Converter Station and Substation) and the limitations of the mitigation proposed (as accepted by National Grid).	The Applicant has fully assessed the effects of the Kent Onshore Scheme on landscape character in accordance with the agreed methodology which is presented in **Application Document 6.3.3.1.A ES Appendix 3.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-143]**. The full assessment including descriptive text for the reported effect is set out within **Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]**. This explains that although the direct effects of the new infrastructure would remain within the LCA, the establishment of the proposed landscape planting would lessen the alteration of the key characteristics experienced at year 1 in the context of the more vegetated part of the LCA and proximity to existing road and energy infrastructure which the Proposed Project is located within. Regarding the limitations of the mitigation proposed, the year 15 assessment notes that the landscape planting around the Minster Converter Station and Substation would have matured and would contribute to reducing perceptual changes arising from the Kent Onshore Scheme and would provide a degree of containment. The assessment therefore does not attempt to portray that the landscape planting would fully enclose the Proposed Project, rather it would contribute to the

Reference	Summary of relevant representation	Applicant's Response
		containment and reducing perceptual changes which would ultimately result in there not being a residual significant adverse effect at year 15.
6.2.7	In relation to Landscape Character Areas, the Council notes that the Landscape Character Areas: B1 - Wantsum North Slopes, E1 - Stour Marshes, F1 - Pegwell Bay and G1 - Ramsgate and Broadstairs Cliffs have all been assigned a 'high' sensitivity, however Landscape Character Areas F1 and G1 are assessed as 'very high' within Table 1.11 which differs from the assessment outlined within the text of the documents.	This discrepancy cannot be found in the application documentation relating to the Kent Landscape and Visual chapter (**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**) or the detailed landscape assessment appendix (**Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]**). Further clarification of the exact location of the suggested discrepancy is requested.
6.2.8	Having regard to the Design Principles Guide it is clear that due to the number of options presented for the design of the Converter Station and Substation, the final visual impact of the scheme remains unclear. It is also noted that the examination documents confirm that the buildings will comprise a 2 metre high platform with total heights of 28 metres (Converter Station) and 20 metres (Substation) with roof height infrastructure above. The concrete platforms are omitted from the plan (7.11.2 Design Approach Document Kent) and as such are misleading.	**Application Document 7.12.2 Design Principles - Kent [APP-367]** contains Key Design Principles in column 3 of Table 3.1 which are secured in Requirement 3 of **Application Document 3.1 draft Development Control Order (DCO) [APP-007] superseded by [AS-087]**. These Key Design Principles apply to the Kent converter station (Work No. 9B). Table 4.1 of the document contains Key Design Principles applicable to Work No. 11 - the new substation at Minster, and these are secured in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**. The Key Design Principles define the design outcomes and embedded mitigation measures that are required to ensure that the visual impact of the final proposals are in line with the Landscape and Visual Impact Assessment (LVIA). Depending on the selected equipment provider, and subject to detailed design, the disposition of buildings and equipment within the Minster Converter Station and Substation may vary. This requirement for design flexibility has been allowed for in the Limits of Deviation and Height Parameters. **Application Document 7.11.2 Design Approach Document (DAD) - Kent [APP-365]** shows illustrations of four different design options of how the Key Design Principles could be met. Depending on the final layouts certain options may be more applicable than others, or they could be used in combination. Tables 3.1 and 4.1 of the Design Principles also includes a column of Potential Associated Activities setting out guidance to clarify the information that could be associated with each Key Design Principle. Section 3.0 Generic Design Parameters in the DAD has been provided to assist with visualisation of how the indicative design layouts fit within the parameters defined in the draft DCO, in which the Table of Parameters states that Work No. 9B (converter station) has a height parameter of *"28 m above existing ground level (not including roof mounted equipment)"* and that Work No. 11 (substation) has a height parameter of *"20 m above existing ground level"*. The note on page 48 of the DAD states that the *"current engineering assumption is that the ground will need to be built up by approximately 2 m."* This is the worst case height that has been used to assess the combined height of the converter station and associated land raising in the illustrations provided within Section 6.0 Design Response to Design Principles in the DAD. The diagram does not show the relationship between the Proposed Project platform and the existing ground level. This will be added to make it clearer when the DAD is revised.
6.2.9	The scheme will involve the erection of 4no. Pylons within the Thanet District. Whilst the documents confirm that steel lattice pylons with a height of 46.5 metres (standard height) will be used for the connection between the proposed combined Converter Station/Substation and the Richborough to Canterbury 400kV overhead line the Draft DCO states that the pylons in Kent will vary in height with a 6 metre deviation (Article 5) and as such could potentially have a height of 52 metres. It is unclear if the worst case scenario for the pylons (i.e. 52m high) has been assessed within the Landscape and Visual Chapter of the Environmental Statement.	**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** states within the 'Flexibility assumptions' table (Table 1.8 on page 44) that the maximum flexibility of the vertical limits of deviation has been assessed.

Reference	Summary of relevant representation	Applicant's Response
6.2.10	The pylons will be a new feature within the Thanet District as part of the Project. The installation of up to six temporary pylons or guyed masts would be required to facilitate the connection to the new Substation. The potential overlap of temporary and new permanent towers during the construction phase would result in more towers being present at a given time. It is the Council's view that this will serve to compound the visual harm, albeit temporarily.	The potential overlap between the temporary and permanent towers as part of the Kent Onshore Scheme is acknowledged within the assessment on visual receptors during the construction phase, detailed within **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]**. For example, on page 27 for the construction phase assessment of viewpoint 10, it is noted that "*The works to the OHL would result in temporary towers which have the potential to contrast with the existing OHL and could be present at the same time as the new permanent towers, which would result in an increased concentration of wirescape*".
6.2.11	There have been a number of temporary construction compounds identified within the Thanet District as the Project has developed. In addition to these the Examination Documents include a number of construction areas. Having regard to the example design outlined within 2.13 Design and Layout Plans and the infrastructure these areas are likely to accommodate, this element of the proposal would result in an even greater visual impact. In cases where the construction areas are sited a considerable distance from the main buildings (Converter and Substation) such as the construction area proposed towards the Lord of the Manor roundabout, these are likely to have a more significant visual impact still as they will not be viewed in the context of the ongoing construction of the main site.	The concern around the visual impact of the construction works associated with the Kent Onshore Scheme is acknowledged. The different elements of the Kent Onshore Scheme, including the temporary construction compounds, are taken into consideration in the assessment of effects on both landscape and visual receptors within **Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]** and **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]**. For example, on page 37 for the construction phase assessment of viewpoint 14, the views towards the construction compounds and occasional movement along access tracks associated with the landfall is acknowledged and factored into the overall assessment on this receptor.
6.2.12	Lighting during construction and operation has not been fully assessed in terms of the landscape and visual impact and the relevant mitigation secured given the sensitivity of the landscape and visual amenity. Assumptions have been made that lighting will be required as and when required during low levels of light particularly during winter. During the operation lighting will be on 8m columns or mounted on the building at an unspecified height. Whilst manually controlled, the operational work hours are not stated and therefore the lighting could be required overnight and for extended periods overnight. Furthermore, the assessment of lighting excludes any maintenance lighting and the frequency and length of maintenance events is not specified although it is acknowledged that this may be difficult to predict accurately. The Lux levels are also only provided as an average maintained level with no detail of maximum lux levels.	An appropriate assessment of the effects of lighting on landscape and visual receptors has been undertaken during construction and operation. The assessment sets out for every landscape and visual receptor at construction and operation the consideration of lighting on the receptor, as detailed within **Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]** and **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]**. Assumptions within the landscape and visual impact assessment (LVIA) regarding lighting have been set out in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** at paragraphs 1.9.5 and 1.9.6. As TDC identify, it is not possible to determine the exact length or duration of task lighting for maintenance tasks at this stage. However, these are usually planned and delivered during day light hours when no additional lighting is required, and task lighting would only be used in emergency situations or for tasks that need to be continuous. This would be infrequent. From a construction point of view, there are some 24 hour activities associated with the Proposed Project, including marine cable laying (including near shore), cable jointing and trenchless drilling so lighting at these locations would be continuous for safety reasons during those activities. The selection and positioning of luminaires shall be managed by the site maintenance team to adhere to the lighting philosophy applied to the fixed lighting installation discussed in the Proposed Project description. Given the core working hours it would be expected that compounds would be lit between dusk and 7pm during the winter months. Lighting requirements would be designed to relevant guidance and standards. This would include detailed calculations to reduce light pollution including reviewing the upward light output ratio and the intention to have any perimeter lighting aiming inwards towards the compound. If there is light spillage then louvres and cowls would be employed to shield the light distribution. The Applicant is committed to conserving and enhancing the natural beauty of the landscape, including a dark skies policy pertaining to use of lighting on the new infrastructure and maintenance activities.
6.2.13	There is a lack of detail on the maximum height of the security fencing at the access and around the Converter Station and Substation once completed. It is noted that no fencing is proposed along the permanent access route.	The security fence around the Minster Converter Station and Substation would be a maximum 4m. This would be an electric fence, and the palisade or mesh fence would be 3m. The fence at the access off the A256 would be standard highways post and rail fencing to prevent unauthorised access to Ebbsfleet Lane North. This would tie in with the proposed gate to the existing highway boundary.
6.2.14	It is the view of the Council that the cumulative effect of all elements of the project such as the proposed Converter Station, Substation, associated	The Applicant has fully assessed the entire Kent Onshore Scheme on landscape character and visual amenity. This includes all aspects of the Kent Onshore Scheme during construction and operational

Reference	Summary of relevant representation	Applicant's Response
	structures, compounds, roads and parking areas would result in significant harm to the intrinsic character of the immediate and surrounding landscape to the detriment of visual amenity for a variety of users over the entire course of the Project.	phases which have been taken into consideration in the detailed assessment of effects on landscape character and visual amenity contained within **Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]** and **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]**. Residual significant effects would be limited to those receptors (represented by viewpoints 4, 5, 6 and 11) in close proximity to the north and north west of Minster Converter Station and Substation. There would be no significant residual adverse effects on the assessed landscape or seascape receptors, with the Minster Converter Station and Substation sitting within the industrial context of the eastern periphery of the marsh landscape.
Agriculture and Soils		
6.2.15	The documents highlight that a likely significant effect is anticipated due to temporary loss of BMV land. However, the permanent reinstatement of BMV land after decommissioning is outlined to result in a likely significant beneficial effect. It is noted that elements of the proposed development will be decommissioned, for example the proposed temporary roads and compounds, however there are no plans to decommission the Project as it is expected the 40 year life span can be extended through maintenance and refurbishment. As such there will be a permanent loss of BMV land within the District. The Council raises concerns with regards to the scale of loss of BMV land in this sensitive area and it is considered that the cumulative impact of buildings (Converter Station and Substation), areas for parking and access roads, would result in large scale BMV losses. The proposed highways works for access would involve the loss of a larger proportion of greenfield land and this infrastructure will remain in situ beyond the construction phase, into the operational phase of the Project and decommissioning along with other structures that will be left below ground. The construction phase of the Project will have the greatest effect on BMV land and robust soil management plans will be essential to ensure that the quality of the stockpiled soils is maintained or enhanced in order that, once the land is returned to agricultural use, the soil quality is equal to or better than before.	**Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [**APP-066**] superseded by [PDA-023]** states that the total area of BMV land required permanently for the Proposed Project in Kent is 12.21ha, which has been assessed as significant. This permanent loss of BMV land (12.21 ha) from agricultural production equates to a very small percentage of the total utilised agricultural area (8.7 million hectares) in England (0.00014%) or in South East England (1.1 million hectares; <0.0001%). The chapter also assesses the potential effects should the Proposed Project be decommissioned; the reinstatement of the 12.21ha of BMV land to pre-construction grades would result in a significant beneficial effect. The chapter makes it clear that this beneficial effect would only arise should the Proposed Project be decommissioned and any soil handling works would be undertaken following good practice in place at the time of the decommissioning. During construction there would be an impact on BMV land from construction of the temporary access and haul roads, temporary construction compounds and construction laydown areas, soil stripping of working areas for underground cabling, and soil stripping for the permanent infrastructure. The temporary land loss across Kent is approximately 169.67 ha, of which 85.01 ha is predicted to be BMV land. In accordance with the control measures set out in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [**APP-341**]**, land required temporarily for construction would be reinstated to its pre-construction use and condition (or as agreed with the landowner). This would include removing temporary works such as compound areas and temporary access and haul roads. Implementation of these measures would reduce the detrimental effects on soil function and would mean that the reinstated soils are able to provide their associated ecosystem services, including productivity, following reinstatement. **Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]** sets out measures for the effective management, protection, and reinstatement of soil resources.
6.2.16	There is an additional concern that the land required for the proposed highway access during the construction period (and in turn a permanent access for the operational period of the project) has the potential to impact on agricultural holdings as a result of land separation.	explains explains**Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [APP-066] superseded by [PDA-023]** explains that, in agreement with the Planning Inspectorate (PINS), the temporary and permanent removal of land from agricultural production can be scoped out from the assessment. The assessment explains that the impact on individual agricultural businesses, which would take account of land take, fragmentation and disruption, would be mitigated through compensation agreements, which lie outside the scope of the EIA.
Ecology and Biodiversity		
6.2.17	The Council has significant concern in relation to the impact the Project will have on the habitat of protected and notable species which, it appears, will	The impact of the Proposed Project on onshore ecology in Kent has been considered in detail in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [APP-062]**

Reference	Summary of relevant representation	Applicant's Response
	result in significant harm to ecology at the local level. These concerns include: construction timing, tunnelling and potential habitat destruction, habitat loss, noise pollution, light pollution, bird strikes and infrastructure hazards, carbon footprint and flood risks, inadequate mitigation measures, water runoff and pollution, seal population disturbance.	**superseded by [AS-047] and [PDA-021]**, **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** and **Application Document 6.6 Habitats Regulations Assessment Report [APP-290] superseded by [AS-007]**. This includes all the impact pathways identified in the Council's relevant representation. The nature of the Council's concerns on these impact pathways is not clear from this relevant representation, but has been further discussed since with the Council in thematic meetings following the issue of their Principal Areas of Disagreement Summary Statement (PADSS), and is to be documented in the draft Statement of Common Ground (SoCG) with Thanet District Council. Mitigation for any potentially significant effects is set out in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349] superseded by [PDA-035].** With the implementation of these measures, it is concluded that no significant residual adverse effects will remain. Overall, there will be a net increase in habitat for most ecological receptors as a result of the Proposed Project. The potential impacts on intertidal habitats in Pegwell Bay, in relation to the installation of the cable via a trenchless technique (such as horizontal directional drilling) and the rest of the Offshore Scheme, have been considered in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [APP-075] superseded by [AS-020]**. In terms of potential impacts on Pegwell Bay, the Applicant has committed to using trenchless techniques (including HDD) at the landfall. This will ensure that the saltmarsh habitat in Pegwell Bay is completely avoided by routing the cables at a depth of 15-20 m beneath the saltmarsh and lagoon. Further information on the technical feasibility of trenchless techniques including HDD, and how the risks of any breaches of the landward chalk and sand dune system and chalk berm will be mitigated and managed is provided in Appendix A Landfall HDD Feasibility Technical Report of **Application Document 7.3 Design Development Report [APP-321]**. A full detailed assessment of potential impacts on marine mammals is provided in **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [APP-077] superseded by [AS-024]** where the River Stour seal population has been considered in relation to potential disturbance from both airborne and underwater sound during construction activities, visual disturbance, potential effects to prey availability and vessel collision. The most recent review of the Greater Thames Estuary seal population identified a maximum of 97 harbour seals present in the River Stour population in August 2021, compared to a maximum total of 714 seals present in the Greater Thames population (ZSL, 2021). Field observation surveys were undertaken in September, October and November, which includes the sensitive moulting period of the River Stour population, to determine the locations of seals within Pegwell Bay and the River Stour. Surveys found seals haul-out on mudbanks in the River Stour, with no suitable seal haul-out locations in the intertidal areas of the wider Pegwell Bay outside of the River Stour. The state of the tide did not appear to significantly influence the location of the seals; they were present hauled-out on the mudflats of the River Stour during both low tide and high tide observations. The Applicant has undertaken an additional seal location observation survey in the River Stour in August 2025, during the optimal period for harbour seal, to supplement the seal location surveys already completed. The results show the seals hauled out on the same mudflats with the River Stour channel, as in previous surveys, which has been included in **Application Document 6.3.4.4.A ES Appendix 4.4.A Pegwell Bay Seal Survey Report [APP-201].**

Reference	Summary of relevant representation	Applicant's Response
		As described in **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [APP-077] superseded by [AS-024]**, the River Stour haul-out site is located a minimum of 1.063 km from the closest construction activity. A-weighted (most conservative and therefore a worst-case scenario) airborne noise calculations indicate that for Temporary Threshold Shift (TTS) in hearing to occur, a seal would need to be within 17 m of the construction activity exposed for 24 hours, which excludes the River Stour seal population from risk of TTS. These sound calculations are being re-run with M-weighted (seal-specific) values, but this is expected to further reduce the distance at which TTS and Permanent Threshold Shift (PTS) could occur from the construction activity location. In addition, the location of the seal haul-out site on the banks of the River Stour is situated such that the seal population is screened from visual disturbance during construction activities due to large areas of saltmarsh and banks created by tidal flow in the river. Furthermore, marine mammals, including seals travel large distances to forage for prey items (273 km for harbour seals and 448 km for grey seals). Therefore, they are not expected to remain within Pegwell Bay during foraging trips at all times, utilising other nearby areas where prey disruption has not occurred. With reference to vessel collision, the River Stour is frequented by recreational vessel traffic. During the seal surveys conducted in September, October and November, a boat was used in the River Stour to observe seal numbers and behaviour. The seals did not react or exhibit behavioural responses to the presence of the vessel only a few metres away from them. Considering the wide-ranging nature of seals and the habituation of seals to vessel traffic any seals in the Pegwell area are unlikely to collide with slow moving vessels associated with construction of the Offshore Scheme. When considering underwater sounds effects in **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [APP-077] superseded by [AS-024]**, modelling has been undertaken for PTS and TTS for all cetacean species that may be present. In relation to disturbance, however, there are no accepted thresholds as behavioural responses are highly variable depending on factors such as ecological context and habituation to underwater sound. Instead, the effective deterrent range (EDR), given for harbour porpoise in JNCC guidance for the assessment of impacts to SACs designated for harbour porpoise (JNCC, 2020), is used for all hearing groups. Harbour porpoise are known to be particularly sensitive to anthropogenic sound but low frequency cetaceans (whale species such as the humpback whale) are also sensitive, particularly to low frequency sounds. However, sound propagation calculations for the specific sound profiles from the Proposed Project activities shows that the greatest zones of influence are for harbour porpoise and so the EDR distance of 5 km is considered applicable as an indication of potential disturbance distances for all species. Several embedded mitigation measures to minimise underwater sound impacts will be implemented during the construction of the Proposed Project, following standard JNCC guidance (JNCC, 2025. JNCC guidelines for minimising the risk of injury to marine mammals from geophysical surveys, currently in draft). For the noisiest activities considered to have the potential for effects to marine mammals (sub-bottom profiling (SBP)) there will be a 500 m observation zone around the vessel, and no SBP activities can commence until a period of at least 20 minutes has passed in which no marine mammals have been observed around the Offshore Scheme in Pegwell Bay. This includes observations for bottlenose dolphin and humpback whales. In addition, prior to equipment operating at full power, there will be a soft-start or gradual increase in sound intensity so avoidance behaviour can result in animals moving away before any injury is likely to occur. Following standard JNCC guidelines will minimise the risk of injury from underwater sound, particularly that of an impulsive nature.
6.2.18	The Council is opposed to the use of the mudflats via the Hoverport and is engaging directly with National Grid in relation to our concerns.	The onshore ecological impact of the Proposed Project in terms of the use of the hoverport to reach the mudflats is discussed in Paragraph 2.9.210 of **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [APP-062] superseded by [AS-047] and [PDA-021]**.

Reference	Summary of relevant representation	Applicant's Response
		For the offshore impact of the Proposed Project, access and egress of vehicles to the mudflats will be via the old hoverport, with a buffer between the defined access route and the seaward (distal) limit of the saltmarsh. The buffer area will be prohibited to vehicular traffic. As appropriate, access will be from offshore for very large items of equipment which are too large to transport across the hoverport (**Application Document 9.13 Pegwell Bay Construction Method Technical Note**, submitted at Deadline 1). A change notification has also been submitted to the Examining Authority which proposes a small increase in the Order Limits on the eastern end of the hoverport due to a seaward encroachment of saltmarsh habitat onto the western access point onto the foreshore. The latter is addressed in the **Change Application: Addendum to Volume 6 Environmental Statement** to be submitted with the change application.
Air Quality and Noise		
6.2.19	The Council's Environmental Health Officer has reviewed the documents and is content that air quality and noise (operations and construction) impacts on human receptors have been assessed in accordance with relevant guidance, assessment methodology and impact criteria and that assessments have been informed by local baseline data. The Council's Officer requests that they are engaged in the ongoing discussions at examination stage concerning these matters so that they can contribute to condition wording and the content of the CEMP.	This is acknowledged and the Applicant will continue to engage TDC's Environmental Health Officer as required throughout the examination stage.
Water Environment, Geology and Hydrology		
6.2.20	Kent County Council, Natural England and the Environment Agency have been consulted on these proposals, and their expertise should be relied upon. The Council's Regulatory Services Manager has been engaged in discussions with National Grid as the Project has developed and requests that they are engaged in the ongoing discussions at examination stage concerning these matters.	This is acknowledged. The Applicant has been engaging with Kent County Council (KCC), Natural England and the Environment Agency prior to the DCO submission and has continued to during the pre-examination stage. This engagement with these bodies and with TDC's Regulatory Services Manager will continue as required throughout the examination stage.
Coast		
6.2.21	As above, the Council is opposed to the use for access of the Hoverport and mudflats, with the potential impact on protected species and qualifying features of the designated sites. The Council welcomes the engagement with Natural England and KCC Biodiversity in considering the extent of the impact on the Coastal habitat.	For the Offshore Scheme, access and egress of vehicles to the mudflats will be via the old hoverport, with a buffer between the defined access route and the seaward (distal) limit of the saltmarsh. The buffer area will be prohibited to vehicular traffic. As appropriate, access will be from offshore for very large items of equipment which are too large to transport across the hoverport (**Application Document 9.13 Pegwell Bay Construction Method Technical Note**, submitted at Deadline 1). A change notification has also been submitted to the Examining Authority which proposes a small increase in the Order Limits on the eastern end of the hoverport due to a seaward encroachment of saltmarsh habitat onto the western access point onto the foreshore. The latter is addressed in the **Change Application: Addendum to Volume 6 Environmental Statement** to be submitted with the change application.
6.2.22	The Council notes that the number and nature of unexploded ordinance (UXO) present in the Offshore Scheme is currently unknown (**Part 4 Marine Chapter 3 Fish and Shellfish Ecology** page 9) and that prior to construction there will be a full geophysical survey to determine the presence of UXO and to enable rerouting away from targets throughout the route, as well as the need for any explosive objects to be cleared. The documents highlight that an impact assessment of the effect of UXO detonation will be undertaken when this information is available for the Marine	This comment has been noted by the Applicant. If UXO clearance is necessary, the activity would be undertaken in accordance with approved industry practices for removal and disposal/waste management of ordnance, particularly the use of low deflagration methods during clearance. These considerations (including cumulatively) will also be included in the separate Marine Licence Application and associated impact assessments.

Reference	Summary of relevant representation	Applicant's Response
	Licence application and if UXO clearance is necessary, the activity would be undertaken in accordance with approved industry practices for removal and disposal/waste management of ordnance (Description of Proposed Project Document).	
Estates and Property Matters		
6.2.23	The Council notes the rights sought by National Grid for the compulsory acquisition of rights over Council owned land. This is subject to separate discussion with the Council's Assets Team and National Grid. We note that the Book of Reference does not outline the compulsory acquisition of any land of the District Council outright.	Noted. The Applicant will continue to engage with Thanet District Council to seek the land rights necessary for the Proposed Project by voluntary agreement and thanks Thanet District Council (Head of Property – Asset Management) for its engagement to date and going forward.
Socio-economics, Recreation and Tourism		
6.2.24	National Grid have concluded that the impacts caused by the Kent Onshore Scheme on a range of receptors is classified as minor or negligible in nature and as such no likely significant effects are anticipated for socio-economics, recreation and tourism during construction. There are no further impacts identified for the operational and maintenance phase beyond those identified for construction and in the event that the site is decommissioned the effects are anticipated to be no greater than those identified for the construction phase. As such the submission assesses that there are no likely significant effects identified in relation to the construction, operation and maintenance or decommissioning phases. The assessment does not appear to take into consideration that Thanet is a seaside/coastal area which relies heavily on tourism and recreation with the summer months providing much of the trade for these businesses in addition to weekend and Bank Holiday trade. The applicant proposes construction hours every day of the week with a limit of 30 HGVs on Sundays and Bank Holidays. Whilst the Traffic and Transport Chapter of the Environmental Statement states that it is not anticipated that the Proposed Project would have any traffic and transport impacts on Sundays/Bank Holidays (with the restrictions identified in the Outline CTMTP - Kent). There has been no assessment of the impact of construction during Sundays and Bank Holidays.	The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are a source of concern for some local businesses. Section 10.9 of **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics Recreation and Tourism [APP-070]** assesses potential effects of the Proposed Project on private and community assets, recreation and tourism, which identified no likely significant residual effects. This considered potential severance impacts on access to recreational routes and Public Rights of Way (PRoW), residential properties, local businesses, visitor attractions community facilities and open space as a result of the Proposed Project. The assessment also considered construction activities taking place on Sundays and Bank Holidays and has been informed by the findings in **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067].** It is not anticipated that the Proposed Project would give rise to any material traffic and transport impacts on these days. Construction working hours will be between 7am and 5pm on Sundays and Bank holidays, with a limit of 30 HGVs a day equating to on average no more than three HGV movements per hour. This low level of vehicle activity is not expected to be perceptible and is unlikely to deter or disrupt local business activity. As a result, the assessment concludes that there would be no significant socio-economic effects arising from construction activities specifically taking place on Bank Holidays and Weekends. The Applicant also recognises that there is potential for noise, air quality, visual and traffic effects on Bank Holidays and Weekends arising from construction of the Kent Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071] superseded by [AS-003].** No significant adverse amenity effects are identified with regards to human health and wellbeing, which includes construction during Bank Holidays and Weekends.
6.2.25	Ramsgate was named in Time Out's 'The 15 best places to visit in the UK in 2024' and is the only Royal Harbour in the UK. Thanet hosts a number of events throughout the year with many taking place over the summer months. These events attract significant numbers of visitors beyond a standard week/weekend. Whilst not an exhaustive list these include the Ramsgate Festival of Sound, Ramsgate Week Regatta, Broadstairs Folk Week, Broadstairs Blues Bash (takes place in February) and Ramsgate International Film Festival (held in March). Many of the events held within the District are annual events and therefore rely on repeat visitors to ensure their continued success. The Council has significant concerns with regards to the negative impact construction and	The Applicant recognises that the potential for impacts associated with the Proposed Project during construction, operation and decommissioning are a source of concern for local tourism. Section 10.9 of **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics Recreation and Tourism [APP-070]** assesses potential effects of the Proposed Project on private and community assets, recreation and tourism, which identified no likely significant residual effects. The assessment concludes that there are no visitor attractions within the Study Area which would be affected by the land take required for the Kent Onshore Scheme or to which access would be required. Additionally, **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]** concludes there are no roads assessed that would experience significant severance effects during construction. Section 7 of **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan - Kent [APP- 338]** includes construction traffic management measures that will be implemented in support of the Proposed Project, to avoid and reduce adverse impacts on the surrounding networks

Reference	Summary of relevant representation	Applicant's Response
	associated traffic will have on both residents and visitors which will in turn discourage people from visiting the District.	during the construction phase. Therefore, there are no significant severance effects identified between residents, visitors and local assets. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Kent Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071] superseded by [AS-003].** No significant adverse amenity effects are identified with regards to human health and wellbeing, with no significant effects on tourism assets arising from the construction of the Kent Onshore Scheme.
6.2.26	In addition, the Council has concerns that the construction period of the Project which would result in disruption, noise and visual impacts to the PRoW network and coastal paths is likely to impact on tourism and the enjoyment of this area for recreation. There is also a concern that due to the length of the construction period opportunities for exercise and use of these routes for leisure would be affected leading to avoidance which has the potential to negatively impact use of these routes in the longer term. Specifically the Council considers that the proposed working hours to include Sundays and Bank Holidays has the potential to impact on the enjoyment of the PRoW, recreation routes and spaces in the vicinity of the application site. This is due to Sundays and Bank Holidays being the most likely times when local residents and visitors to the District would enjoy recreation in this area. Therefore, this would have a significant effect on receptors and as such construction work on Sundays and Bank Holidays is not considered acceptable by the Council.	The Applicant notes the local concerns set out by the Council regarding the impact of the construction period on the local PRoW network and recreational routes, with particular concern regarding the impact of extending working hours to Sundays and Bank Holidays. Section 10.9 of **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics Recreation and Tourism [APP-070]** assesses the potential effects of the Proposed Project on disruption to the use of PRoW and recreational routes. Appropriate route diversions, closures and management measures are proposed as embedded mitigation and outlined in Section 10.8. The criteria for determining the sensitivity of users of PRoW and recreational trails and the magnitude of impact of disruption is outlined in Section 10.4. For example, recreational routes' sensitivity criteria considered several factors, including: - the quality of user experience; - quality of the route; - purpose of usage; and - potential for substitution. Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated even with the inclusion of working hours on Sundays and Bank Holidays. Paragraph 10.9.74 notes that there is potential for noise, air quality, visual and traffic effects arising from construction of the Kent Onshore Scheme to impact on the amenity of private, community, recreational and tourism assets within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071] superseded by [AS-003**]. For PRoW, amenity impacts are assessed under the determinant 'Social Cohesion and Community Identity'. As defined in in **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071] superseded by [AS-003]**, this considers the "*potential adverse impacts on health and wellbeing resulting from disruption to community connectivity and potential changes to landscape and visual amenity, which could impact mental health*". This assessment draws on evidence across multiple environmental disciplines to provide a comprehensive assessment, including the landscape and visual, socio-economics, and traffic and transport effects. Drawing on this evidence, and applying professional judgement, the assessment concludes that there would be no significant effects on social cohesion and community identity, including amenity impacts on PRoW and other recreational receptors. Additionally, impacts related to access to PRoW for active travel caused by the construction of the Proposed Project is assessed under the "Transport modes, access, connections and physical activity" determinant within **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071] superseded by [AS-003]**. This draws on assessments from **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics Recreation and Tourism [APP-070]** and **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**. Taking residual conclusions into account that the routes will remain open and usable throughout construction, alongside the embedded mitigation set out in the **Application Document 7.5.9.2**

Reference	Summary of relevant representation	Applicant's Response
		Outline Public Rights of Way Management Plan – Kent [APP-353], **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [APP-071] superseded by [AS-003]** assesses the likely impact on health and wellbeing in terms of where physical activity and community connectivity may be compromised for users. It concludes that there would be no significant adverse effects on health and wellbeing. Cumulative effects are also assessed in **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]**, with the same conclusion.
6.2.27	The Council actively encourages local recruitment during construction and the use of local services wherever possible.	The Applicant notes the Council's encouragement to make use of businesses within the local supply chain and recruit the construction workforce locally. The Applicant encourages its contractors to use local services and labour where possible but due to some of the specialist nature of the works it is not possible to dictate this to them as the required skills may not be available locally.
6.2.28	It is the Council's view that there is an opportunity for the project to provide educational benefits were it to be approved. We would welcome a program involving local schools and colleges during survey works and the construction phase (as appropriate) similar to those that have been employed for other energy projects in the District. In terms of tourism, information boards (sensitively designed and located) providing detail on the project would be welcomed.	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 as the Proposed Project progresses will work with stakeholders and local communities to further inform this. However, at this stage the Applicant has not committed to preparing and implementing a specific Education Strategy at a project level. The Applicant supports the delivery of community benefits associated with transmission infrastructure, and already has a number of established programmes which deliver this. For example, it operates a community grant programme which is available to nearby charities and not for profit organisations, when projects are in construction.
Traffic and Transportation		
6.2.29	Kent County Council have been consulted on these proposals and their expertise should be relied upon, with particular regard to the suitability of a new access onto the A256 to serve the site. In terms of assessed highways impacts the Traffic and Transport Chapter of the Environmental Statement highlights that around 1% total construction vehicles and less than 1% HGVs is expected across the access points: K-BM03 (Jutes Lane), K-BM04 (Marsh Farm Road) and K-BM05 (Whitehouse Drove) and as such the assessment focuses on the four main access points (K-BM02 A256 Northbound Carriageway, K-BM01 Ebbsfleet Lane, K-BM06 Ebbsfleet Lane North and K-BM07 Sandwich Road). Construction vehicles will also use Sandwich Road, Cottington Link Road, Cottington Road and Ebbsfleet Lane North to access the four main accesses. A number of secondary access routes will also be used by construction vehicles, although limited to LGVs where possible and these routes include Jutes Lane (K-BM03), Tothill Street, High Street and Marsh Farm Road (K-BM04) and A257 The Causeway (Ash Road), Richborough Road and Whitehouse Drove (K-BM05). The Traffic and Transport Chapter states that core construction hours will include Sunday/Bank Holidays (7am-5pm) as required to provide added flexibility to the programme whereas elsewhere the applicant is applying for construction hours every day of the week with a limit of 30 HGVs on Sundays and Bank Holidays. There appears to be no restriction identified for construction work taking place over Sunday and Bank Holiday aside from the applicant's assessed need for it. The examination documents conclude that no likely significant effects have been identified as a result of the Proposed Project on transport and access	As summarised by KCC within their Relevant Representations, as the Local Highway Authority for Kent, KCC has collaborated with the Applicant on Highways and Transportation matters and following positive engagement, all of the issues raised by KCC during the Pre-Examination stage of the DCO have been addressed by the Applicant. Thanet District Council as Local Planning Authority has been invited to and attended Transport thematic meetings held with KCC. The proposed management and mitigation relating to construction traffic is set out within **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]**. The traffic and transport assessment within **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]** does not identify any significant effects on the highway network during the construction phase with the proposed embedded mitigation and control and management measures in place. This is based on an assessment of the peak construction phase in terms of total vehicles and HGVs, including a weekday assessment of the shoulder and traditional network peak hours and a Saturday assessment of the lunchtime peak. The only construction vehicles to pass through Minster will be those travelling via Marsh Farm Road (access K-BM04) to undertake temporary diversion works to the Over-Head Lines (OHL), including constructing a temporary structure, realigning conductors and building scaffold protection towers. Vegetation clearance and survey works will also be undertaken at this access. Construction traffic is only forecast to use this (Marsh Farm Road) route for a period of six weeks, with a maximum of 29 daily vehicles including seven HGVs. This represents 0.4% of total construction vehicle trips associated with the Kent Onshore Scheme. As shown on **Application Document 6.3.3.7.G ES Appendix 3.7.G Traffic Flow Diagrams [APP-181]**, no construction vehicles are expected to travel through Minster during the peak construction phase. As shown on the HGV Routing Plan within **Application Document 6.4.3.7 ES Figures Kent Traffic and Transport [APP-266]**, the route

Reference	Summary of relevant representation	Applicant's Response
	during any phase with the proposed mitigation in place, as all effects have either been categorised as minor adverse or negligible. However, the Council considers that given the number and type of vehicle movements and hours of use, traffic associated with construction is likely to have a significant impact on the local highway network. As previously raised in the Council's statutory pre-application response, significant concern is raised with any construction access via Minster, even as a secondary means of access.	through Minster does not form a primary construction traffic route. Therefore, it is not forecast that these limited vehicle trips (both in quantity and in duration) will result in any impacts through Minster.
Hours of Construction		
6.2.30	The Indicative Construction Programme provided shows that enabling works are expected to begin during Q3 of 2026 and the installation of the Converter Station and Substation is expected to be complete by Q2 2031 with the reinstatement period running until Q2 2032. Due to the length of the construction period (given the scale of the Project) it is considered that the adverse impacts that have been highlighted by the Council in relation to this period of the Project will, whilst temporary, be experienced over a long period of time.	The duration and the effects of the Construction Programme has been taken into account when considering the effects of the Proposed Project as assessed in the EIA. Paragraphs 5.4.9 and 5.4.11 of **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology [APP-046]** explain how the assessment methodology takes into account the duration of impact. The construction working hours are intended to ensure that the Proposed Project can be delivered within the required timescales.
Cumulative Impacts		
6.2.31	The documents highlight that when considering the total potential cumulative effect of all the other developments combined with the Kent Onshore Scheme, there is the potential for a significant total cumulative effect on Landscape Character Area (LCA) E1 Stour Marshes. The concentration of energy related development close to and within Richborough Energy Park whilst occupying the less sensitive part of LCA E1, would have the potential to result in a small and peripheral part of LCA E1 becoming an energy-focused landscape, rather than exhibiting characteristics of the wider marsh. The mitigation planting associated with the Kent Onshore Scheme would provide some separation between the combined developments and the wider marsh landscape, thereby limiting the potential for cumulative significant effects to within the eastern periphery of LCA E1. It is also noted however that, once established, the Converter Station, Substation and concentration of energy and infrastructure development within the vicinity has the potential to further exacerbate the adverse impacts in relation to ecology, transport and tourism and that landscape and visual impact can only be minimised and not mitigated. The total temporary disturbance to soils and temporary and permanent loss of BMV land as a result of the Proposed project combined with residential development at Minster (Tothill Street and Hoo Farm), Richborough Energy Park, Goshall Valley East Street (Ash) (noted this is outside of the TDC boundary) and Spitfire Green developments is considered likely to result in a significant cumulative effect. The Council considers that the assessment in relation to cumulative effects has not given sufficient weight to the impact of the construction period of Manston Airport DCO, in close proximity to the north, coinciding with the construction period for the Project alongside a number of other developments within the District.	The cumulative impacts of the Proposed Project together with other projects have been assessed and reported in **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** in line with guidance on cumulative effects assessment published by the Planning Inspectorate. This has taken account of the construction periods of the other projects included within the assessment. The assessment includes consideration of the cumulative effects relating to noise and vibration, traffic and transport, agriculture and soils, ecology and biodiversity and landscape and visual effects. The assessment of inter-project cumulative effects set out in **Application Document 6.2.3.13 Part 2 Kent Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-073]** was undertaken in accordance with the Planning Inspectorate's 'Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment' (Planning Inspectorate, 2024). There are several factors that must be considered in respect of the potential for cumulative effects. 1) Although there will be temporal overlap of whole construction programmes, there will not be continuous activity in all areas at all times. The construction programme for the cable route of the Kent Onshore Scheme, for example, is much shorter than the overall construction programme. Works at the landfall are even shorter in duration. In addition, works to install the cable will proceed along the cable route, and will not typically take place in the same location for long periods. 2) It is particularly important to understand that peak traffic numbers are limited in duration and that there would be no potential for significant cumulative effects from a traffic and transport perspective based on average construction traffic levels for the Proposed Project, given this would result in Negligible effects for the Proposed Project alone. As such, although the overarching programmes of several projects overlap, it is much less likely that the peak traffic periods will overlap. 3) There is relatively limited spatial overlap between the cumulative projects. 4) There is almost no spatial overlap between the Order limits of the Proposed Project and those of the other project considered.

Reference	Summary of relevant representation	Applicant's Response
	Therefore, concerns are raised regarding the cumulative impact of energy projects in this location and the potential need for further expansion within and potentially beyond the Draft Order Limits to satisfy future energy infrastructure demands.	5) The Zone of Influence (ZoI) for some of the key potential amenity impacts are relatively small. Some example study areas extracted from Table 13.1 are provided below. Air Quality: Construction dust – 250 m from the Order Limits. Trackout – 50 m of the routes used by construction vehicles on the public highway, 250 m from the bellmouths. Construction vehicle emissions – 200 m of the affected road network. Non-Road Mobile Machinery (NRMM) emissions – 200 m of the proposed construction compounds. Back-up Generator Emissions – 200 m from the Converter Station and Substation boundary. Noise: 300 m from works locations for construction noise, 100 m from works locations for construction vibration, 1 km from sources of operational noise. 6) The relative lack of spatial overlap of the various projects, and the distances at which the relevant impacts are likely to experienced, helps to explain why fewer cumulative effects have been identified than some may have anticipated.
Project Related Emissions		
6.2.32	The examination documents state that the potential GHG emissions of the Proposed Project are estimated to contribute less than 0.01% of any respective UK carbon budget and the Proposed Project is part of UK policy to decarbonise the electricity grid and transition to net zero. The effect of GHG emissions associated with the Proposed Project is deemed not significant by the applicant. However, significant concerns are raised about the levels of embodied carbon associated with the construction of the Project. The Council has committed to work towards carbon neutrality by 2030 within our published Net Zero Strategy, with the aim of net-zero on Thanet wide emissions by 2050. The Proposed Project would have the potential to affect the Council's ability to meet this target and the implications of the construction project on district-wide targets should be fully appraised.	Thanet District Council's net zero target covers carbon emissions from projects and operations owned or controlled by the Council. As the Proposed Project is not owned or controlled by the Council, the emissions associated with this project are not attributable to the Council and have no impact on the Council meeting their net zero target. The Proposed Project is a Nationally Significant Infrastructure Project (NSIP) and emissions associated with such projects are generally aggregated on a national level, and not attributed to the districts they pass through. To put the construction emissions in context, the majority of emissions associated with the construction of the Proposed Project are attributed to the embodied carbon in the materials, which accounts for approximately 73% of construction stage emissions. This refers to the carbon emissions associated with the manufacturing of the materials, which generally occurs outside of the boundaries of the Council. Any emissions from construction activities occurring within the Council's geographic boundaries (e.g. plant and machinery, and vehicle movements) make up only a relatively small portion of the remaining construction stage emissions. Therefore, the GHG emissions actually occurring in the Council's geographic boundaries are a minor proportion of the Proposed Project's construction stage emissions, and these emissions are not attributed to the Council as they are aggregated on a national level.
Community Benefit		
6.2.33	We note that the Department for Energy Security and Net Zero published guidance in relation to community funds for transmission infrastructure in April 2025 (https://www.gov.uk/government/publications/electricity-transmission-network-infrastructure-commu nity-funds/community-funds-for-transmission-infrastructure-accessible-webpage). We are keen to understand how National Grid intends to comply with the guidance and how this will be secured either through the DCO or by way of a legal agreement. We look forward to working	The Applicant believes communities should be rewarded for hosting new transmission infrastructure essential to boosting home grown, cleaner and more affordable power for the country. In line with Government guidance, published in March 2025, the Applicant will work with communities and deliver meaningful, long-term, social, and economic benefits through local and strategic investment. The Applicant welcomes all suggestions for the potential use of community benefit

Reference	Summary of relevant representation	Applicant's Response
	with National Grid to highlight local needs and priorities within the Thanet District.	funding. Ahead of construction and separately to the planning process, the Applicant will look to engage local stakeholders to understand local ambitions for community benefit, to help shape the delivery of community benefits. The Applicant is and will continue to explore potential coordination with other developers in the region to understand if there are opportunities to collectively deliver community benefits in a coordinated manner.
Operational Mitigation		
6.2.34	The Council notes that the operational mitigation is proposed to be secured through the Construction Environmental Management Plans. The Council is of the view that any operational mitigation should be secured through an Operational Environmental Management Plan to provide clarity on the mitigation for the temporary and permanent effects as well as for ease of monitoring.	Operation and maintenance related measures are clearly identified within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** (refer to column (6) Project Phase within REAC Tables 1.1. to 1.4). This REAC forms Appendix B of the **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [APP-340] superseded by [AS-127]** and compliance with the measures set out in the REAC, including those relevant to the operation and maintenance phase, is secured through DCO Schedule 3 Requirement 6 as set out in **Application Document 3.1 draft Development Consent Order [APP-007] superseded by [AS-087]**. In some instances, specific operational measures, such as habitat creation, are additionally secured through other management plans such as **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] superseded by [PDA-035]**. It is not considered necessary to produce a separate operational management plan as this would likely lead to unnecessary duplication of information already contained within relevant control documents (i.e. REAC, LEMP) and potentially lead to contradictory securing mechanisms.
Decommissioning		
6.2.35	The definition of decommissioning is unclear. The assumption is that decommissioning would have no greater impact than construction, however, Chapter 4 of the Environmental Statement confirms that the permanent access road would be left in-situ and above ground features would be removed to a sufficient depth to allow other practices/construction to occur unhindered. This would result in permanent effects/impacts that have not been assessed as part of the construction phase and therefore the effects of decommissioning need to be assessed particularly where elements of the proposed development are to be left on or in the ground. Consequently, an Outline Decommissioning Environmental Management Plan should be submitted to secure the relevant mitigation. If the Project is not decommissioned, the impacts of the maintenance and refurbishment of the proposed development is not clear as to the extent of the works required to enable the lifespan of the proposed development to be extended.	Details associated with decommissioning are provided in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]** of the ES. As stated in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045],** there are no plans to decommission the Proposed Project. In the event it is to be decommissioned, a written scheme of decommissioning would be submitted to the relevant planning authority at least six months prior to any decommissioning works. The decommissioning works would follow National Grid's processes at that point in time, for assessing and mitigating any environmental impacts. The workforce required for decommissioning would be less than the number required during construction. All decommissioning works would be undertaken in accordance with good practice at the time of decommissioning and detailed in the Outline Soil Management Plan (**Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [**APP-354**]**). Implementation of these measures would reduce detrimental effects on soil function and would mean that the reinstated soils are able to provide their associated ecosystem services following reinstatement (which includes productivity). As noted by the Council, above ground features would be removed to a sufficient depth to be able to allow other practices or construction to occur unhindered in these areas.

~~Table 6.3~~ Table 6.3 Applicant's Response to the Relevant Representation Kent County Council

Reference	Summary of relevant representation	Applicant's Response
6.3.1	KCC has engaged productively with the applicant on the following issues relevant to the County Council's statutory responsibilities prior to the granting of the DCO: -Highways and Transportation – as the Local Highway Authority for Kent. -Minerals and Waste – as the Minerals and Waste Planning Authority for Kent. -Public Rights of Way – as the Local Highway Authority for Kent. -Surface Water Flooding and Drainage – as the Lead Local Flood Authority for Kent. -Heritage Conservation. -Biodiversity – as the Responsible Authority for the Local Nature Recovery Strategy Following positive engagement, all of the issues raised by KCC during the pre-examination stage have been addressed by the applicant. KCC looks forward to working with the applicant and the Planning Inspectorate as the project progresses through the DCO process and would welcome the opportunity to comment on matters of detail throughout the Examination	The Applicant welcomes the positive engagement undertaken with the County Council and their acknowledgement of the productive discussions and agreements reached in regard highways and transportation, minerals and waste, Public Rights of Way (PRoW), surface water flooding and drainage, heritage conservation and biodiversity matters. Further engagement with the County Council is continuing and will continue throughout Examination, with the draft Statement of Common Ground prepared for Kent County Council, setting out the matters which have been agreed and which are still under discussion.

~~Table 6.4~~ Table 6.4 Applicant's Response to the Relevant Representation of Polly Billington MP

Reference	Summary of relevant representation	Applicant's Response
6.4.1	Ecological Impacts: I am deeply concerned about the potential for this project to cause irreversible damage to nature in Pegwell Bay and Minster Marshes. The bay itself is home to Kent's largest seal population, and the marshes provide a vital habitat for a variety of protected species, such as the golden plover, beavers, and water voles. This is a nationally important ecosystem that we should absolutely avoid causing permanent damage to.	The Applicant notes the concerns regarding Pegwell Bay and Minster Marshes. The impacts on the seal population at Pegwell Bay were assessed in **Application Document Part 4 Marine Chapter 4 Marine Mammals [APP-077]** and this chapter has been continuously updated post-submission with the newest version **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals** submitted at Deadline 1. A further seal location survey was conducted in August 2025 which corroborated data collected in 2024 and the results are presented in **Application Document 6.3.4.4.A (B) Appendix 4.4.A Pegwell Bay Seal Survey Report** submitted at Deadline 1. Additional airborne noise modelling assessing levels of disturbance to this population has been undertaken in relation to the **Application Document 9.13 Pegwell Bay Construction Method Technical Note** the results of which are provided in **Application Document 9.49 Seals and Airborne Sound Disturbance Technical Note**. Both documents will also be submitted at Deadline 1. With the mitigation measures detailed in **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals** and **Application Document 7.5.11 Outline Marine Mammal Mitigation Plan [APP-356]**, coupled with the results of detailed airborne noise modelling and seal location surveys it can be concluded that there will be no significant residual adverse effects on the ecology and biodiversity of the Pegwell Bay seal population. The impact of the Proposed Project on ecology and biodiversity in Kent, including golden plover, beaver and water vole has been considered in detail in **Application Documents 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**, **Application Document 2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** and **Application Document 6.6 (B) Habitats Regulations Assessment Report [AS-007]**. Mitigation for any potentially significant effects is set out in those documents as well as in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and in **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]**. With the implementation of the mitigation measures set out in these documents, it is concluded that no significant residual adverse effects on ecology and biodiversity will remain in the long term.
6.4.2	While it is important to build the infrastructure that will help us achieve clean energy, doing it at the expense of rare and irreplaceable natural habitats such as this extremely damaging. We are in a nature and biodiversity crisis, the UK is in the bottom 10% for biodiversity levels, and we can not afford to make this situation worse. Nature cannot come at the expense of National Grid's bottom line.	The impact of the Proposed Project on ecology and biodiversity in Kent has been considered in detail in **Application Document 6.2.3.2Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**, **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** and **Application Document 6.6 Habitats Regulations Assessment Report [AS-007]**. This has included extensive ornithology survey (including 2 seasons of wintering bird survey, 2 seasons of breeding bird survey, and 12 months of vantage point survey) and detailed surveys for dormouse, reptiles, fish, freshwater plants, riparian mammals, terrestrial and freshwater invertebrates, badgers, roosting and foraging/commuting bats and terrestrial plants. It also includes specific consideration of impacts on locally, nationally and internationally important wildlife sites, including their role regarding the East Atlantic Flyway. Mitigation for any potentially significant effects is set out in those documents, in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]** . With the implementation of these measures, it is concluded that no significant residual adverse effects will remain.
6.4.3	Cultural Heritgae impacts: I have been inundated with concerns from constituents, both via email and on the doorstep, who are deeply worried about the impact of this project. They care deeply about	A systematic programme of cultural heritage assessment has been carried out for the Kent Onshore Scheme to identify and avoid, where practicable, known cultural heritage assets. The results of the surveys are submitted with the DCO and comprise:

Reference	Summary of relevant representation	Applicant's Response
	the natural heritage of their local area and they want reassurance that this will not be damaged – these reassurances have not been granted.	• **Application Document 6.3.3.3.A ES Appendix 3.3.A Cultural Heritage Baseline Report [APP-161]**; • **Application Document 6.3.3.3.D ES Appendix 3.3.D Geophysical Survey Report [APP-164]**; • **Application Document 6.3.3.3.E ES Appendix 3.3.E Aerial Photographic and LiDAR Report [APP-165]**; • **Application Document 6.3.3.3.F ES Appendix 3.3.F Archaeological Evaluation Trenching Report [APP-166]**; and • **Application Document 6.3.3.3.G ES Appendix 3.3.G Geo-archaeological Desk-Based Assessment [APP-167]**. Where impacts to heritage assets cannot be avoided, a programme of archaeological mitigation has been designed and agreed with the Archaeological Advisor to Kent County Council to compensate for the impact and to minimise harm. This agreed mitigation will be secured in the DCO by an Overarching Written Scheme of Investigation which is currently being agreed with the Archaeological Advisor to Kent County Council and will be submitted prior to Examination commencing. Regarding natural heritage, the effects of the Kent Onshore Scheme have been assessed for landscape character receptors. The effects are summarised within **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** and detailed within **Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]**. This assesses effects on defined Landscape Character Areas across the study area, including the Stour Marshes, Wantsum North Slopes, Pegwell Bay and Ramsgate and Broadstairs Cliffs. The assessment reports significant adverse effects at year 1 reducing to minor adverse and not significant residual effects at year 15 of operation and maintenance on the Stour Marshes landscape character within which the Kent Onshore Scheme, notably the Minster Converter Station and Substation, would be permanently located. Landscape and ecological planting identified in **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan - Kent [APP-349 superseded by PDA-035]** would create new and enhanced existing green infrastructure links, including connectivity with the SSSI woodland, providing ecological benefit and strengthening screen planting. Riparian planting around the drainage ditches would also have landscape and ecological benefit providing habitat connectivity and establishing a sensitive interface with the wider marsh landscape.
6.4.4	There is also deep concern about previous work carried out by National Grid when installing the Nemo Link interconnector, leaving permanent damage to the area – damage that has never been repaired. I and my constituents have no trust in National Grid to carry out the work and not cause similar damage again. Damage that must be avoided at all costs.	The Applicant in this case (National Grid Electricity Transmission plc) was not the applicant in respect of Nemo Link interconnector (which was National Grid Ventures, a separate legal entity which is subject to different regulatory controls and obligations). While the Proposed Project does make landfall in Pegwell Bay, unlike in the case of Nemo Link, the Applicant has committed to a trenchless technique to go beneath the sensitive saltmarsh habitat, which will avoid the issues caused by the Nemo Link. The commitment to a trenchless solution is secured through Requirement 6 of Schedule 3 of **3.1 (B) draft Development Consent Order (Clean) – Applicants response to Section 51 Advice issued on 23 April 2025 – Accepted at the discretion of the Examining Authority [AS-012]**. This document has since been superseded by **[AS-087**].
6.4.5	Site selection:	Alternative options have been carefully considered. **Application Document 6.2.3.1 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]** provides a description of the reasonable alternatives considered, including alternative landing locations, and the main reasons for selecting the chosen option including a comparison of the environmental effects, as

Reference	Summary of relevant representation	Applicant's Response
	I strongly believe that National Grid needs to revise their plans for Sea Link and explore alternative landing sites where there would be less damage to nature. We have one chance to build the infrastructure of the future, it is vital that we build it in the right places.	required under Part 2 Schedule 4 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Proposed Project is a High Voltage Direct Current (HDVC) link which comprises different components, namely marine HVDC cable, landfalls, terrestrial HVDC cable, converter stations and an Alternating Current (AC) connection to the network connection point. In identifying an overall preferred solution, the appraisals of these individual components are brought together to identify the most appropriate overall design. Therefore, in identifying a preferred landfall the constraints of the marine HVDC cable route, terrestrial HVDC cable route and AC connection are all taken into consideration as explained in detail in **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368]**. The Applicant acknowledges the concerns about the potential impacts of the Proposed Project and as a result, the Proposed Project incorporates measures to minimise the impacts of construction work including a commitment to the use of trenchless landfall technique. This commitment is secured via **Application document 3.1 draft Development Consent Order (DCO) [AS-087]** Schedule 16, Part 2(10) as well as via commitments W12, W18, LV08, B12, TT05, SE02, GG35, B42, W22, and TT08 of **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**.

~~Table 6.5~~ Table 6.5 Applicant's Response to the Relevant Representations of the Right honourable Sir Roger Gale MP

Reference	Summary of relevant representation	Applicant's Response
6.5.1	Impacts on ecology and cultural heritage receptors: This proposed development will, if granted, grossly intrude upon a SSSI, important natural habitat and the historic Roman Richborough Fort, Saxon Shore and Wantsum Channel.	The impact of the Proposed Project on ecology and biodiversity in Kent has been considered in detail in **Application Documents 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021AS-047]**, **Application Document 2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** and **Application Document 6.6 (B) Habitats Regulations Assessment Report [AS-007]**. The assessment has been informed by extensive ornithology surveys (including two seasons of wintering bird survey, two seasons of breeding bird survey, and 12 months of vantage point survey) and detailed surveys for dormouse, reptiles, fish, freshwater plants, riparian mammals, terrestrial and freshwater invertebrates, badgers, roosting and foraging/commuting bats and terrestrial plants. The assessment includes specific consideration of impacts on locally, nationally (e.g. SSSI) and internationally important wildlife sites, including their role regarding the East Atlantic Flyway. Mitigation for any potentially significant effects is set out in those documents as well as in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and in **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]**. With the implementation of the mitigation measures set out in these documents, it is concluded that no significant residual adverse effects on ecology and biodiversity will remain in the long term. The impact of the Kent Onshore Scheme on cultural heritage assets is assessed in **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]**. The Saxon Shore Fort and Roman port at Richborough are designated as a scheduled monument (NHLE 1014642). The Kent Onshore Scheme will not physically impact archaeological remains associated with the monument, and potential impacts during the operational phase arising from change within the setting of the fort, which includes the associative relationship with Wantsum Channel, 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 the Kent Onshore Scheme, and specifically the presence of the Minster Substation and Minster Converter Station, would result in a minor adverse effect, which is not significant. Supporting visualisations from Richborough fort to support the impact assessment are presented in **Application Document 6.4.3.3 ES Figures Kent Cultural Heritage Part 2 of 2 [APP-262]**.
6.5.2	Design: The structure and linking cables and pylons will be built upon marshland, which is advised against, and will require the installation of a vast raft involving the transportation of thousands of tons of concrete at a cost which was not included in the original proposal (devised before National Grid woke up to the fact that marshlands are wet!) and which the grid has declined to publish.	The ground conditions at the site of the proposed Minster Converter Station and Substation were well known and were factored into the decision-making process for site selection. The site selection process considers a number of factors of which ground conditions is only one. When considered on balance with other technical, environmental and socio-economic factors, the proposed site was selected as preferred option, details of which are provided in **Application Document 7.3 Design Development Report [APP-321]** and **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**). Whilst the Applicant recognises the challenge associated with ground conditions in certain parts of the Kent Onshore Scheme, these are not considered as posing a risk to the delivery of the Proposed Project and can be dealt with through standard engineering processes including piled foundations for the principal structures including the temporary bridge structure over the River Stour. The Applicant as experience of working within these ground conditions. The Converter Station is a necessary part of the Proposed Project and the cost of construction was considered in the **Strategic Option Back Check Report** [**APP-320**].
6.5.3	Need: Not only is this project likely to prove hugely and unacceptably expensive it is also not, in this location, necessary. National Grid have paid lip-service to their public consultation, have not heeded the fundamental objections raised and	The Applicant disagrees with the suggestion that the Proposed Project is not necessary. As set out in **Part 5.2** the **Planning Statement** [**AS-057**], the Proposed Project is Critical National Priority infrastructure with an *'established' and 'urgent'* need for new electricity network infrastructure that should be '*brought forward at pace to meet our energy objectives*' (NPS EN-1 Para 3.3.63).

Reference	Summary of relevant representation	Applicant's Response
	have not adequately considered viable alternatives on brownfield sites. There is also a very real possibility that given developments in technology the proposed scheme will be obsolete before it is operational leaving a landscape destroyed to no useful purpose	In the decision-making process, the Applicant is guided by its duty to balance the need to be economic and efficient, whilst also having regard to preserving amenity, which includes the natural environment, cultural heritage, landscape and visual quality. The evolution of the Proposed Project and the rationale underlying the selection of Minster Marshes as the preferred location for the Kent converter station is described in **Corridor Preliminary Routeing and Substation Siting study** [**APP-368**]. This process was the subject of extensive public consultations as set out in the Consultation Report [**APP-301]**. The Applicant assessed a variety of potential areas for new infrastructure. This assessment included brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure. Further information on the reasoning behind the connection location for the Proposed Project, the alternatives considered, how the Applicant has as far as possible coordinated with other projects and a complete project description is contained in: **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368]; Application Document 8.3 Strategic Options Report (October 2023) [APP-370]; Application Document 7.2 Strategic Options Back Check Report [APP-320]**; **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**; **Application Document 7.13 Coordination Document**; and **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045].** The factors that lead to the location of Kent Converter Station are set out in Part 5 of the **Design Development Report** [**APP-321**]. The Applicant is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network. The Proposed Project is therefore making use of the most appropriate technology available at this time to meet the identified need. Subject to gaining development consent, construction works would be expected to start in 2026 and be functionally completed by the end of 2031. The Applicant cannot foresee any circumstances in the foreseeable future in which the Proposed Project will become obsolete.

~~Table 6.6~~ Table 6.6 Applicant's Response to the Relevant Representation of Jenny Riddell-Carpenter MP

Reference	Summary of relevant representation	Applicant's Response
6.6.1	As the Member of Parliament for Suffolk Coastal – an area that will be impacted by this proposed Energy Infrastructure project, I welcome the opportunity to register as an Interested Party and to provide my feedback and highlight my concerns – as well as concerns of my constituents - to the Examining Authority. While I recognise – and passionately champion – the need to invest in and strengthening our electricity infrastructure and deliver the clean and green energy infrastructure, there are real concerns about the Sea Link proposal that need to be heard and understood. Since I was elected in July 2024, I have been consistently involved and engaged in the consultation process and provided comments on the project update (Jan 2025), and the targeted consultation (between 08 July and 11 August 2024). Throughout each of these consultations, I have continually highlighted the unsuitability of the proposed point at which Sea Link makes landfall in Suffolk, and the failures to sufficiently engage with the local community.	The Applicant welcomes comments from and ongoing engagement with the local MP as a key stakeholder and representative of local interests. There is a strong and urgent need for the delivery of the Sea Link reinforcement project. The needs case is set out in detail in **Application Document 7.2 Strategic Options Back Check Report [APP-320]**. The Sea Link project addresses two distinct system needs, which arise separately in the transmission networks in East Anglia and the South East. These are summarised below: 1. **South East** Sea Link will address a shortfall in the capacity of the existing network in Kent to carry power out of the region at times of low wind and high interconnector imports. This is driven by the interconnectors landing in Kent due to its proximity to mainland Europe, as well as growth in other renewable and battery storage projects. Sea Link has to connect on the network no further west than Canterbury North substation, to provide an additional route for power to flow out of Kent in a scenario where there is fault on the existing overhead line between Canterbury and Kemsley. 2. **East Anglia** Sea Link will support the connection of additional low carbon generation in East Anglia by providing an additional route for power to flow out of the region at times of higher wind. Sea Link has to connect in the Sizewell area in order to enable power flow from the generators connecting in this areas (referred to as the Sizewell Generation Group) in a scenario where there is a fault between Sizewell and Bramford. Sea Link is also particularly important because it bypasses the existing network around north Kent, the Thames Estuary, and London, avoiding putting more power onto these already constrained parts of the network, while also providing further network capacity relief for the generators connecting in Essex (referred to as the Essex Generation Group). As an HVDC link can be configured to transfer power in both directions, it can benefit multiple areas in the East Anglia and South East regions. Sea Link represents a coordinated approach to solving the above issues using a single solution
6.6.2	Coordination with other Nationally Significant Infrastructure Projects (NSIP's): Lack of strategic coordination with other NSIPs As I have made clear in every submission since my election in July 2024, the design, planning, and coordination of the numerous nationally significant projects being brought forward by NGET and National Grid Ventures (NGV) at present across the Suffolk coast fails to recognise their strategic importance. Each of the grid infrastructure projects planned for the Suffolk coast – as well as Sizewell C – are expected to take place within a five-mile radius. Yet these NSIPs are being brought forward as standalone projects, in isolation from each other. This creates clear and obvious risks; the lack of coordination means we may miss the opportunity to understand or plan for the cumulative impact of these projects. The consequences of this cannot be overstated. If we fail to consider this cumulative impact, then we will fail to support the local communities (and the local environment) who are most affected by these works.	While the concerns about strategic coordination are noted, the Proposed Project's acceptance by the Secretary of State as nationally significant infrastructure and its designation as a Critical National Priority (CNP) and Accelerated Strategic Transmission Investment (ASTI) project (as introduced by Ofgem) underlines its importance. This status also provides greater certainty for the needs case of Sea Link and other large, strategic onshore electricity transmission projects by removing the requirement to revisit the need in future planning documents. Other energy projects referenced are separate from the Proposed Project, being promoted by different developers and working to different timescales for delivery. As such, while the Applicant is committed to coordinating consenting and delivery with other projects where opportunities are available, including the colocation of infrastructure, it is essential that Sea Link is delivered on time. NPS EN-1, para 3.3.66 states that the security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable new renewable electricity generation, storage, and interconnection infrastructure that our country needs to meet the rapid increase in electricity demand required to transition to net zero while maintaining energy security. The delivery of this important infrastructure also needs to balance cost to consumers, accelerated timelines for delivery and the minimisation of community and environmental impacts.

Reference	Summary of relevant representation	Applicant's Response
		Cumulative effects have been carefully considered in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].** This document discusses combined effects with EA1N, EA2, Sizewell C, Lionlink and a range of other projects.
6.6.3	Coordination with other NSIP's: This is especially true when considering the laying of cable ducts associated with Sea Link and LionLink. The current approach set out could result in multiple separate cable routes overlapping the same sites, which would diminish any agreed mitigation planning. NGET's project update confirmed that the further amendments to the Sea Link proposal that resulted following the public consultations "*are not material or substantial changes. They do not materially change the effects or fundamentally change the project as a whole.*" It is a real failure of both NGET and NGV that they have failed to work jointly on these plans to co-design options, and that they have failed to jointly consider the significant environment and community impact these proposed projects will have, and therefore have failed to properly plan for viable mitigations. Instead, they have operated in silos and in clear isolation from each other. This should never have been allowed to happen.	Further to the response provided above, information on the reasoning behind the connection location for the Proposed Project, the alternatives considered, how the Applicant has coordinated with other projects and a complete project description is contained in: • **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368];** • **Application Document 8.3 Strategic Options Report (October 2023) [APP-370];** • **Application Document 7.2 Strategic Options Back Check Report [APP-320]**; • **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**; • **Application Document 7.13 Coordination Document**; and • **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093].** In addition, it is noted that LionLink has pushed its next round of consultation back which once again underlines the different timescales that each project is working to and the challenges associated with aligning project delivery.
6.6.4	Community engagement: I remain concerned about the lack of proper and meaningful engagement with the community about these plans, despite repeated requests from the community for NGET to engage more, and engage better.	The SEA Link DCO Application has been through an extensive pre-application consultation process that involved engagement with Statutory Consultees as well as members of the public and other interested parties. This process is detailed in the **Consultation Report [APP-301]** which confirms that a non-statutory consultation for the Proposed Project was held between October and December 2022 and Statutory consultation between October and December 2023. Two further targeted consultations were also carried out. Responses that were received during the course of consultation has fed into the design of the Proposed Project. Notwithstanding this the Applicant will continue to engage with interested parties throughout the Examination.
6.6.5	A few months ago, residents in Saxmundham requested, in good faith and through the Town Council, for NGET to attend a community pop up session, along with other developers. NGET declined to attend. I remain concerned about NGETs relationship with the local community, and have asked them to relook at their communications and community engagement strategy and to truly put the community first.	The SEA Link DCO Application has been through an extensive pre application consultation process that involved engagement with Statutory Consultees and landowners as well as members of the public and other interested parties. This process is detailed in the **Application Document 5.1 Consultation Report [APP-301]** which confirms that a Non-statutory consultation for the project was held between October and December 2022 and Statutory consultation between October and December 2023. Two further targeted consultations were also carried out. Responses that were received during the course of consultation has fed into the design of the Proposed Project. Notwithstanding this the Applicant will continue to engage with interested parties throughout the Examination. Additional rounds of engagement were proportionate in their scope and format, in accordance with the principles and methods set out in the Statement of Community Consultation **5.1.5 Consultation Report Appendix D SoCC [APP-308]**. The scope of this engagement was agreed with the Local Planning Authorities.
6.6.6	Communications and engagement activity is currently failing my constituents, and the developers should not shy away from the engagement that residents need and want.	There has been an extensive programme of engagement which is in accordance with the legislative requirements and informed by inputs from key stakeholders on the engagement methods. There have been multi-stage pre-application consultations allowing consultees several opportunities to provide feedback as the proposals evolved. Pre-application consultation involved four phases. Phase one, referred to as Non-statutory consultation, was held between 24 October 2022 and 18 December 2022. This was followed by two phases of

Reference	Summary of relevant representation	Applicant's Response
		statutory consultation, undertaken in accordance with the Statement of Community Consultation—the preparation of which included contributions from the Host Authorities. Statutory consultation was held between 24 October 2023 and 18 December 2023. Targeted consultation took place between 08 July 2024 and 11 August 2024. Lastly, phase four (Pre-submission engagement), was held between 22 November 2024 and 12 January 2025. All feedback received during the four phases of consultation has been carefully reviewed and considered, alongside outputs from wider stakeholder engagement undertaken by the Applicant as part of its preparation of the application for development consent for the Proposed Project. Regard has been had to all feedback received, and changes have been introduced into the Proposed Project design as a result. The consultation process and its outputs are captured in **Application Document 5.1 Consultation Report [APP-301]** and the Planning Inspectorate has accepted the DCO application on the basis of the approach to consultation. The Applicant will maintain ongoing dialogue with stakeholders throughout the Examination.
6.6.7	Additionally, agricultural landowners, who sustain local food production, have told me of issues with engaging with the Sea Link's NGET team – and have raised their objections to cables being buried to a depth less than 1.8meters. Any less than this will result in the land not being able to be used for arable farming (which is the dominate land use of farming in this area). However, NGET's team have been unwilling to engage with this – risking the land being taken permanently out of arable food production. Any cables being laid on active agricultural land should come with guarantees that arable farmland will be safeguarded for future farming use.	Once the HVDC cable has been installed, land will be reinstated to its current condition. The converter station at Saxmundham, as shown in **Application Document 2.14.1 Indicative General Arrangements Plans – Suffolk [APP-038]**, is sited on land which is Provisionally mapped as Grade 3 land (see **Application Document 6.4.2.6 ES Figures Suffolk Agriculture and Soils [APP-233]**). Detailed surveys could not be undertaken for the submission. However, in consultation with Natural England, a predictive approach was taken which predicts the land affected by the converter station to be likely Grade 3a and not Grade 2 land. As such, the siting of the converter station has focused on lower grade land as shown by the initial review of the available Provisional mapping and based on the predictive mapping. Nonetheless, the Applicant has committed to undertaking detailed agricultural land classification surveys which will be reported on during the examination. As can be seen in **Application Document 6.4.2.6 ES Figures Suffolk Agriculture and Soils [APP-233]** much of the land within the Order Limits in this area is BMV land, including grade 2 land to the southeast. The lowest grade land lies close to the coast and in the low-lying, and thus wetter, areas. These areas have other constraints, such as closer proximity to the Suffolk Coast and Heaths AONB, which were taken into account in the assessment of alternatives. In addition, the assessment (**Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils [APP-053]**) states that the design has been rationalised to minimise permanent land take requirements. As such, the Proposed Project has taken account of relevant policy at all stages of its development. Based on feedback received during the consultation process, the typical depth to the base of the cable trenches will be 1.5 m, see **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]** for further information. The minimum depth of burial of the cable to the top of the protective tile will be 0.9 m. In some instances, subject to discussion and agreement with the landowner, this may be deeper but this will depend on cable design. This minimum burial depth is based on the Energy Networks Association guidance (the industry body for network operators in the UK). Subsoil and topsoil will be reinstated above the tile in accordance with the outline Soil Management Plan (see **Application Document 7.5.10.1 Outline Soil Management Plan - Suffolk [APP-354]**) to ensure that the soil profile is reinstated to its pre-construction condition and so it remains suitable to support the required land use. Agricultural activities will be able to be continued following reinstatement and land hand back; any limitation (for example in relation to tree planting or land drain installation) may be subject to restrictions depending on the actual burial depth at any given location and will for part of the compensation agreement.

Reference	Summary of relevant representation	Applicant's Response
		Any disturbance to or modifications required to the current land drainage system will be incorporated into the construction scope to ensure the land is properly reinstated and drains are left in no worse condition than prior to construction. All affected landowners will be compensated on a fair and reasonable basis for any rights acquired, and any impacts on retained property will be considered in line with the Compulsory Purchase Compensation Code. Compensation claims for other disturbance are considered on a case-by-case basis if there is evidence of negative impacts as a result of the Proposed Project. The Applicant will work with landowners to ensure that they are comfortable with the voluntary agreements. Ongoing discussions are taking place with landowners and their agents.
6.6.8	Impacts on environmentally sensitive and valued landscapes: The proposed project falls within one of the most environmentally sensitive and valued landscapes in the country, including designated National Landscapes (formerly AONBs), Sites of Special Scientific Interest (SSSIs), and the Suffolk Heritage Coast. This area underpins a thriving nature-based tourism economy and supports internationally significant wetland and migratory bird habitats, such as those along the proposed East Atlantic Flyway.	The impact of the Proposed Project on ecology in Suffolk has been considered in detail in **Application Document 6.2.2.2Part 2 Suffolk Chapter 2 Ecology and Biodiversity) [PDA-017], Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** and **Application Document 6.6 Habitats Regulations Assessment Report [AS-007]**. This includes assessment of impacts on Sites of Special Scientific Interest (SSSI), habitats for migratory birds, and the East Atlantic Flyway. Mitigation for any potentially significant effects is set out in those documents, in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059].** With the implementation of these measures, it is concluded that no significant residual long term adverse effects will remain. Overall, there will be a net increase in habitat for most ecological receptors as a result of the Proposed Development. The effects of the Proposed Project on landscape designations, including the Suffolk Coast and Heaths AONB, the defined Suffolk Heritage Coast and landscape character are summarised within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** and detailed within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**. This assessment takes into consideration both the sensitivity of the receptors, of which value forms part of this judgement, and the magnitude of effect on the landscape receptor arising from the Proposed Project. The assessment concludes that at year 15 of operation and maintenance, when the proposed landscape mitigation planting is considered to have matured, the only residual landscape effect would be on Landscape Character Area (LCA) L1: Heveningham and Knodishall Estate Claylands. The Saxmundham Converter Station would be permanently located within a large-scale agricultural field enclosure near to the edge of LCA L1 which, despite the proposed landscape mitigation planting, would remain a large alteration to the key characteristics of the LCA, including the deeply rural character and the limited intrusion from modern development. There are not considered to be significant adverse residual effects arising from the Proposed Project on the other five landscape and seascape receptors or the designated landscapes. Section 10.9 of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]** assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on open spaces or visitor attraction receptors. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no significant effect on tourism assets arising from construction of the Suffolk Onshore Scheme and therefore no mitigation will be required. In addition, recognising that PRoW and recreational trails are valued by tourists, the Applicant acknowledged the importance of assessing the potential impact of the Proposed Project on these routes. Section 10.9 of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics,**

Reference	Summary of relevant representation	Applicant's Response
		Recreation and Tourism [APP-057] assesses the potential effects of the Proposed Project on disruption to the use of PRoW and recreational routes. Appropriate route diversions, closures and management measures are proposed as embedded mitigation and outlined in Section 10.8. The criteria for determining the sensitivity of users of PRoW and recreational trails and the magnitude of impact of disruption is outlined in Section 10.4. For example, recreational routes' sensitivity criteria considered several factors, including: - the quality of user experience; - quality of the route; - purpose of usage; and - potential for substitution. Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated to arise on PRoW and recreational routes as a result of the Suffolk Onshore Scheme.
6.6.9	Site selection: I share concerns raised by campaigners and experts that insufficient consideration has been given to alternative sites, such as the brownfield location at Bradwell or other options closer to areas of electricity demand.	In developing the Proposed Project, the Applicant assessed a variety of potential areas for new infrastructure, including brownfield sites. Further information on the reasoning behind the connection location for the Proposed Project, the alternatives considered, how the Applicant has coordinated with other projects and a complete project description is contained in: • **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368];** • **Application Document 8.3 Strategic Options Report (October 2023) [APP-370];** • **Application Document 7.2 Strategic Options Back Check Report [APP-320]**; • **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**; • **Application Document 7.10 Coordination Document [APP-363]**; and • **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093].** The reports listed above outline the range of options and reasonable alternatives that were considered in the development of the Proposed Project. This includes consideration of brownfield sites and the reasons for them being discounted.
6.6.10	I am disappointed by the lack of ambition to prioritise brownfield development and minimise damage to scientifically important nature sites, as well as high-quality farmland and culturally important rural landscapes.	As set out in **Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [APP-368]** the routeing and siting study area is based on the needs case and preferred strategic option as set out in **Application Document 7.2 Strategic Options Back Check [APP-320]**. The routeing and siting study reviewed the Study Area to identify any appropriate brownfield sites. Due to the land use of the Study Area which is defined by the connection points, there was limited opportunity to identify brownfield sites that could accommodate the technical parameters required. Therefore, the identification of converter site option areas was based on avoidance of designated sites as far as possible, landform, opportunities for natural screening and to minimise visual impacts on settlements.

~~Table 6.7~~ Table 6.7 Applicant's Response to the Relevant Representation of Saxmundham Against Needless Destruction

Reference	Summary of relevant representation	Applicant's Response
6.7.1	Executive Summary: 1.1 Saxmundham Against Needless Destruction (SAND) submits this Relevant Representation to the Examining Authority in respect of National Grid Electricity Transmission's application for a Development Consent Order for the Sea Link project (EN020026). SAND strongly objects to the proposals on grounds of insufficient community engagement, inappropriate siting, environmental harm, traffic and public safety risks. 1.2 SAND is a local campaign group, established in November 2023, with over 300 members from Saxmundham, Sternfield, Benhall, and KelsalecumCarlton. We are affiliated with Suffolk Energy Action Solutions (SEAS) and promote offshore grid solutions and conversion at brownfield sites closer to demand. 1.3 Our principal concerns are that the Sea Link converter station is: • 1.3.1 Too close to residential and heritage assets, causing irreversible visual and landscape harm. • 1.3.2 Accessed via rural roads and an oversized bridge and new permanent haul road from the B1121, that will create prolonged traffic disruption and compromise road safety. • 1.3.3 Proposed without meaningful community consultation and with piecemeal changes that fail to address cumulative impacts. • 1.3.4 Likely to cause significant ecological and biodiversity loss, including habitat fragmentation and damage to protected species. 1.4 We request that the Examining Authority: 1.4.1 Reject the current siting of the converter station and associated infrastructure.	The Applicant responds to these points below.
6.7.2	Introduction: 2.1 SAND was formed to provide information, raise awareness, and represent community interests regarding energy infrastructure proposals affecting East Suffolk. We object to the Sea Link DCO application in its current form. 2.2 National Grid's targeted consultations (July and November 2024) have overlooked widespread stakeholder engagement. Key concerns raised by residents have not been addressed, and consultation materials have been limited in scope. 2.3 This Relevant Representation sets out our objections across the following themes: visual and landscape impact; site selection and community engagement; noise, air quality, and water management; traffic and transport; ecology and biodiversity and cumulative impacts.	The SEA Link DCO Application has been through an extensive pre application consultation process that involved engagement with Statutory Consultees as well as members of the public and other interested parties. This process is detailed in the **Application Document 5.1 Consultation Report [APP-301]** which confirms that a Non-statutory consultation for the project was held between October and December 2022 and Statutory consultation between October and December 2023. Two further targeted consultations were also carried out. Responses that were received during the course of consultation has fed into the design of the Proposed Project. The Applicant notes that the Application has already been through an extensive consultation process that has been found to be consistent with the requirements of the Planning Act 2008 (including the duty to consult the local community under Section 47) of the Planning Act 2008 is part of the Section 55 Acceptance process for the Application **[PD-001]**. Notwithstanding this the Applicant will continue to engage with interested parties throughout the Examination.
6.7.3	Landscape and Visual Impact: 3.1 The converter station's scale (up to 26m) and the six metre high, 150mlong bridge will dominate the rural skyline, conflicting with the heritage setting of nearby Grade II* and Grade II listed assets.	The landscape and visual effects associated with the Suffolk Onshore Scheme, including the Saxmundham Converter Station and River Fromus bridge, are summarised within the landscape and visual chapter **(Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048])** and a detailed assessment provided within the landscape assessment appendix **(Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape**

Reference	Summary of relevant representation	Applicant's Response
		Character Assessment – Suffolk [APP-097]) 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])**. The effects on the rural skyline are acknowledged in terms of the upper extents of the Saxmundham Converter Station being visible in some locations within the surrounding local landscape where views are direct, however the backcloth of existing woodland and the layered vegetation network in the surrounding landscape frequently provides a degree of screening to the Saxmundham Converter Station such that any prominence on the skyline is limited. The River Fromus bridge would not affect the rural skyline as the bridge would be contained within the River Fromus valley and there would be no location from which the bridge would appear against the skyline. 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 **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050].** This includes a worst-case assessment of the impact of the proposed Fromus bridge and Saxmundham Converter Station on the Grade II Listed Hurts Hall and the Grade II* Listed Church of St John the Baptist in Saxmundham Conservation Area. Whilst change to the settings of these assets was identified resulting from the presence of the Proposed Project within their settings, the reported and assessed impact of this change was not related to the Proposed Project dominating the rural skyline. The heritage assessment accords with the statements made above in relation to landscape and visual effects. Whilst the upper extents of the proposed Saxmundham Converter Station would visible alongside Hurts Hall when viewed from the south west of the asset, the backcloth of existing woodland and the layered vegetation network in the surrounding landscape frequently provides a degree of screening to the Saxmundham Converter Station. The Converter Station's height does not break the treeline in these views either towards Hurts Hall or towards the Church of St John the Baptist, nor is it taller in these views than Hurts Hall. This is demonstrated in Viewpoint 2 of **Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209]**. Likewise, whilst the proposed Fromus bridge is present within the former parkland setting of Hurts Hall, and landscape setting of the Church of St John the Baptist, and this is assessed as having an impact through change to their settings at Year 1 of Operation, this impact is not considered to be due to it dominating the skyline. As indicated in Viewpoint 2 of **Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209]**, the bridge would be contained within the River Fromus valley and there would be no location from which the bridge would appear against the skyline or otherwise dominating Hurts Hall or the Church of St John the Baptist.
6.7.4	3.2 Proposed screening planting will take decades to mature and cannot mitigate the prolonged visual intrusion. 3.3 We urge the Examining Authority to require alternative designs: partial excavation of the station, reduced height and massing, sympathetic cladding and green roofs, and early, substantial native planting.	The outline landscape mitigation proposals are set out within the outline Landscape and Ecology Management Plan (oLEMP) **(Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan - Suffolk [AS-059])**. The maturity of this planting is taken into account in the assessment of effects on landscape and visual receptors (detailed within 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])** 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])**). As noted in the oLEMP **(Application Document 7.5.7.1Outline Landscape and Ecological Management Plan - Suffolk [AS-059])**, opportunities will be considered for advanced planting to provide early establishment of woodland planting which would enable increased opportunity for plant growth.

Reference	Summary of relevant representation	Applicant's Response
		Additionally, **Application Document 7.12.1 Design Principles – Suffolk [APP-366]** sets out committed design principles in Table 3.1 which require the detailed building design to adhere to, which include locating the smallest feasible compound and building mass as far south as possible to reduce visual impact. Design Principle N.2 refers to the consideration of green roofs on different buildings within the compound area to be explored at detailed design stage. Design Principles BF.1 – 5 respond to the building and roof forms and ID.1 – 5 on materiality, colour and texture. Design principles in Table 3.1 of **Application Document 7.12.1 Design Principles - Suffolk [APP-366]** are secured through Schedule 6 Requirement 3 of the DCO (**Application Document 3.1 draft Development Consent Order [AS-087]**. The design parameters for the Converter Station are based upon the building's operational requirements. Having consulted on a wide range of alternative design options during Statutory Consultation in 2023, including the features suggested in this representation, the Applicant received a high volume of responses. This feedback, recorded in **Application Document 5.1 Consultation Report [APP-301]**, informed the development of the Design Principle
6.7.5	Site Selection: 4.1 The proposed converter station is sited on prime arable farmland directly adjacent to a residential market town and villages. Alternative brownfield sites closer to demand centres have not been adequately evaluated.	In developing the Proposed Project, the Applicant assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure; this includes both the Bradwell and Sizewell sites. Further detail on the alternative sites that were considered can be found in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**.
6.7.6	Site selection and Community engagement: 4.2 Consultation has been limited to statutory consultees and targeted letters; broad community groups beyond those narrow cohorts have been excluded.	In developing the Proposed Project, the Applicant assessed a variety of potential areas for new infrastructure, including brownfield sites. However, the brownfield sites within the areas of search were considered too small to accommodate the required infrastructure; this includes both the Bradwell and Sizewell sites. Further detail on the alternative sites that were considered can be found in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044].** The SEA Link DCO Application has been through an extensive pre application consultation process that involved engagement with Statutory Consultees and landowners as well as members of the public and other interested parties. This process is detailed in the **Application Document 5.1 Consultation Report [APP-301]** which confirms that a Non-statutory consultation for the project was held between October and December 2022 and Statutory consultation between October and December 2023. Two further targeted consultations were also carried out. Responses that were received during the course of consultation has fed into the design of the Proposed Project. Notwithstanding this the Applicant will continue to engage with interested parties throughout the Examination. Additional rounds of engagement were proportionate in their scope and format, in accordance with the principles and methods set out in the Statement of Community Consultation. The scope of this engagement was agreed with the Local Planning Authorities.
6.7.7	Noise, Air Quality and water Management: 5.1 Extended working hours, plant noise, reversing alarms, and dust will harm residential amenity and public health.	The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from the Suffolk Onshore Scheme to impact on the amenity of residents and potentially health of the local community. Amenity impacts on these receptors are assessed in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no likely significant effect on residents and local community assets arising from construction of the Suffolk Onshore Scheme. Embedded mitigation measures are incorporated into the Proposed Project as set out in the respective ES chapters to reduce construction, operational and decommissioning effects, such as noise and vibration, air quality, transport and access and socio-economics. This will in turn mitigate

Reference	Summary of relevant representation	Applicant's Response
		the effects on the local community and existing facilities from a human health and wellbeing perspective. In terms of disruption and in recognition of the potential for impacts on mental health that could arise from activities on site, and surroundings, the measures set out in **Application Document 7.5.3.1 CEMP Appendix A Code of Construction Practice [APP-341]** and the **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** would reduce or avoid adverse human health and wellbeing related impacts as a result of the Proposed Project. The Applicant as part of its submission has produced a report on coordination which covers how it approached coordination with other projects with the aim to reducing the impact on the environment and local communities. Further details are set out in **Application Document 7.10 Coordination Document [APP-363].**
6.7.8	5.2 Increased HGV traffic will elevate local NO_2 and particulate levels, particularly at junctions and in confined streets.	The assessment within **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]** has considered vehicle emissions for each phase of the Proposed Project. Vehicle emission impacts have been assessed in accordance with best practice guidance and the methodology has been discussed with Suffolk County Council and East Suffolk Council. Review of the traffic data indicated that the flows would be below the Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) Development Control screening criteria, other than on the A12 due to the presence of an Air Quality Management Area in this location (now revoked), and therefore the more stringent IAQM and EPUK Development Control screening criteria were applied. Detailed modelling was therefore undertaken at worst case receptor locations along the A12. Changes in nitrogen dioxide (NO2), Particulate matter less than 10 microns in diameter (PM10) and Particulate matter less than 2.5 microns in diameter (PM2.5) concentrations at these locations were predicted to be negligible as a result of the Proposed Project. Construction vehicle emissions as a result of the Proposed Project have therefore been determined as negligible (not significant). Vehicle emissions associated with the operation and maintenance and decommissioning phases were also determined to be not significant.
6.7.9	5.3 Surface water runoff and bridge construction risk altering river flow and flood regimes in the Fromus catchment.	The proposed bridge crossing of the River Fromus has been subject to a detailed assessment by the Applicant, reported in **Application document 6.8 Flood Risk Assessment [APP-292]**. The design of the proposed crossing is such that the channel and banks of the river would be clear spanned, avoiding any physical impacts and changes on the flow regime. Also, the FRA demonstrates through a flood modelling study, which has been reviewed and approved by the Environment Agency, that there would be no impact on the floodplain of the river and no increase in flood risk as a consequence of the proposed crossing. Surface water runoff from the Proposed Project within the Fromus catchment (during both construction and operation) would be collected and subject to treatment and attenuation using a range of suitable Sustainable Drainage techniques, as detailed in Appendix C of **Application document 6.8 Flood Risk Assessment [APP-292]** and secured by commitments W06 and W11 within **Application Document 7.5.3.1 Outline Code of Construction Practice [APP-341]**.
6.7.10	5.4 We request strict working hour limits (08:00–17:00 Mon–Sat, no Sunday/Bank holiday work).	The Applicant would seek to emphasise that the proposed working hours are intended to provide flexibility to carry out works when and where needed. It is not anticipated that construction activity will take place on every Sunday or Bank Holiday. There will be restrictions on the type of activity that can occur on these days. The restrictions include limiting HGV and percussive piling activities. Details relating to the proposed construction working hours and any associated restrictions are contained in **Application Document 6.2.1.4 Part 1 Chapter 4 Description of the Proposed Project [AS-093]**. The working hours are secured by Requirement 7 of Schedule 3 of the draft DCO (**Application Document 3.1 draft Development Consent Order [AS-0]**). A Construction Code of Practice will help control and manage aspects of the Proposed Project that could affect health and

Reference	Summary of relevant representation	Applicant's Response
		wellbeing. Details are contained in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**.
6.7.11	6.1 The chosen access via the B1121 and Wood Farm track relies on narrow rural roads, a weight restricted railway bridge, and a dangerous dual carriageway junction without enhancement	The main access routes for the Proposed Project during the construction phase comprise the A12 and the B1121 Main Road for access S-BM09, as well as the A12, A1094 and the B1069 Snape Road for accesses S-BM03 and S-BM04. These routes are anticipated to accommodate circa 97% of all construction vehicle trips associated with the Proposed Project and are designed to minimise construction vehicles along alternative less suitable routes such as the B1119 Church Street via Saxmundham. With respect to the B1121 Main Road, B1119 Church Hill and the Wood Farm track, works within the B1119 will be limited to new utility connections and environmental mitigation, which will be undertaken offline from the carriageway. Additional construction traffic along the B1119 Church Hill will be limited to environmental mitigation and mobilisation works (associated with the eastern abutment of the Fromus Bridge) only, which will be completed over a period of four months early in the programme, with a maximum of 25 vehicles per day. Once the new access to the Saxmundham Converter Station and the Fromus Bridge is constructed, all construction traffic will use this access from the B1121 Main Road, avoiding routing through Saxmundham and nearby villages. In terms of the A12 / B1121 Main Road dual carriageway junction, assessments of Road Safety and Driver Delay were carried out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** based on the single busiest day of the construction programme in terms of construction traffic levels (including HGVs). The assessment of Road Safety was based on Personal Injury Accident data obtained from Suffolk County Council (SCC) for the most recent five-year period (at the time of the assessment). The A12 / B1121 junction was assigned a negligible level of sensitivity to reflect the collision record, where only one collision was recorded within the five-year period. In terms of highway congestion and junction performance, the assessment of Driver Delay was informed by queue length surveys during the network peak hours and the A12 / B1121 Main Road junction was assigned a low level of sensitivity to reflect low queuing (3-4 vehicles experienced on one arm during the weekday peak hours). No significant effects were identified for the A12 / B1121 Main Road junction as a result of construction traffic associated with the Proposed Project. In terms of the weight-restricted railway bridge on the B1121 Main Road (Benhall Railway Bridge), the majority of construction vehicles (everything up to and including STGO 1 (46 tonnes)) will be permitted to use the bridge. Therefore, any constraints relating to the usage of this route will be limited to a small number of Abnormal Indivisible Load (AIL) vehicles only. Since the submission of the Development Consent Order (DCO) application, a further review of the feedback received and issues raised on the suitability of the Benhall Railway Bridge for transporting AILs has been carried out, including current proposals / options for addressing these issues. A thematic meeting was held with Suffolk County Council (SCC) and East Suffolk Council (ESC) on 6 August 2025 to review the options for the Benhall Railway Bridge, to better understand SCC's concerns and how these could potentially be addressed. A Technical Note will be submitted during Examination to provide further details of the various options, with details on the number of AILs to be accommodated, road closures, diversion routes and/or alternative routes for cable drum deliverables, as well as pedestrian access to provide SCC with further information and inform future discussions. Notwithstanding this, and as the Examining Authority will be aware, the Applicant intends to submit a Change Request (**Applicant's response to the ExA's s89(3) letter of 5 September 2025 - 9.19 Sea Link DCO notification of change to DCO application[AS-138]**) that responds to the request of Suffolk and East Suffolk Councils to provide more flexibility in the options that can be implemented to enable Abnormal Load Vehicles to cross the bridge and greater clarity over the consenting route.

Reference	Summary of relevant representation	Applicant's Response
6.7.12	6.2 Construction vehicular movements will overlap with multiple NSIPs (Sizewell C, EA1N/EA2, Lion Link, garden neighbourhood construction), creating intolerable congestion, rat-running, and emergency response delays.	A comprehensive cumulative assessment of forecast traffic impacts of the Proposed Project and other projects on the Suffolk highway network has been undertaken, as reported within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This considered other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and Lion Link, and the potential cumulative impacts on the surrounding highway network including with respect to Severance, Driver Delay and Road Safety. The assessment concluded that no significant cumulative effects were likely on traffic and transport receptors when the Proposed Project is considered alongside other developments. The Applicant is committed to on-going engagement with other projects to identify potential opportunities for coordination during project delivery and to minimise potential highway impacts, and the potential for significant cumulative effects as a result of the Proposed Project and other cumulative schemes. During the evolution of the Proposed Project design, the Applicant has engaged with the relevant stakeholders in order to understand and address any issues of concern regarding the Proposed Project and its impacts on emergency services. There are no likely significant effects identified on East of England Ambulance Service (EEAST) operations, service capacity and resources as a result of the Proposed Project. 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 [AS-008]**. **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** demonstrates that the additional construction traffic to be generated by the proposals during the peak construction phase is not expected to result in any significant impacts on the surrounding highway network (including in terms of Driver Delay), with the mitigation identified within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [AS-087]**.
6.7.13	6.3 Proposed seven-day working hours exacerbate community disruption.	The Applicant has proposed core construction working hours of 07:00 to 19:00hrs Monday to Friday, and 07:00 to 17:00hrs on Saturdays, Sundays, and Bank Holidays. Whilst this includes weekends and Bank Holidays, the application clarifies that construction activity is not expected to occur on every Sunday or Bank Holiday. Importantly, restrictions are in place to limit the type and scale of activity during these periods, including a cap of 30 HGV movements per day on Sundays and Bank Holidays and limitations on percussive piling. These restrictions are further detailed in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**. The Applicant has justified the inclusion of extended working hours as necessary to maintain programme flexibility and meet the Government's Clean Energy Action Plan targets. The inclusion of limiting HGV movements on Sundays and Bank Holidays does not contradict the general restriction but rather allows for essential, low-impact activities that support the overall delivery schedule. The Traffic and Transport assessments, including those in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, have considered these extended hours and associated 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.
6.7.14	Ecology and Biodiversity:	Habitat fragmentation and displacement/disturbance of wildlife are assessed in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017].** Detailed proposals for addressing disturbance and ensuring connectivity of habitat for mobile wildlife are

Reference	Summary of relevant representation	Applicant's Response
	7.1 Removal of hedgerows, mature trees and farmland will fragment habitats, severing wildlife corridors and displacement of ground-nesting birds, brown hares, reptiles, and aquatic fauna in the River Fromus.	included in **PDA-017** and (regarding habitat connectivity) **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059].**
6.7.15	7.2 Incomplete Surveys: Baseline data for bats (including barbastelle and Nathusius' pipistrelle), dormice, great crested newts, reptiles and birds (notably golden plover) are outdated, spatially limited or inconclusive.	These comments mirror those raised by Suffolk Energy Action Solutions (SEAS). A detailed response has been made to these comments in our response to the SEAS Relevant Representation presented in **Application Document 9.34 Applicant's Comments on Relevant Representations** There are no outdated surveys and survey coverage has enabled good characterisation of the wildlife populations of the area and determine their overall value, particularly given the temporary nature of the impacts in most fields. The only 'inconclusive' survey result was a single record of a 'possible dormouse' nest made in October 2024. This record denotes that the nest was not characteristic, and it was not possible to resolve it to species. Some ambiguous survey records are always a possibility in dormouse survey and the way the Applicant proposes to deal with this is in line with the Hazel Dormouse Mitigation Handbook (3rd Edition) (Wells D, Chanin P and Gubert L, 2024). Given there is a low expectation of encountering dormice, as agreed with the Suffolk Councils, this is considered appropriately precautionary.
6.7.16	7.3 Missed Receptors: No assessment of brown hare or pond habitats; ponds of principal importance within the Order Limits are ignored.	Brown hares are not a legally protected species except from hunting under certain circumstances. Although their numbers have declined in some parts of the UK, they are a common and widespread species. Since arable land is abundant in the local landscape and will remain so during both construction and operation of the Proposed Project, and since the impact on most fields is temporary as the cable is installed, no significant effect on brown hare would arise. No ponds are being lost due to the works hence impacts on ponds are not assessed.
6.7.17	7.4 The scale of residual, cumulative ecological harm, the unreliability of the Environmental Statement and HRA, and the lack of enforceable mitigation measures mean Sea Link cannot lawfully proceed. SAND strongly urges the Examining Authority to recommend refusal of development consent on ecological grounds.	The Environmental Statement and HRA are not unreliable. See the comments made above in response to specific criticisms. These comments mirror those raised by Suffolk Energy Action Solutions (SEAS). A detailed response has been made to these comments in our response to the SEAS submission. There are no outdated surveys and survey coverage has enabled good characterisation of the wildlife populations of the area and determine their overall value, particularly given the temporary nature of the impacts in most fields. **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]** concludes that there will be no significant residual effects on ecology and biodiversity with the implementation of the mitigation measures detailed in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]** and **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]** and in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**. Both APP-49 and APP-342 will be secured (and thus enforceable) through Requirement 6 of Schedule 3 in the DCO (**Application Document 3.1 draft Development Consent Order [AS-087]**.
6.7.18	Cumulative Impact Assessment 8.1 The aggregation of Sea Link, Lion Link, EA1N/EA2, and Sizewell C within a 6-mile radius has not been assessed holistically. 8.2 Combined effects on landscape, traffic, public services, housing, and community wellbeing are significant and exceed local capacity. 8.3 We request a full cumulative impact assessment covering overlapping traffic, noise, air quality, housing demand, emergency services, and community fatigue.	The cumulative effects of the Proposed Project together with other projects, including Lion Link, EA1N/EA2, and Sizewell C, have been assessed and are reported within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter Project Cumulative Effects [APP-060]**. Paragraphs 13.2.2. to 13.2.4 explain the rationale for establishing the 'zone of influence (ZOI)' (or extent) of the cumulative assessment. An overall cumulative assessment ZOI of 20 km has been used, which exceed the 6 miles radius suggested by SAND. However the ZOI for some topics does not extend to this distance because there is no potential for significant effects at greater distances from the source of effects. The Inter-Project cumulative effects assessment was undertaken in accordance with the Planning Inspectorate's 'Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment' (Planning Inspectorate, 2024). The Applicant's assessment goes beyond the requirements of the Planning Inspectorate's guidance, as a further assessment has been

Reference	Summary of relevant representation	Applicant's Response

undertaken of total cumulative effects, combining all projects, in recognition of the scale of overlapping development in the area.

There are several factors that must be considered in respect of the potential for cumulative effects.

1. Although there will be temporal overlap of whole construction programmes, there will not be continuous activity in all areas at all times. The construction programme for the cable route of the Suffolk Onshore Scheme, for example, is much shorter than the overall construction programme. Works at the landfall are even shorter in duration. In addition, works to install the cable will proceed along the cable route, and will not typically take place in the same location for long periods.
2. It is particularly important to understand that peak traffic numbers are limited in duration, as discussed in the technical note on cumulative traffic effects submitted at Deadline 1.
3. There is relatively limited spatial overlap between the cumulative projects. There is naturally overlap between the Proposed Project and EA1N and EA2 west of the B1069 on the approach to the Friston (Kiln Lane) Substation site, as all three projects will connect into the same substation; this is unavoidable. However, there is a spatial separation between the cable routes for much of their length and the projects make landfall approximately 2 km apart. So although a project may be screened in due to overlap in the Zone of Influence, it may only relate to a small part of the project, with the remainder having little or no potential for cumulative effects.
4. There will be spatial overlap between LionLink and the Proposed Project, although their HVDC cable routes approach the Saxmundham Converter Station site from very different alignments, as LionLink proposes to make landfall south of Walberswick. The fact that the converter stations of the two projects are located together is entirely intentional and proposed in response to stakeholder feedback and national policy relating to coordination between projects where possible. Further details are provided **in Application Document 7.10 Coordination Document [APP-363].** Cumulative effects assessment does not require that a project undertake primary assessment of the effects of another project that has yet to report its own effects or mitigation measures. To do so would be extremely difficult, partly due to a lack of project design information; however, it would also be potentially extremely inaccurate, particularly where embedded/design mitigation has not been developed.
5. There is no spatial overlap between the Order limits of the Proposed Project and those of Sizewell C. At their closest point (east of Saxmundham), they are approximately 650 m apart, however the Order limits of the Proposed Project in this location are included for hedgerow planting. The Sizewell C works in this location are the Saxmundham to Leiston Branch Line upgrades.
6. As evidenced by the relatively small number of shared receptors identified with Sizewell C in the assessment of cumulative Traffic and Transport effects (S-RL, S-RL1 and S-RJ) , there is little overlap between the main construction traffic routes proposed for Sizewell C and those identified for use by the Proposed Project. Beyond the A12, Sizewell C will mostly use the B1122 until the Sizewell Link Road is built. The Proposed Project does not propose to use the B1122 for construction HGVs.
7. There is limited intervisibility between the Proposed Project and Sizewell C.
8. The Zone of Influence (ZoI) for some of the key potential amenity impacts are relatively small. Some example study areas extracted from Table 13.1 are provided below.

Air Quality:

9. Construction dust – 250 m from the Order Limits.
10. Trackout – 50 m of the routes used by construction vehicles on the public highway, 250 m from the bellmouths.
11. Construction vehicle emissions – 200 m of the affected road network.

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12. Non-Road Mobile Machinery (NRMM) emissions – 200 m of the proposed construction compounds.

13. Back-up Generator Emissions – 200 m from the Converter Station and Substation boundary.

Noise:

14. 300 m from works locations for construction noise,

15. 100 m from works locations for construction vibration,

16. 1 km from sources of operational noise.

~~9.~~ Given the relative lack of spatial overlap of the various projects, this helps to explain why fewer cumulative effects have been identified than may have been initially anticipated.

As noted above, in addition to assessing the cumulative effect of the Proposed Project with other projects on an individual topic basis, and in recognition of the large number of other projects assessed, some of which are in close proximity to the Suffolk Onshore Scheme, a further assessment has been undertaken which considers the overall cumulative effect of the Proposed Project with all other developments which may each impact any shared receptors. This is presented in Section 13.3 of **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060].**

In addition to the inter-project cumulative effects assessment, an intra-project cumulative effects assessment has also been undertaken which is reported within **Application Document 6.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059]**.This assessment looks at the potential cumulative (often referred to as 'combined') effects that may arise when multiple aspects of a project impact a single receptor (e.g. a local community). This assessment has identified several potentially significant intra-project cumulative effects including effects on some residential receptors under Friston scenario 2, where the Friston Substation is constructed under the Sea Link DCO. These effects include potential effects on local residents (as a result of a combination of visual, noise, traffic, and health and wellbeing effects) as well as transport receptors and users of Public Rights of Way. Mitigation for such combined effects cannot be confirmed at this stage as it is likely to require more detailed construction logistics information from the appointed contractor. Where there are contributing effects that are reported as significant, such as the moderate (significant) visual effects, these are likely to have been mitigated as much as possible at this stage, as the EIA process has sought to mitigate all potentially significant effects where possible. Any mitigation developed to address potentially significant cumulative effects is therefore more likely to focus upon the minor effects that are contributing to the potentially significant intra-project cumulative effects, and due to their minor nature, these will not necessarily have been identified for further mitigation.

The Applicant notes concern regarding the potential impact of construction workers on local housing. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]** presents an assessment to evaluate whether existing visitor and tourism accommodation within a 60-minute drive of the Suffolk Onshore Scheme could meet demand from the peak construction workforce. Given the limited scale of labour demand, the assessment concludes that there is sufficient capacity for the construction workforce within existing visitor and tourism accommodation and therefore there is not anticipated to be a significant impact on local housing in the private sector**. 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, including Lion Link, EA1N, EA2 and Sizewell C, on local accommodation capacity. Under a worst-case scenario whereby the peak construction workforces of

Reference	Summary of relevant representation	Applicant's Response
		the cumulative schemes overlap, and all workers require accommodation, the chapter concludes that no significant effects are expected. During the development of the Proposed Project design, the Applicant has engaged with the relevant stakeholders in order to understand and address any issues of concern regarding the Proposed Project and its impacts on emergency services (e.g. Suffolk Fire and Rescue Service, East of England Ambulance Service). Whilst the assessment does not explicitly consider emergency services as a separate user type, this particular receptor has inherently been considered as part of the assessments of highway safety and driver delay for all road users. There are no likely significant effects identified on emergency services as a result of the Proposed Project. Nonetheless, 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]**.
6.8.19	Conclusions: 9.1 SAND strongly urges the Examining Authority to reject the current Sea Link Development Consent Order. The converter station's siting, scale, and associated infrastructure pose disproportionate and irreversible harm to landscape character, local ecology, residential amenity, and heritage assets. 9.2 The inadequate consultation process has failed to capture the views of the wider community, and the piecemeal evolution of the project highlights a lack of strategic coordination, particularly in light of overlapping energy infrastructure proposals in the region. 9.3 We believe that the needs of energy transition must be balanced with genuine community engagement.	The responses provided in the above sections outline the Applicant's rationale for the location, design and approach to construction of the Proposed Project. As previously stated, extensive pre-application consultation and coordination with other energy infrastructure projects has informed the development of the Proposed Project.

~~Table 6.8~~ Table 6.8 Applicant's Response to the Relevant Representation of Substation Action Save East Suffolk

Theme	Summary of relevant representation	Applicant's response
	1. The Sea Link examination is the fifth NSIP which the East Suffolk community has had to address in recent years. The previous four were Sizewell C, Scottish Power's EA1N and EA2 projects and the National Grid connection hub2 at Friston. 2. FPC and SASES have very limited resources so they have largely confined their comments to the substations site3 and the cable routes to and from the substations site. In respect of the converter stations site, landfall location and cable route we support the representations of the towns, parishes and residents directly affected thereby.	These comments are noted by the Applicant. It should be noted that the 'connection hub' discussed in the representation is presumed to refer to the National Grid substation at Friston (now referred to Kiln Lane substation). This substation is required to provide the network connection for the Scottish Power Renewables (SPR) East Anglia One (North) and East Anglia Two windfarm projects and is also the network connection point for the Proposed Project. As the substation is an essential component of the East Anglia One (North), East Anglia Two, and Sea Link projects, it was included in all three applications . A substation on its own is not however an NSIP (nationally significant infrastructure project), nor has consent been sought for it in isolation of these three DCOs. Despite the substation benefitting from consent pursuant to two different extant DCOs, and being included in the application for the Proposed Project, it will only be delivered once under one of these three consents
	3. National Grid are well aware of the community's very limited resources, yet with the benefit of its relatively unlimited resources it is pursuing a multiple DCO application strategy for its connection hub, for Sea Link and for LionLink despite complaints by the local community about the huge and unnecessary burden this creates. Whilst the Sea Link examination is taking place the Friston community will have to address not only the examination process but the discharge of requirements processes in respect of the EA2 project plus the statutory consultation for LionLink. In addition Friston is also involved in certain aspects of Sizewell C most significantly the traffic impacts. 4. This is a completely unreasonable burden and renders the examination process unfair and oppressive. This point has been made on multiple occasions to National Grid and the Planning Inspectorate but nothing has changed.	These comments are noted by the Applicant. However, the Applicant is obliged to follow the procedural requirements of the consenting route prescribed in the Planning Act 2008. The Applicant is working closely with the Host Authorities who represent this area and the matters of concern. As mentioned above, a separate DCO application is not being sought for Friston (Kiln Lane) substation (presumed to be the 'connection hub' referred to in the representation). Sea Link and LionLink are completely separate projects, progressed by different developers and each with its own discrete needs case, and each being developed along separate timescales. It would not be possible, necessary, or appropriate to progress these other than as separate applications. It should also be noted that the Applicant (National Grid Electricity Transmission, or NGET) and National Grid Ventures (NGV) are separate businesses. NGET has no influence or control over decisions made by NGV, similarly NGV has no influence or control over decisions taken by NGET. Nonetheless, opportunities for coordination between these projects have been thoroughly explored and, where feasible, delivered. This coordination is evident throughout the application for the Proposed Project.
	5. To add to this unreasonable burden National Grid is seeking a third consent for its connection hub and this causes a number of unnecessary issues and complexities. Further National Grid is acting as if the previous examinations relating to the National Grid connection hub did not take place. In this context it should be remembered that these examination processes were highly forensic and very intensive with many issue specific hearings including extensive expert evidence over a nine month period.	These comments are noted by the Applicant. The Applicant is fully aware of the DCO processes undertaken for the SPR East Anglia One (North) and East Anglia Two windfarm projects and indeed participated as an interested party in the Examinations.

Theme	Summary of relevant representation	Applicant's response
	6. Although the ExAs who considered the EA1N, EA2 and National Grid connection hub projects recommended consent be granted, they were clearly concerned about the environmental damage these projects will cause and the prospect of further development at the same location. In section 28.4 of the ExA Reports headed Overall Conclusion on the Case for Development they stated: *"28.4.4 The local harm that the ExA has identified is substantial and should not be underestimated in effect. Its mitigation has in certain key respects been found to be only just sufficient on balance."* (emphasis added) *"28.4.5 ….the ExA observes that the effects of the cumulative delivery of the proposed development with other East Anglia development on the transmission connection site near Friston are so substantially adverse that utmost care will be required in the consideration of any amendments or additions to those elements of the proposed development in this location" (emphasis added)* *"28.4.6 in relation to this conclusion, the ExA observes that particular regard needs to be had at this location to flood and drainage effects (where additional impermeable surfaces within the existing development site have the potential to affect the proposed flood management solution), to landscape and visual impacts and to impacts on the historic built environment"* 7. There is no evidence that National Grid has respected these comments in the application for Sea Link despite reference having been made to them by FPC during the consultation processes. 8. It is respectfully requested that as many as possible of the hearings are conducted in person or be "hybrid" in a location which is close to the development site, for example Snape Maltings which has very good facilities. Ipswich is not a convenient location for local residents.	These comments are noted by the Applicant. Friston (Kiln Lane) substation will only be delivered once, despite benefitting from powers under the extant SPR East Anglia One (North) and East Anglia Two windfarm DCOs and (if made) the Proposed Project DCO. It is anticipated that it will be delivered (by NGET) under one of the two SPR consents, once SPR has transferred the necessary powers to NGET, with commencement starting early 2026. The Applicant is not proposing to alter the extant East Anglia One (North) and East Anglia Two windfarm DCOs or the associated mitigation. Despite this, National Grid requires a consent for a full 'end-to-end' Sea Link project. This is so that National Grid has all necessary powers itself to deliver a functional network reinforcement and meet the needs case without relying on third party powers. The Friston (Kiln Lane) substation is included in the application for the Proposed Project for this reason. The mitigation associated with the substation works in the Proposed Project is that required to mitigate the effects, although would be integrated with the more extensive SPR mitigation if necessary. However, and as set out above, it is anticipated that the Friston (Kiln Lane) substation will be implemented under the SPR consents in any case.
Cumulative effects	9. Friston Parish Council opposes the Sea Link project. 10. In summary the proposed development will substantially worsen the significant adverse impacts that will be caused by EA1N, EA2 and the NG connection hub in a tranquil rural area, next to the historic village of Friston. It will also create a vast construction and then infrastructure site which will extend all the way from Friston to the south-east of Saxmundham causing multiple significant adverse impacts both during construction and operation. These impacts will be exacerbated by National Grid's planned LionLink project which is currently being consulted on. Further the converter station site at Saxmundham can accommodate a third interconnector project ("Third Project") – see Appendix 2. This capacity was also confirmed by a senior manager of National Grid. This Third Project might be Nautilus which was originally to connect at Friston. The connection point has now been moved to the Isle of Grain but could well revert back to Friston.	The potential for cumulative effects to occur due to the simultaneous construction of the Proposed Project and EA1N, EA2 and LionLink is considered in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]. This assessment has identified several potentially significant cumulative effects, though these are limited to landscape character and visual amenity, soil disturbance, and loss of Best and Most Versatile (BMV) agricultural land. The Nautilus project was not included in the assessment of cumulative effects with other projects. The reasons for this are set out in chapter referenced above, but in summary this was because there was insufficient information about the project to allow any meaningful assessment to be undertaken. Regarding a 'Third Project', the site at Saxmundham has indeed been developed in a masterplanned way on the assumption that it could accommodate up to three converter station projects as acknowledged in the representation. This is set out clearly and in detail in **Application Document 7.10 Coordination Document [APP-363].** However, the originally anticipated project (NGV's Nautilus interconnector proiect) has terminated its connection agreement at Friston (Kiln Lane) substation. As set out elsewhere, it should also be noted that the Applicant (National Grid Electricity Transmission, or NGET) and National Grid Ventures (NGV) are separate businesses. NGET has no influence or control over decisions made by NGV, similarly NGV has no influence or control over decisions taken by NGET. The LionLink interconnector is not being progressed by the Applicant. Notwithstanding this, the process of making offers to generators and interconnectors to connect into the transmission network is overseen by the National Energy System Operator (NESO), not the Applicant. This is set out in **Application Document 7.2 Strategic Options Report Back Check [App-370]**.

Theme	Summary of relevant representation	Applicant's response
Need case	11. The Planning Statement sets out why this project is necessary. However, it does not address the fact that this project will do nothing to address key national interests. 12. This project will not generate any clean electricity it will only cause environmental damage and increase the country's carbon footprint. It will not improve the U.K.'s energy security since it will not provide any further source of energy. It will not reduce energy bills in fact it can only increase them.	NPS EN-1 sets out (in bold text) at paragraphs 3.2.6 to 3.2.8 that the Secretary of State should give substantial weight to the need for energy infrastructure covered by the NPS and is not required to consider separately the specific contribution of an individual project to satisfying the need established in the NPS. This includes transmission infrastructure as well as generation infrastructure and is reflected in the approach taken to the drafting of **Application Document 6.2.1.1 Part 1 Introduction Chapter 1 Introduction and Application Document 7.1 Planning Statement**. Please note that the ES has assessed the impact of the Proposed Project on the environment and taken measures to minimise and reduce any adverse effects. The assessments have helped inform the evolving design to ensure that the Proposed Project has had regard for sensitive environmental receptors. Further details on the assessment and proposed mitigation are contained in the relevant technical chapters of the ES. In developing the Proposed Project, National Grid assessed a variety of potential areas for new infrastructure. Full details on how the design has evolved and the consideration of alternatives please are contained in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered**.
Need case	13. The reason National Grid is bringing forward this project is a result of its failure in strategic planning and to discharge its obligations under Section 9(2) of the Electricity Act 1989 which imposes the following duty upon National Grid: *"(2)It shall be the duty of the holder of a licence authorising him to [participate in the transmission of] electricity—* *(a)to develop and maintain an efficient, co-ordinated and economical system of electricity transmission"*	The Proposed Project represents a highly coordinated approach to solving multiple issues on the transmission network using a single solution. Primarily the Proposed Project will solve two distinct system constraints simultaneously. These comprise the need to address a shortfall in the capacity of the existing network in Kent to carry power out of the region at times of low wind and high interconnector imports, while support the connection of additional low carbon generation in East Anglia by providing an additional route for power to flow out of the region at times of higher wind. The Proposed Project is also particularly important because it bypasses the existing network around north Kent, the Thames Estuary, and London, avoiding putting more power onto these already constrained parts of the network, while also providing further network capacity relief for the generators connecting in Essex (referred to as the Essex Generation Group). As an high voltage direct current (DC) link can be configured to transfer power in both directions, it can benefit multiple areas in the East Anglia and South East regions. This is set out in **Application Document 7.2 Strategic Options Report Back Check [App-370]**. Furthermore, the Proposed Project is identified by the Electricity System Operator (ESO) in the Holistic Network Design (HND) report (July 2022), which sets out a single integrated transmission network design that supports the large-scale delivery of electricity generated from offshore wind. Regarding the other statutory duties mentioned in the representation, the Applicant's duty is to balance the need to be economic and efficient, whilst also having regard to preserving amenity, which includes the natural environment, cultural heritage, landscape and visual quality. This duty underlies decision-making process at every stage of project progress.
Need case	14. The existing pylon lines from Sizewell to Bramford can accommodate with some upgrading (new conductors etc) the electricity which will be generated by Sizewell B and Sizewell C. The reason Sea Link is necessary is because National Grid has chosen to connect energy generated offshore (from windfarms and continental Europe e.g. LionLink)) to a part of the UK where that energy is not required, rather than to London and the South East where it is. In other words this project is only necessary because of mistakes made by National Grid in its transmission strategy. 15. Further there is no guarantee that the energy from Continental Europe will even come from exclusively renewable sources. Energy infrastructure should not be built which simply exports the U.K.'s carbon footprint to other countries.	The Applicant, National Grid Electricity Transmission (NGET) is the owner of the high voltage transmission system in England and Wales. Amongst its statutory roles, NGET must develop a network which can accommodate power flows from existing as well as contracted sources of generation, interconnection, and battery storage. The process for making connection offers is overseen by the NESO (not the Applicant). The Applicant does not choose where generators connect. Generators apply to the NESO for connections to the transmission system, and the NESO makes a connection offer to the generator. The NESO has its own processes for assessing connection applications and identifying connection points (summarised in **Application Document 7.2 Strategic Options Back Check Report [APP-320]).** Once agreed, a connection offer contractually binds a generator to a connection location and timescale. NGET is then required under its licence duties to undertake the works necessary to facilitate the connection.

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		It is also important to note that local demand is not what drives the Sea Link needs case. Although some power is consumed locally, the Proposed Project is needed to take power into the wider network to meet a critical national need. The Proposed Project is also not required to take power into London. Indeed, part of the benefits of the Proposed Project is that it avoids taking any more power onto the already constrained network in London and the Thames Estuary.
Need case	16. Therefore, National Grid should be asked the following questions where its answers should be backed up by independent evidence and not supported by mere assertion. i. Will Sea Link generate any electricity? ii. How will Sea Link improve energy security at times when generating capacity in the UK is insufficient? iii. Will electricity generators outside the UK supply electricity to the UK when there is a shortage of supply within Continental Europe? iv. Will Sea Link transmit electricity generated from entirely renewable sources? v. How will Sea Link reduce bills to consumers taking into account all the costs of developing, operating, maintaining and decommissioning Sea Link?	Responses are provided to the queries raised in the representation below: i. No, the Proposed Project is a transmission network reinforcement. ii. A key element of the needs case is to address a shortfall in the capacity of the existing network in Kent to carry power out of the region at times of low wind and high interconnector imports. iii. Electricity can also be traded on the single market in Great Britain by generators and suppliers in other European countries. iv. No, the Proposed Project will facilitate a diversified mix of generation including renewable and non-renewable sources. v. The Proposed Project is described in the NESO Clean Power 2030 report (November 2024) as being critical for the delivery of the governments clean power targets. This wider government objective will contribute to cutting the link between electricity bills and volatile international gas prices. However, there are many various factors that will influence how costs are reflected in electricity bills, including future policy design beyond the remit of the Applicant or Sea Link.
Development Consent Order	17. The approach which National Grid has taken to the draft development consent order is fundamentally flawed. The application should never have been accepted with a draft DCO in its current form. 18. The problem arises because National Grid is seeking consent for the third time for its connection hub under the Sealink DCO which has already been consented under each of the EA1N and EA27 development consent orders. 19. Arguably a third consent might have been necessary when both those orders were subject to judicial review proceedings and before EA2 had secured a contract for difference which provides the financial "underpinning" for the project. With those matters resolved construction activity is commencing for that project with extensive surveys undertaken at the Friston site and the building of the construction haul road at the Friston site and between the Friston site and the B1069. Major ground work is scheduled for Spring 2026 and all key contractors appointed. There is no longer any doubt that the EA2 project is going ahead. Accordingly there is no need for a separate consent and in fact the elements of the EA2 consent which are necessary for National Grid to construct the NG connection hub can be transferred to National Grid in accordance with the terms of the EA2 DCO. 20. Including a separate consent for the NG connection hub within the Sea Link DCO simply adds complexity and confusion leading to an inefficient examination with unnecessary work for all interested parties who are ill-resourced, compounding what is already an unfair and oppressive process.	. The approach that the Applicant has taken to the draft DCO is not flawed. Friston (Kiln Lane) substation is an essential component of the EA1N, EA2 and Sea Link projects so is included in all three applications. It will only be delivered once, under one of these three consents. It is anticipated that it will be delivered (by NGET) under one of the two SPR consents, once SPR transfers the necessary powers to NGET, with commencement starting early 2026. This is acknowledged in the representation. Despite this, the Applicant requires a consent for a full 'end-to-end' Sea Link project. This is so that National Grid Electricity Transmission has all necessary powers itself to deliver a functional network reinforcement and meet the needs case. The Sea Link application therefore includes Friston (Kiln Lane) substation as it forms an essential component of the Sea Link project for which the Applicant does not currently have the powers to deliver. The Applicant recognises the concerns regarding the risks of complexity and confusion arising from the third overlapping consent. The Applicant has sought to address this risk throughout the development of the Proposed Project, by making it clear in consultation material, during consultation events and other community and stakeholder engagement, and the DCO application itself, that the inclusion of the Friston (Kiln Lane) substation is a fall-back and that the substation is expected to be implemented under the SPR consents. Regarding the DCO terms (assumed to mean the mitigation and working hours), these reflect the outcome of a robust process of environmental impact assessment alongside the technical and delivery requirements of implementing the Proposed Project. Nonetheless, the Applicant is working with ESC to consider whether there are specific elements of the Proposed Project where specific restrictions of working hours may be appropriate. This includes

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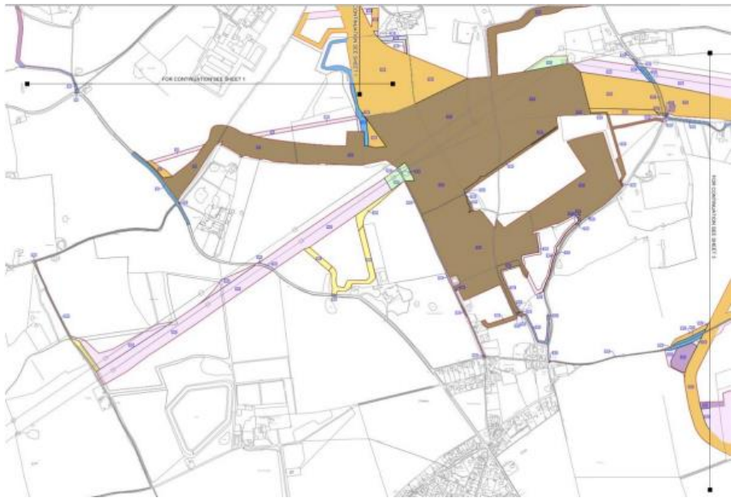
	21. What National Grid is proposing is that the same inadequate DCO terms apply to: • the entirety of the Friston site; • the Saxmundham converter stations site; • the cable route between the sites; and the cable route from the converter stations site to the coast between Aldeburgh and Thorpeness.	aligning the working hours for the Proposed Project's Works No. 1A and 1B (the National Grid substation and associated overhead line works) set out in **Application Document 3.1 draft Development Consent Order [AS-012] superseded by [AS-087]** with the working hours secured in the SPR East Anglia One (North) and East Anglia Two DCOs.
Landscape mitigation	22. This approach can be inferred from studying the land plans in Volume 2 of the Application – land plans sheet two of six. For convenience this is reproduced below.  23. The brown area shows the land which National Grid wishes to compulsory acquire. The white area in the centre of the brown area is the area specifically reserved for the footprint only of the EA1N and EA2 substations but crucially not the areas required to mitigate the landscape, heritage and flood risk impacts of these substations as well has the NG connection hub. 24. This is illustrated by the images in Appendix 1 (of the Relevant Representation) which are taken from the Outline Landscape and Ecological Management Strategy which is secured in both the EA1N and EA2 DCOs. The first image shows the current "baseline" landscape. The second image shows the landscape and flood risk mitigation for the entirety of the site encompassing both the NG connection hub and each of the EA1N and EA2 substations. It will be noted that the landscape mitigation planting is located on land which NG now wishes to compulsorily acquire. It is unclear how the same landscape mitigation is now secured under the draft DCO.	It is important to note that although there would be three DCOs which grant powers to construct Friston (Kiln Lane) substation, the substation will only be delivered once under one of the three consents. If the substation is implemented under one of the two SPR consents, which it is expected to be, then all mitigation secured under that consent would also be implemented. In this scenario (which is presented for assessment and clarity purposes in the application for the Proposed Project as 'scenario 1') then compulsory acquisition powers relating to the National Grid elements of the Friston (Kiln Lane) substation, its mitigation, and its access road would not be used by the Applicant, as they would be unnecessary. This is because these elements would already have been implemented using the powers in the extant SPR DCOs. The Lands Plans in **Application document 2.3 Land Plans Part 1 of 2 [App PDA-005]** omit the footprint of the East Anglia One (North) and East Anglia Two elements of Friston (Kiln Lane) substation, as acknowledged in the representation, because these do not form part of the Proposed Project. However, the Land Plans do show that powers are being sought for the areas around these substations which form part of the mitigation land for the East Anglia One (North) and East Anglia Two projects, and consequently these areas are not shown in white (i.e. outside the Proposed Project Order Limits), again as acknowledged in the representation. This is because these areas would be required as mitigation whether the proposed Friston (Kiln Lane) substation was implemented by either SPR (as expected) or by National Grid Electricity Transmission. In effect, this mitigation forms part of both the East Anglia One (North), East Anglia Two, and the Proposed Project, hence the overlapping DCO Order Limits in this area. As with the landscaping requirements in the SPR DCOs, this landscaping would be secured via a DCO requirement in **Application Document 3.1 draft Development Consent Order [AS-087],** under requirement 6 which requires the submission of a detailed Landscape and Ecological Management Plan (LEMP). The powers to undertake the landscaping were set out in Schedule 1 Part 1.2 of the **Application Document 3.1 draft Development Consent Order [AS-087]** under the definition of associated development. However, a new suite of Works Plans and an updated version of the Draft DCO have been submitted at Deadline 1 which further disaggregate certain principal associated development including landscaping. This will provide further clarity as to where the powers to implement the landscaping works are found. Notwithstanding this, and as set out elsewhere, it is anticipated that the Friston (Kiln Lane) substation, and the associated mitigation, will be implemented under the extant SPR consents in any case.
Flood risk mitigation	25. It will also be noted that there are two Suds ponds. The pond to the east of the NG connection hub is to mitigate the surface water flood risk from the NG connection hub and correspondingly the pond to the east of the EA1N and EA2 substations is to mitigate the surface water flood risk from these substations. Again it is unclear how this flood risk mitigation is now secured under the draft DCO. Furthermore NG's plan of the substation site (the third image 3 at	The Applicant anticipates that the drainage implemented at Friston (Kiln Lane) substation will be that currently being designed (with inputs from National Grid) as part of SPR's East Anglia Two project. This is largely because it will be delivered pursuant to the SPR consent. However, the powers in the Proposed Project application would also allow the Applicant to deliver a comparable drainage strategy if its powers were used to deliver the Friston (Kiln Lane) substation (which they are not expected to be).

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	Appendix 1) shows that the location of the NG Suds pond has moved and dramatically reduced in size and now occupies the area which is allocated to the suds pond for the EA1N and EA2 substations. There is a high surface water flood risk at Friston, a matter with which the ExAs were particularly concerned as evidenced by the extracts from their report set out in paragraph 6 above. The draft DCO does not address this issue and does not even include an Outline Operational Drainage Management Strategy unlike the EA1N and EA2 DCOs.	The drainage strategy shown in the application represents an indicative situation whereby drainage is being implemented only for the Proposed Project. This reflects the use of 'scenarios' in the application for the Proposed Project, which have been used for assessment purposes and to make it clearer that that the delivery of Friston (Kiln Lane) substation under the Sea Link consent would only happen in one set of (highly unlikely) circumstances. The indicative drainage strategy in the application only reflects the drainage requirements of the Proposed Project on its own, because in all other situations (i.e. the SPR elements of Friston Kiln Lane substation are developed, either before, in parallel with, or after the Proposed Project) then the drainage being currently being designed (with inputs from National Grid) as part of SPR's East Anglia Two project is what will be implemented. It would not be the case that the East Anglia One (North) and East Anglia Two elements of Friston (Kiln Lane) substation could be developed without the drainage for those projects being implemented. In discussion with ESC, the Applicant has also committed to submitting a detailed Operational Drainage Management Plan, secured via DCO requirement, to provide further control and reassurance on operational drainage.
Development Consent Order	26. In short the draft DCO is wholly inadequate. It has ignored the mitigation needs at the Friston site which has already been determined under the EA1N and EA2 examinations. There is no need for a separate consent for the NG connection hub and the existing consents should govern the Friston site. Such an approach will enable a much more efficient examination process which will focus on the new elements of Sea Link rather than re-examining matters which have already been settled. For the avoidance of doubt NG was fully involved in the elements of the EA1N and EA2 examinations which related to NG's infrastructure and participated directly in matters relating to the compulsory acquisition of land instructing Michael Humphries QC (as he then was) to represent it in the relevant hearings. 27. Further this approach is particularly egregious given the existing consents for EA1N, EA2 and the NG connection hub were recommended by the ExAs after intense and forensic 9 month examination processes where the ExA is stated in its reports that *"mitigation has in certain key respects been found to be only just sufficient"*. That *"just sufficient"* mitigation is of course secured by the existing consents.	Mitigation needs have not been ignored. The Applicant has taken into consideration the EA1N and EA2 DCOs in developing the Proposed Project. Friston (Kiln Lane) substation is an essential component of the EA1N, EA2 and Sea Link projects so is included in all three applications. It will only be delivered once, under one of these three consents. It is anticipated that it will be delivered (by National Grid ET) under one of the two SPR consents, once SPR has transferred the necessary powers to NGET, with commencement starting early 2026. If delivered under the SPR consent, the mitigation secured under that consent would be delivered directly under those DCOs. Despite this, National Grid requires a consent for a full 'end-to-end' Sea Link project. This is so that National Grid has all necessary powers itself to deliver a functional network reinforcement and meet the needs case. The Sea Link application therefore includes Friston (Kiln Lane) substation as it forms an essential component of the Sea Link project for which the Applicant does not currently have the powers to deliver.
Development Consent Order	28. There are other key mitigation issues which are addressed in the existing consents but not in the draft DCO. Whilst a full comparative exercise has not been undertaken, not least as such an exercise should be unnecessary, a quick review of Part 3 of Schedule 1 - Requirements of the draft DCO and the existing DCOs12 (ignoring the wind turbine elements of those DCOs) shows the inadequacy of the draft DCO. Further evidence of this is demonstrated by the of lack of key outline documents.	The Applicant does not accept the assertion that key mitigation issues have not been addressed. While the more detailed points outlined in associated comments below are specifically addressed in turn, the Applicant has taken into consideration the EA1N and EA2 DCOs along with other recent energy project DCOs in developing the Proposed Project and undertaken a comprehensive and robust Environmental Impact Assessment, through which appropriate mitigation measures are secured in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].**

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Construction working hours	29. An example of a specific issue which is of particular concern to the community is National Grid's proposal to have working hours of seven days a week 6am to 8pm (given the additional hour required beyond the stated "working hours"). It should be noted that National Grid previously accepted working hours of 7am to 7pm (Monday - Friday excluding bank holidays) and 7 am to 1 pm on Saturdays under the existing DCO consents for the National Grid connection hub.	The working hours are intended to ensure that the Proposed Project can be delivered within the timescales required. Shortening working hours would potentially extend the working programme and put at risk the Proposed Project delivery by 2030. The Applicant is working with ESC to consider whether there are specific elements of the Proposed Project where specific restrictions of working hours may be appropriate. This includes aligning the working hours for the Proposed Project's Works No. 1A and 1B (the National Grid substation at Friston Kiln Lane and associated overhead line works) set out in **Application Document 3.1 draft Development Consent Order [AS-012] superseded by [AS-087]** with the working hours secured in the SPR East Anglia One (North) and East Anglia Two DCOs.
Development Consent Order	30. Aside from the Friston site, overall the draft DCO contains inadequate provisions for securing mitigation of the adverse impacts of the proposals and would grant excessive flexibility to the developer to determine the form of the development after consent. National Grid should have taken the existing consents as the starting point, particularly mitigation of environmental impacts, and produced a draft DCO which was much more tailored to the tranquil rural area in which they are seeking to develop major energy infrastructure. 31. It is not as if this issue has not been previously drawn to the Planning Inspectorate's and National Grid's attention. On 14 April 2023 Michael Mahony on behalf of SASES wrote to the Planning Inspectorate copying amongst others National Grid in which the issue of the DCO was raised not least because this matter had been discussed by the Planning Inspectorate with National Grid. The following paragraph was included. *"DCO documents – the DCOs for EA1N, EA2 and the National Grid connection hub at Friston were subject to detailed review and debate during the examination. National Grid should be familiar with those DCOs as it would have been directly involved in their drafting given they include the consent for the National Grid connection hub. If these interconnector projects reach the application stage it would save time if positions reached in relation to these DCOs are reflected in the draft DCOs for the interconnector projects in respect of their onshore infrastructure."* This concern has been completely ignored.	Details of mitigation measures are set out within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** which is secured via Requirement 6 of Schedule 3 in **Application Document 3.1 draft Development Consent Order**. The mitigation for the Proposed Project is the result of the iterative process of environmental impact assessment and consideration of what is necessary and appropriate for the Proposed Project. The way that mitigation is captured, presented, and secured in the application for the Proposed Project reflects this process and the way that the draft DCO and the wider application documents are structured. The Applicant has taken into consideration the EA1N and EA2 DCOs along with other recent energy project DCOs in developing the project and the mitigation measures outlined in the REAC. Sea Link is a separate, different and independent project with a different needs case, the project follows a different route to EA1N and EA2 and includes different technologies and interacts with different stakeholders. As such the Applicant must assess the impact of the project in its own right and provide mitigation accordingly. The ways that the Proposed Project interacts with the extant SPR DCOs is explored in more detail in **Application document 9.24 Friston Substation Update Letter [AS-148]**.
Development Consent Order	32. Given the existing consents, and given the nature of the examination processes which lead to the recommendation and grant of those consents, to revisit the terms of those consents would be irrational.	The Applicant is not proposing to revisit the terms of the SPR EA1N or EA2 projects. The Proposed Project is seeking a separate but overlapping consent. Given that Friston (Kiln Lane) substation is an essential component of the EA1N, EA2 and Sea Link projects, it is included in all three applications. It will only be delivered once, under one of these three consents. It is anticipated that it will be delivered (by National Grid ET) under one of the two SPR consents, once SPR has transferred the necessary powers to NGET, with commencement starting early 2026. If delivered under the SPR consent, the mitigation secured under that consent would be delivered directly under those DCOs. Despite this, National Grid requires a consent for a full 'end-to-end' Sea Link project. This is so that National Grid has all necessary powers itself to deliver a functional network reinforcement and meet the needs case.
Cumulative impact	33. NG has not properly addressed the impact of further developments with other major energy projects in the same area. Those projects are as follows:	The potential for cumulative effects to occur due to the simultaneous construction of the Proposed Project and EA1N, EA2, Sizewell C, and LionLink is considered in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]. This

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	• Sizewell C (under construction) • EA2 (under construction) • EA1N (consented) • National Grid connection hub (consented) • LionLink (pre-application statutory consultation autumn 2025, examination 2026) • Third project (provision has been made at the Saxmundham site) – see Appendix 2.	assessment has identified several potentially significant cumulative effects, though these are limited to landscape character and visual amenity, soil disturbance, and loss of Best and Most Versatile (BMV) agricultural land. The Nautilus project was not included in the assessment of cumulative effects with other projects. The reasons for this are set out in chapter referenced above, but in summary this was because there was insufficient information about the project to allow any meaningful assessment to be undertaken.
Cumulative impact	34. National Grid's assessment of cumulative impact is flawed as it has not taken account of the fact that construction projects are often delayed. So whilst all those projects are unlikely to overlap with each other a significant proportion will.	The potential for cumulative effects to occur due to the simultaneous construction of the Proposed Project and EA1N, EA2, Sizewell C, and LionLink is considered in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]. **The only** aspect of the assessment that has considered the likelihood of overlapping construction is the Traffic and Transport. This is because this assessment is based upon a peak week of traffic.
Cumulative impact	35. It has also ignored the high probability of the third project – see Appendix 2. The impacts of this at the Friston/Saxmundham site are easy to assess since the third project will involve: • another converter station (of the same or very similar design to the Sea Link and LionLink convertor stations) • DC cables coming in from the coast and AC cables going out towards Friston • a further connection at Friston • expansion of the National Grid connection hub at Friston	A third converter station, potentially Nautilus, being located on the Saxmundham site was not included in the assessment of cumulative effects with other projects. The reasons for this are set out in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060], but in summary this was because there was insufficient information about the project for any meaningful assessment to be undertaken.
Cumulative impact	36. This community has already been through examinations where Scottish Power and National Grid were allowed to avoid carrying out a proper cumulative impact assessment on the basis of an assertion that future interconnection projects were too uncertain, despite strong evidence to the contrary presented by the community. This application proves the community were right. 37. Therefore National Grid should carry out a thorough cumulative impact assessment on the basis of a worst-case scenario where more of the projects will overlap and where there will be three interconnector projects at Friston/Saxmundham.	The uncertainty around other project does not necessarily relate to the likelihood of them happening, but rather the uncertainty around details of the projects.
Cumulative impact	38. Cumulative effects will worsen many if not all of the environmental impacts of Sea Link. Key examples are disruption from construction (traffic, noise, flood risk etc), landscape, flood, noise, heritage. Further details of some of these are set out under the subject headings below.	This comment is noted by the Applicant and detailed responses are provided below.
Cumulative impact	39. To reduce cumulative effects from construction the three sets of AC cables (required for Sea Link, LionLink and the third project) from the convertor station site to the National Grid connection hub could be installed at the same time. This approach was taken for Scottish Power's EA1 and EA3 projects connecting at Bramford, and its EA1N and EA2 projects connecting at Friston. This will be much more efficient, less expensive, and significantly reduce disruption from construction.	The possibility of expanding the scope of the Proposed Project to include elements of the NGV projects, specifically ducting for AC cables, has been considered previously. However, the LionLink and Nautilus projects are at less advanced stages in their own development compared to Sea Link. At the point of the finalisation of the Sea Link DCO Application, neither had developed a defined proposal or undergone statutory consultation (indeed Nautilus has now moved away from Suffolk altogether). The design requirements of LionLink are likely to be influenced by NGV's own ongoing assessment work and the outcomes of future statutory consultation. The LionLink designs may also be influenced by NGV business decision making, regulatory factors, and needs drivers that are different to those of National Grid Electricity Transmission. This means that throughout the development of the Proposed Project, there was (and remains) inherent uncertainty regarding the final design requirements of LionLink. It would therefore be unclear what powers National Grid Electricity Transmission would be

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		seeking on behalf of NGV, and where. Furthermore, as the NGV projects are driven by different needs cases to Sea Link, powers sought for additional works would not be justified as part of Sea Link's needs case Furthermore, works which exclusively form part of the NGV projects do not fall within the scope of the Sea Link project which the SoS has directed into the DCO regime via a section 35 direction. Similarly, as an interconnector, LionLink is not associated with the principal development (Sea Link, a network reinforcement project). It would therefore not be procedurally possible to seek the required powers through the DCO application. This was not the case with the SPR projects mentioned in the representation. These projects were able to justify overcapacity in their associated transmission infrastructure on the basis that the other windfarms (which all formed part of the larger East Anglia Hub windfarm cluster, progressed by the same developer, along similar timescales) could make use of the capacity and that the needs could be justified. However, as set out in **Application document 7.10 Coordination Document [Ap-363]**, there remain opportunities for the cable ducts for the Proposed Project and LionLink to be delivered together, should LionLink receive consent in sufficient time, and depending on the outcome of various other programme, procurement, regulatory and commercial factors. This is considered to be possible but unlikely, but the Applicant is nonetheless continuing to coordinate with NGV to explore opportunities.
Site Selection	40. The Applicant's site selection process is flawed. No alternative to Friston/Saxmundham referred to as the "Sizewell Area" has been considered – see paragraph 3.5.9 chapter 3, Part 1 of the Environmental Statement.	To the extent that there is a requirement for an Applicant to demonstrate need for a NSIP, the Proposed Project responds to a well-established and longstanding requirement to reinforce the electricity transmission system in the East Anglia and the south east to respond to the changes required to achieve Net Zero. As well as responding to the changing electricity market the Proposed Project will also address the *'significant boundary deficits' (*Para Ex1.4.16 of the **Strategic Options Back Check Report [APP-320]**, details of which are confirmed in Part 3 of that document. In developing the Proposed Project, the Applicant assessed a variety of potential areas for new infrastructure, including brownfield sites. Further information on the reasoning behind the connection location for the Proposed Project, the alternatives considered, how National Grid has coordinated with other projects and a complete project description is contained in: • **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368];** • **Application Document 8.3 Strategic Options Report (October 2023) [APP-370];** • **Application Document 7.2 Strategic Options Back Check Report [APP-320]**; • **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**; • **Application Document 7.13 Coordination Document**; and • **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045].**
Site Selection	41. Furthermore National Grid has not taken a sequential approach to the location of the National Grid connection hub and has misinformed itself as to the nature of the flood risk at Friston. It would appear to have focused on river and sea flooding rather than surface water flooding and seem to be unaware that the sequential test needs to be applied to surface water flooding as well as river and sea flooding. Generally National Grid's approach to flood risk from surface water flooding is confused.	The Friston (Kiln Lane) substation (assuming that is what is meant by 'National Grid connection hub') already benefits from development consent under the SPR EA1N and EA2 DCOs. Matters of flood risk associated with the substation were addressed by SPR during the examination of those applications. Notwithstanding this, Section 4.4 of **Application Document 6.8 Flood Risk Assessment [APP-292]** presents an assessment of the risks to and arising from the Project in relation to surface water

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		flooding. Assessments have been informed by recently published Environment Agency surface water data (National Flood Risk Assessment 2, January 2025), extracts of which are presented in Figure 2B for the Suffolk Onshore Scheme, and the Friston Surface Water Study mapping (BMT, 2020). Both of the datasets align and corroborate that the proposed Friston Substation is located in an area that has a low risk of flooding from surface water, satisfying the requirements of the sequential test. However, the FRA (Table 4-1) acknowledges the flood risk sensitivities and flooding history of Friston village and acknowledges that runoff any newly created impermeable areas must be managed carefully in order to prevent any downstream flood risk impacts. The DCO therefore secures, via by commitments W06 and W11 within **Application Document 7.5.3.1 Outline Code of Construction Practice [APP-341]** that surface water runoff from the Proposed Project (during both construction and operation) would be collected and subject to treatment and attenuation using a range of suitable Sustainable Drainage techniques, as detailed in Appendix C of the Flood Risk Assessment **[APP-292]**.
Impacts to Landscape and Cultural Heritage assets	42. The consented EA1N, EA2 and NG connection hub will cause significant damage and harm to the landscape and heritage assets which surround the Friston site – see the examination reports for EA1N and EA2.	The Friston (Kiln Lane) substation (assuming that is what is meant by 'National Grid connection hub') already benefits from development consent under the SPR EA1N and EA2 DCOs. Insofar as this part of the representation refers to the consented infrastructure only, matters of landscape and heritage associated with the substation were addressed by SPR during the examination of those applications.
Impacts to Landscape	43. Whilst Sea Link will not increase the footprint of the National Grid connection hub, it will increase the amount of infrastructure within that footprint worsening landscape impacts. 44. In terms of cumulative impact the LionLink project will require the National Grid connection hub to be further expanded. This statement was included in National Grid's consultation materials for LionLink - paragraph 2.14.A.1.146 on page 24. *"Works would be required to the proposed Friston Substation (which would be brought forward as part of the Proposed Project or the East Anglia One North Offshore Windfarm Scheme/East Anglia Two Offshore Windfarm) to facilitate a connection for this NGV Scheme which will likely require an extension to the proposed substation."* 45. Yet further expansion of the National Grid connection hub can also be expected for the Third Project.	The Friston (Kiln Lane) substation (assuming that is what is meant by 'National Grid connection hub') already benefits from development consent under the SPR EA1N and EA2 DCOs The Applicant proposes to build additional infrastructure within the compound of the substation which would include the installation of cable sealing ends and associated HV equipment. Details of the additional infrastructure proposed are provided in the **Application Document 2.13 Design and Layout Plans [APP-037]** on drawing DCO/S/DE/SS/1200, and are shown in red. These are fully assessed within the Friston Scenario 1 assessments and at operation are not considered to be discernible from the wider substation infrastructure which would already be present in the landscape. Should an extension to the substation be necessary to allow the connection of LionLink, any cumulative effects with the Proposed Project would be considered in the inter-project cumulative effects assessment to be reported in the LionLink Environmental Statement. There is insufficient information available about LionLink's potential connection into the substation to allow any meaningful assessment as part of the cumulative effects assessment undertaken for the Proposed Project.
Impacts to Landscape	46. Due to the inappropriateness of this location and mitigation which is only "just sufficient" (see statements by EA2 and EA1N ExAs in paragraph 6 above) further expansions of the NG connection hub for Sea Link14, LionLink and the Third Project will worsen this damage and: • further sever a substantial area of tranquil, open and deeply rural countryside; • further conflict with the prevailing unified character of their surroundings; • further harm the character of Friston; • further harm the setting of Friston Church (Grade II*); • further harm the setting of Friston Postmill (Grade II*)	The Proposed Project does not propose to expand Friston (Kiln Lane) substation beyond the footprint already consented as part of the SPR EA1N and EA2 DCOs. Should an extension to the substation be necessary to allow the connection of LionLink, any cumulative effects with the Proposed Project would be considered in the inter-project cumulative effects assessment to be reported in the LionLink Environmental Statement. There is insufficient information available about LionLink's potential connection into the substation to allow any meaningful assessment as part of the cumulative effects assessment undertaken for the Proposed Project.
Impacts to Landscape	47. Under the EA2 and EA1N DCOs National Grid can build either an AIS (air insulated switchgear) or GIS (gas insulated switchgear) connection hub. National Grid is proposing the GIS design but it should be noted that whilst a GIS connection hub has a smaller footprint it is almost 3 times as high, 16m versus 6m and much more visible in the landscape and incapable of meaningful	The representation is correct in acknowledging that the SPR EA1N and EA2 consents include powers for a National Grid substation comprising either AIS or GIS. The mitigation secured as part of those projects considered either an AIS or GIS substation design.

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	mitigation. Whilst the existing footprint of the connection hub has been consented, given the height of the GIS connection hub any expansion will be far more damaging to the landscape than an expansion of AIS connection hub.	It is anticipated that a GIS substation will be delivered (by National Grid ET) under one of the two SPR consents, once the necessary powers have been transferred from SPR to NGET, with commencement starting early 2026. As
Landscape mitigation	48. Landscape mitigation is almost entirely composed of tree planting which will take decades to even have a limited effect. Full account needs to be taken of local soil and climatic conditions as anticipated growth rates are unlikely to be achieved and widespread planting failures are to be expected. Much longer maintenance and management periods will be required together with irrigation otherwise landscape mitigation will not be achieved. Fundamentally though planting cannot mitigate additional development in the wrong location.	As set out elsewhere, it is expected that Friston (Kiln Lane) substation will be delivered (by National Grid ET) under one of the two SPR consents, once the necessary powers have been transferred from SPR to NGET, with commencement starting early 2026. If delivered under the SPR consent, the mitigation secured under that consent would be delivered. Despite this, National Grid requires a consent for a full 'end-to-end' Sea Link project, and accordingly the application for the Proposed Project also includes powers for the National Grid element of Friston (Kiln Lane) substation and associated mitigation. In this scenario, the landscape mitigation planting at Friston would be subject to a 10 year maintenance period consistent with the SPR EA1N and EA2 DCOs. As noted in the outline Landscape and Ecology Management Plan (oLEMP) **(Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059])**, the landscape mitigation proposals would be subject to adaptive management monitoring which will allow flexibility to adapt to future climate changes and trends with regard to species selection and maintenance requirements. The outline landscape mitigation proposals, as outlined within the oLEMP **(Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059])**, are considered to be appropriate embedded mitigation for the landscape and visual effects arising from the proposals and have been influenced by the local landscape character.
Flood risk	49. National Grid has not adequately or accurately assessed the flood risk impact at Friston which is prone to flooding. It has ignored: • the findings relating to flood risk in the EA1N and EA2 examination – see paragraph 6.5.5 of the ExAs' reports • the findings of the High Court and the Court of Appeal where Mrs Justice Lang (in the High Court) and Lord Justice Lewis (in the Court of Appeal) referred to the fact that there were areas at high risk of surface water flooding - see paragraph 46 of the Court of Appeal judgement and paragraph 71 of the High Court judgment • Scottish Power's flood risk assessment conducted for the EA1N, EA2 and National Grid connection hub applications which are referred to in paragraph 18 of the Court of Appeal judgement. The relevant paragraph 125 is for ease of reference reproduced below. *"However, the National Grid Substation, National Grid CCS cable sealing end compounds and permanent access road are located in an area with varying risk of surface water flooding. The northern and western boundary around the National Grid substation, including the cable sealing and compounds, and part of the footprint of the National Grid substation, includes areas at both high risk of surface water flooding i.e. during the 1*	The Flood Risk Assessment (**Application Document 6.8 Flood Risk Assessment [APP-292])** has been developed with the historic flooding of the area considered and in full liaison with the LLFA and Environment Agency. The drainage strategy has been developed in collaboration with SPR and takes account of SPRs consented projects and meets national and local standards.

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	in 30 year event and medium risk of surface water flooding i.e. there is a risk of flooding during the 1 in 100 year event."	
Flood risk	50. Further National Grid's flood risk assessment would indicate that it has focused primarily on river flooding rather than all sources of flooding as required by policy. The high flood risk at Friston is surface water.	The Flood Risk Assessment (**Application Document 6.8 Flood Risk Assessment [APP-292]**) provides an appraisal of flood risk from a wide range of sources, including surface water (Section 4.4 and Appendix C), Groundwater (Section 4.5 and Appendix D), and in Table 4.2 provides a rationale for scoping out the assessment of flood risk from sewers, reservoirs and other artificial sources. The high risk of surface water flooding at Friston is acknowledged in Section 4.1 of the FRA, which includes a review of relevant Section 19 Flood Investigation reports.
Flood risk	51. National Grid has focused on construction flood risk rather operational flood risk and there is no operational drainage management plan. Even in relation to construction flood risk it is not adequately focused on watercourses to the north of the National Grid connection hub (including any rediverted as a result of the construction of the connection hub) which will be traversed by the cable route between Friston and Saxmundham.	With regard to operational flood risk management, commitment W11 within **Application Document 7.5.3.1 Outline Code of Construction Practice [APP-341]** secures that surface water drainage from permanent above ground infrastructure would be managed and treated using SuDS in accordance with policy and guidance requirements of the relevant Lead Local Flood Authorities to include allowances for climate change in accordance with current (May 2022) Environment Agency guidelines. These SuDS would be maintained over the lifetime of the Proposed Project and the drainage infrastructure would provide the storage necessary to achieve discharges at greenfield rates and would not significantly alter groundwater recharge patterns by transferring recharge quantities from one catchment to another. Operational drainage principles are described in Appendix C of the Flood Risk Assessment **[APP-292]**. It is also noted that W14 within the Outline Code of Construction Practice **[APP-341]** commits the Contractor to developing a Drainage Management Plan and this must be submitted to the Local Planning Authority for approval prior to construction works for the Proposed Project commencing and thereafter the approved plan shall be complied with, subject to any amendments that are subsequently approved pursuant to Requirement 6 of Schedule 3 of the draft DCO (see Application Document 3.1). The plan shall demonstrate how the Contractor would manage surface water runoff across the worksite, including details of how offsite impacts would be managed and mitigated. In discussion with ESC, the Applicant has also committed to submitting a detailed Operational Drainage Management Plan, secured via DCO requirement, to provide further control and reassurance on operational drainage.
Flood risk	52. National Grid has not properly assessed risk of flooding from ground water given the use potential use of infiltration SUDS ponds close to the village of Friston which may increase ground water levels in Friston.	Section 4.5 of Application Document 6.8 Flood Risk Assessment [APP-292] presents an assessment of groundwater flood risk. This notes that groundwater within the area of the proposed Friston Substation is anticipated to be relatively deep (approximately 15 m below ground level) and therefore is unlikely to be intercepted by any shallow foundation excavations. Preliminary ground investigations also indicate the suitability of local conditions to support infiltration based drainage solutions, with rank highly in the drainage hierarchy. Further ground investigation data will be collected to inform the detailed design of foundations and drainage solutions. These designs would prevent any potential for groundwater mounding effects local to infiltration drainage features such that there would be no downstream flood risk impacts.
Flood risk mitigation	53. National Grid, in seeking a third consent for its connection hub, and by the inadequate draft DCO has caused confusion in the mitigation of flood risk at Friston and would appear to be substantially diluting it. As mentioned above no outline operational drainage management plan has been prepared. Further it has ignored the findings of the ExAs in their reports concerning future development of the site where they specifically referenced concerns with regard to drainage – see extract from the reports in paragraph 6 above.	The Applicant anticipates that the drainage implemented at Friston (Kiln Lane) substation will be that currently being designed (with inputs from National Grid) as part of SPR's East Anglia Two project. This is largely because it will be delivered pursuant to the SPR consent. However, the powers in the Proposed Project application would also allow the Applicant to deliver a comparable drainage strategy if its powers were used (which they are not expected to be). The drainage strategy shown in the application represents an indicative situation whereby drainage is being implemented only for the Proposed Project. This reflects the use of 'scenarios' in the application for the Proposed Project, which have been used for assessment purposes and to make it clearer that

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		that the delivery of Friston (Kiln Lane) substation under the Sea Link consent would only happen in one set of (highly unlikely) circumstances. It would not be the case that the East Anglia One (North) and East Anglia Two elements of Friston (Kiln Lane) substation could be developed without the drainage for those projects being implemented. In discussion with ESC, the Applicant has also committed to submitting a detailed Operational Drainage Management Plan, secured via DCO requirement, to provide further control and reassurance on operational drainage. It is also noted that the Applicant is currently updating its drainage strategy following review of the recently published National Standards for Sustainable Drainage Systems (SuDS) (June 2025). Having assessed the impacts of these recently updated standards it is confirmed that the standards do not change any of the Proposed Projects drainage principles or assumptions on which the Environmental Statement is based. The drainage strategy will be shared with the Lead Local Flood Authorities (LLFAs) and submitted during the DCO examination.
Flood risk mitigation	54. The ExA should also be aware that the proposals for flood risk mitigation as set out in the Outline Operational Drainage Management Plan referred to in Requirement 41, Part 3 of Schedule 1 of the EA2 DCO18 may not be feasible and the issue is being re-visited by Scottish Power and Suffolk County Council.	The Applicant notes that this requirement is to develop an Operational Drainage Management Plan for approval by the LLFA and to follow that plan.
Impacts of noise	55. The overriding community requirement is for residential and recreational property (both inside and out) to be free at all times from perceptible noise during construction and operation. 56. The EA1N and EA2 DCOs contain provisions which secure mitigation in respect of construction noise by reference to "Best Practicable Means". A better or the same standard should apply in relation to the Sea Link project on the basis that it applies to all construction work cumulatively for all projects across the Friston/Saxmundham site. There should be no construction noise during weekends and bank holidays. This is easily achieved by avoiding construction works during weekends and bank holidays.	The assessment of construction and operational noise impacts is presented in ES Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-056]. With regards to construction noise, the assessment indicates that significant adverse effects can be avoided with the implementation of best practicable means (BPM). However, adverse effects are likely to remain at some locations during some activities, and therefore some construction noise may be perceivable at some noise sensitive receptors (NSR). Although not desirable, this is an unavoidable and an accepted consequence of all construction. The effects of noise will be reduced as far as practicable with the implementation of BPM. With regards to operational noise, there is potential for operational noise from the proposed Converter station to be perceptible at nearby NSR under certain conditions, and at certain times, and when in relative proximity to the Converter Station boundary. However, this is not in itself an indication of an adverse or significant adverse impact, nor is it contrary to planning policy and guidance. An indicative assessment is presented in Application Document 6.3.2.9.D ES Appendix 2.9.D Suffolk Operational Noise Assessment [APP-138] based on currently available design information. The assessment indicates that operational noise from the converter station would be of a low level at nearby NSR, and that significant adverse effects are not expected where standard mitigation measures are incorporated into the design. The predicted resultant noise level at the nearest property is below that which would be consider the Lowest Observed Adverse Effect Level (LOAEL) and therefore, adverse effects are not expected at nearby NSR. The Proposed Project has committed to employing best practicable means (BPM) to reduce potential effects of noise and vibration during the construction phase. Temporal restrictions (i.e. consideration of works during weekend periods) will also be considered as part of BPM. The use of BPM is secured in management measure NV03 of Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]
Impacts of noise	57. In relation to operational noise the National Grid connection hub includes switchgear which when it operates causes a loud noise. National Grid have sought to downplay this issue by describing it in the past as a "dull thud". However expert evidence in the EA1N and EA2 examinations from Rupert Thornely-Taylor (one of the country's leading acoustic experts) stated that the noise would be sufficient to wake people up at night. Scottish Power on behalf of National Grid sought to downplay this issue by saying the switchgear operates infrequently/in an emergency. It did not challenge the loudness of the noise. National Grid is maintaining its position such switchgear operates infrequently.	Although scoped out of the Environmental Statement (ES) on the basis that significant adverse effects are not expected, an assessment of potential noise impacts from the proposed Friston substation is presented in Application Document 6.3.2.9.E ES Appendix 2.9.E Friston Substation and OHL Operational Noise Information (Informative) [APP-139], at the request of the local authority for information purposes. The EA1N and EA2 proposals assumed an Air Insulated Switchgear (AIS) which can be relatively noisy in operation. However, the Proposed Project proposals are for Gas Insulated Switchgear (GIS) which operates at a much lower noise level. It is GIS which is described as a "dull thud" and could be described as being similar to a van door being closed; in terms of both noise level, and character. This would be inside the GIS building and as such external noise levels would be even lower externally,

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	58. Whatever the level of frequency of operation, at least five projects will connect to the connection hub. Accordingly the level of frequency could be multiplied by five times due to the number of connections. 59. If the project is consented a limit on the noise and frequency of operation of switchgear should be secured in the DCO.	noting that the nearest noise sensitive receptor (NSR) is at a distance of approximately 300m. The assessment presented in the ES [APP-139] considers GIS. The assessment indicates that noise levels from the operation of the switchgear would not lead to a significant adverse effect at NSR (for context, consider a van door being closed approximately once per year in a building 300m away). For noise sources such as switchgear, both the level of the noise and the frequency of occurrence would need to be sufficient to be considered significant adverse effect. The threshold at which such events have potential to be considered a significant adverse effect is a noise level exceeding 60 dB $L_{Amax,F}$, externally, occurring at least 10 to 15 times per night. With regards to switchgear at the proposed Friston substation, the predicted noise level at the nearest NSR is 30 dB $L_{Amax,F}$, and the likely frequency of occurrence is somewhere in the order of once per year to once and would typically be due to faults and maintenance. The noise level and the frequency of operation of switchgear would therefore comfortably not exceed that which would be considered significant. Given the negligible level of impact from switchgear, it is not considered that a condition on noise is required. Additionally, as the switchgear is safety feature for emergency cut-off, a limit of frequency of occurrence is not appropriate.
Noise mitigation	60. A GIS connection hub is enclosed and may require cooling fans. It is not clear whether cooling fans will be installed and what level of noise they create. National Grid should confirm that no cooling fans will be installed in the National Grid connection hub.	Some small external auxiliary plant items are proposed at Friston substation; namely condenser units. These are relatively quiet items of plant noise levels from such items are anticipated to be significantly below existing background noise level during both daytime and night-time periods at nearby noise sensitive receptors and are therefore not significant.
Traffic and Transport – A12 Junctions	61. FPC/SASES is aware that other members of the community will be making representations concerning traffic and transport issues in the wider Saxmundham/Aldeburgh area and the A12. FPC/SASES supports those representations, particularly those relating to the following issues. • A12/A1094 junction (sometimes known as the Friday Street junction) which is an accident black spot. • A12 /B1121 Main Road/Saxmundham – this junction is dangerous. It is not signalled and vehicles have to cross a busy dual carriageway when turning right northbound. • The likely increase in journey times of emergency vehicles, putting lives at risk. 62. With regard to these two junctions no account seems to have been taken of junction capacity in the context of slow braking and slow accelerating HGVs. 63. As a result HGVs will take much longer to navigate the proposed roundabout at the A12/A1094 junction than cars.	**A12/ A1094 Junction** An assessment of Road Safety has been carried out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** for 14 junctions within the study area including the A12 / A1094 junction. The sensitivity of receptors for Road Safety was based on Personal Injury Accident data obtained from SCC for the most recent five-year period (at the time of the assessment), and the A12 / A1094 junction was assigned a high level of sensitivity to reflect the collision record, where eight collisions were recorded within the five-year period. Therefore, the existing collision record of the junction has been considered as part of the assessment based on official data obtained from SCC. The assessment was also based on the worst-case scenario; the single busiest day of the construction programme in terms of construction traffic levels and no significant effects were identified. In terms of road congestion and junction performance, an assessment of Driver Delay has also been carried out at the A12 / A1094 junction. The A12 / A1094 junction already accommodates more than 800 HGVs per day (see **Application Document 6.3.2.7.D ES Appendix 2.7.D Baseline Traffic Movements [APP-125]**), and the sensitivity of this junction was informed by queue length surveys during the weekday network peak hours. The A12 / A1094 junction was assigned a medium level of sensitivity to reflect moderate queuing (5-9 vehicles experienced on up to two arms during the weekday peak hours). Therefore, junction capacity has been considered as part of the assessment. The assessment was also based on the single busiest day of the construction programme in terms of construction traffic levels (including HGVs) and no significant effects were identified. This conclusion remains valid even if the sensitivity level of the junction is increased by a single category (from Medium to High) to reflect higher queuing levels at the busiest times of the year. HGV arrivals and departures will also be staggered throughout the day over a period of 10 hours (between 8am and 6pm) and are not expected to materially affect junction performance, given that the junction already accommodates more than 800 HGVs per day. It is acknowledged that HGVs may take longer to navigate Sizewell C's proposed A12 / A1094 roundabout (which will be delivered as part of the Two Village bypass scheme) than the current junction layout. However, this is expected to be outweighed by the highway safety benefits introduced

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		by upgrading the junction, as well as the wider capacity benefits brought forward by the Two Village bypass scheme. The Consolidated Transport Assessment for Sizewell C concludes that the new roundabout is anticipated to result in a significant reduction in the number of collisions and would be expected to exhibit the low accident rates associated with new roundabouts designed and constructed to DMRB standards. The wider two village bypass scheme will also significantly reduce the volume of traffic passing through Farnham and Stratford St Andrew, both during and after the construction of Sizewell C, bringing long-term benefits to the local community. As such, the Two Village bypass scheme and A12 / A1094 roundabout are expected to bring overall benefits in terms of road safety and network capacity. Notwithstanding this, the assessment of the A12 / A1094 junction within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** has been based on the existing configuration of the junction, given that the Proposed Project cannot rely on future mitigation associated with another DCO. **A12/ B1121 Junction** The assessment of Road Safety within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** includes the A12 / B1121 Main Road junction. The sensitivity of receptors for Road Safety was based on Personal Injury Accident data obtained from SCC for the most recent five-year period (at the time of the assessment), and the A12 / B1121 junction was assigned a Negligible level of sensitivity to reflect the collision record, where only one collision was recorded within the five-year period. Therefore, the existing collision record of the junction has been considered as part of the assessment based on official data obtained from SCC. The assessment was also based on the single busiest day of the construction programme (worst-case scenario) in terms of construction traffic levels and no significant effects were identified. In terms of highway congestion and junction performance, an assessment of Driver Delay has also been carried out at the A12 / B1121 Main Road. The A12 / B1121 junction already accommodates more than 700 HGVs per day (see **Application Document 6.3.2.7.D ES Appendix 2.7.D Baseline Traffic Movements [APP-125]**), and the sensitivity of this junction was informed by queue length surveys during the network peak hours. The A12 / B1121 Main Road junction was assigned a Low level of sensitivity to reflect low queuing (3-4 vehicles experienced on one arm during the weekday peak hours). Therefore, junction capacity has been considered as part of the assessment. The assessment was also based on the single busiest day of the construction programme in terms of construction traffic levels (including HGVs) and no significant effects were identified. This conclusion remains valid even if the sensitivity level of the junction is increased by a single category (from Low to Medium) to reflect higher queuing levels at the busiest times of the year. HGV arrivals and departures will also be staggered throughout the day over a period of 10 hours (between 8am and 6pm) and are not expected to materially affect junction performance, given that the junction already accommodates more than 700 HGVs per day. **Emergency Vehicles** During the development of the Proposed Project design, the Applicant has engaged with and received consultation feedback from the relevant stakeholders (including emergency services), in order to understand and address any issues of concern regarding the Proposed Project and its impacts on emergency services. There are no likely significant effects identified on East of England Ambulance Service (EEAST) operations, service capacity and resources as a result of the Proposed Project, and therefore the impact on EEAST resources is not a topic which has been scoped into the EIA. Nonetheless, 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]**. **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** demonstrates that the additional construction traffic to be generated by the proposals during the peak construction phase is not expected to result in any significant impacts on the surrounding highway network (including in terms of Driver Delay), with the mitigation identified within **Application Document 7.5.1.1 Outline Construction Traffic**

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		Management and Travel Plan – Suffolk [APP-337] which is secured through Requirement 6 of Schedule 3 of Application Document 3.1 draft Development Consent Order.
Traffic and Transport – A12 Junctions	64. In terms of cumulative impact this junction will also be navigated by HGVs for Sizewell C, EA2, EA1N, LionLink, the Third Project and a number of other major development projects in the area. Accordingly there is the prospect of there being very serious congestion at this roundabout with the displacement of traffic to a quiet rural road network which has multiple types of vulnerable road users, pedestrians, cyclists, horses. This raises serious road safety issues. This problem will become particularly acute in periods where there is a higher volume of visitors/tourists to the area.	The Applicant acknowledges that Sizewell C's proposed A12/ A1094 roundabout (which would be delivered as part of the Two Village bypass scheme) would be used by HGVs associated with the Proposed Project as well as HGVs for other cumulative developments in the area. However, Paragraph 10.3.48 of the Consolidated Transport Assessment for Sizewell C concludes that the new roundabout is anticipated to result in a significant reduction in the number of collisions and would be expected to exhibit the low accident rates associated with new roundabouts designed and constructed to Design Manual for Roads and Bridges (DMRB) standards. The proposed roundabout has also been subject to a Stage 1 Road Safety Audit (RSA) where any accepted recommendations will be addressed at detailed design. Therefore, no road safety issues are anticipated. In terms of network capacity, all Sizewell HGV traffic will proceed along the A12 and would not make any turns at the proposed A12 / A1094 roundabout junction. The wider two village bypass scheme will also significantly reduce the volume of traffic passing through Farnham and Stratford St Andrew, both during and after the construction of Sizewell C, bringing long-term benefits to the local community. As such, the Two Village bypass scheme and A12/ A1094 roundabout are expected to bring overall benefits in terms of road safety and network capacity. Therefore, traffic is not expected to be displaced to the local road network or to have impacts on vulnerable road users, pedestrians, cyclists and horses.
Traffic and Transport – A12 Junctions	65. The dangerous nature of the A12/B1121 junction will be exacerbated because the north bound exit when turning right across the dual carriageway is a steep slope. HGVs will accordingly traverse this junction slowly increasing road safety issues and also causing congestion.	Based on the Personal Injury Accident data obtained from SCC, only one collision was recorded at the A12 / B1121 junction within the most recent five-year period (at the time of the assessment). The A12/B1121 junction currently accommodates more than 700 HGVs per day (see **Application Document 6.3.2.7.D ES Appendix 2.7.D Baseline Traffic Movements [APP-125]**) but no existing road safety issues associated with HGVs have been identified based on official data obtained from SCC. The assessment of Road Safety within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** did not identify the potential for any significant effects based on the single busiest day of the construction programme in terms of construction traffic levels. Therefore, no road safety issues are anticipated at this junction as a result of the Proposed Project.
Traffic and Transport – Friston Village	66. An HGV access route is shown to pass through the village of Friston on the B1121. This road is narrow (in many places there are no road markings) and twisty. It is unsuitable for HGV traffic. The survey data for traffic flows and HGVs on this road is overstated and it is submitted that the majority if not all the recorded HGV traffic are buses and agricultural vehicles. 67. This road should not be designated as an HGV route. The proposed construction traffic forecast is very low and therefore could be easily accommodated elsewhere.	This is acknowledged and the Baseline survey data (**Application Document 6.3.2.7.D ES Appendix 2.7.D Baseline Traffic Movements [APP-125]**) for the B1121 Saxmundham Road confirms that few HGVs currently use this route, with around 30 HGVs per day. The main access routes for the Proposed Project during the construction phase avoid Friston and comprise the A12 and the B1121 Main Road for access S-BM09, as well as the A12, A1094 and the B1069 Snape Road for accesses S-BM03 and S-BM04. These main routes are expected to accommodate circa 97% (almost the entirety) of all construction vehicle trips associated with the Proposed Project. The overall routing strategy is designed to minimise construction vehicles along alternative less suitable routes such as the B1121 Saxmundham Road through Friston. A maximum of two HGVs (four movements) per day are expected along the B1121 Saxmundham Road through Friston to access existing Overhead Line towers (via access S-BM11), as shown by **Application Document 6.3.2.7.G ES Appendix 2.7.G Traffic Flow Diagrams [APP-128]** and **Application Document 6.3.2.7.H ES Appendix 2.7.H Preliminary Highway Impact Assessment [APP-129]**. As the proposed construction traffic forecasts through Friston are very low, no impacts are anticipated along this road as reported in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** (negligible significance of effects for all assessment criteria along this road link).
Traffic and Transport – Friston Village	68. There is a serious risk by designating the B1121 through Friston as an HGV route that it will be used by more than the forecast amount. This would appear to be National Grid's intention as they are looking to create a major road junction on the B1121 as set out in the design and layout plans. This junction will also incorporate parking for HGVs. The relevant design and layout plan is reproduced below.	The overall routing strategy is designed to minimise construction vehicles along alternative less suitable routes such as the B1121 Saxmundham Road through Friston. A maximum of two HGVs (four movements) per day are expected along the B1121 Saxmundham Road through Friston to access existing Overhead Line towers (via access S-BM11), as shown by **Application Document 6.3.2.7.G ES Appendix 2.7.G Traffic Flow Diagrams [APP-128]** and **Application Document 6.3.2.7.H ES Appendix 2.7.H Preliminary Highway Impact Assessment [APP-129]**. As the proposed construction traffic forecasts through Friston are very low, no impacts are anticipated along

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		this road as reported in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** (negligible significance of effects for all assessment criteria along this road link). The proposed access on the B1121 (S-BM7) referenced has been designed to accommodate the limited number of HGVs which will be required to access the site during its operational phase. As agreed previously with SPR this access would not be used for construction. The access is not expected to be intensely used by HGVs.A Stage 1 Road Safety Audit (RSA) has also been carried out on the proposed access, and any accepted recommendations will be addressed as part of the detailed design. In addition, **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]** outlines management measures to further reduce the potential impacts of HGV deliveries to the site. For example, the contractor(s) will implement a monitoring and reporting system to check compliance with the measures set out within this Outline CTMTP. This will include the need for a GPS tracking system to be fitted to HGVs to check for compliance with authorised construction routes. Deviations from the authorised routes or changes to traffic levels that are higher than the assumptions set out within the **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]** will require discussion with the relevant highways authorities to determine whether additional mitigation measures are needed.
Traffic and Transport – Friston Village	69. This bell mouth arrangement is completely out of proportion with what is effectively a country lane. This is only to be the entrance for the operational access road which will only be needed to be used by LGVs during operation. It is of course notable that access will be necessary for fire engines which is relevant to the safety comments in paragraphs 77 and 78 below.	Although the access is not expected to be intensely used by HGVs, HGV movements are expected during the operational phase of the substation. The bell mouth arrangement has been designed to facilitate an articulated vehicle entering and existing the site as demonstrated through the vehicle tracking included on the drawing referenced.
Traffic and Transport – Friston Village	70. In terms of other construction traffic the B1121 through Friston and Sternfield should not be used. Sternfield has a single lane humpback bridge and residential properties which are immediately adjacent to, and in some cases overhang, the road. Any increase in traffic on the B1121 is undesirable.	The main access routes avoid both Friston and Sternfield and will accommodate almost the entirety (circa 97%) of all construction vehicle trips associated with the Proposed Project. The overall routing strategy is therefore designed to minimise construction vehicles along alternative less suitable routes such as the B1121 Saxmundham Road through Friston. A maximum of nine construction vehicles per hour, and fewer than 30 peak daily construction vehicles are expected along the B1121 Saxmundham Road through Friston to access existing Overhead Line towers (via access S-BM11) as a result of the Proposed Project, as shown by **Application Document 6.3.2.7.H ES Appendix 2.7.H Preliminary Highway Impact Assessment [APP-129]**. As shown by **Application Document 6.4.2.7 ES Figures Suffolk Traffic and Transport [APP-234]**, all construction vehicles will avoid Sternfield. Therefore, additional traffic along the B1121 Saxmundham Road will be minimised and the village of Sternfield will be avoided by construction traffic.
Traffic and Transport – Friston Village	71. All vehicles used in construction should be clearly marked and identifiable as being those of National Grid similar the arrangements put in place by EDF for Sizewell C. This will help identify which developer's vehicles are in breach of traffic plans, as experience has shown that such breaches are inevitable.	The requirement for construction vehicles to be clearly marked and identifiable for the Proposed Project (for example by placing an identification sticker / board in a prominent position on the vehicle) will be reviewed and secured as part of the CTMTP through Requirement 6 of Schedule 3 of Application Document 3.1 draft Development Consent Order, following further consultation with SCC Highways. It is acknowledged that this is a standard measure that has been adopted by other DCOs such as Sizewell C and EA TWO.
Human health – mental health assessment	72. There is little in the way of an objective mental health assessment of the human impact of the projects upon the local population, a significant proportion of which is elderly and/or retired. A number of residents well-being has already been seriously impacted by the energy projects which will continue for many years to come. This will be made worse by Sea Link, LionLink and the Third Project.	The Applicant recognises that the potential for future environmental changes associated with the Proposed Project are of considerable concern to residents and the Council with regards to the health and wellbeing of its communities. The assessment of Health and Wellbeing impacts and adheres to the latest best practice guidance from the IEMA Guide to Effective Scoping of Human Health in EIA (IEMA, 2022) and also best practice methodology used on other major infrastructure schemes. Specifically, Chapter 11 Health and Wellbeing [APP-058] takes a holistic approach to health and defines health in line with the World Health Organisation (WHO) Europe and the IEMA guidance as a

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"state of complete physical, mental and social wellbeing not merely the absence of disease or infirmity". The IEMA guidance outlines that both physical and mental health should be considered "across the analysis of bio-physical, social, behavioural, economic and institutional influences on population health outcomes", and therefore the assessment considers a wide range of health determinants which are relevant to mental health, quality of life and amenity (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). Therefore mental health is considered under the existing health determinants in the IEMA guidance, with particular relevance given to the following:

- Access to healthcare services and other social infrastructure;
- Access to open space, leisure and play;
- Transport modes, access, connections and physical activity; and
- Social cohesion and community identity.

Stakeholder relevant representations received by local authorities in Kent and Suffolk raised concerns regarding the potential impact of the Proposed Development on community mental health. Previously, the academic study 'Wellbeing Impact Study of High-Speed 2 (WISH2)1' was reviewed by the AECOM Health and Wellbeing technical team to inform assessment and approach in terms of mental health and wellbeing, specifically whether the study's findings, particularly regarding assessment methodology, warranted changes to the existing approach. The review concluded that WISH2 is a 'study protocol', that stemmed from the fact that previous studies into high-speed rail systems have had very little consideration of health impacts, and particularly mental health and wellbeing, with more of a focus placed on accessibility, tourism, housing and land, and economics. The topics in discussion within WISH2, include social connectedness and social exclusion, which are topics which link to existing IEMA and HUDU determinants which are considered within Chapter 11 Health and Wellbeing [APP-058]. In addition, WISH2 suggests that impacts may be experienced differently across different groups of society, a matter that is also recognised by the IEMA guidance and therefore considered through the EIA process, particularly in terms of identifying sensitivity of receptor (often local population in this case). Additionally, the document states that the WISH2 study is intended to last for 10 years, which is not considered to align with the EIA process or timescales and preparation of an assessment of effects within an ES chapter for a project such as Sea Link. Overall, the technical review concluded that no modifications were necessary, as the current Health and Wellbeing methodology aligns with the latest best-practice guidance from IEMA (2022) and HUDU (2019), as well as encompassing local knowledge from relevant thematic meetings with the local authorities.

It is deemed that Chapter 11 Health and Wellbeing [APP-058] covers all relevant health and wellbeing determinants, and where mental health impacts arise, they are discussed within the relevant assessments in line with latest guidance. As such, a complete assessment of health and wellbeing effects has been undertaken. This is set out in Chapter 11 Health and Wellbeing [APP-058]. These conclude that there are no anticipated significant effects as a result of the Proposed Project.

Embedded mitigation measures are incorporated into the Scheme as set out in the respective ES chapters to reduce construction, operational and decommissioning effects, such as noise and vibration, air quality, transport and access and socio-economics. This will in turn mitigate the effects on the local community and existing facilities from a Human Health and Wellbeing perspective. In terms of disruption and in recognition of the potential for impacts on mental health that could arise from activities on site, and surroundings, there are measures set out in CEMP Appendix A Code of Construction Practice [APP-341] and the CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342] to reduce or avoid adverse human health and wellbeing related

[1] Katherine I. Morley et al., (2024); Wellbeing Impact Study of High-Speed 2 (WISH2): Protocol for a mixed-methods examination of the impact of major transport infrastructure development on mental health and wellbeing. Available at: https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0298701 [Accessed May 2024]

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		impacts during the development. This includes addressing concerns raised in stakeholder relevant representations regarding core working hours, and the impact of construction traffic on mental health. National Grid as part of its submission has produced a report on coordination which covers how it approached coordination with other projects with the aim to reducing the impact on the environment and local communities. Further details are set out in Application Document 7.10 Coordination Document [APP-363]. The cumulative effects associated with Health and Wellbeing are also assessed in Chapter 13 Inter-Project Cumulative Effects [APP-060]. The assessment draws upon the conclusions of other relevant environmental aspects, including traffic and transport, air quality, noise and vibration, socio-economics, recreation, and tourism. No significant effects were identified within the respective CEAs of these relevant environmental disciplines. Therefore, the health and wellbeing CEA 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. As set out in Application Document 5.1 Consultation Report [APP-301], National Grid considers that no further changes are considered necessary to be made to the submitted DCO application to make the Proposed Project consistent with national policy in regard to Health and Wellbeing impacts.
Human health	73. NG has not carried out a survey of the actual demographics of Friston or those living near the cable route, so its assessment of human impacts is not reliable.	As stated in **Chapter 11: Human Health** of the ES **[APP-042]**, the study areas are based on the extent and characteristics of the Scheme and the communities/wards directly and indirectly affected by the Scheme. Impacts that occur beyond this are also addressed within the assessment itself, as the Human Health assessment draws upon the findings of supporting chapters to inform its conclusions. These chapters have their own study areas for their own individual assessments, which vary in their extent. Each chapter also sets out mitigation measures relevant to their individual disciplines, such as environmental management plans. Each of these chapters also includes a baseline analysis section, which includes a review of the existing surrounding area. Considering this methodology, the adopted study area for the Human Health assessment is appropriate and in-line with best practice IEMA guidance. As such, the study area used in **Chapter 11 Health and Wellbeing [APP-058]**, of which data is presented at local authority level, adequately encapsulates the more granular geographies within the analysis, as while the assessment adopts a holistic spatial focus to capture wider influences, it also considers the health and wellbeing characteristics of local communities. The methodology ensures that the assessment undertaken is not prejudiced against specific areas. Rather, it applies an objective and evidence-based approach to evaluating health and wellbeing impacts across the defined study area, ensuring that no areas are overlooked or underrepresented. As such, it captures localised impacts in communities such as Friston or those living near the cable route. **Chapter 11 Health and Wellbeing [APP-058]** also considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions in its assessment of health and wellbeing effects, in terms of sensitivity classification. As a result, the assessment presented in **Chapter 11 Health and Wellbeing [APP-058]** fully captures and addresses potential localised effects on the populations identified in the Relevant Representation, and the conclusions remain valid and proportionate.
Human health	74. Damage to well-being will arise from: • the traffic, noise, air, light pollution and disruption associated with a potential construction period of 5/6 years even before the impact of other projects • the permanent loss of amenity (footpaths etc), tranquillity, landscape/heritage damage, and noise and light pollution • financial uncertainty	The Applicant recognises that health and wellbeing is affected by multiple environmental and social factors such as additional traffic, noise, dust, and amenity as a result of the Proposed Development during the construction and operational phases. As such, each of these topics has been assessed individually within **Chapter 7: Traffic and Transport [APP-054], Chapter 8: Air Quality [APP-055], Chapter 9: Noise and Vibration [APP-056], Chapter 10: Socio-Economics, Recreation and Tourism [APP-070]**, and **Chapter 12: Landscape and Visual [APP-048]**, and their influence on health and wellbeing considered in **Chapter 11 Health and Wellbeing [APP-058]**.

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		The assessment of health and wellbeing impacts adheres to the latest best practice guidance from the **IEMA Guide to Effective Scoping of Human Health in EIA (IEMA, 2022)** and also best practice methodology used on other major infrastructure schemes. Specifically, the assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). Embedded mitigation measures are incorporated into the Scheme as set out in the respective ES chapters to reduce effects, such as noise and vibration, air quality, transport and access and socio-economics. This will in turn mitigate the effects on the local community and existing facilities from a human health and wellbeing perspective, as set out in **Chapter 11 Health and Wellbeing [APP-058]**. Specific mitigation measures to manage and control construction impacts are set out in the **Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337];** the **Outline Onshore Construction Environmental Management Plan [APP-340];** and the **CEMP Appendix A Outline Code of Construction Practice [APP-341].** These have been factored into the health and wellbeing assessment. For example, the **CEMP Appendix A Outline Code of Construction Practice [APP-341]** confirms that *"Construction workers will undergo training to increase their awareness of environmental issues as applicable to their role on the project,"* including topics such as traffic management and noise and vibration reduction measures. The measures set out in the **Outline PRoW Management Plan – Suffolk [APP-352**] ensure that connectivity, accessibility, and the recreational value of the routes are maintained where possible. These measures will ensure that local communities are protected, residual effects are minimised. The Relevant Representation raised also raises concerns about financial uncertainty. While the Applicant acknowledges these concerns, it is important to note that issues of property value and compensation fall outside the scope of the EIA process. In line with **IEMA Guide to Effective Scoping of Human Health in EIA (IEMA, 2022)**, **Chapter 11 Health and Wellbeing [APP-058]** is focused on environmental, social and health determinants, and within this scope no significant residual effects on wellbeing have been identified as a result of financial uncertainty. The cumulative impact is assessed in **Chapter 13 Inter-Project Cumulative Effects [APP-060]**, which assesses the impact of Sea Link in addition to other Nationally Significant Infrastructure Projects 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 CEA 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. This assessment also considers vulnerable groups, such as children, the elderly, and individuals with pre-existing health conditions. In conclusion, the overall inter-Project assessment of cumulative effects has been assessed as 'not significant'. In addition, National Grid as part of its submission has produced a report which sets out how it approached coordination with other projects with the aim to reducing the impact on the environment and local communities. Further details are set out in **Application Document 7.10 Coordination Document [APP-363].**

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		In conclusion, the ES demonstrates that all relevant matters influencing health and wellbeing have been fully assessed. Taking into account the mitigation embedded within the scheme design, as well as cumulative impacts assessed in **Chapter 13: Inter-Project Cumulative Effects [APP-060]**, the Applicant concludes that there will be no significant residual adverse effects on health and wellbeing during either construction or operation. The assessment is robust, proportionate and consistent with established guidance.
Human health	75. Residents in Friston living close to the substations site have properties which have become unsaleable. Therefore, people are trapped living in an area they no longer wish to be. No compensation has been offered. The Sea Link project will further extend an already protracted construction period seriously exacerbating this problem and further damaging residents well-being.	The Applicant recognises the concerns raised by residents of Friston in relation to property sales, extended construction activity, and associated effects on wellbeing. While the Applicant acknowledges concerns relating to property values and compensation, it is important to note that the issues are not matters for the EIA or the DCO process. **Chapter 11 Health and Wellbeing [APP-058]** adopts a systematic, evidence-led approach in-line with best practice guidance from the **IEMA Guide to Effective Scoping of Human Health in EIA (IEMA, 2022)** and also best practice methodology used on other major infrastructure schemes. Specifically, the assessment takes a holistic approach to health and considers a wide range of health determinants which are relevant to quality of life and amenity. The assessment considers elements of the Scheme which could affect mental health (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). It draws on a range of public health, socio-economic, and environmental data, including indicators relevant to mental health and wellbeing, and considers vulnerable populations such as the elderly, disabled, and those with pre-existing conditions. Concerns raised through official consultation and engagement processes have been considered at multiple stages of the DCO process, consistent with the Planning Act 2008 and HUDU (2019) and IEMA (2022) guidance. This has included scoping stage engagement, targeted consultation, and three thematic health and wellbeing meetings with relevant stakeholders, including public health representatives, to inform the assessment of community health, emotional wellbeing, and potential psychosocial effects. The structured consultation process and comprehensive methodologies ensure these insights are fully embedded within the assessment, consistent with IEMA best practice. In addition, as stated in **Application Document 5.1 Consultation Report [APP-301]**, a community relations team will be appointed by National Grid to provide dedicated community relations and external communication support during construction. A free telephone helpline and website will be maintained. The community relations team will record the details of any complaints. It is deemed that **Chapter 11 Health and Wellbeing [APP-058]** covers all relevant health and wellbeing determinants in line with latest guidance. As such, a complete assessment of health and wellbeing effects has been undertaken, which concludes that there are no anticipated significant effects as a result of the Proposed Project. The ES also considers cumulative effects in **Chapter 13: Inter-Project Cumulative Effects [APP-060]**, which includes the interaction between the Proposed Project and other major developments in the area. The assessment concludes that no significant cumulative adverse effects on human health and wellbeing are expected, given the mitigation measures embedded within each project and ongoing coordination between developers.
Human health	76. It is understood that the mental health charity MIND is carrying out a mental health survey in Suffolk in relation to the impact of the energy projects. That survey should be given great weight in respect of those who live close to the development.	The Applicant is aware of wider initiatives, including the survey being carried out by the charity MIND in Suffolk. While such surveys may provide useful qualitative insights into community perceptions and experiences, it is important to note that the EIA must be based on robust, systematically collected evidence and consistent methodologies to ensure findings are proportionate, transparent, and comparable across projects. Any emerging findings from external surveys can complement, but do not replace, the structured technical assessments required under the EIA Regulations.

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		Chapter 11 Health and Wellbeing [APP-058] adopts a systematic, evidence-led approach in-line with best practice IEMA guidance, drawing on a range of public health, socio-economic, and environmental data, including indicators relevant to mental health and wellbeing, and considers vulnerable populations such as the elderly, disabled, and those with pre-existing conditions. In addition, concerns raised through official consultation and engagement processes have been considered at multiple stages of the DCO process, consistent with the Planning Act 2008 and HUDU (2019) and IEMA (2022) guidance. This has included scoping stage engagement, targeted consultation, and three thematic health and wellbeing meetings with relevant stakeholders, including public health representatives, to inform the assessment of community health, emotional wellbeing, and potential psychosocial effects. The structured consultation process and comprehensive methodologies ensure these insights are fully embedded within the assessment, consistent with IEMA best practice. In addition, as stated in **Application Document 5.1 Consultation Report [APP-301]**, a community relations team will be appointed by National Grid to provide dedicated community relations and external communication support during construction. A free telephone helpline and website will be maintained. The community relations team will record the details of any complaints. In summary, the survey may provide insight into individual perceptions but does not constitute a reliable, representative dataset sufficient to alter the conclusions of **Chapter 11 Health and Wellbeing [APP-058]**. The ES methodology, which integrates multiple quantitative and qualitative sources, provides a comprehensive and defensible basis for evaluating health and wellbeing impacts associated with the Proposed Project, where it is deemed that no significant effects are anticipated.
Safety	77. No safety case is provided for the convertor stations and connection hub. Fire and explosion are relatively frequent occurrences at substations and converter stations as a simple Internet search will prove. This risk will be even higher with such a concentration of electrical infrastructure between Friston and Saxmundham. The area around Friston/Saxmundham will be full of vegetation and crops for significant periods of the year. During dry periods there is a very real risk in the event of a substation/convertor station fire that this will rapidly spread with an immediate threat to people and houses adjacent to the site and over a much wider area. Wildfires in Europe and the US have shown how rapidly fires can spread in dry conditions with a recent example in Northern Ireland in April. There should be an independent fire risk assessment (including in relation to the preparedness and resources of local fire services) together with a contingency plan containing arrangements for evacuation.	Safety is fundamental to National Grid's operations. Fire is relatively rare in transmission substations in the UK and no instances of fire have breached the perimeter of National Grid's footprint. There is no risk of fire spreading to vegetation, crops or houses. We are confident of this because of the safety precautions and systems that will be installed, such as fire deluge systems, heat and smoke detectors, alarms and remote monitoring systems. Every site has a Fire Risk Assessment in accordance with the Regulatory Reform (Fire Safety) Order 2005 which is carried out by trained fire risk assessors. In addition, regular drills and coordination with emergency response services ensure readiness in the event of an emergency.
Safety	78. The safety and security of all residents and workers within a 30km radius of Sizewell B is secured by an evacuation plan in the event of a nuclear accident and no consideration has been given to the impacts of the proposals on that plan or plans put in place as part of the Sizewell C development.	We are in regular contact and coordination with both Sizewell B's ongoing operations and Sizewell C's construction activities. This coordination ensures that precautions are in place for a nuclear accident. This is led by Sizewell and the Applicant comply with their recommendations and emergency plans.
Socio-economics	79. Onshore development elements contribute very little to the local economy during construction and nothing post construction. During construction these projects will only add to what is already a severe skills shortage. 80. The loss of amenity etc. both during construction and thereafter is a risk to tourism, a key part of the local economy. 81. Therefore, locally these projects only have the potential to cause economic damage.	The Applicant notes the concern regarding local labour supply. The home-based workers assessment is set out in **Chapter 10: Socio-economics, Recreation and Tourism** of the Environmental Statement **[Doc Ref]**. As set out in Table 10.20, in the construction phase, an estimated 65 average net additional 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. Based on professional judgement and other similar schemes, given the specialised nature of the construction roles, this has been estimated to be 30%. Therefore 20 jobs per annum are expected to be taken up by residents in the Study Area. Given the volume of construction and operational work required and an estimated 65 average net

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		additional jobs per annum, outside the peak period, impacts on skills and employment are not anticipated to be substantial. The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are currently a source of concern for local tourism. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment, such that any likely significant effects of the Scheme have been identified and mitigated. Section 10.9 of **Chapter 10: Socio-economics, Recreation and Tourism** of the Environmental Statement **[APP-070]** assesses potential effects of the Scheme on private and community assets, recreation and tourism. The assessment identified no significant effects on visitor attraction receptors. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Suffolk Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in **Chapter 11 Health and Wellbeing [APP-071]**. No significant adverse effects are identified with regards to human health and wellbeing. In summary, there will be no effect on tourism assets arising from construction of the Suffolk Onshore Scheme and therefore no mitigation will be required.
Light pollution	82. There will be significant light pollution given the "dark skies" of the present rural environment both during construction (particularly at construction compounds) and operation. 83. During operation there will be security and car park lighting which even if "movement sensitive" will be frequently triggered by wildlife. 84. The use of artificial light should be minimised during construction and operation.	The lighting proposals of the Suffolk Onshore Scheme are fully assessed for landscape and visual receptors within 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])** 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])**. This is particularly assessed in relation to dark skies when considering the Suffolk Coast and Heaths AONB, where it is concluded that lighting associated with the Proposed Project is expected to be localised and limited to temporary periods and is not considered to alter the dark skies of the AONB at construction. At operation there would be no permanent lighting associated with the Proposed Project within the AONB and whilst there would be limited lighting associated with the Saxmundham Converter Station it is not considered to alter the dark skies of the AONB. Lighting is proposed to be linked to movement sensors at the access gates for security and safety however lighting within the compounds is to be on demand only and triggered manually, avoiding the lighting from being triggered by wildlife. Lighting is to be directional and mounted at a maximum height of approximately 8m to reduce impacts. Permanent lighting will be for sufficient for the safe movement of staff and vehicles around site. Where specific task lighting is required for maintenance activities if these are required to be undertaken in poor or limited lighting conditions then additional temporary task lighting will be used. This enables the permanent lighting to be kept at a lower level.
Design	85. The design process suggested by National Grid is inadequate. It should follow the process in the EA2 and EA1N DCOs. 86. National Grid is proposing a GIS connection hub. GIS switchgear historically contained SF6 which is a highly damaging greenhouse gas. National Grid state they will use an alternative to SF6 but little information is given as to the nature of the alternative gas. Whilst it may not be as damaging as SF6 it could still be an environmentally damaging gas. Furthermore these gases can become toxic in a fire creating a further safety issue – see further paragraphs 77 and 78 above. Full disclosure is required in relation to the gas that will be used, its safety in all conditions and its impact on the environment in manufacture, use and disposal.	The Applicant has committed to using SF6 free solutions for the GIS substations on the project. The type of alternative gas used will be determined at detailed design. Suppliers are continuously developing and improving SF6 free offerings, and the Applicant will be working with their supply chain to select the most appropriate alternative as part of the detailed design process. The Applicant and its contractors will follow all COSHH legislation and best practice in the handling, use and disposal of any substances used in the construction, operation or dismantling of the proposed project.
Land use	87. Sea Link will cause a significant loss of Grade 2 and 3 agricultural land which is substantially worsened by the cumulative effects of all the energy	The converter station at Saxmundham, as shown in **Application Document 2.14.1 Indicative General Arrangements Plans – Suffolk [APP-038]**, is sited on land which is Provisionally mapped

Theme	Summary of relevant representation	Applicant's response
	projects. There needs to be a cumulative assessment of all the agricultural land that has been lost across Suffolk as a result of multiple energy projects.	as Grade 3 land (see **Application Document 6.4.2.6 ES Figures Suffolk Agriculture and Soils [APP-233]**). Detailed surveys could not be undertaken for the submission. However, in consultation with Natural England, a predictive approach was taken which predicts the land affected by the converter station to be likely Grade 3a. Much of the land within the Order Limits in this area is best and most versatile (BMV) land, as such the use of Grade 3a over Grade 2 shows a preference for the use of lower grade land. These areas also have other constraints which were taken into account in the assessment of alternatives (**Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**). Cumulative effects are fully assessed and presented in **Application Document 6.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060],** and includes assessment against other major projects within the region.
Ecology impacts	88. The projects will involve the loss and disruption of habitat for badgers, bats, owls, great crested newts, adders and other wildlife. 89. Bats are present at the site and along the cable route.	Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049] assesses impacts on all these receptors (except great crested newt which will be addressed through the District Level Licensing Scheme) and concludes that there will be no significant residual effects with the implementation of the mitigation measures detailed in APP-049 and AS-059 Outline Landscape and Ecological Management Plan – Suffolk. All these mitigation measures are intended to be enforceable through legally binding implementation of the detailed LEMP and their inclusion in the legally binding Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].
Ecology impacts	90. All wildlife will be disturbed by noise and light pollution both during construction and operation at the substations site. The use of artificial light should be minimised during construction and operation.	Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049] assesses disturbance impacts, including through noise and lighting during both construction and operation. This includes reference to detailed noise modelling and operational lighting modelling. It concludes that there will be no significant residual effects with the implementation of the mitigation measures detailed in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342], which includes lighting controls.
Ecology impacts	91. Already from the existing projects there is evidence of displacement of wildlife. Although there is only anecdotal evidence the level of "roadkill" seems to have increased locally. An assessment should be made of this.	For the reasons identified in the responses to points 88 and 90, the temporary short-term nature of construction activity in most locations within the Order Limits, and measures to ensure the construction corridor remains passable to wildlife such as badger, no specific survey of this type is necessary.
Public Rights of Way	92. There are many PROWs throughout the onshore development area, which will be temporarily closed or diverted for unspecified amounts of time with a major loss of amenity.	National Grid acknowledges this feedback. Diversion routes have been identified where any temporary PRoW closures will be required. These details are set out in **7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]**. It is proposed to temporarily divert several PRoW during the construction phase. The proposed diversion routes will be designed to be of equivalent nature and connectivity to the existing sections of the routes to be closed, whilst minimising the additional journey length as far as practical. Short term temporary diversions will last four weeks, and long-term temporary diversions will be the full construction phase. The Applicant recognises the importance of local amenity and access to PRoW. In response to this concern, **Chapter 11: Health and Wellbeing [APP-058]** assesses the likely significant effects on amenity of PRoW users, drawing on assessment from **Chapter 10: Socio-Economics, Recreation and Tourism [APP-057]** and **Chapter 1 Landscape and Visual [APP-048]**. The cumulative impact is also assessed in **Chapter 13 Inter-Project Cumulative Effects [APP-060]**. No significant adverse effects are identified with regards to human health and wellbeing.

~~Table 6.9~~ Table 6.9Applicant's Response to the Relevant Representation of Great Oaks Small School

Reference	Summary of relevant representation	Applicant's Response
6.9.1	Environmental Sensitivity & Recognition: The school has received the Eco Schools International Award and was named Eco School of the Year 2023–2024, highlighting the ecological importance of its grounds. The surrounding area supports rare species and habitats, which the school believes are at risk from the Scheme.	The Applicant acknowledges the school's concerns about the potential effects of the Proposed Project in relation to its grounds and the recognition it has achieved there. The Applicant acknowledges the ecological sensitivity of sites in the surrounding area. A detailed impact assessment is set out in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [APP-062]**. The impact assessment has been produced in line with guidance and legislation which has taken into consideration statutory designations. Extensive consultation with key stakeholders such as Natural England, Environment Agency, RSPB, Thanet Council, Dover Council, Kent County Council and Kent Wildlife Trust has taken place, and the survey data and impact assessment has informed avoidance and mitigation. Although the assessment concludes no significant impact even in the absence of mitigation, mitigation has been included in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [AS-012]**. Further details can be found in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [APP-062]** and **Application Document 6.6 Habitats Regulations Assessment Report [APP-290]**.
6.9.2	Noise & Vibration Impact: Students are highly sensitive to sensory input; even minor increases in noise or vibration can cause distress. The quiet, low-sensory environment is essential for students' ability to attend and learn. Increased traffic and construction activity could disrupt this environment significantly.	The school's concerns about the potential effects of the Proposed Project in terms of noise and vibration are acknowledged. The Proposed Project incorporates measures to control noise and vibration, as set out in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**, **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and Outline Noise and Vibration Management Plans (**Application Document 7.5.8.2 Outline Construction Noise and Vibration Management Plan – Kent [APP-351]**). Detailed plans which must be substantially in accordance with these outline management plans will be brought forward post consent as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [APP-007]**. In addition, an indicative assessment of operational noise from the proposed Minster Converter Station, based on current design information, is presented in **Application Document 6.3.3.9.D ES Appendix 3.9D Kent Operational Noise Assessment [APP-191]**. With standard embedded mitigation measures, the impact of operational noise from the proposed Kent Converter Station on all nearby Noise Sensitive Receptors (including the school), has been assessed as having a negligible magnitude during both daytime and night-time periods. This would result in a negligible effect at all nearby Noise Sensitive Receptors, which is considered to be not significant.
6.9.3	Traffic & Access Issues: The Ebbsfleet roundabout is already congested; increased truck and lorry movements will worsen access to Jutes Lane. This will affect: School trips and external visits. Families' ability to drop off and pick up students. Overall travel times for students, which are already long.	The Applicant has listened to concerns from stakeholders over the use of Jutes Lane as an access point and as identified in our **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]** paragraph 7.4.52 only a very low proportion of construction vehicles (circa 1% in total, and less than 1% HGVs) is expected across the access points comprising K-BM03 (Jutes Lane), K-BM04 (Marsh Farm Road) and K-BM05 (Whitehouse Drove) combined. For Jutes Lane this is limited to utility diversion and connection works which are associated with utilities in this location and therefore cannot be avoided. The Applicant has assessed the impacts on Ebbsfleet Roundabout as negligible due to the small increases in traffic volumes associated with the works **Application Document 6.3.3.7.H Part 3 Kent Chapter 7 Appendix 3.7.H Preliminary Highway Impact Assessment [APP-182]** details the percentage increase in traffic showing only a 1.1% increase in the am peak from 8am to 9am considered the most likely peak to impact on Great Oaks Small School. Over the whole day the 12-hour and 24-hour distributions show only a 1.5% increase and 1.4% increase, respectively.

Reference	Summary of relevant representation	Applicant's Response
		The Applicant will look to continue to liaise with Great Oaks Small School to discuss the phasing of any works in the proximity of the school as the detailed design and construction programmes are developed.
6.9.4	School's Unique Role & History: The school was founded in 2001 by parents due to lack of suitable education options, registered with the DfE in 2003 and incorporated in 2004. The school operates as a charity, not a profit-making business and caters to students with specific needs who cannot easily transfer to other schools.	The Proposed Project incorporates measures to minimise, control and mitigate effects that may be perceived as being detrimental to the school. Nonetheless, the Applicant is willing to engage further with the school in order to better understand specific areas of concern about the construction and operational phases.
6.9.5	Operational Threat: The National Grid Converter Station and Stability Facility pose a serious threat to the school's ability to function at its current location. The school is actively seeking alternative premises, but options are limited due to its unique requirements and charitable status.	The Proposed Project incorporates measures to minimise, control and mitigate effects that may be perceived as being detrimental to the school. Nonetheless, the Applicant is willing to engage further with the school in order to better understand specific areas of concern about the construction and operational phases.
6.9.6	Request for Representation: The Head Teacher requests that the school and its staff be treated as Interested Parties in the examination process. Contact details provided for formal representation.	The Applicant welcomes the school's engagement with the Proposed Project.
6.9.7	Position on Renewable Energy: Supports renewable energy in principle. Opposes the Scheme's location due to irreversible environmental damage to sensitive habitats.	The Applicant is cognisant of the concerns raised in these comments. Extensive surveys have been undertaken to inform decision-making and the Proposed Project has been designed, as far as possible, following the mitigation hierarchy. In the first instance, this is in order to avoid or reduce adverse environmental impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project such as sensitive routeing and siting of infrastructure and temporary works. The Proposed Project is a network reinforcement project, designed to meet specific needs arising from grid connection agreements that National Grid is obliged to fulfil by 2030. While the Applicant acknowledges the concerns about the potential impacts of the Proposed Project and its locational requirements, the publicly documented needs case explains the requirements to reinforce the network between the Sizewell area and the Kent area. Alternative options have been carefully considered. Reasoning behind the connection location for the Proposed Project has been addressed within **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]** and **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045]**.

Table 6.10~~Table 6.10~~ Applicant's Response to the Relevant Representation of the International Union for the Conservation of Nature (IUCN)

Reference	Summary of relevant representation	Applicant's Response
6.10.1	Impacts on biodiversity and ecosystem functions and services: IUCN is a science-based standard setter for best practice in protected and conserved areas, specifically, and biodiversity conservation more generally. IUCN is a membership organisation that engages as a network to ensure the implementation of approved Resolutions and Council-approved standards and knowledge products. Based on inputs from UK-based IUCN members and Commission experts, IUCN is currently engaged in assessments of the conservation status and performance of distinct place-based conservation efforts (protected areas, other effective area-based conservation measures OECM, and traditional lands and territories) in the East Kent Region, including Thanet. IUCN is the co-lead for the United Nations World Database on Protected Areas, which is the official atlas for measuring national contributions to global biodiversity targets. Thanet and East Kent are significant areas of importance for the UK's protected area coverage. IUCN is concerned that, without adaptive measures and a rethink of current plans, the proposed infrastructure project - as described through available information - will likely have major and lasting impacts on the biodiversity and ecosystem functions and services, especially to the site of the proposed converter station and to the target area for the associated pipeline routing.	The impact of the Proposed Project on ecology and biodiversity in Kent, including those anticipated from the construction and operation of the proposed converter station and underground HVDC cable (no pipeline is being proposed) route, has been considered in detail in **Application Documents 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**, **Application Document 2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** and **Application Document 6.6 (B) Habitats Regulations Assessment Report [AS-007]**. This has included specific consideration of impacts on locally, nationally and internationally designated important wildlife sites, including their role regarding the East Atlantic Flyway. Mitigation for any potentially significant effects is set out in those documents and in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]**. With regard to the development of the proposed converter station, impacts on wintering golden plover have been fully assessed and mitigation proposals developed and agreed with Natural England. These are detailed in Document **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]** and secured through measure B54 of the **Register of Environmental Actions and Commitments [APP-342]**. With the implementation of these measures, it is concluded that no significant residual adverse effects will remain.
6.10.2	Importantly, these impacts may likely significantly carry over to areas of importance for biodiversity and ecosystem functions and services in the immediate vicinity of the direct proposed project footprint. Based on available information, IUCN would expect knock-on and adverse outcomes across the broader ecological system of Thanet and East Kent; reduced viability for the crucial avian migratory route for the East Atlantic Flyway; additional risks to threatened marine life resident or seasonal to the English Channel, including seals, cetaceans and other important ocean biodiversity; as well as disruption to geomorphic processes already destabilised by increased climate variability, such as the shifting of the Goodwin Sands	The impact of the Proposed Project on ecology and biodiversity in Kent has been considered in detail in **Application Document 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**, **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** and **Application Document 6.6 (B) Habitats Regulations Assessment Report [AS-007]**. This has included extensive ornithology survey (including two seasons of wintering bird survey, two seasons of breeding bird survey, and 12 months of vantage point survey) and detailed surveys for dormouse, reptiles, fish, freshwater plants, riparian mammals, terrestrial and freshwater invertebrates, badgers, roosting and foraging/commuting bats and terrestrial plants. It also includes specific consideration of impacts on locally, nationally and internationally important wildlife sites, including their role regarding the East Atlantic Flyway, including an assessment of permanent loss of functionally-linked land for golden plover (and mitigation agreed with Natural England) and a collision risk assessment associated with the new section of overhead line. Mitigation for any potentially significant effects is set out in the document listed above and in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]**. The impact of the Proposed Project on marine ecology and biodiversity has been considered in detail in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [AS-020]** (superseded by **Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology** at Deadline 1), **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [AS-095]** (superseded by **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals** at Deadline 1), **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology [APP-078]** (superseded by **Application Document 6.2.4.5 (B) Part 4 Marine Chapter 5 Marine Ornithology [AS-115]**) , and **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [APP-076]** (superseded by **Application Document 6.2.4.3 (B) Part 4 Marine**

Reference	Summary of relevant representation	Applicant's Response
		Chapter 3 Fish and Shellfish Ecology [AS-022]). The assessment indicates that the project is not expected to result in any significant effects on the identified features. Potential effects on Goodwin Sands Marine Conservation Zone (MCZ) have also been assessed in **Application Document 6.11 Marine Conservation Zone Assessment [APP-296]** (superseded by **Application Document 6.11(B) Marine Conservation Zone Assessment** submitted at Deadline 1), which considers both impacts to physical processes in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [AS-113]** (superseded by **Application Document 6.2.4.1(C) Part 4 Marine Chapter 1 Physical Environment** submitted at Deadline 1) and impacts on benthic features in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [AS-020]** (superseded by **Application Document 6.2.4.2(C) Part 4 Marine Chapter 2 Benthic Ecology** at Deadline 1). The assessment concludes that the project is not expected to result in any significant effects on these features and will not hinder the conservation objectives of the site.**AS-020** The marine qualifying features in designated sites have been assessed in **Application Document 6.6 Habitat Regulations Assessment Report [AS-007]** (superseded by **Application Document 6.6 (C) Habitat Regulations Assessment Report** submitted at Deadline 1). Additional airborne noise modelling has been conducted in relation to seals at Pegwell Bay, which is provided in **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals** and the **Application Document 9.49 Seals and Airborne Sound Disturbance Technical Note** both of which were submitted at Deadline 1. Further information and refinement regarding physical processes modelling has been provided in **Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment [AS-114]**. Furthermore, information on intertidal surveys for marine ornithology is provided in **Application Document 6.2.4.5 (B) Part 4 Marine Chapter 5 Marine Ornithology [AS-115]**. The assessment concludes that the project is not expected to result in any significant effects on these features.
6.10.3	International standards for biodiversity and climate protection: IUCN would like to support further consideration of the infrastructure project's impacts, to help ensure it meets international standards for biodiversity and climate protection, as per the commitments of the United Kingdom to the United Nations Convention on Biological Diversity - Kunming - Montreal Global Biodiversity Framework, in particular Target 3 on achieving 30% of the planet under effective systems of protected areas, other effective area-based conservation measures, and traditional lands and territories, that are representative, well-connected and integrated into the broader ecological landscapes and seascapes.	This comment is noted by the Applicant. Please refer to previous answers with regards to where within the application impacts on ecology and biodiversity are reported.
6.10.4	Mitigation Hierarchy Assessment: IUCN proposes that a proper Mitigation Hierarchy Assessment accompanies the project planning process. IUCN has helped other major infrastructure projects in this regards, including successfully in 2025 for the development of water extraction infrastructure in the new Vjosa Wild River National Park in Albania, in collaboration with the Ministry of Environment and Tourism of Albania, the Prime Minister's office of Albania, the Albanian National Development Fund, the German Embassy in Albania, and the German Development Bank KfW. IUCN stands ready to support our members and local experts in the consultation process and support a full and proper mitigation hierarchy approach to the proposed Sealink infrastructure, to help ensure development can proceed without a high and unmitigated cost to globally significant biodiversity and ecological process	The mitigation hierarchy has been considered throughout the development of the Proposed Project. **Application Document 7.3 Design Development Report [APP-321]** summarises the development of the Proposed Project from strategic options through the Proposed Project as applied for and how environmental, including ecological, receptors have been considered and sought to be avoided wherever possible in line with National Grid's statutory duties under the Electricity Act, including the requirement to bring forward proposals that are efficient, co-ordinated, and economical, and have regard to the desirability of preserving amenity. Furthermore, **Application Document 7.1 Planning Statement [AS-057]** outlines how the Applicant has assessed the Proposed Project against all the requirements of NPS EN-1, which includes the requirement to demonstrate compliance with the mitigation hierarchy.

Reference	Summary of relevant representation	Applicant's Response
		The Proposed Project is a High Voltage Direct Current (HDVC) link which comprises different components, namely marine HVDC cable, landfalls, terrestrial HVDC cable, converter stations and an Alternating Current (AC) connection to the network connection point. In identifying an overall preferred solution, the appraisals of these individual components are brought together to identify the most appropriate overall design. It is therefore important to note that when there are multiple factors under consideration, it is not always possible to avoid all potential impacts, and other steps in the mitigation hierarchy may need to be considered. **Application Document 6.2.3.1 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]** provides a description of the reasonable alternatives considered and the main reasons for selecting the chosen option including a comparison of the environmental effects, as required under Part 2 Schedule 4 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. How the mitigation hierarchy has been applied specifically to ecological receptors is set out in section 8 of the following documents: • **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]**; • **Application Document 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**; • **Application Document 6.2.4.2 (B) Part 4 Marine Chapter 2 Benthic Ecology [AS-020]**; • **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [AS-022]** ; • **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [AS-095];** and • **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology [AS-115]**
6.10.5	Site-level Impacts: The converter station infrastructure, as described, in terms of its size, scope, scale, construction phase, and longer-term operational impacts, will significantly disrupt the biodiversity value and ecological contribution of the Minster Marshes, and negate the truly positive contributions of local landowners and general public in managing the site for maximum biodiversity benefit, especially as a critical stepping stone for important resident and migratory species, including IUCN and UK red-list threatened taxa. The Minster Marshes meet the UN CBD definition of an 'Other Effective Area-based Conservation Measure' (OECM), based on IUCN criteria framed within the provisions of UN CBD Decision 14/8. The site is part of the UK contribution to the global 30% target for both its intrinsic in-situ and complementary connectivity conservation efforts. Secondly, the pipeline, as planned in available information, will directly and significantly disturb habitat and ecological function of Sandwich and Pegwell Bay National Nature Reserve. The Reserve is listed by the UK on the UN World Database of Protected Areas as IUCN Category V - An IUCN Category V protected area, also known as a Protected Landscape or Seascape, an area where the interaction of people and nature over time has created a distinct landscape with significant ecological, biological, cultural, and scenic value. The focus of any alterations must be on maintaining the integrity of this interaction to protect and sustain the area and its associated values. The proposed infrastructure developments are not compatible with the UK commitments to the criteria and standards for an IUCN Category V protected area.	The impacts as a result of the construction and operation of the proposed Minster Converter Station on wildlife have been considered in detail in **Application Documents 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**, and **Application Document 6.6 (B) Habitats Regulations Assessment Report [AS-007]**. This includes specific consideration of impacts on locally, nationally and internationally designated important wildlife sites, including their role regarding the East Atlantic Flyway, including an assessment of permanent loss of functionally-linked land for golden plover (and mitigation agreed with Natural England) and a collision risk assessment associated with the new section of overhead line. Mitigation for any potentially significant effects is set out in those documents and in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]**. With regard to the development of the proposed converter station, impacts on wintering golden plover have been fully assessed and mitigation proposals developed and agreed with Natural England. These are detailed in **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]**. With the implementation of the proposed mitigation measures, it is concluded that no long term significant residual adverse effects will remain. The permanent loss of the arable field within which the proposed Minster Converter Station is situated will not affect habitat connectivity for wildlife in Minster Marshes or along the River Stour corridor due to the arable nature of the field (and the fact this loss is being addressed by enhancing habitat somewhere else within the wider landscape), the large amount of residual habitat (including habitat of greater ecological value) that would remain in Minster Marshes and Ash Level, and the fact that the proposed Converter Station would be immediately adjacent to existing industrial development (including an active construction site on the opposite side of Weather Lees Hill). Permanent culverts have been designed to ensure continued passage of wildlife. There will be a net

Reference	Summary of relevant representation	Applicant's Response
		increase in woodland, species-rich grassland and wetland habitats as a result of the Proposed Project. Operational disturbance from the proposed Minster Converter Station (in terms of noise and lighting) and collision risk due to the new section of overhead line has been assessed on designated sites, ornithology and other ecological receptors and considered not to be significant. It is acknowledged in **Application Documents 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]** that there will be some disturbance during construction. However, this area has been subject to other construction activities in recent years including the Richborough to Canterbury overhead line (completed in 2021 and which traverses Minster Marshes) and an active construction site on the opposite side of Weather Lees Hill, which have not harmed the interest of the area. Moreover, extensive mitigation measures to reduce disturbance and disruption during construction have been included in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**, such as noise reduction techniques to reduce noise to an acceptable level over as much of the site as possible (measure B44),as well as seasonal restrictions (measures B48, B50 and B51). There is no proposed pipeline as part of the Proposed Project. Instead, and in relation to the proposed HVDC cable route, the Applicant has committed to a trenchless technique to pass beneath the sensitive habitats (i.e. saltmarshes) within the designated sites at Pegwell Bay, including Sandwich and Pegwell Bay National Nature Reserve. The commitment to a trenchless solution is secured through Requirement 6 of Schedule 3 of **3.1 (B) draft Development Consent Order (Clean) – Applicants response to Section 51 Advice issued on 23 April 2025 – Accepted at the discretion of the Examining Authority**. This document has since been superseded by [**AS-087**]. Potential effects of the trenchless solution and other temporary activities such as use of associated equipment and plant at Pegwell Bay on key features including intertidal habitats, ornithology and the Pegwell Bay Seal Population have been assessed in detail in **Application Document 6.2.4.2 (B) Part 4 Marine Chapter 2 Benthic Ecology [AS-020], Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology [AS-115]** and **Application Document 6.2.4.4 (D) Part 4 Marine Chapter 4 Marine Mammals [AS-096]** respectively. Updated versions of **Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology** and **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals** were also submitted at Deadline 1.
6.10.6	Disruption to connectivity: The converter station in particular will potentially impact the biodiversity and ecological function of the Minster Marshes area in terms of its critical role as a connectivity buffer and spill-over zone for Sandwich and Pegwell Bay NNR and adjacent SSI, as well as Stodmarsh National Nature Reserve and other important refugia and habitats across Thanet and East Kent. IUCN experts have credible and up-to-date documentation of the critical connectivity function of the site of the proposed infrastructure itself and the adjacent marshes and Stour river waterways. The Minster Marshes function as an artery and temporary haven for migratory species as and when adverse conditions affect the adjacent protected areas, for example through adverse and exacerbated weather conditions caused by climate variability and other local disturbances, especially from human activities. The UN Global Biodiversity Framework Target 3 is specific and descriptive on several counts on the role of connectivity, of integrated landscapes and seascapes, and of operational and effective systems of protected and conserved areas. The Minster	The permanent loss of the arable field within which the proposed Minster Converter Station would be situated will not affect habitat connectivity for wildlife in Minster Marshes or along the River Stour corridor due to the arable nature of the field (and the fact this loss is being addressed by enhancing habitat within the wider landscape), the large amount of residual habitat (including habitat of greater ecological value) that would remain in Minster Marshes and Ash Level, and the fact that the proposed Converter Station is immediately adjacent to existing industrial development (including an active construction site on the opposite side of Weather Lees Hill). Permanent culverts have been designed to ensure continued passage of wildlife. Impacts on bird passage along the River Stour corridor between Pegwell Bay and Minster Marshes (as well as Stodmarsh) have been considered in **Application Documents 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**, and **Application Document 6.6 (B) Habitats Regulations Assessment Report [AS-007]**. This includes specific consideration of impacts on locally, nationally and internationally designated important wildlife sites, including their role regarding the East Atlantic Flyway, including an assessment of permanent loss of functionally-linked land for golden plover (and mitigation agreed with Natural England) and a collision risk assessment associated with the new section of overhead line. It has been agreed with Natural England that the proposed new section of overhead line is

Reference	Summary of relevant representation	Applicant's Response
	Marshes are the core piece in the connectivity mosaic for biodiversity, especially for resident and migratory birds, in Thanet and East Kent, and for the East Atlantic Flyway. The additional marine impacts from the pipeline construction will likely impact biodiversity and ecological and geological processes in the Channel.	unlikely to materially affect collision risk for interest features of either Thanet Coast & Sandwich Bay SPA or Stodmarsh SPA, and thus the East Atlantic Flyway. The impact of the Proposed Project on marine ecology and biodiversity has been considered in detail in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [AS-020]** (superseded by **Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology** at Deadline 1), **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [AS-095]** (superseded by **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals** at Deadline 1), **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology [APP-078]** (superseded by **Application Document 6.2.4.5 (B) Part 4 Marine Chapter 5 Marine Ornithology [AS-115]**) , and **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [APP-076]** (superseded by **Application Document 6.2.4.3 (B) Part 4 Marine Chapter 3 Fish and Shellfish Ecology [AS-022]**). Potential effects on Goodwin Sands Marine Conservation Zone (MCZ) were also been assessed in the **Application Document 6.11 Marine Conservation Zone Assessment [APP-296]** (superseded by **Application Document 6.11 (B) Marine Conservation Zone Assessment** submitted at Deadline 1) which considers both impacts to physical processes in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [APP-074]** (superseded by **Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment** submitted at Deadline 1) and impacts on benthic features in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [AS-020]** (superseded by **Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology** at Deadline 1). The assessment concludes that the project is not expected to result in any significant effects on these features and will not hinder the conservation objectives of the site. The marine qualifying features in designated sites have been assessed in **Application Document 6.6 Habitat Regulations Assessment Report [AS-007]** (superseded by **Application Document 6.6 (C) Habitat Regulations Assessment Report** submitted at Deadline 1). Additional airborne noise modelling has been conducted in relation to seals at Pegwell Bay, which is provided in **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals** and the **Application Document 9.49 Seals and Airborne Sound Disturbance Technical Note** both of which were submitted at Deadline 1. Further information and refinement regarding physical processes modelling has been provided in **Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment [AS-114]**. Furthermore, information on intertidal surveys for marine ornithology is provided in **Application Document 6.2.4.5 (B) Part 4 Marine Chapter 5 Marine Ornithology [AS-115]**. Lastly, impacts on physical processes including geological features were assessed in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [AS-113]**. The assessment concludes that the project is not expected to result in any significant effects on these features. The proposed development is for the installation of a subsea electricity (HVDC) cable. It is not for the construction of a 'pipeline' which is a term generally used to describe the infrastructure required to carry gas or liquids, which has the potential for a larger footprint than an electricity cable. The potential effects of the cable on biodiversity and ecological and geological processes have been considered in **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [AS-020]** (superseded by **Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology** at Deadline 1) and **Application Document 6.2.4.1 (B) Part 4 Marine Chapter 1 Physical Environment [AS-114]**.

Reference	Summary of relevant representation	Applicant's Response
6.10.7	System-level impacts: As above, the Minster Marshes play a critical role in conferring ecological function and services to surrounding protected areas, including Sandwich and Pegwell Bay NNR, Stodmarsh NNR, the coastal Ramsar designation, and numerous SSI sites. The immediate site cannot simply be accounted for in terms of metres squared of direct impact.. The loss of a viable haven for biodiversity in and between other important sites will reduce the resilience and effectiveness of the local and regional system of protection. The IUCN Green List Standard is currently being used to quantify, in tangible and measurable terms, the potential loss of effectiveness across the system of local conservation areas, as has been the case in other similar instances including Albania, as above, and in Donna World Heritage Area in Spain, among others. IUCN proposes a proper Mitigation Hierarchy Assessment that would build on UK and international standard and best practice to optimise the location of proposed infrastructure away from such a significant biological corridor that is internationally recognised and well-managed by its landowners and stewards as an OECM site of global conservation importance. In this regard, IUCN supports the position of the Kent Wildlife Trust in terms of avoiding specific impacts to the Sandwich and Pegwell Bay NNR and Minster Marshes.	Please see the Applicant's response to previous comments with regards to impacts on ecology and biodiversity and designated important wildlife sites. While the Applicant acknowledges the concerns about the potential impacts of the Proposed Project, the publicly documented needs case explains the requirements to reinforce the network between the Sizewell area and the Kent area. Alternative options have been carefully considered. Accordingly, the reasoning behind the connection location for the Proposed Project has been addressed within a significant number of studies and consultations, including **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**. **Application Document 7.2 Strategic Options Report Backcheck Report [APP-320]** explains why the Proposed Project is needed and the strategic options considered; **Application Document 7.3 Design Development Report [APP-321]** explains how the design process was conducted and how the design evolved from the selection of the preferred strategic proposal to the Proposed Project as applied for; and **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022) [APP-368]** explains how the routeing and siting of the Proposed Project was undertaken and the reasons for the selection of the emerging preferences, which were consulted upon during non-statutory consultation. **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]** explain how the preferred options were selected and how the design of the Proposed Project evolved from non-statutory consultation to the Proposed Project as consulted upon at statutory consultation. Given the detailed information set out in the above reports the Applicant considers that the application provides sufficient information to justify the choice of location. In addition, however, the Applicant is cognisant of the concerns raised in these comments, with extensive surveys, including ground investigation works, informing decision-making. The Proposed Project incorporates measures to minimise the impacts of construction work. This is set out in **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]**. Detailed plans which must be substantially in accordance with these outline management plans will be brought forward post consent as secured by Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [AS-087]**.

~~Table 6.11~~Table 6.11 Applicant's Response to the Relevant Representation the London Gateway Port Authority

Reference	Summary of relevant representation	Applicant's Response
6.11.1	Introduction and Background London Gateway Port Limited, LG Park Freehold Limited and LG Park Leasehold Limited (collectively hereinafter referred to as DPWLG) are the owners and operators of DP World London Gateway Port (the Port) and DP World London Gateway Logistics Park (the Logistics Park) on the north bank of the Thames Estuary in Stanford-le Hope, Essex. The Port is a Nationally Significant Infrastructure Project (NSIP) and makes a significant contribution to the national economy1. Once fully developed, the Port will comprise deep sea shipping and container handling facilities with an annual throughput that will equate to approximately 27% of the predicted national growth in such trade by 2030. The Logistics Park will provide up to approximately 740,000sq.m of vital commercial floorspace. Both are of national significance and importance.	The location, details and significance of the London Gateway Port are acknowledged by the Applicant.
6.11.2	DPWLG Concerns The proposed cable corridor appears to run close to the Sunk and North Est Spit pilot station areas The aforementioned pilot stations are the only ones available for larger vessels to access London Gateway Port. In addition, the cable burial depth is key to ensure future vessel can be accommodated. Possible impacts include: •Permanent impacts because of cable depths • Permanent and temporary impacts from surveys, cable laying and repair/maintenance • Permanent impacts from interaction with third party schemes (cable crossings) • Temporary impacts from interaction with third party schemes simultaneous operations) • Temporary and permanent impacts from the safety zones • Temporary and permanent impacts from dredging • Permanent impact from the change in cable depth due to changes in riverbed/sea • Temporary impact in the dredged depth during installation. The range of impacts vary from vessel displacement and delays to placing a constraint on the size of vessel that achieve access to London Gateway port and thus, its future growth and overall capacity. .	The Applicant acknowledges the London Gateway Port's concerns around potential impacts to shipping and navigation and the importance of minimising such impacts. These impacts are assessed within **Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]**. As noted in the Navigational Risk Assessment regarding safety zones, 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. Such RRZ are therefore temporary during the construction phase. 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 NIP will 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. Regarding concerns surrounding water depth and cable depth placing possible constraints on the size of vessel achieving access to London Gateway Port, the Applicant has been in discussion with the Port of London Authority (PLA) and Harwich Haven Authority (HHA) in order to safeguard water depths in key areas to secure future access to ports. 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.

~~Table 6.12~~ Table 6.12 Applicant's Response to the Relevant Representation of the RSPB

Reference	Summary of relevant representation	Applicant's Response
6.12.1	The Royal Society for the Protection of Birds (registered Charity England and Wales number 207076, Scotland number SC037654, 'the RSPB') was set up in 1889. It is a registered charity incorporated by Royal Charter and is Europe's largest wildlife conservation organisation, with a membership of 1.15 million (RSPB Annual Report 2023-24). The RSPB manages 222 nature reserves in the UK covering an area of over 158,000 hectares. The RSPB acknowledges the pre-application discussions that have taken place with the Applicant, National Grid Electricity Transmission, in respect of the Sea Link Development Consent Order Application (the Application), particularly through the public consultation process but also in addition to those requirements.	This is noted by the Applicant and the detailed points are responded to below.
6.12.2	The RSPB's status as an interested party: The RSPB notes that it is an Interested Party by virtue of ss. 57(1) and 102(1)(aa) of the Planning Act 2008 due to its freehold ownership of land at RSPB North Warren which is affected by the proposed development but would have been registering in any event due to potential adverse effects on the protected sites.	This is noted by the Applicant
6.12.3	The RSPB's interests: The RSPB is supportive of renewable energy and associated works required to upgrade the electrical network, providing all potential adverse impacts on wildlife and habitats can be avoided through careful siting and design. Our ecological concerns with the Sea Link Application centre around the impacts of the cable routes on designated nature conservation sites and their features, including the RSPB's North Warren reserve in Suffolk and Pegwell Bay in Kent and the marine environment especially the proposed cable routes within designated wildlife sites and the Applicant's current approach to the mitigation hierarchy. Although we continue to object to the proposed locations for this project, due to the risk that the project is consented despite these concerns, our focus during the Examination will be on securing comprehensive mitigation for potential impacts on designated nature conservation sites.	This is noted by the Applicant.
6.12.4	RSPB's interests- Suffolk: The onshore cables will pass underneath the Leiston-Aldeburgh Site of Special Scientific Interest (SSSI) close to the Sandlings Special Protection Area (SPA), both of which are partly within the RSPB's North Warren nature reserve. Our focus is the potential impacts of installing the cables and associated construction and access activity on key habitats and species of these important nature conservation sites. Our concerns include, but are not limited to: • the adequacy of the initial environmental assessments forming part of the project's Environmental Impact Assessment and Habitat's Regulations Assessment, • the proposed safeguards/ecological mitigation around the use of trenchless cabling techniques and any ecological impacts and future maintenance issues this may require, • the draft DCO excluding the possibility for the Applicant to revert to open trenching for the Suffolk landfall; both for the initial works and any future maintenance/repairs,	The environmental assessments have been undertaken in accordance with guidance and best practice. In terms of the adequacy of the environmental assessments, we note that the application has been deemed acceptable and the Environmental Statement has been found to be of a satisfactory standard by the ExA in accordance with the requirements of Section 55 of the Planning Act 2008. The Applicant therefore maintains that the environmental assessments associated with the Proposed Project are adequate.. The impact of the Proposed Project on ecology and biodiversity in Suffolk has been considered in detail in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]**, **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** and **Application Document 6.6 Habitats Regulations Assessment Report [AS-007]**. The assessment includes consideration of potential impacts on designated sites, such as Leiston-Aldeburgh SSSI, Sandlings SPA and RSPB's North Warren nature reserve; as well as impacts on habitats and protected species. Specifically, potential for disturbance of birds from noise and lighting has been assessed in paragraphs 2.9.78 to 2.9.86 and 2.9.189 to 2.190 of **Application Document 6.2.2.2 Part 2 Suffolk**

Reference	Summary of relevant representation	Applicant's Response
	• the potential disturbance of birds through e.g. noise and lighting impacts, • the ability for the existing land uses at North Warren to continue during the construction works period and any future periods of maintenance etc., • the overall potential for works (including access routes) to damage habitats at the site or affect their longer-term management and achievement of their conservation objectives, • the limited monitoring proposed and the ability to identify requirements for further mitigation should there be further impacts on the nature conservation interests (the feedback loop mechanism), and; • procedures for emergencies or faults occurring during either construction or operation and associated impacts.	**Chapter 2 Ecology and Biodiversity [APP-049]**. Whilst the effects of the trenchless installation on surface habitats and hydrology (and thus ability for existing land uses to continue) in Leiston-Alderburgh SSSI/North Warren Reserve, including access tracks, is discussed in paragraphs 2.9.7 to 2.9.9 and associated bullets, paragraph 2.9.25 and paragraphs 2.9.165 and 2.9.166 of **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]**. These paragraphs also discuss issues such as risk of frac out and risk of stuck drilling equipment and how these would be resolved if they arose. Mitigation for any potentially significant effects on ecology and biodiversity is set out in the documents cited above, as well as in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [APP-348]** superseded by **[AS-059]**. With the implementation of these measures, it is concluded that no significant residual long term adverse effects will remain. Overall, there will be a net increase in habitat for most ecological receptors as a result of the Proposed Project. With regards to the exclusion of open trenching techniques for cable installation at the landfall, the Applicant remains confident in the feasibility of the proposed trenchless technique as set out in Appendix A Landfall Feasibility Technical Note of **Application Document 7.3 Design Development Report [APP-321]**. As such, the Applicant has committed to the use of trenchless techniques at the landfall and there are no proposals in the DCO to allow open cut trenching, even as a fall-back position. If trenchless techniques were for any reason identified as not feasible, any proposals for alternative methods would require a formal amendment to the DCO, with a new supporting environmental assessment. The Kent and Suffolk Landscape and Ecological Management Plans have sections on monitoring (section 7). These include proposals for monitoring surveys for breeding and non-breeding birds, bats, riparian mammals, and badgers. The oLEMPs deliberately do not present detailed monitoring proposals. As stated in the oLEMPs, a post-construction monitoring programme and reporting procedures will be formalised, agreed with the relevant planning authority and included within the detailed LEMP, prior to construction works commencing. Post-construction monitoring and reporting programmes will be established for some habitats and species following completion of construction works, where agreed with the relevant planning authority.
6.12.5	The RSPB's interests impacts on Ecology-Suffolk: We may also wish to comment on other ecological issues including the proposed approach to co-ordination between this and other projects in the area, any cumulative or in-combination impacts of this and other projects, potential impacts on important species and habitats elsewhere in the cable corridor and the Applicant's proposals for Biodiversity Net Gain.	This is noted by the Applicant. For reference the proposed approach to co-ordination is outlined in **Application Document 7.10 Coordination Document [APP-363]**, the cumulative and in-combination impacts are set out in **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059]** and **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]** and the potential impacts on important species is outlined in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]**. The Applicant's proposal for BNG is set out in **Application Document 6.12 Biodiversity Net Gain Feasibility Report [AS-055]**.
6.12.6	The RSPB's interests Impact on Ecology- Suffolk-Kent: The onshore cables will pass through the Thanet Coast and Sandwich Bay SPA, Sandwich Bay Special Area of Conservation and Sandwich Bay and Hacklinge Marshes SSSI. In addition to our concerns about the proposed works site selection and minimal consideration of the mitigation hierarchy, namely that less damaging options have not been considered, we are concerned about potential direct and indirect impacts on the species and habitats of the area, including qualifying species	In terms of site selection, **Application Document 6.2.3.1 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]** provides a description of the reasonable alternatives considered and the main reasons for selecting the chosen option including a comparison of the environmental effects, as required under Part 2 Schedule 4 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Proposed Project is a High Voltage Direct Current (HDVC) link which comprises different components, namely marine HVDC cable, landfalls, terrestrial HVDC cable, converter stations and an

Reference	Summary of relevant representation	Applicant's Response
	for the Thanet Coast and Sandwich Bay SPA such as Golden Plover and Turnstone, and functionally linked land (Minster Marshes). We will be wanting to comment on proposals to mitigate loss of open land for wintering Golden Plover, including suitability of location, and the evidence used to inform these proposals. Our concerns include, but are not limited to, • the adequacy of the initial environmental assessments forming part of the project's Environmental Impact Assessment and Habitat's Regulations Assessment, • the safeguards/ecological mitigation around the proposed use of trenchless cabling techniques and associated infrastructure • any associated habitat impacts and future maintenance issues this may cause, and; • the protection of the shoreline and intertidal habitat together more generally with their important species such as Turnstone.	Alternating Current (AC) connection to the network connection point. In identifying an overall preferred solution, the appraisals of these individual components are brought together to identify the most appropriate overall design. Therefore, in identifying a preferred landfall and converter station site the constraints of the marine HVDC cable route, terrestrial HVDC cable route and AC connection are all taken into consideration. **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368]** describes this process. While the Applicant may identify certain areas to be more constrained than alternatives based on certain factors, the preferred design represents the overall most appropriate solution, taking all elements into account. The Applicant therefore considers that it has met the requirements of both EN-1 and EN-5 in terms of demonstrating that environmental constraints have been avoided where possible, including avoidance through the commitment to constructing under, rather than through, key habitats and sections of designated sites. The Applicant has followed the mitigation hierarchy and identified opportunities to avoid and mitigate constraints whenever possible. Significant amounts of environmental survey and assessment have been undertaken, technical design work, and stakeholder consultation to inform the Applicant's approach to reducing impacts which for Kent are set out in Part 3 of the Environmental Statement (ES). **Application Document 7.3 Design Development Report [APP-321]** explains how the design of the Proposed Project has evolved from strategic options through to that applied for and how environmental constraints from desktop and field surveys alongside stakeholder feedback have fed into that process. The impact of the Proposed Project on ecology in Kent has been considered in detail in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**, **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** and **Application Document 6.6 Habitats Regulations Assessment Report [AS-007]**. Mitigation for any potentially significant effects is set out in those documents, and in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]**. With the implementation of these measures, it is concluded that no significant residual long term adverse effects will remain. The proposals for mitigation for loss of functionally-linked farmland for golden plover have been agreed with Natural England and secured in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].** Overall, there will be a net increase in habitat for most ecological receptors as a result of the Proposed Project. With regards to trenchless techniques, associated safeguards including impacts on habitats such as the saltmarsh are discussed in paragraphs 2.9.7 to 2.9.9, 2.9.33 to 2.9.39 and 2.9.173 to 2.9.175 of **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]** as well as **Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology [AS-087]**, **Application Document 9.13 Pegwell Bay Construction Method Technical Note**, and **Application Document 9.49 Seals and Airborne Sound Disturbance Technical Note**. This includes consideration of issues such as habitat loss, frac out and stuck drilling equipment, the risk of these, and how they will be avoided or mitigated.
6.12.7	We wish to comment on the additional risk of damage occurring, as has happened with previous similar schemes. We may also wish to comment on the risk that future events, such as flooding, may cause harm to the infrastructure and the potential that such damage may have knock-on impacts on the nearby habitats. Regarding Minster	It is understood that the reference to 'previous similar schemes' has been made in relation to the Nemo Link project. The Applicant understands this project included open trenching within its Marine Licence application." and therefore, as explained above, this differs significantly from the landfall proposals for the Proposed Project which do not allow for open trenching at the landfall. The

Reference	Summary of relevant representation	Applicant's Response
	Marshes, where a converter station and pylons are proposed, we may wish to address potential impacts on farmland and wetland birds and proposals for mitigation.	Applicant also notes that Nemo Link is not a National Grid Electricity Transmission (NGET) project but a National Grid Ventures (NGV) joint venture with Belgian Elia. These are both separate businesses from National Grid Electricity Transmission (NGET)., as explained in paragraph 1.6 of the **Application Document 7.1 Planning Statement [AS-057]**. The Project's design has embedded resilience against future flood events, by accommodating allowances for climate change, for example, in sizing of drainage features and river crossings. There is also a commitment (W12) within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** to the monitoring of the existing flood defences at the landfall sites, during the cable installation in accordance with protocols agreement with Environment Agency to ensure no detriment to the integrity of the defences, safeguarding the Proposed Project from the risk of coastal flooding, as well as preventing the risk of knock on detriment to nearby habitats. Impacts on farmland and wetland birds have been considered in detail in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**, **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** and **Application Document 6.6 Habitats Regulations Assessment Report [AS-007].** Mitigation for any potentially significant effects is set out in those documents, and in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035].**
6.12.8	Marine Environment: The RSPB is also concerned about the potential disturbance and displacement impacts of construction, installation, maintenance and decommissioning of the subsea high voltage cable (HVDC) on the Outer Thames Estuary SPA's Red-throated Diver.	The Applicant has committed to a seasonal restriction between 1 November – 31 March for offshore cable burial activities (excluding pre-lay grapnel run activities) in the Outer Thames Estuary SPA, with a restriction between 1 January – 31 March for landfall cable installation activities at the Suffolk Landfall in Aldeburgh. This will avoid construction and vessel presence, during the sensitive wintering period for Red-throated Diver. These measures are set out in the **Application Document 7.8 Red Throated Diver Protocol [APP-361]** and the **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]**. The seasonal restriction is secured via Schedule 2, Requirement 11 of the **Application Document 3.1 draft Development Consent Order (DCO) [AS-087]**. The Applicant is continuing to engage with Natural England on the exclusion of the pre-lay grapnel run activities from the seasonal restrictions.
6.12.9	The RSPB's capacity to engage in the Examination note:	Due to resource limitations, the RSPB regrets that it is unlikely to be able to attend issue specific hearings or to submit written responses for all Examination deadlines. We propose to engage with the Examination primarily through the submission of Written Representations and the agreement of a Statement of Common Ground with the Applicant, setting out clearly the initial areas of disagreement and revised near the end of the Examination to show our final position to aid the Examining Authority. As part of this we will continue our discussions with the Applicant.
6.12.10	The RSPB reserves the right to add to and/or amend its position in light of changes to or any new information submitted by the Applicant.	This is noted by the Applicant.

~~Table 6.13~~ Table 6.13 Applicant's Response to the Relevant Representation of the RSPB Thanet Group

Reference	Summary of relevant representation	Applicant's Response
6.13.1	Impact on Minster Marshes: The Thanet RSPB local group are very concerned about the impact of the proposed National Grid converter station on Minster Marshes, coming through Pegwell Bay Nature Reserve- a Ramsar site. Many of our 160 members visit Pegwell Bay Nature Reserve and Minster marshes regularly for bird watching and can verify that this area is essential for our migrating bird population, being in a unique place on the migration corridor, as well as our resident birds. As the tide rises in the bay, the wading birds move from coast to marshland for feeding. There are very accurate records of the numbers and lists of species registered by our members. Since mid-2023, community-led surveys have recorded 224 species over 48,969 individual observations. The species range from waders and wildfowl to amphibians, rare invertebrates and raptors. This is not marginal land. This is an active, irreplaceable wetland ecosystem that supports biodiversity of national significance.	The impact of the Proposed Development on ecology in Kent has been considered in detail in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047], Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** and **Application Document 6.6 Habitats Regulations Assessment Report [APP-290]**. This has included extensive ornithology survey (including two seasons of wintering bird survey, two seasons of breeding bird survey, and 12 months of vantage point survey) and detailed surveys for dormouse, reptiles, fish, freshwater plants, riparian mammals, terrestrial and freshwater invertebrates, badgers, roosting and foraging/commuting bats, and trees and hedgerows. It also includes specific consideration of impacts on locally, nationally and internationally important wildlife sites, including their role regarding the East Atlantic Flyway. Mitigation for any potentially significant effects is set out in those documents, and in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349]** which are secured in turn via Schedule 3, Requirement 6 of **Application Document 3.1 draft Development Consent Order (DCO) [AS-087]**. With the implementation of these measures, it is concluded that no significant residual adverse effects will remain.
6.13.2	Impacts to ecological connectivity: The area acts as a critical ecological superhighway connecting Pegwell Bay with the rest of the Southeast and further afield. It is home to hundreds of bird species, many of which are on the endangered list, including significant populations of 32 red-listed bird species, 46 amber listed birds, and 74 other species, including species in danger of extinction in the UK such as nightingale, cuckoo, grey partridge, skylark, grasshopper warbler, garden warbler, curlew, golden plover, lapwing, hen harrier, marsh harrier, yellow hammer, tree sparrow, greenfinch, turtle dove and more. The full records are publicly accessible at: (Redacted) Any trenching, construction access or infrastructure through this area would fragment habitats, disturb breeding and foraging patterns, and risk long-term loss of species that the UK is legally committed to protecting.	**See response to previous comment**
6.13.3	Biodiversity Net Gain: The Biodiversity Net Gain (BNG) mitigations proposed by National Grid are wholly inadequate in this context. The idea that planted trees or recreating some habitats could replace ancient wetland complexity and species connectivity, is fundamentally flawed. There is no like-for-like exchange. Wetlands like Minster Marshes cannot simply be recreated elsewhere. Once lost, their function and biodiversity are gone for good. The committee members, therefore, wish to make a strong objection to this project on behalf of our members.	Whilst it is accepted that the wetland habitat at Minster Marshes has a long continuity and provides suitable wetland habitat for a range of protected and notable species, the habitats that make up the wetland habitats, particularly to the south of the River Stour and in the location of the proposed converter station are not habitats of high distinctiveness (in relation to the distinctiveness values assigned in the Statutory Metric) and comprise cropland and grassland habitats. The wetland feature of these habitats is a result of the ditch network and inundation of these areas by Minster Stream, the River Stour and the ditch network in times of heavy rainfall. The Proposed Works in area to the north and the south of the River Stour up to the trainline are broadly temporary works with only the six new pylons being permanent features. Impacts to habitats resulting from the haul roads and other works associated with the pylon works are to be re-instated following a three-year delay to account for the construction period. Re-instatement of these habitats is considered to be feasible as the underlying habitats are cropland and grassland habitats of low botanical interest. Permanent loss of cropland habitats resulting from the construction of the converter station is unavoidable. However, as National Grid will be in ownership of the land surrounding the converter station it has been

Reference	Summary of relevant representation	Applicant's Response
		possible for the habitats within the Minster Stream riparian zone to be enhanced, with further habitat creation and enhancement within the riparian zone of the ditch network located at the west, south and east of the proposed converter station location. In addition to this, SuDS features that are required have been designed to provide additional habitat to a range of protected and notable species such as water voles. Since some of these features have been specifically designed for water voles, it is considered that these features are complementary to the wetland habitat. There is a shortfall of 47.58 habitat units. In accordance with best practice guidance and the biodiversity gain hierarchy, the delivery of biodiversity units should be initially considered on-site. However, as explained in paragraph 5.2.3, opportunities for additional habitat creation and enhancement on-site are limited, and land outside of the BNG Parameters Line will need to be considered for the Proposed Project to achieve 10% BNG. The habitat units required to achieve a 10% net gain will therefore be delivered off-site, through on of the following approaches: • partnership delivery to provide registered off-site biodiversity units with wider environmental and societal benefits; • National Grid's Nature and Climate Framework suppliers to provide registered off-site biodiversity units with wider environmental and societal benefits; and • working with other registered off-site biodiversity unit providers. Further discussion will be undertaken with established and experienced conservation organisations which champion public access and engagement with the aims of delivering the required units in such a way to deliver a more meaningful and targeted provision of BNG (i.e. to benefit protected and notable species within local biodiversity action plans) that may work towards targets within the incoming Local Nature Recovery Strategy (LNRS).
6.13.4	Ecological Surveys: We feel that National Grid have not carried out sufficient surveying of the area at various times of the year and therefore do not reflect the true picture of the numbers of birds which use this natural marshland.	National Grid has undertaken extensive survey for birds including 12 months of vantage point survey (covering all seasons), two years of non-breeding bird survey, two years of breeding bird survey, a bird carcase search of the existing Richborough to Canterbury overhead line through the Order Limits and review of existing bird records collected by others including those provided by landowners. As mentioned above, a wide range of bird species has been recorded on site and this is acknowledged and discussed in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047]** and **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** and has led to the bird assemblage of the survey area being classified as being of District to Regional importance for breeding birds and Regional to National importance for non-breeding birds.
6.13.5	Impacts to ornithology: We would also like to raise the issue of the numbers of pylons that NG wishes to add to this area at varied heights. There are well recorded incidents of over 150 swans being killed in just one night when the last lot of pylons were added across the marshes. The likelihood of a massive impact on the local bird population is extremely high. When many of these species are struggling to survive in this area due to the huge reduction in arable farmland (mostly for housing) this could be the final straw for many and they will be lost from SE Kent forever.	The assessment provided in **Application Document 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity (Clean) [AS-047]** and **Application Document 6.6 Habitats Regulations Assessment Report [APP-290]** includes assessment of impacts on all bird species, including large birds flying through the zone of the proposed overhead line. A collision risk analysis has been undertaken (see **Application Document 6.3.3.2.F ES Appendix 3.2.F Vantage Point Survey Report [APP-152**]) and mitigation included which has been commented upon and agreed with Natural England. Mitigation for any potentially significant effects is set out in those documents, as well as in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349]**. With the implementation of these measures, it is concluded that no significant residual adverse effects will remain. An assessment of avian collision risk is presented in **ES Appendix 3.2.F Vantage Point Survey Report [APP-152]**, which is supported by the results of corpse searches along the existing OHL network presented in **ES Appendix 3.2.G Overhead Line Mortality Monitoring Survey Report [APP-153]**. This shows that for the majority of species the risk of collisions is fewer than one individual annually. Even for species

Reference	Summary of relevant representation	Applicant's Response
		where the extrapolated number of transits through the 'at risk' zone generates a potential collision event that exceeds one individual per year, such as Cormorant, Greylag Goose and Mallard, given the caveats in generating the extrapolated annual transits and absence of modelling for predicted collisions, these annual figures are low in comparison to regional populations. The recorded mortality from corpse searches along the existing OHL network in the Survey Area was only noted for a limited number of species. Notably, many of the species recorded as making a large number of flights through the risk zone, were not among those species recorded as collision events, e.g., Cormorant, Greylag Goose and other duck species, beyond Mallard. Indeed, for species such as Cormorant, observations of flights regularly recorded the species passing over the existing OHL.
6.13.6	Impacts to ornithology – Noise pollution Another important impact of this proposal is the noise pollution from the converter station. The bird population in this area are already struggling with the increased noise pollution from the battery storage plant, Southern Water's water treatment plant and the 50htz that is likely from this converter station will significantly increase the impact on birds such as owls, cuckoos and nightingales. (Look at Dogger Bank wind farm as precedent.)	**Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047]** includes an assessment of operational noise in paragraphs 2.9.198 to 2.9.201 (operational disturbance). This concludes that the noise disturbance threshold agreed with Natural England would only be exceeded 10 m from the Minster Converter Station and Substation.
6.13.7	Cumulative effect: The cumulative impact in this area must be noted. With solar panels on farmland, Southern Water's need soon to expand due to additional needs from additional housing in the area, as well as the battery storage area, this area has been exceptionally hard hit and the SSSI site is already being impacted by this, with a reduction in nesting nightingales, egrets and herons	**Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]** discusses combined ecological effects including on ecology, including with Manston Airport, solar farms, housing developments and Weatherlees Hill Wastewater Treatment Works and a range of other projects. Ecology assessment is specifically provided in **Tables 13.30** and **13.40** of the application document and includes a justification. This includes consideration of receptors such as bats and ornithology including the cumulative loss of functionally-linked land for golden plover. Mitigation measures incorporated into the Kent Onshore Scheme are taken into account as is the fact that in the long-term, habitat creation around the Minster Converter Station and Substation mean that there will be a net increase in woodland, wetland and grassland due to the Kent Onshore Scheme, in addition to changes to arable farming practices on a parcel of land to ensure it is farmed specifically for farmland birds. This informs the conclusion of no significant adverse cumulative effect.
6.13.8	Ecological impacts: We would also like to raise our concerns about the planned 2m deep platform of hardcore that National Grid intend to put under the converter station (as they did not originally understand that the marshland regularly flooded) as this hardcore is going to be polluted with toxins which will then be washed directly into our local water system & pollute the marshland and the Stour river- causing further damage to the wildlife.	
6.13.9	Another concern is the amount of disturbance in the area whilst the enormous drills go through to incredible depths attempting to locate hard surfaces for the frame of the platform for the converter station. This will have a significant impact on wildlife	Noise disturbance from construction including of the converter station platform is assessed in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [AS-047]** in paragraphs 2.9.20 to 2.9.32. This assesses noise disturbance of all phases of the project against noise criteria agreed with Natural England and discussed with other stakeholders during the assessment process, including RSPB, and several mitigation measures are incorporated into the project in response including: The use of best practicable methods to reduce noise is commitment B44 in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments. Programming the overhead line pylon base installation will be planned to avoid the core wintering period of October to February, thus considerably reducing the extent of disturbance and displacement of wintering birds south of the River Stour. The Applicant will also look to programme works that would increase noise levels at Sandwich Bay to Hacklinge Marshes SSSI (Weather Lees Hill) above 60dB LAmax to avoid March to June.

Reference	Summary of relevant representation	Applicant's Response
6.13.10	Site Selection: Other key points of objection include: Failure to use pre-industrialised or brownfield locations, as adopted in other North Sea countries (e.g. Zeebrugge, Rotterdam), where converter stations and landfalls are located in ports or industrial zones — not in fragile rural and coastal areas.	As set out in **Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (October 2022) [APP-386]** due to land use of the routeing and siting study area for the Proposed Project which was defined by the Needs Case as set out in **7.2 Strategic Options Back Check Report [APP-320]**, there was limited opportunity to identify brownfield sites that could accommodate the technical parameters required. Where a brownfield site existed within the routeing and siting study area this was appraised as set out in **Document 8.1 Corridor and Preliminary Routeing and Siting Study [APP-386]**. A significant number of studies and consultations were undertaken in the development of the project as detailed in the following documents: **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044].** **Application Document 7.2 Strategic Options Report Backcheck Report [APP-320]:** Explains why the Proposed Project is needed and the strategic options considered. **Application Document 7.3 Design Development Report [APP-321]:** Explains how the design process was conducted and how the design evolved from the selection of the preferred strategic proposal to the Proposed Project as applied for. **Application Document 8.1 Corridor Preliminary and Routeing and Siting Study (October 2022) [APP-368]:** Explains how the routeing and siting of the Proposed Project was undertaken and the reasons for the selection of the emerging preferences, which were consulted upon during non-statutory consultation. **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]:** Explains how the preferred options were selected and how the design of the Proposed Project evolved from non-statutory consultation to the Proposed Project as consulted upon at statutory consultation. These documents set out the many factors considered in identifying site options and selection of a preferred option.
6.13.11	Lack of alignment with modern energy planning principles, such as an Integrated Offshore Grid, which would route offshore wind power via subsea HVDC cables directly to energy hubs closer to demand, avoiding costly and damaging onshore infrastructure.	Examples of projects in mainland Europe show that the offshore grid approach does not result in less onshore infrastructure. While underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet, meaning that this approach represent a feasible solution in the manner envisaged in these comments.
6.13.12	Traffic and Transport: Traffic and access problems: Whether in Suffolk or Kent, rural roads are unsuitable for HGVs and construction traffic. Communities will face gridlock, pollution, and delays to emergency services.	The below response has been provided with respect to the proposals in Kent, to provide a focussed and more relevant response to the Thanet RSPB local group. Responses with respect to the proposals in Suffolk have been provided separately elsewhere to address RRs raised by stakeholders in Suffolk (which cover and address similar themes on potential construction traffic impacts). The proposed site access (K-BM02) on the A256 (for the Kent Onshore Scheme) will be used as the main access during both construction (for mobilisation/trenchless work and the haul road to the west of the A256) and operation (permanent access/field access). The access will be used throughout the construction programme to accommodate circa 91% of all construction vehicle trips. Therefore, the A256 access will be used to accommodate the vast majority of construction vehicles. Alternative access points will only be used where necessary to access other parts of the Order Limits, or to carry out other works that subsequently allow the A256 access to be used. This is therefore designed to reduce construction vehicle trips on parts of the local highway network (including rural roads), which will only be used to access localised works and to enable the wider works to subsequently be accessed via the main site access (K-BM02) on the A256 Richborough Road. The proposed management and mitigation relating to construction traffic is set out within **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]**. The Traffic and Transport Assessment within **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]** does not identify any significant impacts on the highway network during the construction phase with the proposed embedded mitigation and control and management measures in place. This is based on an assessment of the peak construction phase in terms of total vehicles and HGVs, including a weekday assessment of the shoulder and traditional network peak hours and a Saturday assessment of the lunchtime peak.

Reference	Summary of relevant representation	Applicant's Response
		During the evolvement of the Proposed Project design, the Applicant has engaged with the relevant stakeholders in order to understand and address any issues of concern regarding the Proposed Project and its impacts on emergency services. There are no likely significant effects identified on East of England Ambulance Service (EEAST) operations, service capacity and resources as a result of the Proposed Project. The construction vehicle routing has been designed to minimise impacts across the highway network, as set out within **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]**. As summarised by Kent County Council (KCC) within their RRs, as the Local Highway Authority for Kent, KCC has collaborated with the applicant on Highways and Transportation matters and following positive engagement, all of the issues raised by KCC during the Pre-Examination stage of the DCO have been addressed by the Applicant.
6.13.13	Socio-economics: Economic and social decline: The disruption caused by construction would deter tourism, reduce trade for local businesses, and lower quality of life — all in areas already economically vulnerable.	The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction are currently a source of concern for local tourism and businesses. To address this concern, the Applicant has undertaken a comprehensive and robust Environmental Impact Assessment, through which no residual significant effects have been identified following the application of appropriate mitigation. Section 10.9 of **Chapter 10: Socio-economics, Recreation and Tourism** of the Environmental Statement **[APP-070]** assesses potential effects of the Scheme on private and community assets, recreation and tourism. The assessment concludes that there are no visitor attractions or business premises within the Study Area which would be affected by the land take required for the Kent Onshore Scheme or to which access would be required. Additionally, **Chapter 7 Traffic and Transport [APP-067]** concludes there are no roads assessed that would experience significant severance effects during construction. Section 7 of **Outline CTMTP for Kent [APP- XX]** includes construction traffic management measures that will be implemented in support of the Proposed Project, to avoid any adverse impacts on the surrounding networks and ability to access visitor attractions and local businesses during the construction phase. Therefore, there are no significant severance effects identified between residents, visitors and local assets. The Applicant recognises that there is potential for noise, air quality, visual and traffic effects arising from construction of the Kent Onshore Scheme to impact on the amenity of residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits. Amenity impacts on these receptors are assessed in **Chapter 11 Health and Wellbeing [APP-071]**. No significant adverse amenity effects are identified with regards to human health and wellbeing. As a result, there will be no effect on tourism assets arising from the construction of the Kent Onshore Scheme and no mitigation will be required. Additionally, the Applicant notes concerns about the potential impact of the Proposed Project on visitor perceptions of the local area. The Applicant has undertaken a review of other Nationally Significant Infrastructure Projects (NSIPs) and their potential effects on tourism and visitor activity since the DCO submission. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for the Proposed Project, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. Sizewell C's visitor perception survey indicated that 39% of respondents might be discouraged from visiting the local area during the construction phase. However, a review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Kent Onshore Scheme, as concluded within **Chapter 10: Socio-economics, Recreation and Tourism** of the Environmental Statement **[APP-070].**

Reference	Summary of relevant representation	Applicant's Response
6.13.14	Consultation: Failure to respect local engagement and opposition: There is widespread resistance to Sea Link and related projects from communities who will bear the burden but receive no benefit. This must be recognised. We respectfully suggest looking at research carried out by University College London- Roach. This looked into increased public resentment when the public were not fully engaged with the EIA incinerator in Plymouth. National Grid's attempts to inform the local residents has been woefully inadequate, with inaccessible paperwork, out of the way public venues, and very little engagement with the public.	Community concerns about the Proposed Project are acknowledged. The Applicant believes communities should be rewarded for hosting new transmission infrastructure essential to boosting home grown, cleaner and more affordable power for the country. In line with Government guidance, published in March 2025, National Grid will work with communities and deliver meaningful, long-term, social, and economic benefits through local and strategic investment. The Applicant welcomes all suggestions for the potential use of community benefit funding. Ahead of construction and separately to the planning process, the Applicant will look to engage local stakeholders to understand local ambitions for community benefit, to help shape the delivery of community benefits. The Applicant is and will continue to explore potential coordination with other developers in the region to understand if there are opportunities to collectively deliver community benefits in a coordinated manner. There has been an extensive programme of engagement which is in accordance with the legislative requirements and informed by inputs from key stakeholders on the engagement methods. There have been multi-stage pre-application consultations allowing consultees several opportunities to provide feedback as the proposals evolved. Pre-application consultation involved four phases. Phase one, referred to as Non-statutory consultation, was held between 24 October 2022 and 18 December 2022. This was followed by two phases of statutory consultation, undertaken in accordance with the Statement of Community Consultation—the preparation of which included contributions from the Host Authorities. Statutory consultation was held between 24 October 2023 and 18 December 2023. Targeted consultation took place between 08 July 2024 and 11 August 2024. Lastly, phase four (Pre-submission engagement), was held between 22 November 2024 and 12 January 2025. All feedback received during the four phases of consultation has been carefully reviewed and considered, alongside outputs from wider stakeholder engagement undertaken by the Applicant as part of its preparation of the application for development consent for the Proposed Project. Regard has been had to all feedback received, and changes have been introduced into the Proposed Project design as a result. The consultation process and its outputs are captured in **Application Document 5.1 Consultation Report [APP-301]** and in accepting the DCO application, the Planning Inspectorate has accepted the approach taken to the consultation undertaken in the DCO application.
6.13.15	Finally, we urge the Examining Authority to pause Sea Link and call for a coherent national spatial energy plan, led by the National Energy System Operator (NESO) and aligned with current government priorities. We need a forward-thinking system that uses modern technology, offshore integration, and brownfield sites — not one that sacrifices our rarest and most precious natural spaces for avoidable infrastructure.	While the concerns about strategic coordination are noted, the Proposed Project's acceptance by the Secretary of State as nationally significant infrastructure and its designation as a Critical National Priority (CNP) and Accelerated Strategic Transmission Investment (ASTI) project (as introduced by Ofgem) underlines its importance. This status also provides greater certainty for the needs case of Sea Link and other large, strategic onshore electricity transmission projects by removing the requirement to revisit the need in future planning documents. It is acknowledged that a large number of consultees have long advocated for an integrated offshore grid over the pre-application stage of the Proposed Project. The Applicant is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network. It is recognised that In Europe there is a trend towards multiple windfarms feeding into offshore converter stations. However, on the continent, offshore windfarm arrays are typically smaller and generate less power than the larger arrays that are located around the UK coastline. In addition, underground and offshore high voltage direct current cables which can carry more than 2 GW are not available yet. As such, in Belgium, the

Reference	Summary of relevant representation	Applicant's Response
		3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to 10 cables coming ashore and requiring construction of over 100 km of new overhead lines and around 20 km of new underground cables. Similarly, the German and Dutch transmission network operator, TenneT, is building at least 13 individual 2 GW connections from offshore windfarms directly to land. Each connection will use three cables, instead of the two used by the Proposed Project, along with a similarly sized converter station. This evidence shows that the offshore grid approach does not result in less onshore infrastructure, nor does this approach represent a feasible solution to the network reinforcement that the Proposed Project is seeking to provide. In developing the Proposed Project, the Applicant assessed a variety of potential areas for new infrastructure, including brownfield sites. Further information on the reasoning behind the connection location for the Proposed Project, the alternatives considered, how National Grid has coordinated with other projects and a complete project description is contained in: • **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368];** • **Application Document 8.3 Strategic Options Report (October 2023) [APP-370];** • **Application Document 7.2 Strategic Options Back Check Report [APP-320]**; • **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**; • **Application Document 7.13 Coordination Document**; and • **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045].**
6.13.16	For all these reasons — strategic, environmental, economic, and moral — RSPB Thanet Local Group members respectfully ask you to reject Sea Link's onshore development as currently proposed and we implore the government inspectorate to ask National Grid to look for an alternative site, which does not have such grave consequences upon this amazing, diverse and irreplaceable habitat for the bird population of south east Kent.	These comments are noted and responses addressing the points raised are provided in the above sections.

~~Table 6.14~~ Table 6.14 Applicant's Response to the Relevant Representation of Thanet Fishermen's Association

Reference	Summary of relevant representation	Applicant's Response
6.14.1	We are writing in response to the National Grid SeaLink project being accepted for examination on 23 April 2025 and progressing to the Pre-Examination phase, and to register as an interested party. Thanet Fishermen's Association (TFA) represents a small number of under 10m vessels working from the Thanet Ports of Ramsgate, Margate and Broadstairs	This is noted by the Applicant.
6.14.2	As a result of having to deal with multiple cross-sector projects in a small area, the fishing industry and the small associations that represent them have become increasingly familiar with the conclusions of assessments applied to them and the consequences of these conclusions. If the impact conclusion is not sufficient then the mitigation will reflect that and be equally insufficient.	This is noted by the Applicant.
6.14.3	Displacement of small inshore vessels has become so frequent in the region that TFA do not believe the Fishermen have been without some form of offshore project disruption since 2010. Throughout that time, Thanet Fishermen's Association has always acted pragmatically and attempted to work with projects, in the best interests of its Fishermen, and not against them. The ever-increasing demand for offshore space in the Outer Thames, for energy in particular, has been exponential and we consider that Environmental statements and impact assessments have not kept pace with the changes that are taking place, or the impacts inflicted on the fisheries in the region. The diligence that needs to be applied to understand the fisheries that will be affected in a project area, is paramount if there is to be a genuine assessment of impact and an attempt to minimise that impact.	A characterisation of the commercial fisheries of relevance to the area of the Proposed Project is provided in **Application Document 6.3.4.8.A ES Appendix 4.8.A Commercial Fisheries Technical Report [APP-204]** and summarised in **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries [APP-081]**. The information included in the Application is based on analysis of publicly available fisheries data and information provided by fisheries stakeholders during consultation, including consultation with Thanet Fishermen's Association (TFA). The Applicant acknowledges TFA´s concerns and notes that the assessment presented in **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries [APP-081]** gives consideration to the impacts from the Project alone. Potential cumulative impacts associated with other offshore development/activities in the region are assessed in **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084]**. It is noted that due to an error **Application Document 6.3.4.8.A ES Appendix 4.8.A Commercial Fisheries Technical Report [APP-204]** does not include some of the updates made to the PEIR, including those intended to address some of TFA comments. An addendum with the updated technical report will be submitted at Deadline 1.
6.14.4	TFA/ SeaLink engagement/PEIR response. TFA has been engaged with the SeaLink project since 2021 and entered a response to the PEIR in December 2023. The PEIR response highlighted multiple issues that TFA felt Sealink had either not considered, or were in disagreement with. TFA acknowledges that on reading the Environmental Statement (Document: 6.3.4.8 Part 4, Marine Chapter 8, and Commercial Fisheries Chapter 8 Appendix 4.8.A) a number of our comments have been taken into consideration and welcome any improvement. However, we still consider there are specific and broad points of disagreement.	Due consideration was given to the PEIR comments received from TFA in **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries [APP-081]** and in **Application Document 6.3.4.8.A ES Appendix 4.8.A Commercial Fisheries Technical Report [APP-204]**. Detailed responses to the points raised by TFA in their PEIR response are included in **Application Document 5.1.6 Appendix E Statutory Consultation Part 4 of 4 [APP-312]**. However, it is noted that due to an error **Application Document 6.3.4.8.A ES Appendix 4.8.A Commercial Fisheries Technical Report [APP-204]** does not include some of the updates made to the PEIR, including those intended to address some of TFA comments. This error has been rectified in an update to **Application Document 6.3.4.8.A ES Appendix 4.8.A Commercial Fisheries Technical Report** submitted at Deadline 1. This updated document includes clarification of the distribution of netting grounds and a chart showing grounds targeted by demersal netters across the area of the Proposed Project (Figure 8.23). Communication and engagement with the fishing industry, including TFA is on-going and will continue post-consent. This commitment will be secured through the preparation of a Fisheries Liaison and Co-existence Plan (FLCP) as set out in an update to **Application Document 7.5.3.2 CEMP Appendix B**

Reference	Summary of relevant representation	Applicant's Response
		Register of Environmental Actions and Commitments (REAC) submitted at Deadline 1. The Applicant notes that a Fisheries Liaison Officer (FLO) has already been appointed for the Project to facilitate ongoing engagement.
6.14.5	In response to the PEIR, TFA set out concerns, including comments on the collection of Kent data (which has resulted in almost no fishing data shown South of the Longsand), bottom drifting, cable crossings, cumulative impact and displacement.	This comment is a continuation of the comment above. Please refer to the previous response.
6.14.6	The small amount of data shown in plate 8.22 of the commercial fisheries technical report, titled 'Fishing Grounds for Static nets as Identified Through Consultation' does in fact show bottom drift grounds entered by Thanet Fishermen's Association due to concerns around this method not being recognised at all in the PEIR. We acknowledge that there are now some references to bottom drifting, but do not think due consideration has been given to impacts on this method of fishing and the potential permanent loss of ground from cable crossings, cable protection or redundant cable cut ends. We note that permanent loss of ground has not been scoped in for assessment during any phase of the works (8.3.8), though permanent loss of ground is suggested at 8.9.73, predominantly relating to the presence of cable protection where the minimum DOL cannot be achieved. If rock berms are used in drift ground, or depth of burial is not achieved and rock protection is used, this will be a permanent loss of ground. The PEIR referred to up to 13.2km of external cable protection and that is a great deal of ground to lose if it is in the wrong place, so we welcome the consultation mentioned at 8.10.3 to discuss alternative cable protection methods. We also disagree with point 8.9.39 'However, consultations with fishers have shown that a small proportion of netters use bottom drift nets which can touch the seabed. However, for the purpose of risk avoidance demersal netters are considered able to place their gear at variable depths, and therefore are adaptable during the construction phase'. This highlights that this method is not properly understood and therefore not properly assessed. Bottom drift gear is in constant contact with the seabed and is not set at variable depths. Any obstruction on the seabed will interfere with bottom drifting and cannot be avoided, we therefore disagree with the assessment on sensitivity. This point alone shows there needs to better understanding and consideration of this method in order to properly assess the impact on it.	The Applicant notes that information on drift netting provided by fisheries stakeholders, including information on location of grounds in relation to the Project, was accounted for in the assessment following the feedback received from TFA at the PEIR stage. A chart showing drift netting grounds based on information provided during consultation is included in the updated **Application Document 6.3.4.8.A ES Appendix 4.8.A Commercial Fisheries Technical Report** submitted at Deadline 1 (see Figure 8.23) that informed the assessment presented in **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries [APP-081]**. The Applicant acknowledges an error in section 8.3.8 where impacts during operation are referred to as temporary for both loss and alteration of fishing ground and displacement of commercial fisheries. This error has been corrected in an update to **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries** submitted at Deadline 1A to align the scoped in impacts listed in section 8.3.8 with the impacts as assessed in sections 8.9.73 to 8.9.94. This correction applies to impacts on all fisheries including fixed and drift net fisheries. The Applicant will seek to achieve target depth of lowering across the entire length of the marine cable route, minimising where possible any requirements for additional cable protection. Where this is not possible due to ground conditions, and additional cable protection is required, the Applicant has committed to consulting fishers on the design of cable protection and to apply learnings from other developments' cable protection designs. This is with the intention of minimising risk to fishing gear, and particularly to minimise interference with drift nets, in the event that cable protection requires installation within drift netting grounds. This commitment will be secured through the preparation of a Fisheries Liaison and Co-existence Plan (FLCP) as set out in an update to **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 1. With regards to the statement included in paragraph 8.9.39 of **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries [APP-081]**, the Applicant acknowledges the points made in the Relevant Representation and has updated the assessment of sensitivity i to reflect that bottom drift nets do make contact with the seabed and therefore there is potential for bottom drift nets to snag on obstacles that may temporarily be present on the seabed during construction. The Applicant has also included a commitment to prepare a Fisheries Liaison and Co-existence Plan (FLCP). This will be developed in consultation with fisheries including the TFA and will set out a communications protocol to ensure all fishers are advised of the presence and location of any obstacles that may be present as well as procedures for claims for gear loss or damage. This commitment is included in **Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries** and **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 1.

Reference	Summary of relevant representation	Applicant's Response
6.14.7	We do not agree with the suggestion that fishing should not occur over cables and if this were the case, the inshore industry in the Outer Thames would be severely damaged, probably beyond recovery. If ground conditions are properly assessed by a project and cables are properly buried there should be no need to contemplate not fishing over cables.	The primary objective of the Applicant is to achieve target Depth of Lowering (DOL) across the entire offshore cable route such that any additional cable protection would not be required. However, due to variations in ground conditions along the cable route, there are areas where it may not be possible to achieve target DOL. In these areas, additional cable protection may be required depending on the DOL that is achieved. For the purpose of the impact assessment, it is necessary, and recognised standard practice to consider a worst-case scenario or Maximum Design Scenario (MDS) for all design parameters including cable protection. With regards to fisheries, where cable protection is required, it is recognised that this could result in a loss of access for certain fisheries to the areas of seabed located beneath the cable protection. The assessment also acknowledges that there is potential that the presence of the cable protection may restrict access to fishing grounds where there is a risk of snagging fishing gear where fishers are required to cross the cable route to access fishing grounds. As set out above, the Applicant in recognising this risk has committed to preparing a Fisheries Liaison and Co-existence Plan (FLCP) as set out in an update to **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 1. The FLCP will be prepared in consultation with the fishing industry and will set out procedures for ongoing consultation on the design of any rock protection that is required and procedures for claims for loss or damage to fishing gear.
6.14.8	More broadly, our comments in the PEIR still stand. Fishermen from Thanet and Whitstable work the Southern part of the cable route using mixed methods, both mobile and static. The number of projects in the region mean that all methods, and Fishermen, are both directly and indirectly impacted. Displacement is increasing on all levels and Fishermen in the region are being squeezed into decreasing spaces. There are a considerable number of exposed cables across multiple projects in the region and there is an opportunity to learn from these mistakes rather than desktop and just repeat the same errors with the same consequences.	In terms of the cumulative effects from the presence of multiple projects within the vicinity of Proposed Project, these have been assessed in **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084]**. This includes additional mitigation commitments whereby the Applicant will communicate with other developers to reduce the potential for cumulative effects to occur; and maintain consultations with fishers regarding the design of cable protection, with the intention of minimising the risk to all fishing gears to negligible levels. A procedure for the claim of loss of / or damage to fishing gear will also be developed as part of an evidence-based cooperation agreement between the development and fishers. This commitment will be secured through the preparation of a Fisheries Liaison and Co-existence Plan (FLCP) as set out in an update to **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 1. The Applicant urges that any known locations of exposed cables be reported to the Joint Committee on the National Security Strategy (JCNSS), if this has not already been done. This is of course a concerning issue for fisheries, but it is also a matter of national security and national infrastructure stability.
6.14.9	The commercial fisheries chapter repeatedly refers to a wide range of fishing grounds being available and the fishing vessels being more adaptable and versatile, in order to mitigate the magnitude and sensitivity of any effects on them. In reality, the increase in project numbers, ongoing mitigation, MPA's and other restrictions have seen the available grounds in the region greatly reduced and those remaining become increasingly valuable to the Fishermen who remain. Adaptability, posed in a way to reduce the sensitivity of the fleet, is now vital for the Fishermen to be able to make a living. Changing methods or targeting different species is only an option if those species are available, both seasonally and legislatively.	Consideration has been given in the assessment to both impacts associated with the project alone in **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries [APP-081]** and cumulatively between projects in **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-84]**. The Applicant is committed to communication with fishers; a FLO has been appointed a for the Project for this purpose. Consultation with fisheries stakeholders is ongoing and will continue post-consent. We encourage Thanet Fisheries Association (TFA) to engage in this process, particularly with consultations regarding the design of cable protection, which intends to find solutions that minimise the risk to all fishing gears to negligible levels. Furthermore, the Applicant has committed to holding discussions with other developers with the intention of reducing the potential for cumulative impacts to occur -please see **Application Document 6.2.4.11 Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [APP-084]**]. These commitments will be secured through the preparation of a Fisheries Liaison and Co-

Reference	Summary of relevant representation	Applicant's Response
		existence Plan (FLCP) as set out in an update to **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 1.

~~Table 6.15~~ Table 6.15 Applicant's Response to the Relevant Representation of the Tenant Farmers Association

Reference	Summary of relevant representation	Applicant's Response
6.15.1	The Tenant Farmers Association of England and Wales is dedicated to protecting the property interests of tenant farmers informed by public policy, statute, regulations, case law and contract. The Sealink project brings us squarely into those territories.	The Applicant acknowledges the role of the Tenant Farmers' Association and the potential effects of the Proposed Project upon the interests of its members.
6.15.2	The inspector will need to consider whether the potential negative impacts of the project on the personal circumstances tenant farmers outweigh the benefits of the scheme. In terms of the public policy environment, when addressing the conference of the National Farmers Union in February 2023 the current Prime Minister stated that "Tenant farmers need a fair deal. They need to know their futures are secure. I want to see more solar farms across the countryside. We've got high hopes for solar energy in our green prosperity plan. There'll be opportunities for farmers, opportunities for rural growth, cheaper bills, and in the long-term, real energy independence. But we can't do it by taking advantage of tenant farmers, farmers producing good British food on carefully maintained, fertile land. They can't plan properly if the soil beneath their feet isn't secure. It's a huge barrier to planning sustainable food production, so we've got to give them a fair deal, and we've got to use our land well".	The Proposed Project is a network reinforcement project. The Applicant's publicly documented needs case explains the requirements to reinforce the network between the Sizewell area and the Kent area. It is considered that the benefits outweigh harm, based on the expectation that the Proposed Project will reinforce the electricity network, adding redundancy and flexibility to the grid, helping to reduce the risk of power outages and improve the security of supply across the South and East of England. To the extent that there is a requirement for an Applicant to demonstrate need for a NSIP, the Proposed Project responds to a well-established and longstanding requirement to reinforce the electricity transmission system in the East Anglia and the southeast to respond to the changes required to achieve Net Zero. As well as responding to the changing electricity market the Proposed Project will also address the *'significant boundary deficits' (*Para Ex1.4.16 of the **Strategic Options Back Check Report [APP-320]**, details of which are confirmed in **Part 3** of that document. Land affected by the cable routes will be reinstated post construction to allow the previous farming operations to continue and the Proposed Project has set out a framework for the required mitigation and a route for this to be secured and delivered. The Outline Soil Management Plans (**Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]** and **Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]**) notes that soil is a vulnerable and non-renewable resource (and includes reference to biological activity), and that care must be taken throughout all handling, transporting and stockpiling activities so that soil resources are protected and conserved for future use. Compulsory acquisition is being pursued where the land in question is considered necessary to facilitate the Proposed Project. This is based on options driven by the availability of suitable alternatives. **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]** includes land grade, as defined by the Agricultural Land Classification (ALC) system, as one of the criteria assessed. **Application Document 4.2 Statement of Reasons [APP-012]** at section 6.5 sets out the necessity and proportionality of the land included in the Compulsory Acquisition. • The Applicant assessed alternative options to deliver the necessary connection with more limited land take, but the acquisition of third-party interests cannot be avoided to deliver the project. • Wherever possible, the Applicant is seeking rights in land rather than outright acquisition • Where appropriate, the Applicant has sought to take powers to temporarily use land, rather than permanent acquisition of land or rights. • The Order Limits are drawn tightly to avoid any unnecessary interference with or extinguishments of third-party rights but have regard to the need for flexibility to ensure project deliverability. • Compensation is payable for the compulsory acquisition of land or rights. Compensation is also payable for loss or damage caused by the exercise of any power of temporary use of land. Any dispute in respect of the compensation payable is to be determined by the Lands Chamber of the Upper Tribunal. In addition, **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils [APP-053]** states that the design has been rationalised to minimise permanent land take requirements.
6.15.3	Although these comments relate specifically to solar farms, they could equally apply to other green energy schemes, including Sealink, involved in bringing in electricity from offshore projects.	The caselaw examples cited in these comments are noted and the personal circumstances of affected landowners and occupiers are carefully considered. The health, safety and wellbeing of the public, local communities and employees is the Applicant's highest priority. Throughout the development of the proposals,

Reference	Summary of relevant representation	Applicant's Response
	With those thoughts firmly in mind, I would then wish to refer you to the words of Lord Scarman in giving judgement in the House of Lords case of Great Portland Estates v the Mayor and City of Westminster in 1984: "Personal circumstances of an occupier, personal hardship, the difficulties of businesses which are of value to the character of a community are not to be ignored in the administration of planning control. It would be inhumane pedantry to exclude from the control of our environment the human factor. The human factor is always present, of course, indirectly as the background to the consideration of the character of land use. It can, however, and sometimes should, be given direct effect as an exceptional or special circumstance. But such circumstances, when they arise, fall to be considered not as a general rule but as exceptions to a general rule to be met in special cases. If a planning authority is to give effect to them, a specific case has to be made and the planning authority must give reasons for accepting it".	the Applicant has carefully evaluated the potential impacts of the Proposed Project on health and wellbeing, and where appropriate identified means of mitigating any impacts of the construction and operational phases. A complete assessment of health and wellbeing effects has been undertaken. This is set out in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing** and **6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003]**. Nonetheless, the general need for new nationally significant energy infrastructure projects such as Sea Link is established in NPS EN-1, confirming that projects should be 'brought forward at pace to meet our energy objectives' (NPS EN-1 Para 3.3.63) as confirmed at **Part 5.2 the Planning Statement [AS-057].** Part 4.2 of NPS EN-1 further identifies a 'critical national priority for low carbon infrastructure' that specifically includes energy infrastructure projects that are directed into the NSIP regime under section 35 of the Planning Act 2008: 'such as interconnectors, Multi-Purpose Interconnectors, or 'bootstraps' to support the onshore network which are routed offshore' (Glossary section of NPS EN-1) For those projects which have a section 35 direction, such as the Proposed Project, paragraph 3.2.12 of NPS EN-1 states: "In these circumstances any application would need to be considered in accordance with the NPS'. In particular: 'where the application is for electricity network infrastructure not covered by sections 15-21 of the Planning Act, including underground or offshore infrastructure, the Secretary of State should give substantial weight to the need established at paragraphs 3.3.65 to 3.3.83 of this NPS". The Proposed Project responds to and addresses this strategic need which is explained in the **Strategic Options Back Check Report [APP-320]** and has been back checked.
6.15.4	Informed by the case law which I have already referenced, the Hon Mr Justice Richards in giving judgement in the case of R v Vale of Glamorgan District Council in 2000 under which he quashed a planning consent for the change of use to agricultural buildings subject to an agricultural tenancy said: "The members [of the planning committee] were advised that the position of the tenant, though a material consideration, was 'not in the absence of any other objection, sufficient ground to sustain a refusal of the application'. The members were effectively being told that the tenant's position and the loss of the buildings to agricultural use could not amount to a freestanding planning consideration capable of justifying the refusal of permission; that there had to be some additional ground of objection such as the highways objection that had been the basis of the original recommendation of refusal. In my judgement that was an erroneous approach. It adopted too narrow a view of the relevant policy framework". Taken together with the public policy statement noted, these precedent cases must steer the inspector to consider the negative impact of the Sealink proposal on tenant farmers. Tenant farmers who are likely to lose a substantial area of their holdings will see the loss of their businesses, their homes and their livelihoods which must be considered both significant and exceptional. These issues must be addressed as part of the process for determining whether this scheme should proceed and on what basis.	As outlined above, identifying the Proposed Project as a 'critical national priority for low carbon infrastructure' provides specific justification of the need, whereby the benefits are considered to outweigh the harm. The Applicant acknowledges the concerns raised in relation to the potential effects of the Proposed Project upon tenant farmers. However, as stated in **Application Document 4.2 Statement of Reasons [APP-012]** the Order Limits of the Proposed Project are drawn tightly to avoid any unnecessary interference with or extinguishments of third-party rights, while compensation is payable for the compulsory acquisition of land, rights or loss or damage caused by the exercise of any power of temporary use of land.

~~Table 6.16~~ Table 6.16 Applicant’s Response to the Relevant Representation of Tarmac Marine Limited

Reference	Summary of relevant representation	Applicant’s Response
6.16.1	The offshore route of the cable passes close to licensed aggregate extraction areas, future aggregate search areas and locations where Tarmac Marine's ships navigate	The marine cable route corridor was changed based on consultation feedback. This added in 100 metre buffer zones between aggregate extraction areas to give additional clearance to areas in close proximity to the proposed route, prior to DCO submission. This process was documented in the route development documents **APP368 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022), Table 7-5, and relevant sections 7.6.5, 7.6.8, 7.6.9. APP369: 8.2 Options Selection and Design Evolution Report (October 2023), relevant sections 4.5.51., 4.5.58, 4.5.61 and 4.5.62.**

~~Table 6.17~~ Table 6.17 Applicant's Response to the Relevant Representation of Campaign to Protect Rural England (CPRE) Kent

Reference	Summary of relevant representation	Applicant's Response
6.17.1	CPRE Kent is an independent charity that forms part of the national CPRE, the countryside charity. Across Kent, we represent 1,173 individual members and 173 parish councils, local amenity groups and civic societies. Our primary objective is to protect and enhance the beauty, tranquillity and diversity of the Kent countryside, ensuring it remains a thriving environment valued by everyone. As a Kent-based countryside charity, our primary focus naturally lies on the Kent landfall elements of the project. However, this should not be taken to imply that we are indifferent to the wider impacts of the scheme elsewhere. We remain equally concerned about the effects of the proposals on Suffolk, as well as the substantial marine impacts arising from the scheme as a whole. In particular, we fully support and endorse the representations being made by our sister organisation, the Suffolk Preservation Society. While our representations may not directly address these matters, our silence should not be read as agreement or acceptance of these aspects of the scheme.	This is noted by the Applicant and individual points are responded to in the table below.
6.17.2	CPRE Kent recognises and strongly supports the need to 'rewire' the UK to achieve rapid decarbonisation of the energy sector. We appreciate the urgent priority placed on delivering nationally significant infrastructure projects (NSIPs) that will enable the transition to a sustainable, low-carbon energy system. However, it is crucial that this process prioritises the best overall net-zero solutions for the countryside, not merely those which are quickest or most economically convenient. At a national level, CPRE is actively engaged with the Aldersgate Group and Renewable UK in advocating for a new, more integrated and strategic approach to energy infrastructure. We particularly welcome the ongoing development by the National Electricity System Operator (NESO) of a strategic spatial energy plan, which we believe is essential to ensuring future projects are genuinely coordinated and sustainable. We do not, however, believe that the present approach being taken to energy infrastructure is being genuinely coordinated. Rather, CPRE Kent remains significantly concerned that an overly accelerated delivery approach risks placing excessive pressure on landscapes and ecosystems. Many areas of natural capital are already severely degraded, and further unmitigated environmental pressures threaten irreversible damage to the countryside's landscape and ecological assets. While the necessity of new energy infrastructure to support low-carbon lifestyles is evident, this must be progressed thoughtfully and in a comprehensively joined-up manner.	
6.17.3	For CPRE Kent, it is essential that infrastructure decisions are balanced with ecological considerations. That is, while we accept the urgency of delivering net-zero infrastructure, we emphasise that this cannot justify bypassing rigorous environmental scrutiny. Currently, there remains insufficient strategic oversight to clearly understand optimal locations and actual infrastructure needs. CPRE Kent considers that the present approach risks significant overplanning, potentially resulting in unnecessary grid connections that could ultimately be avoided through a more considered and strategic timeline.	

Reference	Summary of relevant representation	Applicant's Response
	Against this context, CPRE Kent considers the submitted Development Consent Order (DCO) application fundamentally flawed.	
6.17.4	Specifically, and in the context of Section 104 of the Planning Act 2008, it is our view that the application as submitted in not in accordance with the relevant National Policy Statements (primarily NPS EN-1, EN-3 and EN-5) and that the adverse impact of the Proposed Development would outweigh its benefits.	In accordance with Section 104(3) of the 2008 Act, the Secretary of State is required to decide whether the application is in accordance with the relevant national policy statements and must be satisfied that the "the adverse impacts of the proposed development would outweigh its benefits" (Section 104(7)). To determine this, a balance of the Proposed Project's adverse impacts against its benefits must be carried out. The Applicant has presented the overall planning balance in **Application Document 7.1 (C) Planning Statement (Clean) [AS-057]** and the concludes that the Proposed Project is accordance with the relevant NPSs for Energy – NPS EN-1, EN-3 and EN-5 and that the benefits of the Proposed Project outweighs its adverse impacts.
6.17.5	As will be demonstrated in this representation and through the examination process, CPRE Kent and others have identified multiple serious concerns regarding the Sea Link project in Kent. While each individual harm to the environment, landscape and local communities must individually be weighed against the scheme, it is only when these impacts are considered cumulatively that the full scale of harm becomes apparent. Taken together, the nature, extent and significance of these harms in our view render the choice of this single site wholly incapable of credible justification. It is therefore clear to CPRE Kent that the applicant has not undertaken any genuine or robust assessment of reasonable alternatives to the proposed Kent site. All our detailed concerns that follow must therefore be considered in light of this primary objection.	Alternatives have been considered throughout the development of the Proposed Project. **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]** provides a description of the reasonable alternatives considered and the main reasons for selecting the chosen option including a comparison of the environmental effects, as required under Part 2 Schedule 4 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. The Applicant's publicly documented needs case sets out the requirements to reinforce the network between the Sizewell area and the Kent area. Alternative options have been carefully considered. Accordingly, the reasoning behind the connection location for the Proposed Project has been addressed within a significant number of studies and consultations which are outline in: • **Application Document 7.2 Strategic Options Report Backcheck Report [APP-320]** explains why the Proposed Project is needed and the strategic options considered including the selection of the Richborough area; • **Application Document 7.3 Design Development Report [APP-321]** explains how the design process was conducted and how the design evolved from the selection of the preferred strategic proposal to the Proposed Project as applied for; • **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368]** explains how the routeing and siting of the Proposed Project was undertaken and the reasons for the selection of the emerging preferences, which were consulted upon during non-statutory consultation; and • **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]** explains how the preferred options were selected and how the design of the Proposed Project evolved from non-statutory consultation to the Proposed Project as consulted upon at statutory consultation. Given the detailed information set out in the above reports the Applicant considers that the application provides sufficient information to justify the choice of location.
6.17.6	Need Case It remains our view that insufficient detailed information has been provided by the applicant to robustly justify the needs case for the Sea Link project at the proposed location in Kent. That is, while we acknowledge the overarching national policy framework provided by the National Policy Statements (NPS EN-1, EN-3, and EN-5), which broadly supports the development of critical national infrastructure to enable the	There is a strong and urgent need for the delivery of the Sea Link reinforcement project. The needs case is set out in detail in **Application Document 7.2 Strategic Options Back Check Report [APP-320]**. The Sea Link project addresses two distinct system needs, which arise separately in the transmission networks in East Anglia and the South East. These are summarised below:

Reference	Summary of relevant representation	Applicant's Response
	UK's transition to low-carbon energy, it is our firm view that the applicant has not adequately evidenced why this particular location is the most suitable or necessary to meet this national priority.	1. **South East** Sea Link will address a shortfall in the capacity of the existing network in Kent to carry power out of the region at times of low wind and high interconnector imports. This is driven by the interconnectors landing in Kent due to its proximity to mainland Europe, as well as growth in other renewable and battery storage projects. Sea Link has to connect on the network no further west than Canterbury North substation, to provide an additional route for power to flow out of Kent in a scenario where there is fault on the existing overhead line between Canterbury and Kemsley. 2. **East Anglia** Sea Link will support the connection of additional low carbon generation in East Anglia by providing an additional route for power to flow out of the region at times of higher wind. Sea Link has to connect in the Sizewell area in order to enable power flow from the generators connecting in this areas (referred to as the Sizewell Generation Group) in a scenario where there is a fault between Sizewell and Bramford. Sea Link is also particularly important because it bypasses the existing network around north Kent, the Thames Estuary, and London, avoiding putting more power onto these already constrained parts of the network, while also providing further network capacity relief for the generators connecting in Essex (referred to as the Essex Generation Group). As an HVDC link can be configured to transfer power in both directions, it can benefit multiple areas in the East Anglia and South East regions. Sea Link represents a coordinated approach to solving the above issues using a single solution.
6.17.7	Need Case In its Planning Statement (APP-319 Document 7.1) and Strategic Options Back Check Report (APP-320 Document 7.2), the applicant sets out a generalised narrative focused primarily on the urgent need for reinforcement of the electricity transmission network to support the transition away from fossil fuels and accommodate increased generation from renewable sources. Specifically, it is highlighted that electricity demand is predominantly concentrated in large urban areas, including significant centres such as those within the M62 corridor, the Midlands, the M4 corridor and, critically, the South East. Given this context, it would logically follow that transmission infrastructure should, where possible, be located close to these major demand centres to maximise efficiency and reduce environmental impacts associated with extensive transmission lines.	See response above. Additionally, while it is true that there are large demand centres throughout the country in the way acknowledged in the representation, It should be noted that the need case for Sea Link is not to take power directly to these demand centres. The need is specifically to reinforce areas of the network where there are constraints, in the way set out above.
6.17.8	Need Case Despite the general assertions regarding network reinforcement needs, the applicant's specific justification for selecting the specific location remains limited. To CPRE Kent, this is particularly problematic given the significant environmental sensitivities associated with the chosen site. Pegwell Bay, the Minster Marshes and surrounding areas contain highly sensitive ecological habitats with national and international designations (SSSI, Ramsar, SAC and SPA). As set out below, these sites support substantial populations of protected species, including numerous Red- and Amber-listed birds and other critical wildlife populations. Put simply, as the potential for significant environmental impacts at this very specific location is exceptionally high, the need to be able to robustly justify the need for this specific location must also be exceptionally high.	The needs case for the Proposed Project and the selection of the Richborough area as the preferred strategic option is detailed in **Application Document 7.2 Strategic Options Back Check Report [APP-320].** The reasons for the selection of the preferred option to facilitate a connection into the Richborough area are set out in: • **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368]** which explains how the routeing and siting of the Proposed Project was undertaken and the reasons for the selection of the emerging preferences, which were consulted upon during non-statutory consultation; • **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]** which explains how the preferred options were selected and how the design of the Proposed Project evolved from non-statutory consultation to the Proposed Project as consulted upon at statutory consultation; and

Reference	Summary of relevant representation	Applicant's Response
		• **Application Document 7.3 Design Development Report [APP-321]** which explains how the design process was conducted and how the design evolved from the selection of the preferred strategic proposal to the Proposed Project as applied for. Responses to specific points on the selection of Pegwell Bay and Minster Converter Station over alternatives landfall and converter station option areas considered are set out in more detail below. These environmental receptors and constraints at the proposed site have all been robustly considered in the site selection, design, and assessment of the Proposed Project. It should be noted that while the proposed landfall is located within Pegwell Bay, which is subject to various national and international designations (SSSI, Ramsar, SAC and SPA), the proposed converter station and substation site (at the edge of a large area known as the 'Minster Marshes') is not subject to any designations for ecology or habitat. However, where there is a functional relationship between the converter station and substation site and the designations in Pegwell Bay, this is fully assessed in the application.
6.17.9	Need Case Despite CPRE Kent raising similar concerns at each stage of the pre-submission consultation, it remains that the applicant's documentation continues to provide little more than broad references to the constraints of existing transmission networks. We still cannot see any detailed analysis or comparative assessments that really justify why it has to be the precise location that has been chosen. Where it is assessed, we get vagaries around alternative sites not being available or not cost-effective. What we don't have is the applicant convincingly demonstrating why the proposed Kent landfall, with its associated infrastructure, represents the best or indeed only viable option available. This is only adding to our concern that the applicant has not fully considered the broader cumulative environmental impacts or appropriately applied the mitigation hierarchy, particularly the fundamental step of avoidance.	There is a strong and urgent need for the delivery of the Sea Link reinforcement project. The needs case is set out in detail in **Application Document 7.2 Strategic Options Back Check Report [APP-320]**. As set out therein, the Proposed Project has to connect on the network no further west than Canterbury North substation, to provide an additional route for power to flow out of Kent in a scenario where there is fault on the existing overhead line between Canterbury and Kemsley. **Landfall location** As set out in **Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [App-368]**, the Proposed Project considered six landfall areas of search within the Kent study area. National and international designated sites for nature conservation were unavoidable at any of these landfall areas of search. with all potential landfall locations resulting in varying degrees of interaction with these designations. These included four areas along the north Kent coast, one area between Margate and Broadstairs and one area in Pegwell Bay. The north Kent coast landfall areas of search were not progressed due to significant technical and environmental constraints on the marine approaches, and the landfall close to Broadstairs was not progressed due to significant constraints on the onward terrestrial route corridor. The landfall at Pegwell Bay, following the process of options appraisal and the application of the mitigation hierarchy, was therefore identified. **Mitigation hierarchy** The mitigation hierarchy was rigorously applied, as part of the approach to consenting set out in **Application document 7.3 Design Development Report [App-321]** and as part of the iterative process of EIA. The avoidance of environmental designations and other environmental constraints is an important factor which informs the Applicant's site selection process. This is considered alongside other factors such as engineering feasibility, cost, and other wider environmental and socio-economic matters. Notwithstanding that all potential landfall locations resulted in varying degrees of interaction with national and international designated sites for nature conservation, the proposed landfall at Pegwell Bay was identified as the least constrained technically viable landfall option, with opportunities to avoid impacting the sensitive saltmarsh habitat using trenchless cable technology. The onward terrestrial cable corridor and the converter station and substation sites

Reference	Summary of relevant representation	Applicant's Response
		avoid designated sites altogether. While the AC overhead lines connecting into the existing network oversail a belt of dense trees and scrub which forms part of the Sandwich Bay and Hacklinge Marshes SSSI and continue into the Ash Level and South Richborough Pasture Local Wildlife Site, this is unavoidable recognising the need to connect into the existing network.
6.17.10	Need Case Overall, it remains that the applicant still needs to provide robust and detailed justification for the selection of this highly sensitive Kent location. Without such justification, particularly regarding the proximity of infrastructure to significant urban demand centres as identified in paragraph 3.1.6 of the Strategic Options Back Check Report (APP-320 Document 7.2), we consider that the needs case for the project, as currently presented, is incomplete and insufficient.	The needs case for the Proposed Project is not to take power directly to a demand centre. Instead, the Proposed Project is a network reinforcement that addresses a number of system needs simultaneously. The needs case is set out in detail in **Application Document 7.2 Strategic Options Back Check Report [APP-320]**.
6.17.11	As set out in our introduction, CPRE Kent's overarching opposition to the proposed Sea Link project rests primarily on the basis that the applicant is still failing to provide a transparent, rigorous and fully justified explanation of why the option of landfall at Pegwell Bay with a converter station at Minster Marshes is the only option that has been genuinely considered for Kent.	Six landfall areas of search and two converter station site option areas were considered for the Proposed Project in Kent. The detailed explanation behind the selection of Pegwell Bay and the preferred landfall and Minter Converter Station as the preferred converter station location is contained in: • **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368]**; • **Application Document 7.3 Design Development Report [APP-321]**; and • **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**.
6.17.12	While the applicant is right in its assertion that NPS EN-1 does not contain any general requirement to consider alternatives or to establish whether the proposed project represents the best option, it does still explicitly require applicants to rigorously consider alternatives where significant environmental impacts are likely.	Alternatives have been considered throughout the development of the Proposed Project. **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]** provides a description of the reasonable alternatives considered and the main reasons for selecting the chosen option including a comparison of the environmental effects, as required under Part 2 Schedule 4 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
6.17.13	This policy position reflects legal position as reflected within the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (as amended) (the EIA Regulations). Specifically, Regulation 14(2)(d) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 clearly requires that the Environmental Statement includes: *"A description of the reasonable alternatives studied by the developer which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment."* This is reinforced by the mitigation hierarchy articulated in the National Planning Policy Framework (NPPF) paragraph 180, which prioritises avoidance of impacts above mitigation and compensation. Instead, it has been clear to CPRE Kent from the outset that the applicant's decision to progress this specific location was a predetermined decision with lip-service at best being paid to any actual alternative options or locations. Our consistent representations from 2023-2025 have sought to raise this as a concern. However, National Grid has persistently failed to provide transparent or robust assessments of potential brownfield	While the Applicant acknowledges the concerns about the potential impacts of the Proposed Project, the publicly documented needs case explains the requirements to reinforce the network between the Sizewell area and the Kent area. Alternative options have been carefully considered. Accordingly, the reasoning behind the connection location for the Proposed Project has been addressed within a significant number of studies and consultations which are outline in: • **Application Document 7.2 Strategic Options Report Backcheck Report [APP-320]** explains why the Proposed Project is needed and the strategic options considered including the selection of the Richborough area; • **Application Document 7.3 Design Development Report [APP-321]** explains how the design process was conducted and how the design evolved from the selection of the preferred strategic proposal to the Proposed Project as applied for; • **Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368]** explains how the routeing and siting of the Proposed Project was undertaken and the reasons for the selection of the emerging preferences, which were consulted upon during non-statutory consultation; and

Reference	Summary of relevant representation	Applicant's Response
	sites, alternative landfall points or offshore grid integration options. Also, and as set out above, it remains that the applicant has provided very little by way of specific analysis explaining the need for this particular project in this location, with the technologies proposed.	• **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]** explains how the preferred options were selected and how the design of the Proposed Project evolved from non-statutory consultation to the Proposed Project as consulted upon at statutory consultation. Given the detailed information set out in the above reports the Applicant considers that the application provides sufficient information to justify the choice of location. Responses to brownfield alternatives and landfall options are provided in more detail in the responses below. In Europe, there is a trend toward multiple windfarms connecting to offshore converter stations. However, continental arrays are smaller and produce less power than the larger UK arrays. High-voltage direct current cables capable of carrying over 2 GW are not yet available. For example, Belgium's 3.5 GW Princess Elisabeth Island will require up to 10 landfall cables, over 100 km of new overhead lines, and about 20 km of underground cables. Similarly, TenneT in Germany and the Netherlands is building at least 13 separate 2 GW connections, each using three cables and a converter station, which is more than the two cables proposed for this project. This evidence shows that an offshore grid does not reduce onshore infrastructure and is not a feasible alternative to the network reinforcement the Proposed Project aims to deliver.
6.17.14	CPRE Kent has considered the detail of the applicant's case, as set out within the Applicant's Planning Statement (APP-319 Document 7.1) and Strategic Options Back Check Report (APP-320 Document 7.2), However, it remains that there is a clear absence of credible justification for rejecting lower-impact alternatives, including options such as K1a (Broadstairs), identified by National Grid's own assessments as potentially preferable. Further, it remains that the applicant's reasoning is not substantiated by any meaningful cost-benefit analysis. It is also still the case that there is an inconsistent application of environmental constraints such as flood risk.	The needs case for the Proposed Project and the selection of the Richborough area as the preferred strategic option is detailed in **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369].** As set out in **Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [APP-368]**, the Proposed Project considered six landfall areas of search within the Kent Study Area which would facilitate a connection in the Richborough area. These included four areas along the north Kent coast, one area between Margate and Broadstairs and one area in Pegwell Bay, these are illustrated on Plate 5.3 of **Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [APP-368]**. National and international designated sites for nature conservation were unavoidable at any of these landfall areas of search. The Proposed Project is a High Voltage Direct Current (HDVC) link which comprises different components, namely marine HVDC cable, landfalls, terrestrial HVDC cable, converter stations and an Alternating Current (AC) connection to the network connection point. In identifying an overall preferred solution, the appraisals of these individual components are brought together to identify the most appropriate overall design. Therefore, in identifying a preferred landfall the constraints of the marine HVDC cable route, terrestrial HVDC cable route, converter station site and AC connection are all taken into consideration. **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368]** describes this process. While the Applicant may identify certain areas to be more constrained than alternatives based on certain factors, the preferred design represents the overall most appropriate solution, taking all elements into account. The Applicant identified (amongst others) both Pegwell Bay (K1) and an area north of Broadstairs (K1a) as potential landfalls. All routes making landfall in these locations are constrained to some extent and national and international designated sites for nature conservation were unavoidable at any of these landfall areas. Although taken in isolation the Broadstairs landfall would be slightly preferred to the Pegwell Bay landfall from a purely marine routeing perspective, there are significant constraints associated with the onward terrestrial corridor from the Broadstairs landfall to both converter station option areas considered, including existing settlements and further proposed development, (part of which has subsequently been delivered) as illustrated on Figure 8.5 of **Application Document 8.1 Corridor Preliminary Routeing and Siting study (October 2022) [APP-368]**. As set out in

Reference	Summary of relevant representation	Applicant's Response
		Application Document 8.1 Corridor Preliminary Routeing and Siting study (October 2022) [APP-368] the extensive technical challenges, risks, and impacts associated with constructing a HVDC cable through those areas mean that the Broadstairs landfall (K1a) was not preferred as part of a final 'end to end' design. Cost was taken into consideration in the selection of the preferred strategic option as set out in **Application Document 7.2 Strategic Options Report Backcheck Report [APP-320].** Cost was not the determining factor in the section of the preferred routeing a siting option. As set out in **Application Document 8.1 Corridor Preliminary Routeing and Siting study (October 2022) [APP-368]** due to the number of terrestrial and marine elements, to cost every theoretical end-to-end solution would be disproportionate as there are tens of thousands of end-to-end combinations. As cost is generally a factor of length and technical complexity the decision was taken to cost one of the longest and one of the shortest end-to-end solutions to understand the cost differential between the two. The preferred option selected did not represent the shortest solution or the lowest cost option.
6.17.15	Likewise, and as previously stated, all north Kent coast landfall options (K2-K5) were seemingly ruled out on the basis of cost and complexity grounds more than environmental constraints. There are, however, no details provided as to the extent of these additional costs.	As set out in **Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [App-368]**, the Proposed Project considered six landfall areas of search within the Kent study area. These included four areas along the north Kent coast, one area between Margate and Broadstairs and one area in Pegwell Bay, these are illustrated on Plate 5.3 of **Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [App-368]**. For the reasons set out in **Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [APP-368]** the north Kent coast landfall areas of search were ruled out due to significant technical and environmental constraints on the marine approaches. These included: • Margate and Long Sands Special Area of Conservation (SAC), which due to shipping a navigation constraints and bathymetry would have been unavoidable with a landfall along the north Kent coast. This designation is designated for sandbanks therefore any cable or crossing protection within the designated site would have resulted in permanent habitat loss of the interest features of this site. Natural England expressed concerns regarding the potential impacts of crossing the proposed NeuConnect cable within the Margate and Long Sands SAC as the material required for the crossing could permanently change the protected features in this site. Natural England also advised that their preference was for the project to avoid any cable installation in this protected site. Landfalls at either Pegwell Bay or Broadstairs would avoid this permanent habitat loss. An area of mobile sandbank off the north Kent coast as illustrated on Figure 7.17 of **Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [APP-368].** Mobile sediment is considered to be an important consideration as cable spanning or over burial could result which presents a considerable exposure and engineering risk. • Interaction with key anchorage areas offshore of Margate. National and international designated sites for nature conservation were unavoidable at any of the Kent landfall areas of search**. Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [APP-368]** recognised the ecological constraints of the Pegwell bay landfall area of search but also identified that trenchless construction techniques could be used to avoid permanent habitat loss within these sites. As set out above installing marine cables in mobile sandbanks presents an exposure risk, any exposure would require remedial (maintenance) measures which could include re burial or cable

Reference	Summary of relevant representation	Applicant's Response
		protection increasing potential maintenance costs. Any remedial measures within the Margate and Long Sands SAC which is designated for mobile sandbanks could result in permanent habitat loss of the interest features of this site.
6.17.16	It is stated that there are "few brownfield sites that could accommodate the technical parameters required for the converter station". What brownfield sites were considered but ruled out? What were the "technical parameters" used to rule out consideration of other potential brownfield sites? We asked these questions within our response to the statutory consultation, though it is the case they remain unanswered.	The needs case for the Proposed Project and the selection of the Richborough area as the preferred strategic option is detailed in **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369].** Due to land use of the Proposed Project Study Area defined by the connection area, there was limited opportunity to identify available brownfield sites that could accommodate the technical parameters required. Two converter station site Option Areas (Area A and Area B) were identified within the study area as set out in **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368].** Neither of these areas contained available brownfield sites that could accommodate the technical parameters required. The identification of converter site option areas was therefore based on avoidance of designated sites as far as possible, landform, opportunities for natural screening and to minimise visual impacts on settlements.
6.17.17	Instead, we have a proposed development that threatens significant damage to nationally and internationally protected sites, including Sites of Special Scientific Interest (SSSIs), Special Protection Areas (SPAs), Ramsar sites and areas classified as Best and Most Versatile (BMV) agricultural land. As set out in more detail below, we firmly believe that the applicant has failed to properly apply the mitigation hierarchy by not prioritising avoidance of impacts. Instead, they have jumped straight to reliance on mitigation and compensation has been prioritised.	The Proposed Project is a HDVC link which comprises different components, namely marine HVDC cable, landfalls, terrestrial HVDC cable, converter stations and an AC connection to the network connection point. In identifying an overall preferred solution, the appraisals of these individual components are brought together to identify the most appropriate overall design. Therefore, in identifying a preferred option the constraints of each component (converter station site, landfall, marine HVDC cable route, terrestrial HVDC cable route and AC connection) are all taken into consideration. **Application Document 8.1 Corridor and Preliminary Routeing and Siting Study (CPRSS) [APP-368]** describes this process. No options are without constraints, and the competing constraints of each option have to be brought together to identify an on balance preferred option, as such total avoidance of constraints is not possible. The development of the Proposed Project has sought to avoid impacts as far as possible and where avoidance has not been possible apply mitigation. The application of avoidance has been applied at all levels from avoiding sites and features through routeing and siting, the selection of construction techniques such a trenchless cable installation to avoid direct effects and through control measures such as seasonal timing restrictions to avoid construction whilst particular interest features are present. With regards to nature conservation protected sites, as set out above national and international nature conservation sites were unavoidable at any of the Kent landfall areas of search, therefore the specific reasons for each site's designation were taken into account and the potential for the permanency of the effect on those features. Whilst temporary impacts are predicted on the Pegwell Bay designated sites as set out in **Application Document 6.6 (B) Habitats Regulations Assessment Report [AS-007]** and **Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]** the Proposed Project has sought to avoid permanent habitat loss by committing to a trenchless crossing of the sensitive saltmarsh habitat with the sites. Permanent habitat loss however within habitat sites crossed by options that made landfall on the north Kent coast was not considered to be avoidable. With regards to BMV both converter station site Option Areas (Area A and Area B) included BMV as categorised by the Provisional Agricultural Land Classification (ALC) England. Area A is predominately Grade 2 and 3 whereas Area B entirely in Grade 1. Whilst likely BMV was not avoidable with any option the selection of the preferred option took account of provisional ALC grades of both optional areas.

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6.17.18	Also as set out in more detail below, the ecological sensitivity of Pegwell Bay and Minster Marshes has been significantly underestimated, as evidenced by incomplete pre-application surveys and inadequate viability assessments of proposed mitigation. CPRE Kent is not alone in highlighting serious flaws and gaps in the ecological data supposedly underpinning the decision to go with landfall option K1 at Pegwell Bay. Notably, Suffolk's Energy Action Solutions ecologist notes that the applicant has failed to provide a comprehensive assessment of impacts on Habitats and Species of Principal Importance, in particular for hedges, ponds, Harvest Mouse, Brown Hare, Great Crested Newt and other species, which applies equally for the Kent scheme. Kent Wildlife Trust, meanwhile, points to suppression of ecological data, including significant under-reporting of Golden Plover counts, resulting in substantial underestimation of compensation requirements.	A detailed response has been provided to the Relevant Representation of Suffolk Energy Action Solutions, rebutting suggestions of a lack of comprehensive impact assessment on receptors in Suffolk. With regard to Kent, detailed surveys have been undertaken of Pegwell Bay and Minster Marshes including two seasons of non-breeding bird survey (covering both areas), two seasons of breeding bird survey (covering both areas) and (relating to Minster Marshes) twelve months of vantage point bird survey. Minster Marshes has also been subject to detailed surveys for dormice, invertebrates, reptiles, roosting and foraging bats, badgers and riparian mammals. While no survey was undertaken for great crested newts, this was through agreement with Natural England and in line with published government guidance (Developers: how to join the great crested newt district level licensing scheme - GOV.UK) which specifically states that '*By joining a scheme, you do not need to: carry out your own surveys of great crested newts* [or] *plan and carry out mitigation work to move the newts to safety*'. It is noted that Kent Wildlife Trust has indicated two seasons of survey should also have been undertaken for receptors other than birds, but there is no requirement for this in either law or published guidance. Impacts on Habitats of Principal Importance and great crested newts have been discussed in **Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**. There has been no evidence of harvest mouse found in surveys in Kent. No ponds in Kent are to be lost to the Proposed Project. A reference to 700 golden plovers was made in error in the Preliminary Environmental Information Report (PEIR) report. The survey recorded a flock of 370 golden plover and 700 lapwings seen as an inflight aggregation, with flock movements over the railway between the proposed convertor station and fields to the west. However, in the PEIR documents it was mis-transcribed as 700 golden plovers. The error was picked up in discussion with the surveyors in October 2023, was raised with stakeholders during thematic meetings and discussions around the compensation land and has been corrected for the ES. Natural England has agreed the amount and location of mitigation land for golden plover is appropriate.
6.17.19	Likewise, and as set out in more detail below, we consider that the applicant's approach to flood risk is contrary to NPS EN-1 and EN-5. The sequential test has not been properly applied, with no clear evidence that sites in lower flood risk areas have been genuinely assessed. Instead, the applicant relies on engineered mitigation to justify development within areas that are known to flood, including access routes, which remain exposed to residual risks. In our view, this falls short of the policy requirement to demonstrate that flood risk has been avoided wherever possible and that safe operation can be maintained throughout the project's lifetime.	In accordance with NPS EN-1 and NPS EN-5 the identification and appraisal of routeing and siting options for the Proposed Project considered environmental and socio-economic factors as well as technical and engineering design considerations and cost. This included consideration of flood risk. This is explained in **Application Document 7.3 Design Development Report** which summarises the key design decisions from the historical reports detailing options appraisal. **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered** also provides an overview of the main alternatives considered. The routeing and siting options process resulted in the majority of the Order Limits being outside areas at medium or high risk of flooding with the Proposed Project's infrastructure, particularly those elements that could be at risk of flooding during the operational lifetime of the Proposed Project, such as the substations, converter stations and cable transition joint bays being located in Flood Zone 1. During construction, the Proposed Project avoids construction compounds in Flood zones 2 and 3. Due to its linear nature some components of the Proposed Project associated with construction access routes (e.g. proposed temporary bridge over the River Stour in Kent), works to existing pylons and construction of new pylons to facilitate integration of the Project with the existing energy transmission network, and where the marine cables make landfall at Kent must necessarily cross areas with a medium and/or high likelihood of flooding (Flood Zones 2 and 3)

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		due to there not being reasonable alternatives at lower risk, however, these components are also of low vulnerability to flooding, are flood resilient, being able to safely operate in times of flood, and access to them would only be required for routine maintenance and inspections which could be planned to avoid periods of flooding. In addition, below ground infrastructure such as cabling once constructed will not be subject to flood risk because this infrastructure will be buried and therefore the Sequential Test applies only to the construction phase of these components. Commitments have been made to use trenchless crossings of landfall areas to avoid impacts on the floodplain from the underground cable construction.
6.17.20	Given these considerable deficiencies, CPRE Kent is of the view that National Grid has materially failed to meet its statutory obligations under the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and national policy under NPS EN-1 and EN-5.	Alternatives, including addressing policy set out in NPS EN-1 and EN-5 as discussed above, have been considered throughout the development of the Proposed Project. The identification and appraisal of routeing and siting options for the Proposed Project considered environmental and socio-economic factors as well as technical and engineering design considerations and cost. This is explained in **Application Document 7.3 Design Development Report** which summarises the key design decisions from the historical reports detailing options appraisal. **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]** provides a description of the reasonable alternatives considered and the main reasons for selecting the chosen option including a comparison of the environmental effects, as required under Part 2 Schedule 4 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
6.17.21	Underpinning CPRE Kent's overarching objection is our firm view that the applicant has failed to apply the mitigation hierarchy. As set out above, this is required under the Overarching National Policy Statement for Energy (NPS EN-1), the National Planning Policy Framework (NPPF) and Regulation 14(3)(c) of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017. Instead of demonstrating that harm has been genuinely avoided wherever possible, it is our view that the applicant is defaulting prematurely to mitigation and compensation.	In developing the Proposed Project, the mitigation hierarchy has been rigorously applied by the Applicant, as part of the approach to consenting set out in **Application document 7.3 Design Development Report [App-321]** and as part of the iterative process of EIA. The avoidance of environmental designations and other environmental constraints is an important factor which has informed the Applicant's site selection process. This is considered alongside other factors such as engineering feasibility, cost, and other wider environmental and socio-economic matters. In considering these various factors, the Applicant has used reasonable judgement, in the context of the various statutory duties in the Electricity Act 1989 which include the duty to "*develop and maintain an efficient coordinated, and economical system of electricity transmission*" (which includes reducing costs on behalf of consumers), and also the duty to have regard to the desirability of conserving the environment and doing what can reasonably be done to mitigate effects. These duties are set out in **Application Document 7.1 Planning Statement [AS-057].**
6.17.22	At its core, NPS EN-1 requires that applicants *"include appropriate avoidance, mitigation, compensation and enhancement measures as an integral part of the proposed development"* (para. 5.4.35). Where significant harm cannot be avoided, it must be adequately mitigated or, only as a last resort, compensated for. This sequential approach lies at the heart of the mitigation hierarchy, placing avoidance as the principal first step. In reality, and for the reasons set out above, we really cannot agree that avoidance has genuinely been pursued by the applicant. The applicant asserts that the design has been shaped by "careful attention" to ecological constraints, but, again for the reasons set out above, this claim is not borne out by the evidence.	
6.17.23	Further, even within the Order Limits themselves, it is our view that the applicant has failed to apply avoidance at the local scale. As we explore further below within our ecology and biodiversity comments, while the Limits of Deviation are sufficiently wide to allow repositioning of elements of the converter station, substation and associated infrastructure to avoid harm to key features, such as priority hedgerows, watercourses and open mosaic habitats, no such avoidance has been demonstrated.	As set out in **Application Document PDA-021 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity**. careful attention has been paid to the mitigation hierarchy in the design (trenchless construction rather than open cut) and timing of works (avoiding the most disturbing works during March to June) close to Sandwich Bay to Hacklinge Marshes SSSI in particular. Similarly, paragraph 2.9.61 of **Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]** states that the option to lay the HVDC cables across ditches using a method other than open cut trenching, such as horizontal directional drilling under ditches, has been explored as part of the design development. However, this is considered impractical due to the high-water table in the area, the need for large construction

Reference	Summary of relevant representation	Applicant's Response
		compounds at either side of any ditch to send and receive the drill, and the fact that such crossing methods would take significantly longer (given the number of ditches to be traversed) than the open cut trenching method and therefore extend the overall construction programme and duration of disruption. Regarding limits of deviation, the limits of deviation for the converter station and substation are tightly fitted to the size of those structures and are entirely within a single field. Moving the location of either structure within the limit of deviation would not alter the habitats affected.
6.17.24	Equally troubling is the applicant's approach to protected species. Great Crested Newt (GCN), European Eel, Hazel Dormouse and several bat species have all been inadequately surveyed, or in some cases not surveyed at all, with the applicant instead proposing to rely on licensing schemes or "*precautionary working methods*" in lieu of properly evidencing the ecological baseline. Again we go into more detail about this below.	While no survey was undertaken for great crested newts, this was through agreement with Natural England and in line with published government guidance (Developers: how to join the great crested newt district level licensing scheme - GOV.UK) which specifically states that 'By joining a scheme, you do not need to: carry out your own surveys of great crested newts [or] plan and carry out mitigation work to move the newts to safety'. Bats were surveyed in line with standard published guidance including an activity survey of the site consisting of six transects and a bat roost potential inspection. While the average number of static detector nights recorded across all transects in all months was 4.67 and thus slightly below the recommended five nights average (although it should be noted that the five nights average is not expressed to a decimal point), this is is not considered to be a constraint to the conclusions, as sufficient data has been collected across the Survey Area as a whole to determine the key habitat for use by bats, and the bat assemblage utilising the Kent Onshore Scheme Order Limits (valued as Regional importance). Moreover, as a precaution all hedgerows being affected by the Kent Onshore Scheme are being treated as important features for bats. The dormouse survey for the project was also undertaken in line with guidance, and across the site as a whole far exceeded the minimum survey effort required (based on guidance minimum survey effort to prove absence was 20 points, whereas the average effort for the Kent survey across the site was 31 points i.e. 50% greater). Moreover, despite the absence of confirmed dormouse records, due to landowner reports and the presence of ambiguous records within the survey, a precautionary method of working has been introduced as a commitment. In other words, although the survey did not confirm presence of dormice, the site will be treated as if they were present during vegetation clearance thus ensuring avoidance of killing or injury to any dormice that are present, Furthermore, due to the planting proposals around the converter station and substation there will be a significant net increase in suitable habitat for dormice following the development.
6.17.25	However, even on the basis of the deficiencies in the baseline surveys alone, it is already evident that the extent of harm is not being properly assessed or quantified. This failure directly undermines the proper application of the mitigation hierarchy. As required by Regulation 14(3)(b) of the EIA Regulations, sufficient data must be gathered to enable a reasoned conclusion to be reached on the likely significant effects. It is our view that the applicant's approach of seeking to bypass detailed surveys in favour of generic management plans at a later stage cannot substitute for proper assessment of avoidance at this application stage.	As stated above it is a mischaracterisation of the Applicant's extensive survey work, covering several years in some cases, to suggest the Applicant has sought to bypass detailed surveys.
6.17.26	Where mitigation is proposed, we have serious concerns as to how effective it is likely to be. For example: • The chosen site for Functionally Linked Land (FLL) compensation west of the A256 is demonstrably unsuitable, as Kent Wildlife Trust and others have detailed extensively. Its proximity to major roads and urban infrastructure introduces light, noise and human disturbance entirely incompatible with the	The golden plover mitigation land has been agreed to be suitable for mitigation in discussions with Natural England. It is close to the Thanet Coast and Sandwich Bay SPA where golden plovers congregate in large numbers and golden plovers have been recorded in the area. A far larger area is being put forward than is strictly necessary to mitigate for golden plover habitat loss (10 ha compared to 3.8 ha) allowing a considerable buffer along the A256 which is also separated and screened from the mitigation land by a dense woodland belt. Observations of the site at night indicate that it is not exposed to significant lighting due to the screening tree belt, and there are many instances of waterfowl and waders congregating near to roads.

Reference	Summary of relevant representation	Applicant's Response
	foraging and roosting requirements of target SPA species such as Golden Plover • The applicant has materially under-reported Golden Plover numbers, using out-of-date baseline figures despite higher counts being recorded in subsequent surveys • In relation to the four permanent culverts, the applicant has wholly failed to consider viable design alternatives such as bottomless or baffled culverts that would allow passage of European Eel – a critically endangered species whose full lifecycle requirements have not been assessed Similarly, there is an absence of any clear assessment or avoidance of impacts on ground-nesting birds from the converter station heightening, which will exacerbate raptor predation	A reference to 700 golden plovers was made in error in the Preliminary Environmental Information Report (PEIR) report. The survey recorded a flock of 370 golden plover and 700 lapwings seen as an inflight aggregation, with flock movements over the railway between the proposed convertor station and fields to the west. However, in the PEIR documents it was mis-transcribed as 700 golden plovers. The error was picked up in discussion with the surveyors in October 2023, was raised with stakeholders during thematic meetings and discussions around the compensation land and has been corrected for the ES. Moreover, these birds were not recorded on the converter station field but were recorded flying past and a large flock was only recorded on a single occasion; the applicant is therefore taking a precautionary approach by assuming the field in which the converter station is to be delivered constitutes functionally linked land of importance to the SPA. Alternative culvert designs were considered. Piped culverts were originally proposed by project engineers but these were deemed ecologically unacceptable. Open bottom arched culverts were considered but it was deemed unlikely that these can be used satisfactorily within the narrow water courses on this scheme. Given the ground conditions the spread foundations would likely cover the width of the watercourse resulting in removing the intended benefit. While the converter station was not explicitly mentioned, increased predation risk due to the presence of tall structures (i.e. new pylons) was covered in paragraphs 2.9.224 to 2.9.227 of **Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]** and the analysis would also apply to the converter station. A conclusion of no significant increase in predation risk was reached. Given the number of tall structures already present in the area, it is unlikely that an increase in potential perches would result in an increase in predation intensity as it would not result in an increase in predatory birds without territory conflict.
6.17.27	Even if mitigation were to succeed – which remains highly uncertain – the project would still result in permanent, cumulative losses of Functionally Linked Land in combination with other nearby projects such as Solar Farms. As it stands, we are not convinced that this cumulative harm has been properly assessed or factored into the applicant's ecological balance.	The cumulative impact of loss of functionally linked habitat has been discussed in Application Document AS-007 (**Application Document 6.6 (B) Habitats Regulations Assessment Report [AS-007]**), specifically Section 8.4. It is concluded in that document that the proposed mitigation will address alone and cumulative functionally linked land impacts. Natural England have not disagreed with the mitigation in their Relevant Representation.
6.17.28	It is also the case that several proposed mitigation measures rely on management commitments that are yet to be defined, secured or funded, and that offer no certainty of delivery. The use of such deferred management plans contradicts the clear requirements of NPS EN-1, which states at paragraph 5.3.18 that *"development consent should not be granted where significant harm would result after applying the mitigation hierarchy".*	A comprehensive Register of Environmental Actions and Commitments (REAC) **(Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**) has been produced to record all commitments made by the Applicant during the iterative development of the designs of the Proposed Project, including embedded measures which are totally intrinsic to the design as part of the Application and additional mitigation measures that have been identified through the Environmental Impact Assessment (EIA). In addition, a suite of outline management plans have been produced which set out specific measures for the management of impacts during construction, including impacts on archaeology, air quality, landscape and ecology, noise and vibration Public Rights of Way (PRoW) and soils. It is not uncommon for management plans to be produced in outline at the application stage, with further detailed provided at a later date once contractors are on board and the design has progressed sufficiently to allow for site-specific mitigation measures to be developed. Provision of detailed management plans (which must be substantially in accordance with the outline management plans submitted with the application) is secured through DCO Schedule 3, Requirement 6 **[AS-087]**.
6.17.29	Overall, it is CPRE Kent's view that the applicant's approach represents a wholesale failure to correctly apply the mitigation hierarchy. Its application of avoidance is superficial and selective, mitigation measures are speculative or unsubstantiated, and	In developing the Proposed Project, the mitigation hierarchy has been rigorously applied by the Applicant, as part of the approach to consenting set out in **Application document 7.3 Design Development Report [App-321]** and as part of the iterative process of EIA. The avoidance of

Reference	Summary of relevant representation	Applicant's Response
	compensatory proposals are both ecologically inappropriate and legally non-compliant. Without proper baseline data, evidenced avoidance and robust mitigation design, the applicant has not discharged its obligations under NPS EN-1, the EIA Regulations 2017 or the Conservation of Habitats and Species Regulations 2017.	environmental designations and other environmental constraints is an important factor which informs the Applicant's site selection process. This is considered alongside other factors such as engineering feasibility, cost, and other wider environmental and socio-economic matters. In considering these various factors, the Applicant uses reasonable judgement, in the context of the various statutory duties in the Electricity Act 1989 which include the duty to "*develop and maintain an efficient coordinated, and economical system of electricity transmission*" (which includes reducing costs on behalf of consumers), and also the duty to have regard to the desirability of conserving the environment and doing what can reasonably be done to mitigate effects. These duties are set out in **Application Document 7.1 Planning Statement [AS-057].**
6.17.30	CPRE Kent has concerns about the robustness of the mitigation proposed for some features of the Sea Link project. We also have concerns about the robustness of the protected species surveys and the adequacy of the Environmental Statement (ES) in relation to the proposed environmental protections, which we have listed below. • The removal of 300m of hedgerow • Destruction of a water ditch • Permanent culverts • Construction of a bridge • Overhead cabling • The spine road route • Redacted and withheld protected species surveys • Lighting • Permanent outlets • Environmental Statement is suboptimal The Environmental Statement (APP-062 document 6.2.3.2 Chapter 2 Ecology and Biodiversity) does not fully address the environmental risks and plays down the significance of the development's impacts on this internationally protected site with its nationally and internationally protected fauna.	A full suite of ecological surveys has been undertaken to inform the assessment in **Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**. Moreover, the Proposed Project will result in the planting of 6.5 ha of woodland, 5 ha species rich neutral grassland, 1 km native hedgerow, and 2 ha of wetland. As such there will be a considerable net increase in the amount of woody and wetland habitat as a result of the Proposed Project. Mitigation in terms of culverts, bridges and their designs has been developed in consultation with the relevant flood risk management authority, for example, the Stour (Kent) Internal Drainage Board, wit commitments to these design principles being secured through inclusion within **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**. Alternative forms of culvert were explored as discussed earlier in this document.
6.17.31	It is noted that impacts on hedgerows were assessed as temporary and therefore to be scoped out for the purposes of EIA assessment. This was on the basis that the converter station would be located within an arable field so would therefore not result in permanent loss of notable habitats. However, the Environmental Statement itself confirms that the construction of the Minster Converter Station and associated substation will result in the permanent loss of hedgerow. Such linear features are important habitat corridors and form part of the wider ecological network functionally linked to the Thanet Coast and Sandwich Bay SPA, SAC, Ramsar and SSSI designations. The loss of these features, particularly given their connectivity value, cannot properly be regarded as insignificant or readily mitigated	The proposed Project will result in the planting of 6.5 ha of woodland and 1 km native hedgerow. As such there will be a considerable net increase in the amount of woody and hedgerow habitat as a result of the Proposed Project. Figure 1 of **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]**) shows how this will preserve and strengthen habitat connectivity around the converter station and particularly with regard to connecting the Weather Lees Hill part of Sandwich Bay to Hacklinge Marshes SSSI to the wider landscape.
6.17.32	While it is noted that it has been agreed with Natural England (NE) that any impacts on GCN are to be addressed through the District Licensing Scheme, we have serious concerns about the position that no surveys are to be conducted.	Government guidance with regard to District Level Licensing (Developers: how to join the great crested newt district level licensing scheme - GOV.UK) states that 'By joining a scheme, you do not need to: carry out your own surveys of great crested newts [or] plan and carry out mitigation work to move the newts to safety'.

Reference	Summary of relevant representation	Applicant's Response
	GCN is a protected species in the UK and protected under European law Annex IV of the European Habitats Directive – it is illegal to kill, injure, disturb or damage its habitat; this refers to all life stages, including eggs. This species is in continuous decline and while the district-level licencing is to allow for habitat creation the scheme is designed to balance the need for development with the protection of the species and therefore the developer is still required to demonstrate that all reasonable measures have been taken to avoid or minimise harm to GCN. Without having carried out any GCN surveys to establish presence/absence of this protected species, how can the applicant demonstrate that all reasonable measures have been taken?	
6.17.33	No botanical survey has been conducted as far as we are aware. The Phase 1 habitat survey has been heavily redacted, so it is very difficult for us to assess the Badger situation on site. We requested an unredacted version of this survey and were met with a rebuttal despite our assurances that the information would remain confidential. We are well used to receiving unredacted Badger reports, as we did for the Lower Thames Crossing NSIP, where we were asked to sign a non-disclosure agreement. We therefore request to see an unredacted Phase 1 habitat report and any subsequent report involving Badgers.	A Phase 1 Habitat Survey is a botanical survey. No further botanical survey was undertaken because the botanical data collecting during the Phase 1 Habitat Survey was adequate for the assessment. Badger records are routinely redacted from publicly available information.
6.17.34	Surveys were conducted in May, June and September for both terrestrial invertebrates and aquatic invertebrates. The optimal time to survey aquatic invertebrates is January to March and October to December. Therefore, the aquatic surveys are suboptimal and should be repeated at the correct time of year.	Table 2.3 of **Application Document 6.3.2.2.F ES Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]**) states that aquatic invertebrate surveys were undertaken in November and May. The normal aquatic macroinvertebrate survey seasons are spring (March to May) and autumn (September to November).
6.17.35	The applicant fails to recognise the defunct Hoverport as being a priority habitat. The Hoverport, being open mosaic habitat on previously developed land, is likely to support a diverse assemblage of invertebrates including the Fiery Clearwing and Sussex Emerald, yet no terrestrial invertebrate survey has been carried out at this site as far as we are aware. Due to the high potential biodiversity value of this site, we would expect it to be assessed accordingly.	The importance of the defunct hoverport is recognised in **Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**, including the presence of the fiery clearwing moth and Sussex emerald moth. No terrestrial invertebrate survey has been conducted at the site as yet because the landowner (Thanet District Council) has not granted a licence to do so. However, based on the latest walkover of the site in June 2025 it has been confirmed that the open tarmac and hardstanding areas through the site are sufficient for vehicles to access the intertidal area without vegetation clearance.
6.17.36	The Hoverport also supports several orchid species such as Man orchid, Southern Marsh Orchid and Bee Orchid; therefore we would expect a botanical survey to have been conducted by a suitably experienced surveyor.	The importance of the defunct hoverport is recognised in **Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**, including the presence of orchids. No botanical survey has been conducted at the site as yet because the landowner (Thanet District Council) has not granted a licence to do so. However, based on the latest walkover of the site in June 2025 it has been confirmed that the open tarmac and hardstanding areas through the site are sufficient for vehicles to access the intertidal area without vegetation clearance.
6.17.37	The Breeding Bird Survey report states that four suitably qualified surveyors surveyed the area, whereas the Environmental Statement claims that only two suitably qualified surveyors were utilised. This needs clarification.	All surveyors were suitably qualified but the two referenced in the Environmental Statement were the people who led the surveys. Each survey was undertaken by two teams of two people, with one member of each team being an experienced ornithology survey lead.
6.17.38	Table 1.3 of the Environmental Statement Appendix 3.2D (APP-150 document 6.3.3.2.D ES Appendix 3.2D Breeding Bird Survey Report 2023) detailing high tides and weather conditions are all morning times; there are no details for the evening survey. The report states that six visits in total were carried out, with one evening survey, yet all six listed are morning surveys. This needs clarification.	Refer to the row for date 13/06/23 within Table 1.3 of **Application Document 6.3.3.2.D ES Appendix 3.2.D Breeding Bird Survey Report 2023 [APP-150]**. This shows the detail of the evening survey, with start and end times of 18:45pm and 21:55pm.
6.17.39	Table 1.3 of the Environmental Statement Appendix 3.2E (APP-151 6.3.3.2.E ES Appendix 3.2E Breeding Bird Survey Report 2024) details the date of the fourth visit as being 02/05/24, yet Annex 2.E.1 Detailed Survey Data (APP-151) lists visit four as having been carried out on 03/05/24. This needs clarification.	This is a minor typographical error, noting the report refers to 02/05/24 in all other instances. Annex 2.E.1 of **Application Document 6.3.3.2.E ES Appendix 3.2.E Breeding Bird Survey Report 2024 [APP-151]** has been corrected for Deadline 1.

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6.17.40	One of the key target species is Golden Plover. The graph entitled Total Flightlines Recorded (Target Species) below paragraph 14.5 (APP-152 document 6.3.3.2.F ES Appendix 3.2.F Vantage Point Survey Report) does not list Golden Plover, which therefore was not observed. Could this be because the two vantage point locations were not adequate to record a qualifying species of the SPA? It is also worth noting that this survey was carried out only with existing overhead cables; the proposed development would place a further 3.5km of overhead lines that the birds would need to navigate.	As described in sections 1.3.8-1.3.11 of the Vantage Point Survey report (**Application Document 6.3.3.2.F ES Appendix 3.2.F Vantage Point Survey Report [APP-152]**, the vantage point (VP) locations used were adequate in providing coverage of the full extent of proposed new section of overhead line. The purpose of the vantage point surveys was to establish flight activity of bird species occurring within the area of the proposed new OHL, to understand the level of potential collision risk. The approach to surveys, including identification of suitable VP locations, is set out in section 1.3 of the Vantage Point Survey report and followed the standard Scottish Natural Heritage (2017) guidance as per paragraph 1.3.1 of **Application Document 6.3.3.2.F ES Appendix 3.2.F Vantage Point Survey Report [APP-152]**. No golden plovers were recorded making flights through the area of the proposed new overhead line during the vantage point surveys and, therefore, collision risk for golden plover was not considered further.
6.17.41	The contents of the Overhead Line Mortality Monitoring Survey Report are noted (APP-153 document 6.3.3.2G Appendix 3.2G). It is highly likely that there would be under-recording of the mortality of birds due to scavenging and the difficulty of locating the birds' carcasses; for instance a portion of killed birds is likely to have landed in the water and either been scavenged from there, sunk or been carried away by the current. The heterogeneity of the surveys can also be a contributing factor.1 Studies have suggested a survey effort of more than once a week. Furthermore, this survey would not account for injured birds that could still fly and therefore might die elsewhere. Detection methods not adopted for this survey include technologies such as loggers, sensors and automated collision detection methods such as lidar, radar and cameras placed at strategic points along a fixed transect.	Some under recording may have occurred and that has been taken into account in the use of the report outputs. The carcase search was used to provide context for the assessment of potential collision risk, and even allowing for some underreporting due to scavenging, it does not indicate a high incidence of bird collisions with the existing overhead line.
6.17.42	Under Table 2.10 Flexibility assumptions (APP-062) the lateral LoD for the converter station and substation states that in practice these two constructions could be laid anywhere within the lateral limit of deviation and as the LoD is a single, large arable field this does not materially affect the ecological assessment. If this is so, then why the need to remove 300 m of hedgerow and a ditch? Could the two structures not simply be moved somewhere less damaging where removal of priority habitat is not necessary?	This is incorrect. The limit of deviation for the converter station and substation is tightly fitted to the size of those structures and is entirely within a single field. Moving the location of either structure within the limit of deviation would not alter the habitats affected. The hedgerow/scrub area and ditch are in the middle of the arable field and there is no way the converter station and substation could be constructed without their removal given the size of the structures.
6.17.43	The Vertical LoD has been scoped out as not relevant to ecological assessment. We disagree; the height of the converter station and substation is of material concern due to the proximity of ground-nesting birds and the vantage point it provides for raptors.	While the converter station was not explicitly mentioned, increased predation risk due to the presence of tall structures (i.e. new pylons) was covered in paragraphs 2.9.224 to 2.9.227 of **Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]** and the analysis would also apply to the converter station. A conclusion of no significant increase in predation risk was reached. Given the number of tall structures already present in the area, it is unlikely that an increase in potential perches would result in an increase in predation intensity as it would not result in an increase in predatory birds without territory conflict.
6.17.44	At paragraph 2.7.28 (APP-062) the peak count of Golden Plover in the 2022/23 survey was 370 individuals and the peak count in the 2023/24 survey was 421 individuals. Therefore, why has the lesser figure from the older survey been taken as the baseline for mitigation? Both of these peak figures were counted on one particular day, with high numbers of foraging individuals counted on all other days at low tide. Therefore, the mitigation should be appropriate to accommodate at least 421 individuals taken from the most recent survey data of 23/24 and if we add the 13 inland individuals counted this takes the figure to 434.	This is a misunderstanding of the survey reports. The figure of 421 individuals is for the intertidal area not Minster Marshes/the converter station field. The converter station field is the functionally-linked land being mitigated and therefore 370 birds is the correct number. It is incorrect to sum all golden plover recorded irrespective of whether inland or intertidal.
6.17.45	The various reports (APP-062 and APP-159 document 6.2.3.2.M Appendix 3.2.M Hazel Dormouse Survey Report) state that no records in the past 10 years were returned by	This is why the Applicant undertook survey and also why the Applicant took account of landowner feedback regarding dormice.

Reference	Summary of relevant representation	Applicant's Response
	the Kent and Medway Biological Records Centre (KMBRC). This is likely to be because of restricted access to private land. If there is no access or permission to carry out surveying, then no historical records would be created. Absence of evidence is not evidence of absence.	
6.17.46	We find the Hazel Dormouse survey report to be less than transparent and it seems despite the surveyors being sure when they found a Wood Mouse nest, they became less sure when encountering a 'possible' Dormouse nest. A competent and suitably licensed Dormouse surveyor should be sure with the majority of the nests they encounter, whether they are created by Dormice or not. We feel this is an attempt to run down the site as a possible habitat supporting Dormice. We find it highly unlikely that there would be no Dormice, or even very few Dormice, present on a site as large as this with excellent connectivity.	All licenced dormouse surveyors must be competent and experienced to obtain their licences from Natural England. However, ambiguous nests are not uncommon. The dormouse survey for the project was undertaken in line with guidance and across the site as a whole far exceeded the minimum survey effort required (based on guidance at the time minimum survey effort to prove absence was 20 points, whereas the average effort for the Kent survey across the site was 31 points i.e. 50% greater). Moreover, despite the absence of confirmed dormouse records, due to landowner reports and the presence of ambiguous records within the survey, a precautionary method of working has been introduced as a commitment. In other words, although the survey did not confirm presence of dormice, the site will be treated as if they were present during vegetation clearance thus ensuring avoidance of killing or injury to any dormice that are present, Furthermore, due to the planting proposals around the converter station and substation there will be a significant net increase in suitable habitat for dormice following the development. The applicant does not consider this can be fairly described as running down the site as possible dormouse habitat.
6.17.47	When we visited the site, we found a lot of Dormouse nesting tubes had been damaged or incomplete. Furthermore, July, while within the optimal window for surveying, is late in the season to set out nesting tubes or boxes. Nesting tubes should be checked from April to November and thus set out ideally at the end of the previous season to bed in over winter. By July, any Dormice would have been likely to have created nests; therefore, it is highly unlikely the tubes would be utilised in the first season of surveying. This means that the only two months that are optimal for surveying were the following season's checks in 2024, providing only two months' worth of optimal checks. By November, Dormice are beginning to look for somewhere to hibernate; thus, any Dormice likely to be found are dispersing adolescents.	Wherever dormouse tubes were damaged they were replaced where possible. If it wasn't possible this was taken into account in the scoring. The dormouse survey for the project was also undertaken in line with guidance and across the site as a whole far exceeded the minimum survey effort required (based on guidance at the time minimum survey effort to prove absence was 20 points, whereas the average effort for the Kent survey across the site was 31 points i.e. 50% greater).
6.17.48	In order that we can fully assess the situation with Badgers across the Site we would need to see sight of the unredacted version of the Badger Reports (APP-062).	This is a matter to raise with The Planning Inspectorate.
6.17.49	REDACTED TEXT – Are trees with bat roost potential to be felled or not? This needs clarification.	No bat roosts, or trees with roost potential, are to be removed due to the works. Four trees with PRF-I are along proposed access routes and could be affected by road widening (root damage) or by heavy machinery as it passes (foliage or root damage). However, road widening is not proposed in these locations and since these are farm accesses no impact that would affect the ability of these trees to support roosting bats is expected.
6.17.50	Bats quite clearly utilise the whole of the Site, especially along both sides of the river. This puts them at significant risk of collision from OHL. The mitigation proposed for birds such as deflectors would not necessarily work for all bats, which use echo location to navigate and not sight.	There is no evidence that overhead lines pose a significant collision risk for bats, and this issue has not been raised by Natural England or the local planning authorities.
6.17.51	The lighting is highly likely to negatively affect bats' foraging behaviour and activity. With today's modern AI cameras, lighting is not an essential requirement and if it was absolutely necessary then motion-sensitive lighting would be preferable.	A lighting assessment on bats has been undertaken and is reported in paragraph 2.9.235 of **Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**. This states that There would be little need for operational lighting for operational staff, with lighting limited to security lighting and task lighting as needed during any maintenance works. There would also be no lighting along the permanent access road. In line with best practice guidance from the BCT and Institute of Lighting Professionals (ILP) (Bat Conservation Trust and Institute of Lighting Professionals, 2023) lighting would be the minimum required for the safe working of the proposed Minster Converter Station. This is secured by commitment B58 in

Reference	Summary of relevant representation	Applicant's Response
		Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342].
6.17.52	Anguillid Eels are a diverse taxonomic group consisting of 19 species and subspecies, including the European Eel. This unique species relies on inland waters to grow and mature into adult Silver Eels, at which stage they migrate back to the Sargasso Sea to spawn. Eels play a vital ecological role as predator, prey and indicator species for freshwater biodiversity. The International Union for the Conservation of Nature (IUCN) has found that six of the Anguillid Eel species have undergone rapid decline in recent years and are threatened with extinction. European Eel populations have fallen even more than other species and it is the only one listed as Critically Endangered. Barriers to migratory routes, such as culverts, are cited as one of the contributing threats to this rapid decline, along with pollution, over-exploitation, climate change and other factors. Eels only reproduce once in their lifetime, making them especially vulnerable. In relation to culverts specifically, Cutts et al 2024 (Eel Conservation in Inland Habitats: Global evidence for the effects of actions to conserve anguillid eels) cite the following: *"The greatest threats to anguillid eels from residential and commercial development tend to be from habitat destruction, pollution, and impacts from activities related to energy production and transportation".* They continue: *"A culvert is a structure built to channel water beneath roads, railways or other infrastructure. Culverts can pose significant barriers to anguillid eel migration, due to factors like high water velocities, debris accumulation, and elevated outlets that prevent eels from entering or escaping (Larinier 2002). In some cases, the complete removal of culverts may be the most effective solution for restoring natural water flow and re-establishing uninterrupted migration routes for eels."* It has been suggested in a study by Balkham et al (2010) and Feurich et al (2011) that using a bottomless or three-sided culvert, or placing substrate or baffle within a culvert to reduce water velocity and provide refuge, may aid the Eels. Whatever adaptations developers make to culverts to facilitate the passage of migrating Glass and Silver Eels, work should be timed to avoid the annual elver run (February through June).	Alternative culvert designs were considered. Open bottom arched culverts were considered but engineering deemed it unlikely that these can be used satisfactorily within the narrow water courses on this scheme. Given the ground conditions the spread foundations would likely cover the width of the watercourse resulting in removing the intended benefit. Proposed culverts would either preserve the natural bed of the ditch or consist of a box culvert where the inverts are sunk below the bed level of the water course and natural/existing bed material placed across the inside of the culvert to lift the level up to meet that of the existing. This is secured in commitment W03 of **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**.
6.17.53	The clearing of ditches to instal the culverts would need to address several faunal, namely Water Vole, nesting birds, reptiles, Eels and macrophytes, needs at certain times of the year and inevitable clashes with timings. Certain months of the year are more sensitive for some species than for others. So, for vegetation clearance the ES suggests September to October is best for nesting birds and Water Voles but then suggests February to April, which would clash with the nesting bird season. It then goes on to say if none of the above are present then vegetation clearance can take place outside of these windows. While Water Voles and nesting birds have been considered here, the migratory times for Eels apparently have not.	Where nesting birds are present it is not legally permissible to remove their active nests. Where water voles are present it is only legally permissible to close their burrows during specified periods (15 September to 31 October and 15 February to 15 April). These are the main factors legally controlling the timing of ditch habitat clearance and culvert installation.
6.17.54	Glass Eels migrate from February through June, peaking around April from the sea upstream to fresh waters. Silver Eels migrate downstream towards the ocean from August to December. To create the culverts, the river or ditch would need to be dammed. The ES suggests at the section on Embedded Measures at paragraph 2.8.5 (APP-062) that *"drainage outfalls will be designed to exclude eels from accessing the Drainage Systems (SuDS), for example by having outfall pipes situated above the receiving water level"*. However, the water level is likely to fluctuate depending on tide and rainfall and	The embedded mitigation referred to is an example. Further design parameters of outfalls may be considered during detailed design, as necessary, in order to exclude eels from SuDS.

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	Eel behaviour has not been considered. More mitigation such as screens and appropriate bar spacing should be designed to prevent Eels from being entrained.	
6.17.55	No timings have been offered for clearance of hedgerows in relation to Dormouse activity, only that a precautionary method would be followed, which is meaningless. There should be more information in relation to considering the activity of Dormice, hibernation and breeding, with method of hedgerow removal and timings laid out in full.	The steps involved in the precautionary method of working are provided in paragraph 2.9.92 of **Application Document (6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**). Timing for removal of possible dormouse habitat under a precautionary method of working would be the same as that needed if a licence was required from Natural England, which is mid-September to end of October.
6.17.56	The ES states at paragraph 2.9.31 (APP-062) that to minimise the area of the SSSI subject to noise disturbance in any season, the site preparation, earthworks and foundation creation for both the converter station and substation and permanent access are "programmed" to avoid the March to June period and, in so doing, avoid the nesting season. The nesting season runs from March through to the end of August, with peak times during March and July. We therefore disagree with the assessment of "minor adverse" and it being not significant.	The core of the nesting season is generally taken to be March to June, and this is the period that has been identified should avoid noise levels above 60 dB LAmax at Weather Lees Hill by Natural England.
6.17.57	The ES goes on to say at paragraph 2.9.85 (APP-062) that the construction for the converter station and substation would occur late February 2029 and late April 2030 and would therefore coincide with the Cetti's Warbler nesting season. However, the applicant states that if Cetti's Warbler chooses to nest in ditches adjacent to the construction works it can be "assumed" they are not disturbed by the ongoing works. This demonstrates a misunderstanding of this bird's behaviour. Cetti's warblers are known to have strong attachments to their territories and nesting areas. They often return year on year to the same nesting site, where the males will re-establish their territories.	If a Cetti's warbler returns to the same territory when construction works are already commenced nearby, it is reasonable to assume habituation to or acceptance of construction disturbance. In line with the Wildlife & Countryside Act, it is not the territorial male that is the sensitive receptor for disturbance but rather a pair at an active nest.
6.17.58	The Golden Plover mitigation, paragraph 2.9.185 (APP-062), includes the use of insecticides with the statement that "*Insecticides that affect soil invertebrates will not be applied"*. We are unaware of any insecticide that would not affect insects that reside in the soil. The whole point of insecticides is that they negatively affect insects. The insecticides intended to be used are listed below, along with their negative effects on biodiversity. • Amidosulfuron: A broad-spectrum herbicide that can be toxic to aquatic and terrestrial species. It has a high potential to leach into groundwater. • Clodinafop-propargyl: Can affect the environment and human health, with possible carcinogenic links. Poses a severe risk to aquatic life and has moderate toxicity to biodiversity, especially mammals. • Fenoxaprop-P-ethyl: A post-emergence herbicide. Can affect aquatic life and potentially humans, with moderate effect on mammals, fish and aquatic invertebrates. • Tri-allate: Can have significant effects on the environment, especially aquatic invertebrates and small mammals. It can persist in the environment so accumulate over time with consistent use. It is classed as toxic to aquatic life with long-lasting effects. Potential for the metabolites to affect ground water. It is clear that these herbicides and insecticides, while legal to use, are likely to have a negative effect on the surrounding environment. We do not feel convinced that the use of any herbicide or insecticide would be beneficial within this sensitive habitat, especially	This text was with regard to insecticides that are directly applied to the soil, and which are intended to target soil dwelling invertebrates (on which golden plovers feed) as opposed to those which are applied to address insects attacking the leaves and above-ground parts of the plant.

Reference	Summary of relevant representation	Applicant's Response
	in a known wetland area. Therefore, we would like there to be assurances that no herbicide or insecticide will be utilised.	
6.17.59	CPRE Kent strongly objects to the proposed overhead lines and associated pylons as currently proposed at Minster Marshes, primarily in terms of landscape and environmental harm. As set out within the planning statement, some 3.5 km of new HVAC overhead line is proposed, comprising two separate sections totalling this distance, replacing about 2.2 km of existing overhead lines.	The HVAC overhead line is fully considered in the Applicant's Landscape and Visual Impact Assessment which is presented in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061], Application Document 6.3.2.1 (C) ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]** and **Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]**. Additionally, the new HVAC overhead line is shown in the visualisations contained in **Application Documents 6.4.3.1 ES Figures Kent Landscape and Visual Parts 2-4 [APP-241, APP-242 and APP-243]**. The HVAC overhead line would be located within Landscape Character Area (LCA) A2 Ash Levels and whilst it would create a localised concentration of wirescape this would be within a small part of the LCA which is already influenced by towers and overhead lines, resulting in a minor adverse and not significant residual effect.
6.17.60	CPRE Kent simply cannot comprehend why the applicant is not taking the wholly reasonable and straightforward step of undergrounding the cables at this location, particularly given the relatively short length involved and the sheer scale of public concern that the proposed overhead lines at this highly sensitive location are rightly causing. Despite repeated requests for clarification, the applicant continues to assert that undergrounding this section of cables has been discounted due to unspecified "technical issues" relating to flooding or hydrological constraints. To date, these claims remain unexplained. If such technical constraints are genuinely insurmountable, this once again raises questions regarding the appropriateness of siting the converter station and substation at such an ecologically sensitive location.	The amount of overhead line incorporated into the project is only a relatively small length of the connection provided. Where overhead lines are proposed alternative options have been extensively assessed and while there may be perceived visual benefits associated with use of underground cables, on balance, overhead lines involve less impact on Minster Marshes during construction and over the lifetime of the asset. Details of this are set out in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044].**
6.17.61	As we have consistently stated in earlier submissions and set out in detail below, the proposed converter station and substation alone are likely to result in significant landscape impacts across a number of identified viewpoints. The addition of the overhead lines and pylons would clearly exacerbate these impacts, creating further visual intrusion and substantially altering the character of this valuable and sensitive landscape. Given the nature of the marshland setting, introducing such industrial-scale infrastructure at height would significantly compromise the tranquil and open character of the surrounding countryside.	The Applicant acknowledges that there would be significant residual visual effects from 4 of the 14 representative viewpoints (viewpoints 4, 5, 6 and 11) as a result of the introduction of the Kent Onshore Scheme in these views. Within these views the HVAC overhead line and associated increase in wirescape would be located in the same part of the view as the existing towers and OHL with the HVAC overhead line resulting in varying degrees of prominence subject to the angle of the view. The effects of the HVAC overhead line on the landscape character of LCA A2 Ash Levels is provided in **Application Document 6.3.2.1C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097].** The HVAC overhead line would create a localised concentration of wirescape within a small part of the LCA where the characteristics of the marsh landscape are already influenced by the existing towers and overhead lines, resulting in a minor adverse and not significant residual effect.
6.17.62	In terms of environmental harm, our overriding concern remains that the proposed overhead lines and pylons, specifically in this chosen location, would significantly increase the risk of bird strikes and fatalities, far exceeding what could otherwise reasonably be expected. It is acknowledged in the Government's National Policy Statement EN-5 that overhead lines present a known collision and electrocution risk to large birds, particularly swans, geese, gulls and waders, especially near coastal and riverine areas. This risk is markedly higher during periods of poor visibility and throughout spring and autumn migration periods.	An assessment of avian collision risk is presented in **Application Document 6.3.3.2.F ES Appendix 3.2.F Vantage Point Survey Report [APP-152]**, which is supported by the results of corpse searches along the existing OHL network presented in **Application Document 6.3.3.2.G ES Appendix 3.2.G Overhead Line Mortality Monitoring Survey Report [APP-153]**. This shows that for the majority of species the risk of collisions is fewer than one individual annually. Even for species where the extrapolated number of transits through the 'at risk' zone generates a potential collision event that exceeds one individual per year, such as Cormorant, Greylag Goose and Mallard, given the caveats in generating the extrapolated annual transits and absence of modelling for predicted collisions, these annual figures are low in comparison to regional populations.

Reference	Summary of relevant representation	Applicant's Response
		The recorded mortality from corpse searches along the existing OHL network in the Survey Area was only noted for a limited number of species. Notably, many of the species recorded as making a large number of flights through the risk zone, were not among those species recorded as collision events, e.g., Cormorant, Greylag Goose and other duck species, beyond Mallard. Indeed, for species such as Cormorant, observations of flights regularly recorded the species passing over the existing overhead line. It is acknowledged that collisions with the existing overhead line network do appear to occur for a limited number of species, e.g., Mute Swan. Where the proposed overhead line route crosses the River Stour, the deployment of bird deflectors will provide an extra layer of visibility, particularly in poor weather conditions. This commitment is secured through **Application Document 7.5.3.2 Appendix B of the Outline CEMP Register of Environmental Actions and Commitments (REAC) [APP-342]**. It is considered that in the context of the Proposed Project and species involved, that hanging deflectors, especially those with fluorescent markings offer the best solution, to making the lines visible in adverse weather or low light conditions. As such, **Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]** concludes that collision with the proposed overhead line will result in a negligible effect which is not significant.
6.17.63	Specifically, NPS EN-5 para 2.10.1 states: *The applicant should consider and address routing and avoidance/minimisation of environmental impacts both onshore and offshore at an early stage in the development process.* NPS EN-5 para 2.10.2 goes on to state: *Careful siting of a line away from, or parallel to, but not across, known flight paths can reduce the numbers of birds colliding with overhead lines considerably.* Given this acknowledged risk, the decision by the applicant to propose overhead lines at Minster, a site directly within a known and critical migratory bird flyway, seems particularly ill-judged.	**See above response on collision risk**
6.17.64	This specific location would include the construction of a double-circuit overhead line crossing directly over the River Stour. Such infrastructure would effectively create a hazardous barrier or 'fishnet' of overhead lines and pylons precisely at a point where many thousands of birds move between feeding, roosting and migratory stopover areas. The devastating incident at nearby Monkton in January 2003, when at least 177 Mute Swans were killed after colliding with overhead power lines, provides a stark, real-world indication of the potential catastrophic outcomes of installing overhead lines at this location.	See above response on collision risk. Note that the event in 2003 was 22 years ago in a different location and cannot be taken to represent a trend or a common occurrence.
6.17.65	Additionally, the proposals indicate that these overhead lines and pylons would cross a grass meadow left uncultivated for the past two decades, enhanced by wetland scrapes created in 2018 as part of Higher-Level Stewardship. This habitat is functionally linked to the nationally and internationally significant Sandwich and Pegwell Bay National Nature Reserve (NNR) and is critically important in providing refuge for waterfowl displaced from these nearby designated areas during high tides or adverse weather conditions. To jeopardise the viability of this meadow by installing pylons and overhead lines represents an environmentally irresponsible approach that contradicts statutory conservation objectives.	This has been taken into account via the collision risk assessment mentioned above. Paragraph 2.9.171 of **Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]** discusses the potential for displacement of birds from overhead powerlines and notes that there are many instances of overhead powerlines through wetlands that support significant waterfowl and wader populations. Surveys for the Proposed Project have identified waterfowl and waders roosting and foraging on the ground at wetland areas around the existing Richborough to Canterbury overhead line which indicates from local evidence that overhead powerlines are not avoided by these species.

Reference	Summary of relevant representation	Applicant's Response
6.17.66	Further upstream, the ecologically rich Stour Valley, including Stodmarsh NNR, lies within the regular commuting corridor for a wide variety of birds. The cumulative impacts arising from installing overhead lines along such an important ecological corridor would clearly be significant and unacceptable.	The impacts on Stodmarsh are specifically included in the collision risk assessment.
6.17.67	Under the Electricity Act 1989 (Section 38 and Schedule 9), National Grid has explicit duties regarding environmental protection and is required to conserve flora and fauna and to mitigate, as far as reasonably possible, any adverse impacts resulting from its projects. In our view, pursuing overhead lines at Minster, without providing detailed evidence of comprehensive consideration of feasible alternatives, including undergrounding, constitutes a clear breach of this statutory obligation.	The choice of an overhead line for the HVAC connection in Kent, as opposed to an underground cable, accords with paragraph 2.9.20 of NPS EN-5 , which states that "overhead lines should be the strong starting presumption for electricity networks developments in general", in areas that are not nationally designated for their landscape value (National Parks, National Landscapes or The Broads). It is also made clear in paragraph 2.9.7of NPS EN-5 that the development of new OHLs is not incompatible with applicants' statutory duties under Schedule 9 of the Electricity Act.
6.17.68	To date, no publicly available documents demonstrate sufficiently that a genuine assessment or evaluation has taken place in relation to undergrounding at Minster. CPRE Kent remains unconvinced that this vital stage of the process has been properly conducted.	A robust Environmental Impact Assessment (EIA) has been undertaken of the Proposed Project and it is reported within the Environmental Statement (Volume 6) for the Application. This includes consideration of impacts on flora and fauna as a result of the Kent Onshore Scheme [PDA-021] and identifies required mitigation to address likely significant effects as far as possible. A significant number of studies and consultations were undertaken in the development of the Proposed Project as detailed in the following documents: • **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044].** Explain the alternatives considered in relation to the Kent Onshore Scheme, including consideration of HVAC alternative technologies (overhead line or underground cable) and the justification for the selection of an overhead line option based on the appraisal outcomes. • **Application Document 7.2 Strategic Options Report Backcheck Report [APP-320]:** Explains why the Proposed Project is needed and the strategic options considered. • **Application Document 7.3 Design Development Report [APP-321]:** Explains how the design process was conducted and how the design evolved from the selection of the preferred strategic proposal to the Proposed Project as applied for. • **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting Study (October 2022) [APP-368]:** Explains how the routeing and siting of the Proposed Project was undertaken and the reasons for the selection of the emerging preferences, which were consulted upon during non-statutory consultation**.** • **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]:** Explains how the preferred options were selected and how the design of the Proposed Project evolved from non-statutory consultation to the Proposed Project as consulted upon at statutory consultation. Given the detailed information set out in the above reports the Applicant considers that the application provides sufficient information to justify the choice of HVAC technology in the Kent Onshore Scheme. The amount of overhead line incorporated into the project is only a relatively small length of the connection provided. Where overhead lines are proposed alternative options have been extensively assessed and while there may be perceived visual benefits associated with use of

Reference	Summary of relevant representation	Applicant's Response
		underground cables, on balance, overhead lines involve less impact on Minster Marshes during construction and over the lifetime of the asset.
6.17.69	Given the substantial and demonstrable landscape and ecological harms associated with the overhead line proposals at Minster, combined with what must surely represent only a modest cost differential for undergrounding this relatively short section, we reiterate our view that undergrounding must be urgently reconsidered. If it is genuinely the case that technical issues preclude undergrounding, these must be clearly evidenced and transparently communicated. Should this remain impossible, alternative locations for the substation and converter station, outside of this ecologically sensitive corridor, must be fully explored and presented.	The choice of an overhead line for the HVAC connection in Kent, as opposed to an underground cable, is explained in **Application Document 7.3 Design Development Report [APP-321]**. Due to the ground conditions and requirement for trenchless crossings it was considered likely that the underground cable option would have greater temporary impacts during construction than the overhead line option. Although the overhead line option has a greater potential for permanent impacts on landscape character, the setting of historical assets and bird collision risk, the underground option would require a permanent compound within Flood Zones 2 and 3, would have more potential for physical impacts on non designated heritage assets and would lead to more permanent habitat loss. It was these factors that led to the identification of the overhead line option as the preferred HVAC technology choice for the Kent Onshore Scheme. The potential for greater landscape and visual, setting, and bird collision risks that could result from the overhead line option was recognised and it was sought to minimise these risks through the development of the design. This accords with paragraph 2.9.20 of NPS EN-5 that "overhead lines should be the strong starting presumption for electricity networks developments in general" in areas that are not nationally designated for their landscape value (National Parks, National Landscapes or The Broads). It is also made clear in paragraph 2.9.7of NPS EN-5 that the development of new OHLs is not incompatible with applicants' statutory duties under Schedule 9 of the Electricity Act.
6.17.70	We believe that the proposed development will have significant effects on the local landscape in its own right, and on views and visual amenity.	The Applicant acknowledges in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** that there would be potentially significant residual effects at year 1 of operation for LCA E1 Stour Marshes (host landscape character area) and at four of the fourteen representative viewpoints (viewpoints 4, 5, 6 and 11). Visual effects would remain significant from the 4 viewpoints in the long term (year 15 operation), however, effects on LCA E1 would reduce to minor adverse and not significant once the landscape mitigation matures which would contribute to reducing the perceptual changes arising from the Kent Onshore scheme from the remainder of the LCA and the wider marsh landscape. The landscape planting once established would provide a degree of containment to the permanent infrastructure, ensuring that the overall sense of identity and distinctiveness of the marsh landscape is retained.
6.17.71	The proposed converter station and Minster substation are to be located in adjoining buildings, which will be read in the landscape as a single, large-scale slab of a development. It is understood that the buildings have been raised 2m to mitigate against the risk of flooding. These buildings are to be 28m (converter station) and 20m (Minster substation) in height, as set out in the Environmental Statement (APP-243 document 6.4.3.1 ES figures Kent Landscape and Visual Part 4 of 4). It is noted, however, that the drawings set out in the Environmental Statement (APP-240 document 6.4.3.1 ES figures Kent Landscape and Visual Part 1 of 4) indicate that both buildings will be 28m high. These buildings are shown at figure 6.4.3.1.3 of the Environmental Statement (APP-240) to be located in the National Character Area 113 (the North Kent Plain). This includes the Kent Character Area of the Wantsum and Lower Stour Marshes. The Kent Character Area of the Wantsum and Lower Stour Marshes is subdivided locally to include the Thanet District Council Landscape Character Areas B1 (Wantsum North Slopes) and E1 (Stour Marshes) and the Dover District Council Landscape Character	As explained in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045 superseded by AS-018]**, the maximum height of the Minster Converter Station would be 28 m which includes the 2 m platform and 20 m for the Minster Substation which also includes the 2 m platform. The Zone of Theoretical Visibility (**Application Document 6.4.3.1 ES Figures Kent Landscape and Visual Part 1 of 4 [APP-240]** reflects these maximum parameters as identified on the ZTV plan (**Figure 6.4.3.1.7 of APP-240**) as do the block photomontages in **Application Document 6.4.3.1 ES Figures Kent Landscape and Visual Parts 2 to 4 [APP-241, APP-242 and APP-243]**. The block photomontages show the maximum parameters applied for (in terms of footprint and height) which represent the Rochdale Envelope, however, the Minster Substation would comprise a combination of built form and external electrical infrastructure which the block photomontages don't illustrate. Additional Illustrative visualisations have been prepared (**Application Document 9.14 Suffolk and Kent Illustrative Visualisations,** submitted at Deadline 1) which represent a typical and more realistic design solution. This demonstrates that the Minster Converter Station and Substation would not appear as a single built mass but rather a series of buildings and external electrical infrastructure.

Reference	Summary of relevant representation	Applicant's Response
	Assessment area A2 (Ash Levels) – see figure 6.4.3.1.4 of the Environmental Statement (APP-240 document 6.4.3.1 ES figures Kent Landscape and Visual Part 1 of 4). The Wantsum and Lower Stour Marshes Character Area (Ash Levels) wraps around Landscape Character Area H1 (Richborough Bluff). This is the site of the Roman fort and amphitheatre at Richborough Castle, a Scheduled Monument. The Minster Marshes and the Ash Levels are open low-lying marshland landscapes where development is typically sparse. Figure 6.4.3.1.1 in the Environmental Statement (APP-240) confirms that the site lies 1.87m below sea level. There will be significant effects on the Landscape Character Areas of the Wantsum North Slopes (B1), which looks out across the Stour Marshes (E1), and on the Landscape Character Area of the Richborough Bluff (H1) which looks out across the Ash Levels (A2). The effects of the converter station and Minster substation will be exacerbated by the provision of high-voltage overhead lines, which will be in addition to the existing concentration of pylons in the area.	A small part of the southern edge of the Wantsum North Slopes (LCA B1) would be directly affected by the permanent access road which would cross a large-scale agricultural field. Whilst the road would create smaller field parcels, this would be consistent with the presence of smaller scale fields within the southern part of the LCA and would also reflect a historic field pattern (refer to **Application Document 6.2.3.3 Part 3 Kent Chapter Cultural Heritage [APP-063]**. Whilst there would be indirect effects associated with the perception of the operational Minster Converter Station and Substation on the LCA, these would be set within the context of existing energy infrastructure. The characteristic views from the LCA over adjoining marshes and sea views from elevated ground would be largely conserved resulting in minor adverse and not significant residual effects. There would be no direct effects on Richborough Bluff (LCA H1) and indirect effects on the LCA would be limited to distant intervisibility with the Kent Onshore Scheme in the context of Richborough Energy Park and the existing towers and overhead line. Effects are considered to be negligible adverse and not significant as the key characteristics of Richborough Bluff including the open landscape and wide views experienced from the distinctive knoll of higher land above the surrounding marshes would remain unaffected.
6.17.72	The proposed works will dominate the local landscape. It is not accepted that by virtue of the alleged proximity to the Richborough Energy Park that the impact of the proposed development will be lessened. The Richborough Energy Park is located some distance to the south-east, such that the siting of the proposed energy infrastructure will appear as an isolated form, in a distinctive low-lying, sparsely developed area.	The Applicant refutes that the Kent Onshore Scheme would dominate the local landscape. The Minster Converter Station and Substation have been specifically sited to be as close as possible to Richborough Energy Park, noting the intervening designated woodland which precludes further proximity. The native woodland planting (refer to **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]**) would provide containment to the Converter Station and Substation site so that it appears visually connected to the Richborough Energy Park rather than the wider marsh landscape.
6.17.73	Figure 6.4.3.1.6 of the Environmental Statement (APP-240) sets out on a map base the location of the 14 representative viewpoints described by the applicant at Table 1.10 of the Environmental Statement (APP-061 document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual). Table 1.10 notes that there will be high impacts from viewpoints 2 (Pegwell Bay) and 8 (the viewing tower at Richborough Roman Fort). In our opinion there will also be high impacts from the Wanstum north slopes, which includes viewpoints 4 (from the PRoW east of Minster), 5 (the junction of Grinsell Hill/Ebbsfleet Lane) and 11 (Thorne Hill, south of the A299).	Table 1.10 of **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** does not note that there would be high impacts from viewpoints 2 and 8, but rather that the value of the views are considered to be high. The value of the view is part of the sensitivity judgement which also considers susceptibility. The magnitude and resulting effect (a combination of the sensitivity which is derived from value and susceptibility and the magnitude) is summarised in Tables 1.11, 1.12 and 1.13 of **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061].** The detailed assessment of visual effects is contained in **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]** which identifies that viewpoints 4, 5 and 11 would experience residual significant effects**.**
6.17.74	Photo montages (visualisations) in the Environmental Statement (APP-241, document 6.4.3.1 ES figures Kent Landscape and Visual Part 2 of 4 and Part 3 of 4) demonstrate this visual impact: • Viewpoint 4: the year 15 summer visualisation demonstrations that proposed planting north of the buildings will have little impact on reducing the significant effect of the proposed development • Viewpoint 5: the year 15 summer visualisation demonstrations that proposed planting north of the buildings will have little impact on reducing the significant effect of the proposed development • Viewpoint 8: the year 15 summer visualisation demonstrations that proposed planting north of the buildings will have little impact on reducing the significant effect of the proposed development	As noted in the Applicant's response above residual significant effects would be experienced in views from viewpoints 4, 5 and 11. As explained in **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]** views experienced from viewpoint 8 (viewing tower within Richborough Roman Fort) would result in minor adverse and not significant effects. The views experienced of Minster Converter Station and Substation in the distance would be partially filtered by intervening vegetation with the infrastructure appearing within a small part of the panoramic view, set against the rising land to the north and would not break the skyline.

Reference	Summary of relevant representation	Applicant's Response
	Viewpoint 11: the year 15 summer visualisation demonstrations that proposed planting north of the buildings will have little impact on reducing the significant effect of the proposed development	
6.17.75	Figure 1 of Outline Landscape and Ecological Management Plan (APP-349 document 7.5.7.2) provides an aerial photograph showing proposed plant/landscape mitigation to the margins of the proposed buildings. This provides the context for the year 15 summer visualisations.	**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** acknowledges that the effects on landscape character and visual amenity cannot be fully mitigated by virtue of the scale of the infrastructure. However, embedded mitigation measures including siting and planting do assist in minimising the effects. The Minster Converter Station and Substation are located within a large-scale agricultural field to the east of the railway line and within the eastern edge of LCA E1 which exhibits some differing characteristics to the wider marshland further to the west. The more enclosed landscape (due to vegetation cover) and proximity to existing road and energy infrastructure (including Richborough Energy Park) lessons the change to the aesthetic and perceptual aspects of the landscape. Due to the location on the edge of the marshes, the operational infrastructure would impact the key characteristics at a local level, including localised increase in development. The majority of key characteristics of the marsh landscape would remain largely unaffected as they are either not present in the baseline or are conserved, including the existing drainage ditch pattern.
6.17.76	At paragraph 1.8.3 of the Environmental Statement (APP-061 document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual) it is stated native planting will be used to provide structural screening to the converter station and substation, "whilst providing containment to the converter station and substation site so that it appears visually connected to the Richborough Energy Park rather than the wider marsh landscape".	
6.17.77	We are of the firm view that by virtue of the large-scale nature and location of the proposed energy infrastructure, its impact is incapable of being mitigated. It speaks neither to the Richborough Energy Park nor to the marshland landscape of Minster Marshes or Ash Levels.	
6.17.78	A further disservice is given to these Landscape Character Areas by virtue of the impacts being considered on an individual District character area by District character area basis, rather than as a whole in the context of the Kent Character Area of the Wantsum and Lower Stour Marshes.	The approach adopted for the assessment of effects on landscape character and the district scale of characterisation that has been used was agreed with Kent County Council, Thanet District Council and Dover District Council at Scoping stage and subsequently through the various landscape thematic meetings (refer to **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**).
6.17.79	The applicant sets out its assessment of the likely significant impacts of landscape and visual receptors at Appendix 3.1.C of the Environmental Statement (APP-145). A summary is provided at Table 1.11 for construction/decommissioning, Table 1.12 (operation and maintenance, year 1) and Table 1.13 (operation and maintenance, year 15) of the Environmental Statement (APP061 document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual). It should be noted that the summaries provided are just that: summaries. There is a risk that the understanding of impacts will be unwittingly underplayed – although commentary is provided for landscape receptors within the Environmental Statement (APP-061 document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual) from paragraph 1.11.2 (construction), 1.116 (year 1) and 1.11.9 (year 15); and for visual receptors from paragraph 1.11.10 (constructions), 1.11.14 (year 1) and 1.11.18 (year 15) for visual receptors in terms of the magnitude of the likely significant effect and the significance of that effect (significant/not significant).	Summary tables and text are provided in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** with the full, detailed assessment provided in **Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]** and **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146].**
6.17.80	For instance, it is claimed that for Landscape Character Area B1 (Wantsum North Slopes) construction traffic is not considered to be dissimilar to typical agricultural machinery on arable fields. We would query whether the nature of agricultural traffic movements has been quantified in terms of size of vehicle and frequency of movement. Without knowing this or the nature of the proposed construction vehicles, it is impossible to make such a claim – see page 3 of Appendix 3.1.C of the Environmental Statement (APP145) – before concluding that there would be a minor adverse/not significant impact.	**Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]** provides a detailed assessment of effects on LCA B1 Wantsum North Slopes at construction, operation year 1 and year 15. The extracted reference to construction traffic is taken out of context whereas the full wording identifies that "*such activity would also introduce new energy related infrastructure into a localised part of the LCA, which is not an existing characteristic of the LCA…*".

Reference	Summary of relevant representation	Applicant's Response
6.17.81	This comparison/underplaying of the impact of construction vehicles is repeated in the consideration of the landscape impacts across other LCAs.	As explained above the extracted reference is taken out of context of the detailed assessment of effects which is presented in **Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]**.
6.17.82	Furthermore, it is claimed that for Landscape Character Area E1 (Stour Marshes) and at other LCAs at year 1 there would be a moderate adverse/significant impact where the converter building and substation would be located – including permanent loss of vegetation and loss of openness as a result of the addition of energy infrastructure. It is then claimed that this impact would be lessened by proximity to, among other things, Richborough Energy Park. In essence, adding more energy infrastructure to the existing energy infrastructure will result in a lesser landscape impact – see page 12 of Appendix 3.1.C of the Environmental Statement (APP145). This doesn't make sense.	The assessment of effects on the host landscape character area LCA E1 Stour Marshes is fully set out in **Application Document 6.3.3.1C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-146]** with the findings summarised in section 1.11 of **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061].** The Minster Converter Station and Substation are located within a large-scale agricultural field to the east of the railway line and within the eastern edge of LCA E1 which exhibits some differing characteristics to the wider marshland further to the west. The more enclosed landscape (due to vegetation cover) and proximity to existing road and energy infrastructure (including Richborough Energy Park) lessons the change to the aesthetic and perceptual aspects of the landscape. Due to the location on the edge of the marshes, the operational infrastructure would impact the key characteristics at a local level, including localised increase in development. The majority of key characteristics of the marsh landscape would remain largely unaffected as they are either not present in the baseline or are conserved, including the existing drainage ditch pattern.
6.17.83	There is also a claim at page 12 of Appendix 3.1.C of the Environmental Statement (APP145) that "the raised platform associated with Minster Converter Station and Substation would not be dissimilar to the bunded topography associated with the small, embanked reservoirs which are a feature within arable fields". We query whether this is a generalisation or whether there is actually evidence of such reservoirs within this particular landscape character area.	The reference relates to an existing reservoir immediately to the northeast of the Minster Converter Station site and is apparent on the aerial mapping contained in **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]**. This characteristic is also identified in the Thanet District Landscape Character document as one of the key characteristics of LCA E1 Stour Marshes.
6.17.84	With regard to the proposed towers and HVAC OHL, it is noted that these "affect long uninterrupted views; however, this concentration of wirescape would be within the context of the existing towers and OHL which comparatively lessens the effect". Again, a case of more energy infrastructure apparently resulting in less of an impact to the landscape.	The HVAC overhead line is fully considered in the Applicant's Landscape and Visual Impact Assessment which is presented in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**, **Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-146]** and **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146].** The visual assessment acknowledges that within views the HVAC overhead line and associated increase in wirescape would result in varying degrees of prominence subject to the angle of the view in relation to the existing towers and overhead line.
6.17.85	At page 13 this section continues that the overhead lines would bring pylons closer to the River Stour and Saxon Shore Way, which is dismissed as a localised perceptual change on this recreational route. This cannot be a true representation of the facts. There will be a massive change to the enjoyment of this route because of the increased concentration of wirescape in the locality, which will be exacerbated by the use of higher towers.	Viewpoints 3 and 10 are located on the Saxon Shore Way and the assessment of visual effects is presented in **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-098]** with photomontages presented in **Application Document 6.4.3.1 ES Figures Kent Landscape and Visual Part 2 of 4 and Part 3 of 4 [APP-241 and APP-242].** The section of the Saxon Shore Way represented by viewpoint 3 is dominated by the existing towers, overhead line and Richborough Substation, in which the additional HVAC overhead line and towers would be noticeable but less prominent elements resulting in residual minor adverse and not significant effects. Views from the Saxon Shore Way at viewpoint 10 reflect a view characterised by the River Stour and surrounding marsh landscape with the existing overhead line and towers appearing within the mid ground of the view. The addition of the new HVAC overhead line and towers would increase the number of towers visible in the view but would be at a similar scale, partially screened by intervening vegetation and would be an unobtrusive change in the composition of the view resulting in minor adverse and not significant residual effects.
6.17.86	Rather bizarrely, by year 15 we're told that the landscape effect will be minor adverse/not significant – see page 14 Appendix 3.1.C of the Environmental Statement (APP145) – by virtue of the fact that "the landscape planting once established would	The assessment of effects on the host landscape character area LCA E1 Stour Marshes is fully set out in **Application Document 6.3.3.1C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-146]** with the findings summarised in section 1.11 of

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	provide a degree of containment to the permanent infrastructure… ensuring that the overall sense of identity and distinctives of the marshland landscape is retained". We cannot agree that the landscape impact will not be significant be year 15, as the photo visualisations clearly tell a very different story – see APP-242 document 6.4.3.1 ES Figures Kent Landscape and Visual Part 1 of 4.	**Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061].** The Minster Converter Station and Substation are located within a large-scale agricultural field to the east of the railway line and within the eastern edge of LCA E1 which exhibits some differing characteristics to the wider marshland further to the west. The more enclosed landscape (due to vegetation cover) and proximity to existing road and energy infrastructure (including Richborough Energy Park) lessons the change to the aesthetic and perceptual aspects of the landscape. Due to the location on the edge of the marshes, the operational infrastructure would impact the key characteristics at a local level, including localised increase in development. The majority of key characteristics of the marsh landscape would remain largely unaffected as they are either not present in the baseline or are conserved, including the existing drainage ditch pattern.
6.17.87	It is noted that the applicant does not consider the temporary diversion, or permanent footpath diversion of footpaths (TE37 and TE39), to affect recreational access (see page 11 of APP-145 document 6.3.3.1.C Landscape Designation and Landscape Character Assessment). However, any temporary (or permanent diversion) will by its very nature have a deleterious impact on users' enjoyment of these routes.	Effects on the amenity of Public Rights of Way (PRoW) users is presented in **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003].** Within the context of the landscape character area referred to on page 11 of APP-145, the short term temporary diversion of PRoW TE37 and TE39 would not affect the overall recreational access provision which is present in LCA E1 Stour Marshes.
6.17.88	In fact, there is a whole series of PRoWs that will be impacted by the proposed development. These are: • TE39 – Brook Lane, running south from the railway line (temporary or permanent diversion) • T37 – south of the railway line (temporary diversion during construction works) • TE40 – north of the railway line to Minster; in addition • the Grinsell Hill road north of the railway line is promoted by Kent County Council as a PRoW route (which runs from Cliffs End via Cottington Road to Minster and then Monkton, St Nicholas and up to the coast and then back round in a loop via Birchington, Margate, Broadstairs and Ramsgate). This is the Viking Coast Trail stretching 27 miles from Sandwich to Reculver and the East Coast Path National Trail (King Charles III England Coast Path) from Ramsgate to Whitstable https://explorekent.org/activities/viking-coastal-trail/ TE26/EE2 - Saxon Shore Way to the south (being the closest PRoW to the proposed buildings).	Effects on the amenity of Public Rights of Way (PRoW) users is presented in **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003]**. **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]** has been prepared as part of the DCO application to reduce impacts on Public Rights of Way (PRoW) wherever possible. This has been developed in consultation with the relevant local planning authorities and provides details on PRoW diversions, closures and management during the construction, operation and decommissioning phases.
6.17.89	In terms of the impact on visual amenity, it is noted that the applicant concludes there will be a likely significant effect on viewpoints 3, 4 and 5 (construction); 4, 6 and 11 (year 1); and 4, 5 and 6 (year 15). In none of the scenarios is the impact on viewpoint 8 (Richborough Castle) considered likely to be significant, when the impact of the proposed development will have a very similar impact as that documented for the northern viewpoints	The Applicant concludes in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061],** that there would be likely significant effects on viewpoints 3, 4, 5, 6 and 11 (construction); 4, 5, 6 and 11 at operation year 1 and year 15. As explained in **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]** views experienced from viewpoint 8 (viewing tower within Richborough Roman Fort) would result in minor adverse and not significant effects. The views experienced of Minster Converter Station and Substation in the distance would be partially filtered by intervening vegetation with the infrastructure appearing within a small part of the panoramic view, set against the rising land to the north and would not break the skyline.
6.17.90	CPRE Kent maintains that the loss of Best and Most Versatile Agricultural Land (BMV) arising from the Sea Link project should carry significant weight in the decision-making process. The applicant's Planning Statement acknowledges that approximately 50.11% (85.01 hectares) of the land within the Kent onshore scheme is categorised as BMV, primarily comprising Grade 3a land (53.36 hectares), and that some 12.21 hectares will	A complete assessment of the impacts on agriculture, best and most versatile (BMV) land and soils in Kent has been undertaken. **This is set out in Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils.** Whilst approximately 50% of the land within the Order Limits is likely to comprise BMV land, the majority of this will be reinstated, with soils handled and restored in line with the requirements of the outline Soil Management Plan (**Application**

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	be permanently lost, which it accepts is significant (Planning Statement, APP-319 – Document 7.1 paragraph 7.9.12).	**Document 7.5.10.2 Outline Soil Management Plan - Kent**). This will ensure land can be reinstated to its pre-construction condition and can be returned to agricultural production. The permanent loss of 12.21 ha of BMV land needs to be balanced with the Proposed Project needs case, which will help the UK with British Energy Security Strategy 'Security of Supply' and to meet its Net Zero target to reduce carbon emissions.
6.17.91	As previously outlined, the applicant has failed to demonstrate that alternative sites – especially those on lower-grade agricultural land – have been adequately considered or dismissed. This omission runs counter to the national planning mitigation hierarchy, which mandates that avoidance of environmental harm must take precedence over mitigation or compensation.	**Application Document 7.1 (C) Planning Statement [AS-057]** sets out how, in line with paragraph 5.11.12 of NPS EN-1, the Applicant has sought to minimise impacts on BMV agricultural land from the outset through sensitive routeing and siting of infrastructure and temporary works and rationalisation of the design to minimise permanent land take requirements. Areas of search for potential converter station sites had to be located within a radius of approximately 5 km of the identified connection points. This was to ensure as short as possible AC connection between the converter station and connection point. The greater the AC cable length the greater the losses which need to be reduced with the use of reactive compensation equipment, which would result in additional land take and cost (as explained in **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368]**). Although the presence of provisional BMV land was a consideration in the siting of the converter stations, this had to be balanced against other key environmental and technical constraints which meant sites which have BMV land were chosen, although sites with lower grades of BMV land were chosen over those which contained Grade 1. However, avoidance of Grade 1 agricultural land was a key consideration in selecting sites for the converter stations, as explained in **Application Document 7.3 Design Development Report [APP-321].**
6.17.92	CPRE Kent has consistently objected to the loss of Best and Most Versatile Land (BMV) in planning applications in Thanet, reflecting our firm belief that Grade 1 and other BMV land should be safeguarded as a strategic national asset contributing significantly to food security. CPRE research confirms a loss of more than 14,000 hectares of prime agricultural land since 2010, seriously undermining the UK's ability to maintain domestic food production (CPRE Report Back to the land: rethinking our approach to soil). Further, CPRE policy emphasises that Grades 1-3a are the country's most valuable farmland and should be protected unless no lower-grade alternatives exist.	**Application Document 7.1 (C) Planning Statement [AS-057]** sets out how, in line with paragraph 5.11.12 of NPS EN-1, the Applicant has sought to minimise impacts on BMV agricultural land from the outset through sensitive routeing and siting of infrastructure and temporary works and rationalisation of the design to minimise permanent land take requirements. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for Critical National Priority Infrastructure such as the Proposed Project. Land required temporarily will be reinstated to its pre-construction condition through implementation of good practice soil handling measures as set out in the outline Soil Management Plan (**Application Document 7.5.10.2 Outline Soil Management Plan – Kent [AS-057]**). Overall, it is considered that the Proposed Project is in accordance with national policyi relating to the protection of agricultural land as the use of agricultural land and the permanent loss of BMV land during construction is justified.
6.17.93	The impact extends beyond direct land-take given the indirect consequences of severance and fragmentation on surrounding agricultural enterprises. More fundamentally, the location of the proposed converter station and substation near Minster could act as a catalyst for further energy infrastructure such as solar farms and battery storage, which will exacerbate pressures on BMV land. CPRE nationally advocates for a strategic land-use framework to prevent piecemeal encroachment on agricultural resources. This framework supports integrated decision-making to protect agricultural capacity in the face of infrastructure expansion.	The National Energy System Operator (NESO) was tasked in October 2024 by the Government with producing a Strategic Spatial Energy Plan (SSEP) for the energy system across Great Britain. The SSEP will support the UK, Scottish and Welsh governments and regulators, in tandem with energy markets, to assess the optimal locations, quantities and types of energy infrastructure needed to transition to low carbon energy. The SSEP represents a significant shift towards the strategic land-use framework that the CPRE is advocating.
6.17.94	In the specific context of Thanet, the permanent loss of Best and Most Versatile Land (BMV) must be given significant weight in the planning balance. Thanet is uniquely constrained, being surrounded by the sea on three sides, and contains some of the country's most exceptional Grade 1 agricultural soils. These soils, coupled with Thanet's maritime, relatively frost-free, climate, create a rare agricultural resource of national	**Application Document 7.1 (C) Planning Statement [AS-057]** sets out how, in line with paragraph 5.11.12 of NPS EN-1, the Applicant has sought to minimise impacts on BMV agricultural land from the outset through sensitive routeing and siting of infrastructure and temporary works and rationalisation of the design to minimise permanent land take requirements. The permanent loss of BMV land is considered necessary on the basis that there

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	significance that is irreplaceable in food production terms. As CPRE Kent has consistently highlighted, much of the country's remaining BMV land is increasingly threatened by flooding, making Thanet's remaining high-grade land all the more precious and strategically important. The pressures on Thanet's BMV land have already reached unsustainable levels, with very substantial areas of greenfield, predominantly BMV land, already allocated for development within the adopted Local Plan. Moreover, incremental losses, even where individually small, collectively erode this finite resource with profound consequences for national food security, a concern CPRE's national 'Building on our Food Security' report has repeatedly emphasised. Once such high-quality land is developed, it is lost forever to productive agriculture.	is urgent need for Critical National Priority Infrastructure such as the Proposed Project. Land required temporarily will be reinstated to its pre-construction condition through implementation of good practice soil handling measures as set out in the outline Soil Management Plan (**Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]**). Overall, it is considered that the Proposed Project is in accordance with national policy relating to the protection of agricultural land as the use of agricultural land and the permanent loss of BMV land during construction is justified. Food security in the UK is a multifaceted issue, shaped by domestic production capabilities, import dependencies, land use patterns (including landowner/manager decisions and preferences), and environmental challenges. The Government[6] has concluded that the continued increase in production and levels of food traded internationally supports the security of UK imports in the immediate term, and whilst they have identified longer-term risks to food security these do not include development on agricultural land. The temporary nature of the land used during construction, combined with the very small percentage of land affected by the Proposed Project and the overall stability of the UK food system, suggests a minimal effect. While the UK Government has identified potential long-term risks to food security, these are driven by broader systemic factors like climate change rather than small-scale land use changes.
6.17.95	In the National Policy context, NPS EN-1 and EN-3 explicitly require developers to "minimise impacts on the best and most versatile agricultural land… and preferably use land in areas of poorer quality" . Indeed, paragraph 2.10.30 of EN-3 reaffirms that the use of Grade 1, 2 and 3a land must be avoided "where possible" and only justified with compelling evidence. Simultaneously, the NPPF is unequivocal: "where significant development of agricultural land is necessary, areas of poorer-quality land should be preferred to those of a higher quality" and BMV land must be recognised for its ecosystem services and food security importance.	**Application Document 7.1 (C) Planning Statement [AS-057]** sets out how, in line with paragraph 5.11.12 of NPS EN-1, The Applicant has sought to minimise impacts on BMV agricultural land from the outset through sensitive routeing and siting of infrastructure and temporary works and rationalisation of the design to minimise permanent land take requirements. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for Critical National Priority Infrastructure such as the Proposed Project. Land required temporarily will be reinstated to its pre-construction condition through implementation of good practice soil handling measures as set out in the outline Soil Management Plan (**Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]**). Overall, it is considered that the Proposed Project is in accordance with national policy relating to the protection of agricultural land as the use of agricultural land and the permanent loss of BMV land during construction is justified.
6.17.96	Accordingly, it is CPRE Kent's firm view that the loss of BMV must weigh significantly against the proposal.	**Application Document 7.1 (C) Planning Statement [AS-057]** sets out how, in line with paragraph 5.11.12 of NPS EN-1, the Applicant has sought to minimise impacts on BMV agricultural land from the outset through sensitive routeing and siting of infrastructure and temporary works and rationalisation of the design to minimise permanent land take requirements. The permanent loss of BMV land is considered necessary on the basis that there is urgent need for Critical National Priority Infrastructure such as the Proposed Project. Land required temporarily will be reinstated to its pre-construction condition through implementation of good practice soil handling measures as set out in the outline Soil Management Plan (**Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]**). Overall, it is considered that the Proposed Project is in accordance with national policy relating to the protection of agricultural land as the use of agricultural land and the permanent loss of BMV land during construction is justified. In deciding the Application, the Secretary of State must be satisfied in accordance with Section 104(3) of the Planning Act 2008 that "the adverse impacts of the proposed development would outweigh its benefits" (Section 104(7)). To determine this, a balance of the Proposed Project's adverse impacts against its benefits must be carried out. This overall planning balance is presented in **Application Document 7.1 (C) Planning Statement (Clean) [AS-057].** It is acknowledged that the loss of BMV land is one of the key adverse impacts of the Proposed Project however this has been afforded limited negative weight in the planning balance. By

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		contrast the benefits of the Proposed Project are substantial in terms of its contribution to the transition to net zero and moderate in terms of ecology and nature conservation, leading to a balance in favour granting development consent for the Proposed Project. In terms of the Subsection 104(7), it is considered that the benefits of the Proposed Project outweighs its adverse impacts.
6.17.97	NPS EN-1 (Section 5.8) and EN-5 (Section 3.7) both require applicants to assess flood risk comprehensively, addressing all potential sources of flooding over the entire lifetime of the proposed nationally significant infrastructure. In this instance, the applicant is seemingly relying on a site-specific Flood Risk Assessment (FRA), which focuses primarily on engineered mitigation measures to demonstrate that the site can be made safe. However, CPRE Kent believes that this is contrary to the NPS policy framework, which makes it clear that the preferred approach is to avoid areas at risk of flooding wherever reasonably practicable, in line with the sequential approach advocated by EN-1 paragraph 5.8.13, which states: *"The applicant should seek to avoid flood risk through sequential site selection. Preference should be given to locating projects in areas of lowest flood risk (Flood Zone 1). If there is no reasonably available site in Flood Zone 1, then sites in Flood Zone 2 can be considered, applying the sequential test as appropriate. If, following application of the sequential test, there is no reasonably available site in Flood Zones 1 or 2, then sites in Flood Zone 3 can be considered, applying the exception test as appropriate. Where flood risk cannot be avoided through site selection, applicants will need to demonstrate that appropriate mitigation measures are in place and that residual risk is acceptable."* As per our comments above in relation to failure to consider alternatives, we feel that lip-service at best has been given to genuinely demonstrating alternative locations with a lower risk of flooding have been properly considered.	The Flood Risk Assessment (FRA) that has been prepared (**Application Document 6.8 Flood Risk Assessment [APP-292]**) assesses flood risk from watercourses, the sea, surface water and groundwater during both construction and operational stages of the Project. In accordance with NPS EN-1 and NPS EN-5 the identification and appraisal of routeing and siting options for the Proposed Project considered environmental and socio-economic factors as well as technical and engineering design considerations and cost. This included consideration of flood risk. This is explained in **Application Document 7.3 Design Development Report** which summarises the key design decisions from the historical reports detailing options appraisal and **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered** which provides an overview of the main alternatives considered. The routeing and siting options process resulted in the majority of the Order Limits being outside areas at medium or high risk of flooding with the Proposed Project's infrastructure, particularly those elements that could be at risk of flooding during the operational lifetime of the Proposed Project, such as the substations, converter stations and cable transition joint bays being located in Flood Zone 1. During construction, the Proposed Project avoids construction compounds in Flood zones 2 and 3. Due to its linear nature some components of the Proposed Project associated with construction access routes (e.g. proposed temporary bridge over the River Stour in Kent), works to existing pylons and construction of new pylons to facilitate integration of the Project with the existing energy transmission network, and where the marine cables make landfall at Kent must necessarily cross areas with a medium and/or high likelihood of flooding (Flood Zones 2 and 3) due to there not being reasonable alternatives at lower risk, however, these components are also of low vulnerability to flooding, are flood resilient, being able to safely operate in times of flood, and access to them would only be required for routine maintenance and inspections which could be planned to avoid periods of flooding. In addition, below ground infrastructure such as cabling once constructed will not be subject to flood risk because this infrastructure will be buried and therefore the Sequential Test applies only to the construction phase of these components. Commitments have been made to use trenchless crossings of landfall areas to avoid impacts on the floodplain from the underground cable construction.
6.17.98	Even where mitigation might reduce on-site flood risk, EN-1 paragraph 5.8.17 requires applicants to demonstrate that the development would remain safe and operational under flood conditions for its full lifetime, taking account of climate change, and that any residual risks can be safely managed. This includes ensuring that safe access and egress can be maintained during flood events, and that any impacts on emergency services would be acceptable. In this instance, elements of the proposed development, including access routes and ancillary infrastructure, remain exposed to identified flood hazards, with no satisfactory evidence that safe access can be secured throughout the project's lifetime.	**Application Document 6.8 Flood Risk Assessment [APP-292]**, demonstrates that the Proposed Project would remain safe and operational under flood conditions for its full lifetime, taking account of climate change, and that any residual risks can be safely managed. Access to the new overhead lines and pylons in the Stour floodplain, which are the only above ground operational infrastructure in Flood Zone 3, and which have to be located to join the Proposed Project to the existing energy network, would only be required to undertake routine maintenance visits. The visits would be planned to avoid periods of flooding, therefore avoiding any flood hazards to maintenance personnel over the Proposed Projects lifetime.
6.17.99	From our review of the documents, we can see no substantive evidence that any meaningful engagement has taken place with the Local Planning Authority or Environment Agency to establish appropriate search areas, nor is there any comparison with lower-risk sites located within Flood Zone 1 or outside high-risk flood areas.	In accordance with NPS EN-1 and NPS EN-5 the identification and appraisal of routeing and siting options for the Proposed Project considered environmental and socio-economic factors as well as technical and engineering design considerations and cost. This included consideration of flood risk. This is explained in **Application Document 7.3 Design Development Report** which

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	Instead, the application appears to treat flood risk as a technical matter to be managed through design mitigation alone, bypassing the policy requirement to locate development, so far as reasonably possible, away from areas subject to flood hazard.	summarises the key design decisions from the historical reports detailing options appraisal and the consultation which occurred during this process. The routeing and siting options process resulted in the majority of the Order Limits being outside areas at medium or high risk of flooding with the Proposed Project's infrastructure, particularly those elements that could be at risk of flooding during the operational lifetime of the Proposed Project, such as the substations, converter stations and cable transition joint bays being located in Flood Zone 1. During construction, the Proposed Project avoids construction compounds in Flood zones 2 and 3.
6.17.100	As set out within our response to the Statutory Consultation, CPRE Kent previously raised significant concerns regarding the Applicant's failure to provide meaningful detail on the likely amenity impacts arising from the construction phase of this development. Instead, we were told that much of the relevant information, including specific construction methods, programme detail and mitigation proposals, was deferred to future stages via Construction Method Statements and similar documents to inform the Environmental Statement (ES) only at the DCO submission stage.	A complete health and wellbeing assessment has been undertaken. Specifically, **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003]** takes a holistic approach to health and defines health in line with the World Health Organisation (WHO), Europe, and the IEMA guidance as a "*state of complete physical, mental and social wellbeing not merely the absence of disease or infirmity*" (WHO, 1946), and therefore the assessment considers a wide range of health determinants which are relevant to mental health, quality of life and amenity (for example changes in landscape and visual amenity, noise, access to open space and employment) as well as physical health (for example associated with air pollution and access to healthcare facilities). Specifically, **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003]** assesses the likely significant effects on amenity of residents, businesses, development sites, PRoW users, and users of open spaces, and community facilities within 500 m of the Order Limits. The cumulative impact is also assessed in **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]**. No significant adverse effects are identified with regards to human health and wellbeing.
6.17.101	In the event, it now seems to be the case that the application relies solely upon high-level Outline Construction Environmental Management Plans (APP- 340 Documents 7.5.3 and 7.5.2) and a generalised Code of Construction Practice (APP-341 Document 7.5.3.1 Appendix A to the CEMP), with all material detail deferred to future approval following consent. As confirmed at paragraph 4.6.1 of the Planning Statement (APP-319 Document 7.1) full Construction Method Statements will only be prepared after grant of consent, at the detailed design stage, pursuant to DCO Requirements. Consequently, critical matters such as construction phasing, site layouts, traffic routing, amenity protection measures and site-specific working methods remain unknown, meaning that the full scale of amenity impacts during construction cannot be properly assessed at this stage	The assessment of Health and Wellbeing impacts adheres to the latest best practice guidance from the IEMA Guide to Effective Scoping of Human Health in EIA (IEMA , 2022) , IEMA Guide to Determining Significance For Human Health In Environmental Impact Assessment (IEMA, 2022) and also follows the best practice methodology used on other major infrastructure schemes. A comprehensive Health and Wellbeing assessment has been undertaken to address potential impacts on amenity and quality of life during construction. Specifically, **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003]** assesses the likely significant effects on amenity of residents, businesses, development sites, PRoW users, and users of open spaces, and community facilities within 500 m of the Order Limits. The cumulative impact is also assessed in **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]**. No significant adverse effects are identified with regards to human health and wellbeing. The assessment evaluates a wide range of determinants relevant to amenity, including noise, landscape and visual effects, access to open space, as well as physical health determinants such as air quality and access to healthcare facilities. **Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127]**, **Application Document 7.5.2 Outline offshore Construction Environmental Management Plan [APP-339]** and **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** provide the necessary high-

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		level mitigation framework, and detailed measures will be secured through subsequent Construction Method Statements to ensure continued protection of health, wellbeing, and amenity during construction.
6.17.102	That the applicant does confirm that construction working hours are now proposed to extend to include Sundays and Bank Holidays probably, however, tells us all we need to know as to what the attitude to amenity impact would be when it did come to the post-consent discharging of details. That is, to CPRE Kent this seems to confirm the absence of any meaningful regard for the significant amenity and well-being impacts that this project would impose on the local community for what would be a sustained and prolonged period. In practice, what is now proposed would result in virtually continuous construction activity throughout the week, removing entirely the limited degree of respite that might otherwise have existed for local residents, visitors and indeed wildlife. Clearly removing the single bit of respite being offered to the local community and wildlife is going to exacerbate the already significant negative impact of the project, but seemingly the trimming of profit margins is more important than this.	The Applicant notes the local concerns set out by CPRE regarding the impact of extending the construction working hours to Sundays and Bank Holidays, particularly with regards to visitors. Section 10.9 of **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism [APP-070]** considers potential severance of access to residential properties, local businesses, visitor attractions community facilities and open space as a result of the Proposed Project. The assessment of severance is informed by the findings in **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**, whereby it is not anticipated that the Proposed Project would have any traffic and transport impacts on Sundays and Bank Holidays. Construction working hours will be between 7am and 5pm on Sundays and Bank holidays. With a limit of 30 HGVs a day, on average there is anticipated to be a maximum of three HGV movements an hour. HGV movements of this rate per hour would not be noticeable and highly unlikely to deter business activity. As a result, any impact of HGVs on local businesses during Sundays and Bank Holidays will not lead to any anticipated significant effects. In addition, recognising that PRoW and recreational trails are valued by tourists and visitors, the Applicant acknowledged the importance of assessing the potential impact of extended working hours on these routes. Section 10.9 of **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism [APP-057]** assesses the potential effects of the Proposed Project on disruption to the use of PRoW and recreational routes. Appropriate route diversions, closures and management measures are proposed as embedded mitigation and outlined in Section 10.8. The criteria for determining the sensitivity of users of PRoW and recreational trails and the magnitude of impact of disruption is outlined in Section 10.4. For example, recreational routes' sensitivity criteria considered several factors, including: • the quality of user experience; • quality of the route; • purpose of usage; and • potential for substitution. Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated even with the inclusion of working hours on Sundays and Bank Holidays.
6.17.103	CPRE has long been a leading voice in the campaign against light pollution. We have a special interest in this issue: darkness at night is one of the key characteristics of rural areas and represents a major difference between what is rural and what is urban. NPPF 185(c) requires planning policies to limit the impact of light pollution on intrinsically dark landscapes and nature conservation, and to limit the impact of light pollution from artificial light on local amenity. This duty has been further reinforced by statutory guidance, which requires local planning authorities to assess not just where light falls, but when and how much, with particular care in areas of intrinsic darkness or ecological sensitivity.	The duties and importance of limiting light pollution is acknowledged and has been considered throughout the design of the Kent Onshore Scheme. With regard to the effect of light pollution from artificial light on local amenity, an appropriate assessment of the effects of lighting on landscape and visual receptors has been undertaken during construction and operation. The assessment sets out for every landscape and visual receptor at construction and operation the consideration of lighting on the receptor, as detailed within **Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]** and **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]**. Assumptions within the landscape and visual impact assessment (LVIA) regarding lighting have been set out in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** at paragraphs 1.9.5 and 1.9.6. It is not possible to determine the exact length or duration of task lighting for maintenance tasks at this stage. However, these are usually planned and delivered during day light hours when no additional lighting is required, and task lighting would only be used in emergency situations or

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		for tasks that need to be continuous. This would be infrequent. From a construction point of view, there are some 24 hour activities associated with the Proposed Project, including marine cable laying (including near shore), cable jointing and trenchless drilling so lighting at these locations would be continuous for safety reasons during those activities. The selection and positioning of luminaires shall be managed by the site maintenance team to adhere to the lighting philosophy applied to the fixed lighting installation discussed in the Proposed Project description. Given the core working hours it would be expected that compounds would be lit between dusk and 7 pm during the winter months. A lighting assessment on bats has been undertaken and is reported in paragraph 2.9.235 of **Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**. This states that there would be little need for operational lighting for operational staff, with lighting limited to security lighting and task lighting as needed during any maintenance works. There would also be no lighting along the permanent access road. In line with best practice guidance from the BCT and Institute of Lighting Professionals (ILP) (Bat Conservation Trust and Institute of Lighting Professionals, 2023) lighting would be the minimum required for the safe working of the proposed Minster Converter Station. This is secured by commitment B58 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**.
6.17.104	The application site lies within one of the few remaining enclaves of dark skies in Thanet District, as clearly shown in CPRE's interactive map and CPRE Kent's 2016 analysis, which identifies Thanet as experiencing some of the county's darkest rural legacy. It is therefore deeply concerning that, despite this acknowledged sensitivity, the Planning Statement (APP-319 Document 7.1, para 7.15.21) offers only a cursory acknowledgment of light pollution risks, referring vaguely to future detailed design and mitigation to be secured at the Discharge of Requirements stage under the DCO. Indeed, the Planning Statement accepts that final lighting designs would not be produced until after the grant of consent and are entirely reliant on later approval of post-consent Construction Environmental Management Plans (CEMP) and Operational Environmental Management Plans (OEMP) pursuant to Requirements 8 and 24 of the Draft DCO (APP-007 Document 3.1).	The location of the application site and existing light levels are noted. Lighting requirements would be designed to relevant guidance and standards. This would include detailed calculations to reduce light pollution including reviewing the upward light output ratio and the intention to have any perimeter lighting aiming inwards towards the compound. If there is light spillage then louvres and cowls would be employed to shield the light distribution. The Applicant is committed to conserving and enhancing the natural beauty of the landscape, including a dark skies policy (see **Application Document 7.12.2 Design Principles – Kent [APP-367].** pertaining to use of lighting on the new infrastructure and maintenance activities. Paragraph 7.15.21 of **Application Document 7.1 Planning Statement [APP-319]** only signposts to **Application Document 6.3.3.1.D Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146],** explaining that lighting associated with the Minster Converter Station and Substation would be on for occasional and short periods of time during the operational phase. The Planning Statement has considered light pollution effects from the Kent Onshore Scheme in respect of Policy SE08 Light Pollution of the Thanet Local Plan (Thanet District Council, 2023): this is set out in Appendix C of the Planning Statement (Local Policy Accordance Table). The potential effects from lighting on landscape character is presented in **Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145],** which explains that associated lighting at the Minster Converter Station and Substation is not expected to noticeably affect the perceptual quality of the relevant Landscapes Character Areas (LCAs), as the lighting would be on only for occasional and short periods of time and within the context of the A256 corridor.
6.17.105	In short, there is no firm commitment within the application documents to any specific lighting controls. Neither the Outline CEMP (APP-340 Document 7.5.3) nor the Outline Design Principles (APP—367 Document 7.12.2 for Kent) contain binding commitments. Therefore, without firm control through DCO requirements, CPRE Kent is concerned that the proposal would permit the introduction of extensive lighting columns,	A Register of Environmental Actions and Commitments (REAC) (**Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342])** has been produced to record all commitments made by National Grid during the iterative development of the designs of the Proposed Project, including embedded measures which are totally intrinsic to the design as part of the Application and additional mitigation

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	floodlighting and security lighting across both the converter station site and the new substation compound, causing irreversible degradation of Thanet's remaining dark sky resource, to the detriment of local amenity, tranquillity and wildlife	measures that have been identified through the Environmental Impact Assessment (EIA). Specific measures related to lighting are included in the REAC, including: • GG21: Construction lighting will be of the lowest levels necessary to safely perform each task. • B58: in line with best practice guidance f In line with best practice guidance from the Bat Conservation Trust and Institute of Lighting Professionals (ILP) operational lighting would be the minimum required for the safe working of the proposed Minster Converter Station. Lighting would be directed to the interior of the Converter Station, and on as low a column height as possible, with measures such as hoods or cowls implemented where required to minimise light spill onto immediately surrounding habitat. The REAC forms Appendix B of the Outline Onshore Construction Environmental Management Plan (CEMP) and compliance with the REAC is secured through Schedule 3 Requirement 6 of the draft Development Consent Order (**Application Document 3.1 draft Development Consent Order [AS-087]**. As outlined in the Outline Onshore CEMP (**Application Document 7.5.3 Onshore Construction Environmental Management Plan [AS-127]**) National Grid will put in place robust procedures to audit and inspect the Proposed Project, including its supply chain of contractors, to make sure the control measures set out in the REAC are adopted when constructing the project. The REAC will apply to all areas of the Proposed Project delivered pursuant to the DCO and the contractor(s) will be expected to demonstrate compliance with these measures.

References

Bat Conservation Trust and Institute of Lighting Professionals. (2023). *Bats and Artificial Lighting at Night.*
IEMA . (2022). *Effective Scoping of Human Health in Environmenbtal Impact Assessment.*
IEMA. (2022). *Determining Significance for Human Health in Environmental Impact Assessment .* Institute of Environmental Management and Assessment.
Thanet District Council. (2023). *Thanet Local Plan.*

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