The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.34.6 Applicant's Thematic Responses to Relevant Representations

Planning Inspectorate Reference: EN20026

Version: BA
~~November~~ December 2025

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7. Thematic Responses to Relevant Representations

7.1.1 The tables below comprise the Applicants Responses to the themes raised in the Relevant Representations that the Applicant has not provided a direct response to.

7.1.2 The ExA also issued their **Rule 6 Letter dated 19 September [PD-010]** requiring the Applicant to specify the names of the parties making the representation and the relevant examination library reference in order to demonstrate that all relevant representations have been responded to. The Applicant has reviewed all the RR submitted, and to increase the conciseness of this document similar points have been grouped together and responded to on a Thematic Basis. A corresponding table identifying the name and the relevant examination library reference of the RR raising those themes is Appended to this Document.

~~Table 7.1~~ Table 7.1 Applicant's Response to the Relevant Representations that raise Agriculture and Soil

Reference	Topic	Applicant's Response
7.1.1	Concerns over the loss of productive agricultural and Best and Most Versatile land in Suffolk	A complete assessment of the impacts on agriculture, best and most versatile (BMV) land and soils in Suffolk has been undertaken. This is set out in **Application Document 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils (Clean) [PDA-019]**. Potential impacts on agricultural land, including BMV land, have been assessed based on the final design presented within **Application Document ES 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [AS-093]**. The cable route will be reinstated to its previous use and therefore farming operations are able to continue post construction. Soil handling will be undertaken in accordance with good practice as set out in an outline Soil Management Plan (**Application Document 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]**). The agricultural use of land within the majority of the Order limits will only be impacted on a temporary basis, with agricultural uses able to continue following construction for land required for the installation of underground cables and temporary construction working areas. There would be 11.45 hectares of Best and Most Versatile agricultural land permanently lost for the construction of the Suffolk Onshore Scheme, of which the majority is lost due to the construction of the new converter station. These elements of the project were required to be located within 5 km of the consented Friston Substation, which restricted the area of search for a site. The objective to minimise loss of agricultural land was taken into account in site selection, but it was not possible to find a better site with a lower quality agricultural land. Agricultural Land Classification surveys are currently being completed to confirm the impact based on detailed survey data. This work will build upon the predictive mapping that was undertaken to support the initial application documents. However, overall, the temporary nature of many of the construction activities and the subsequent restoration of the land, and its return to pre-construction use, is likely to result in the avoidance of most long-term impacts on agricultural and soil receptors. Mitigation measures that are embedded into the design of the Proposed Project to reduce, and where possible, avoid agricultural and soils effects are 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].** As required by paragraph 5.11.14 of NPS EN-1, 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]**) have been prepared to minimise and manage effects on soils. Compensation claims for disturbance are considered on an evidenced basis, and landowners and farmers will therefore be encouraged to keep records to support their claims. Where productive land is lost as a result of the permanent infrastructure, this impact needs to be balanced with the Proposed Project needs case, which will help the UK with British Energy Security Strategy 'Security of Supply' and with helping the UK to meet its Net Zero target to reduce carbon emissions.
7.1.2	Concern over the loss of productive agricultural and Best and Most Versatile Land in Kent	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 (B) Part 3 Kent Chapter 6 Agriculture and Soils (Clean) [PDA-023]**. Potential impacts on agricultural land, including BMV land, have been assessed based on the final design presented within **Application Document ES 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [AS-093]**.

Reference	Topic	Applicant's Response
		The cable route will be reinstated to its previous use and therefore farming operations are able to continue post construction. Soil handling will be undertaken in accordance with good practice as set out in an outline Soil Management Plan (**Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]**). The agricultural use of land within the majority of the Order limits will only be impacted on a temporary basis, with agricultural uses able to continue following construction for land required for the installation of underground cables and temporary construction working areas. There would be 12.21 hectares of Best and Most Versatile land lost in Kent as a result of the Kent Onshore Scheme, the majority due to the construction of the new Minster Converter Station and Substation. No alternative sites were identified with a lower quality of agricultural land that performed as well from a practical perspective and when taking into consideration other environmental considerations. Agricultural Land Classification surveys are currently being completed to confirm the impact based on detailed survey data. This work will build upon the predictive mapping that was undertaken to support the initial application documents. Compensation claims for disturbance are considered on an evidenced basis, and landowners and farmers will therefore be encouraged to keep records to support their claims. Where productive land is lost as a result of the permanent infrastructure this impact needs to be balanced with the Proposed Project needs case, which will help the UK with British Energy Security Strategy 'Security of Supply' and with helping the UK to meet its Net Zero target to reduce carbon emissions.
7.1.3	Concerns over the impact to farmers / farming community	National Grid is and will continue to work with all landowners including tenants who may be affected by the proposals to understand the impacts on their operations and to work with them as the construction programme is developed. National Grid will seek to work with the farming community to limit disruption where practicable. The cable route will be reinstated to its previous land condition and therefore farming operations will be able to continue post-construction. The final cable route and associated accommodation works will be discussed and agreed prior to commencement of construction to ensure disruptions to normal farming operations are limited. Compensation claims for disturbance will be considered on an evidenced basis, and landowners and farmers will therefore be encouraged to keep records to support their claims.
7.1.4	Impact on agricultural workforce (demand for construction workers)	Concerns about potential employment displacement within the agricultural workforce are acknowledged. Table 10.23 of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [APP-057]** sets out that in the construction phase an estimated 65 average net additional jobs per annum will be created by the Proposed Project. Given the scale of the local construction workforce within a 60-minute drive time, this level of additional employment is considered relatively low. Consequently, workforce displacement effects are expected to be limited and are unlikely to have a significant impact on the agricultural workforce.

~~Table 7.2~~ Table 7.2 Applicant's Response to the Relevant Representations that raise Air Quality

Reference	Topic	Applicant's Response
7.2.1	Impact of increased dust and fumes during construction, including health impacts	National Grid acknowledges the potential for impacts on air quality during construction, particularly from dust generating activities. **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]** and **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]** provide an assessment of dust impacts using the accepted methodology within the Institute of Air Quality Management document Assessment of Dust from Demolition and Construction (2024) V2.2. The assessment also considers potential impacts from vehicles and Non-Road Mobile Machinery (NRMM). Measures relevant to the control and management of impacts during construction have been included within **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**. **Application Document 7.5.6.1 (B) Air Quality Management Plan – Suffolk (Clean) [AS-129]** and **Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent [APP-347]** set out the mitigation measures required for the construction phase of the Proposed Project. They include proposed air quality monitoring locations that will be in place for the construction phase of the Proposed Project, which will be used to ensure mitigation measures are working effectively.
7.2.2	The potential for construction phase air quality impacts on sensitive habitats and plant communities	The air quality impacts on ecology receptors are assessed within **Application Document 6.2.2.2 (B) Part 2 Suffolk Chapter 2 Ecology and Biodiversity (Clean) [PDA-017]** and **Application Document 6.2.3.2 (B) Part 3 Kent Chapter 2 Ecology and Biodiversity (Clean) [AS-047]**. The air quality assessment within both **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]** and **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]** have considered ecological receptors. Measures relevant to the control and management of impacts during construction have been included within **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**, **Application Document 7.5.6.1 (B) Air Quality Management Plan – Suffolk (Clean) [AS-129]** and **Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent [APP-347]**. These measures together will ensure no unacceptable construction phase air quality impacts on sensitive habitats and plant communities.

~~Table 7.3~~ Table 7.3 Applicant's Response to the Relevant Representations that raise Construction Impacts

Reference	Topic	Applicant's Response
7.3.1	Impact of construction compounds and haul roads.	**Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] superseded by [AS-093]** of **Volume 6 Environmental Statement** (ES) outlines information on the proposed construction compounds and Proposed Project drawings indicate where construction compounds will be located, including typical compound layouts. The impacts of the construction phase in terms of construction compounds and haul roads have been assessed within the Environmental Impact Assessment (EIA) and are reported within the ES within each of the relevant technical chapters. 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 to avoid other utilities. Further details of construction vehicle routing and the limitations of construction traffic vehicle movements on certain parts of the network are set out within **Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]**. The estimates regarding HGV movements and workforce profiles have been derived by the engineering team based on the anticipated construction programme and construction compounds/ activities at each access point. The assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** is based on the peak construction phase and the assumptions relating to trip generation and trip distribution are robust.
7.3.2	Concern that there is limited information about the construction of the Proposed Project.	Available information of the proposed methods and programme of construction is provided in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-018]**. Outline information on the proposed permanent access roads, temporary haul roads and compounds is also provided. Project drawings indicate where construction compounds will be located, including typical compound layouts. Compound site restoration will follow a standard method that has successfully been implemented in numerous other sites, which have reverted to previous uses with no lasting adverse impacts. Furthermore, the Applicant is working with other developers to identify opportunities to coordinate construction activities. A detailed construction programme cannot be completed until the construction contractors are appointed. Requirement 4 of the draft Development Consent Order (**Application Document 3.1 (B) Draft Development Consent Order [AS-012]**) states that development cannot commence until a written scheme setting out all stages of the proposed development has been submitted to the relevant planning authority, ensuring that the local planning authority is aware of the planned programme.
7.3.3	Suggestion to ensure that the construction workforce are adequately trained and comply with all procedures and management plans.	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. This Code of Construction Practice forms part of **Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127]** which sets out the steps expected of the construction contractors in terms of competence, training and awareness. Specific training needs will be developed for individuals to reflect the work to be carried out on the Proposed Project and the risk and opportunities identified. Regular toolbox talks will be held to provide on-going reinforcement and awareness training in regard, but not limited to, waste management, pollution prevent and control, biosecurity, environmental measures, archaeology and emergency response procedures. Management Plans secured through the requirements within Schedule 3 of **Application Document 3.1 draft Development Consent Order [APP-007] superseded by [AS-087]** will also be adhered to.
7.3.4	Construction work on a Saturday afternoon is not acceptable.	Since publication of the Preliminary Environmental Information Report (PEIR) within Statutory consultation, the proposed construction working hours have changed. The change of these hours was consulted on as part of the Targeted consultation.

Reference	Topic	Applicant's Response
		The proposed construction core working hours (unless otherwise approved by the relevant Local Planning Authority) for all terrestrial works in Suffolk and Kent are: • Monday – Friday: 0700 to 1900; and • Saturday, Sunday and Bank Holidays: 0700 to 1700. Details relating to the proposed construction working hours and any associated restrictions are contained in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] superseded by [AS-093]**. The working hours are secured through Requirement 7 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [APP-007] superseded by [AS-087]**. The impacts of construction work on Saturday afternoons, Sunday and Bank Holidays have been assessed within the EIA and this is reported within the ES within the technical chapters, where relevant. The traffic and transport assessments within **Application Document 6.2.2.7 Part 2 Chapter 7 Traffic and Transport [APP-054]** and **6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]** specifically include an assessment of the Saturday lunchtime period (12pm to 1pm) based on forecast construction traffic movements during the peak period of construction and does not identify the potential for significant effects as a result of the Proposed Project. Construction work, including that undertaken if and where needed on Saturday afternoons, Sundays and Bank Holidays, would be suitably controlled by (for example) **Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127]**, **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**.
7.3.5	Pollution to surrounding area, including visual, noise, and air quality/dust, as a result of construction works.	The impacts of potential visual, noise and air quality/dust pollution from the construction phase have been assessed within the EIA and are reported within the ES within each of the relevant technical chapters: • **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**; • **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]**; • **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [APP-056] superseded by [AS-109]**; • **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**; • **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]**; and • **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration [APP-069] superseded by [AS-111]**. Measures to control pollution from the construction works are set out in **Application Document 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127]**, **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**
7.3.6	Construction methods impacting landscape and wildlife.	The impacts from the construction phase on landscape and wildlife have been assessed within the EIA and are reported within the ES within each of the relevant technical chapters: • **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**; • **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049] superseded by [PDA-017]**; • **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**; and

Reference	Topic	Applicant's Response
		• **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [APP-062] superseded by [PDA-021]**; • **Application Document 6.2.4.2 Part 4 Marine Chapter 2 Benthic Ecology [APP-075] superseded by [AS-020]**; • **Application Document 6.2.4.3 Part 4 Marine Chapter 3 Fish and Shellfish Ecology [APP-076] superseded by [AS-022]**; • **Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [APP-077] superseded by [AS-095]**; and • **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology [APP-078] superseded by [AS-115]**. Where required, appropriate mitigation to address the potential impacts of construction methods on landscape and wildlife have been set out in these ES chapters. These measures are also outlined in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**.
7.3.7	Construction traffic will lead to congestion and deter tourism to the area.	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 [APP-045] superseded by [AS-093]**. The construction vehicle routing has also 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]** and **7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]**. Construction phase transport effects (including with respect to Driver Delay/ congestion) are assessed within **Application Document 6.2.2.7 Part 2 Chapter 7 Traffic and Transport [APP-054]** and **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**. These demonstrate that the additional construction traffic to be generated by the Proposed Project during the peak construction phase is not expected to result in any significant impacts on the surrounding highway network (including with regard to Driver Delay/ congestion), with the identified mitigation in place (to be secured by the aforementioned management plans). **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism [APP-070]** concludes that there would be no significant adverse effects on visitors or tourism as a result of the Proposed Project.

~~Table 7.4~~ Table 7.4 Applicant's Response to the Relevant Representations that raise Cultural Heritage

Reference	Topic	Applicant's Response
7.4.1	Impact on the following in Suffolk: • Setting of the village of Sternfield; • Medieval village of Friston; • Old Aldeburgh harbour; Thorpeness village	The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce cultural heritage impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project such as the sensitive routeing and siting of infrastructure and temporary works. Impacts on cultural heritage from the Suffolk Onshore Scheme are considered in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050].** This assessed impacts on all receptors that have the potential to result in significant environmental effects as a result of physical impacts during construction, or as a result of permanent impacts on the setting of assets during the Operational phase. Assets taken forwards to full assessment were identified in **Application Document 6.3.2.3.A Volume 6 Appendix 2.3.A Cultural Heritage Baseline Report [APP-104]**. These include 'The Mear' (ADB160) which may have been an area used as a former harbour or landing area, although no archaeological evidence of this has been identified. The assessment for physical impacts on 'The Mear' are detailed in **Application Document 6.2.2.3 Volume 6 ES Chapter 3 Cultural Heritage [APP-050].** Thorpeness was not taken forwards to full assessment due to the limited potential for impacts on the setting of the Conservation Area. This was largely a result of the Suffolk Onshore Scheme being at least 1 km from the Conservation Area and well screened by extensive woodland and buildings. Works between Gorse Hill and the Offshore Scheme are also limited to installation of the cable through below ground Horizontal Directional Drilling (HDD) as the marine cable element transitions to the Suffolk Onshore Scheme. Furthermore, the methodology adopted for impacts on setting, which was agreed with relevant stakeholders, focused on the permanent above ground infrastructure (i.e. the Converter Station and Substation) and Thorpeness falls outside of the study area adopted for setting impacts resulting from the permanent above ground infrastructure. Likewise, assets within Sternfield and Friston were not taken forwards to full assessment as it was considered that the Suffolk Onshore Scheme would not result in a significant impact as a result of screening and topography as detailed in **Application Document 6.3.2.3.A Volume 6 Appendix 2.3.A Cultural Heritage Baseline Report [APP-104]**. Further detail with regards to impacts on built heritage, including Sternfield, is provided within the Applicant's heritage response to Suffolk Energy Action Solutions (SEAS) relevant representation (RR-5210). As stated within the chapters, residual effects of the Proposed Project on cultural heritage receptors in Suffolk following the implementation, where necessary, of additional mitigation measures are assessed to be not significant.
7.4.2	Impact on historic sites in Pegwell Bay where St Augustine and Julius Caesar are reported to have landed.	The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce cultural heritage impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project such as the sensitive routeing and siting of infrastructure and temporary works. Potential impacts resulting from the Kent Onshore Scheme are detailed within **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063].** This covers all receptors that have the potential to suffer significant environmental effects as a result of physical impacts during construction, or as a result of permanent impacts on the setting of assets during the Operational phase. This includes the multi-period Ebbsfleet Lane Complex which include remains dating to the Roman period, as well as assets in the terrestrial zone of the Pegwell Bay area. The exact location of the landings by Julius Caesar and St Augustine are not known/documented, therefore potential impacts on these cannot be assessed. As stated within the chapters, residual effects of the Proposed Project on cultural heritage receptors in both Kent and Suffolk following the implementation, where necessary, of additional mitigation measures are assessed to be not significant.
7.4.3	Impact on the Roman Richborough Fort.	The impact on the Roman Richborough Fort is assessed in the ES, with visualisations from Richborough Fort are provided in **Application Document 6.4.3.3 ES Figures Kent Cultural Heritage Part 2 of 2 [APP-262]**. The Fort is

Reference	Topic	Applicant's Response
		recognised as being a high value asset, but with only a negligible magnitude of effect to the setting predicted. Therefore, a minor (non-significant) adverse effect. Illustrative visualisations have also now been produced and supplied to Historic England, and these further demonstrate the limited potential for impacts on the setting of the Fort.
7.4.4	Impact of construction traffic route on historic sites	Impacts on cultural heritage from the **Kent Onshore Scheme are considered within Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [6.2.3.3].** Also see, **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338].** The Abbotts Walls (MKE76083) represents an earthwork bank that is reported as forming part of the early reclamation and management of the Wantsum Channel/Minster Marshes landscape. Assumed to have originally been constructed in the medieval period, the earthwork has been altered and enhanced during later periods. The asset, as recorded and mapped on the Kent HER, survives for a distance of approximately 5km. The Kent Onshore Scheme would result in the proposed temporary access crossing the assets at a point near where the Minster Stream discharges into the River Stour. In this area the Abbotts Walls is already truncated by a farm access, while later Second World War defences (MWX43342) are also assumed to have resulted in impacts to the asset. The assessment of physical impacts on the asset is provided in **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]**
7.4.5	Impact to The Heritage Coast of Suffolk	Impacts on cultural heritage from the Suffolk Onshore Scheme are considered in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** and for the Kent Onshore Scheme within **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063].** Effects on the Suffolk Heritage Coast are detailed within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**. The Suffolk Heritage Coast also includes an area offshore which would have direct effects at construction due to the presence of a cable laying barge. This would be in the context of occasional large-scale marine vessels out at sea and the presence of offshore wind farms. The landfall construction activity would slightly affect the visual relationship with the predominantly rural coastline, however in a localised geographical area. There would be a temporary and localised displacement on fishing and water-based recreational activities during construction. It is considered that there would be a minor adverse (not significant) effect on the Suffolk Heritage Coast as a result of the Suffolk Onshore Scheme at construction and Year 1 of operation and a negligible adverse (not significant) effect on the Suffolk Heritage Coast as a result of the Suffolk Onshore Scheme at Year 15 of operation. Effects on the Suffolk Coast and Heaths AONB are also detailed within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097].** The routeing, design and mitigation of the Proposed Project has been designed as far as possible to avoid impacts on the Suffolk Coasts and Heaths AONB. Consideration of this issue and the need to reduce impacts have been embedded into the design of the project from an early stage and as a result there are no significant adverse effects predicted on the AONB arising from the Proposed Project for any stage of development.
7.4.6	Impact to the views and sense of place impinging on rural character of heritage assets	Impacts on cultural heritage from the Suffolk Onshore Scheme are considered in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** on all receptors that have the potential to result in significant environmental effects as a result of physical impacts during construction, or as a result of permanent impacts on the setting of assets during the Operational phase. Further detail with regards to impacts on built heritage and its setting is provided within the Applicant's heritage response to Suffolk Energy Action Solutions (SEAS) relevant representation (RR-5210).

Reference	Topic	Applicant's Response
7.4.7	Impacts to heritage assets have been minimised within assessments	Impacts on cultural heritage from the Suffolk Onshore Scheme are considered in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050].** Further detail with regards to impacts on built heritage is provided within the Applicant's heritage response to Suffolk Energy Action Solutions (SEAS) relevant representation (RR-5210).

~~Table 7.5~~ Table 7.5 Applicant's Response to the Relevant Representations that raise Geology and Hydrogeology

Reference	Topic	Applicant's Response
7.5.1	Need to obtain an understanding of the geology of the Proposed Project area.	Available information on the geology of the Suffolk and Kent Study Areas have been collated and are presented in the relevant assessment Chapters: **Application Document 6.2.4.1 Part 4 Marine Physical Environment [APP-074],** superseded by **AS-113, Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** and **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065]**. The ground investigation reports are contained in **Application Document 6.3.2.5.D Appendix 2.5.D Ground Investigation Report – Suffolk [APP-119]** and **Application Document 6.3.3.5.C Appendix 3.5.C Ground Investigation Report – Kent [APP-171]** which further describes the geology encountered by the intrusive ground investigation undertaken for the Proposed Project.
7.5.2	Concerns over water pollution	Information on groundwater abstractions within the Study Area has been obtained and an assessment on the potential impacts on groundwater receptors including groundwater abstractions is included within **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** and **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065]**, the locations of the abstractions are also shown on the accompanying figures. The Environmental Statement is also supported by a groundwater risk assessment included within **Application Document 6.3.2.5.B ES Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117]** and **Application Document 6.3.3.5.B ES Appendix 3.5.B Qualitative Groundwater Risk Assessment [APP-170]**. In addition, a number of commitments have been included within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** in regard to water pollution.
7.5.3	Concern over location of landfall cables which requires drilling, impacting sedimentary processes.	Potential impacts on coastal sedimentary processes at the Suffolk and Kent landfall areas during the construction phase are covered in the relevant assessment chapter: **Application Document 6.2.4.1 Part 4 Marine Physical Environment [APP-074],** superseded by **[AS-113].**
7.5.4	Concerns over impacts to coast due to nature of geology of area.	The Suffolk coast is recognised as being particularly sensitive due to the underlying geology of the area. Potential impacts to both the Suffolk and Kent coastlines and coastal processes are assessed in the relevant assessment chapter: **Application Document 6.2.4.1 Part 4 Marine Physical Environment [AS-113].**

~~Table 7.6~~ Table 7.6 Applicant's Response to the Relevant Representations that raise the Proposed Landfall Location

Reference	Topic	Applicant's Response
7.6.1	Impact of the Kent landfall on the landscape of Pegwell Bay.	The landscape sensitivity of Pegwell Bay is noted. The assessment of effects arising from the Kent Onshore Scheme on landscape character is summarised within **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visua**l **[APP-061]** and detailed **within Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-097]**. This includes reference to the potential effects of the landfall on the relevant published Landscape Character Area (LCA). Table 3.1 in Appendix 3.1C assesses the effect on Thanet District Council Landscape Character Assessment (TDLCA) LCA F1: Pegwell Bay during construction and concludes that there would be direct effects on the LCA associated with the cable laying barge and other vessels temporarily within Pegwell Bay and out at sea. These elements of the Suffolk Onshore Scheme would be present for a short period of time, would have a minimal effect on the key characteristics of the LCA and in the context of existing features that would lessen the degree of change. It should be noted that the marsh and mudflats would not be affected by the landfall construction due to the trenchless crossing technique. There would also be direct effects associated with construction access within the northern part of the LCA, including along the former hoverport site. This would temporarily influence the character along the foreshore, but the existing context of derelict context of the site, the residential edge of Cliffsend and movement along Sandwich Road would reduce effects. It should be noted that recreational activities, including within Pegwell Bay Country Park, would, however, remain unaffected. There would be indirect temporary effects associated with other aspects of the Suffolk Onshore Scheme, including construction compounds and construction access. There would be a limited effect on the perceptual aspects of the landscape as intervisibility is limited by intervening vegetation and there is the existing context of Sandwich Road. The effect on LCA F1 at construction is considered to have a negligible adverse magnitude, which alongside the very high sensitivity rating would result in a negligible adverse (not significant) significance of effect. LCA F1 is scoped out of the operational assessment at Scoping stage as the only direct effect on the LCA would be a very short section of monitoring access with occasional use and therefore the limited potential for significant adverse effects.
7.6.2	Concern over the impact of the landfall location on ecology at Sandlings SPA, The Haven Aldeburgh LNR, Leiston-Aldeburgh SSSI and RSPB North Warren Reserve, and the impact on the landscape of the Heritage Coast which are all present adjacent to the Suffolk landfall. Concern that this is the wrong location and that avoidance of impact was not considered.	The Applicant acknowledges the sensitivity of the mentioned designated and defined sites. Nature Conservation Designations Assessments of potential impacts on the Sandlings SPA and the Leiston to Aldeburgh SSSI (including the RSPB North Warren Reserve) as well as details of the committed mitigation is included within **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]** and **Application Document 6.6 (B) Habitats Regulations Assessment Report [AS-007]**. Furthermore, following statutory consultation the proposed construction compound in this area has been reduced in size and moved further away from the mentioned Statutory designations. In addition to reducing the potential for ecological effects, these changes have also helped to lessen the impact on nearby relevant receptors, residential properties and the flood zone. This revised design was presented at targeted consultation. Suffolk Heritage Coast Effects on the landscape of the Suffolk Heritage Coast are summarised within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** with the detailed assessment being contained within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**. The design has evolved to include trenchless methods for the installation of cables to avoid direct impacts on Sandlings SPA or Leiston-Aldeburgh SSSI. The commitment to a trenchless

Reference	Topic	Applicant's Response
		solution is contained in **Application Document 7.5.3.2 CEMP Register of Environmental Actions and Commitments (REAC) [APP-342]** which is secured through Requirement 6 of Schedule 3 of the draft DCO. Regarding the Suffolk Heritage Coast, this also includes an area offshore which would experience direct effects at construction due to the presence of a cable laying barge. This would be in the context of occasional large-scale marine vessels out at sea and the presence of offshore wind farms. The landfall construction activity would slightly affect the visual relationship with the predominantly rural coastline, however in a localised geographical area. There would be a temporary and localised displacement on fishing and water-based recreational activities during construction. It is considered that there would be a minor adverse (not significant) effect on the Suffolk Heritage Coast as a result of the Suffolk Onshore Scheme at construction. <u>Alternatives</u> An assessment of alternative landfall locations is presented in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**. The reasons for the siting of the Suffolk landfall are set out in **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022)** [**APP-483**]
7.6.3	Possibility of beach erosion due to construction of the landfall.	**Application Document 6.2.4.1 (C) Part 4 Marine Chapter 1 Physical Environment** describes the erosional trends of Pegwell Bay and Suffolk and the beaches where the cables make landfall. Estimated future erosion at both landfall sites is also described within the baseline section. The assessment examines changes to nearshore seabed morphology at the landfalls, and beach morphology including Pegwell Bay to Hacklinge Marshes SSSI and The Haven (Local Nature Reserve and SSSI). It concludes that coastal geomorphological change and associated changes to sediment transport regimes during installation activities would have no significant effect on coastal morphology.
7.6.4	Concern over the impact on maritime heritage from the marine cable and landfall sites in both Suffolk and Kent.	As part of the ES that accompanies the DCO application, the Applicant has undertaken an assessment of the potential impacts on known and potential marine archaeology up to the Mean High Water Springs mark. This includes physical disturbance activities causing direct damage and/or loss of known and potential heritage receptors on and below the seabed, and physical disturbance activities causing changes to hydrodynamic and sedimentary regimes leading to sediment reduction on the seabed and scour, causing adverse indirect effects on marine heritage receptors. Furthermore, the assessment has considered works that would affect the setting of known marine heritage receptors and the character of the historic seascape. These assessments have been undertaken by archaeological specialists in line with recognised best practice guidance documents. The results of the assessment are reported in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology [APP-079]**. The assessment did not identify any potential significant adverse effects of the Proposed Project on marine archaeology. A number of sources of primary and synthesised information were consulted for the assessment which are contained in **Application Document 6.3.4.6.A ES Appendix 4.6.A Marine Archaeological Technical Report [AS-026]**. Further geophysical survey data will be archaeologically assessed at Pegwell Bay, Kent to ensure the entirety of the Offshore Scheme has been analysed for known and potential archaeological receptors. Any necessary mitigation measures will be implemented. Robust mitigation measures to remove or reduce the significance of impact on marine archaeological assets have been proposed and are detailed in **Application Document 7.5.5 (B) Outline Offshore Overarching Written Scheme of Investigation [PDA-033]**.
7.6.5	Concern about landfall at Aldeburgh beach and the potentially permanent disruption that will impart on users.	The Proposed Project has committed to the use of a trenchless technique at the landfall in Suffolk; this commitment is included in **Application Document 7.5.3.2 CEMP Register of Environmental Actions and**

Reference	Topic	Applicant's Response
		Commitments (REAC) [APP-342] which is secured through Requirement 6 of Schedule 3 of the draft DCO. Therefore, there will be no temporary or permanent disruption to users of Aldeburgh beach.
7.6.6	Concern that the same damaging impacts caused by the Nemo Link Project will be repeated by this Proposed Development.	The Nemo Link project was a joint venture, continental interconnector in partnership with Belgian Elia. The Proposed Project is a piece of domestic transmission infrastructure that will be owned by the Applicant. The Applicant has committed to a trenchless solution beneath the sensitive saltmarsh habitat at Pegwell Bay (unlike Nemo Link) and the option of a trenched installation is not included in the application. The commitment to a trenchless solution is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [AS-012]**. This will avoid the impacts on the saltmarsh that resulted from Nemo Link.
7.6.7	Landfall should be directed towards where energy is needed directly.	This point relates to the need case which is responded to separately.
7.6.8	Queries and concern about landfall location at Aldeburgh and its connection to Friston.	The reasons for the siting of the Suffolk landfall and the decision to connect into the Friston Substation are set out in **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022)** [**APP-483**]

~~Table 7.7~~ Table 7.7 Applicant's Response to the Relevant Representations that raise Landscape and Visual Impacts

Reference	Topic	Applicant's Response
7.7.1	Impact of the Proposed Project on the Suffolk Coast and Heaths AONB and the landscape character of the designation.	The designated status of the landscape is acknowledged by National Grid. The effects arising from the Suffolk Onshore Scheme on the Suffolk Coast and Heaths AONB 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]**. The assessment takes into account the Natural Beauty indicators of the Suffolk Coast and Heaths AONB. The Planning Statement (**Application Document 7.1 Planning Statement (Clean) [AS-057]**) provided an assessment on the Special Qualities Indicators. Part of the Suffolk Onshore Scheme lies within the Suffolk Coast and Heaths AONB; therefore, it would be temporarily affected during the construction period. This would comprise underground High Voltage Direct Current (HVDC) cable laying, including vegetation removal, temporary displacement of agricultural land and acid grassland, temporary infiltration ponds and pipes along the cable route and at the landfall, temporary drilling rig at the landfall, a construction compound to the east of Leiston Road (B1122) and construction access along the cable route. The total length of the HVDC cable route within the AONB would be approximately 2.47 km. At operation and maintenance, there would be a very small loss of trees associated with the HVDC corridor, however, the majority of the HVDC corridor would be restored to the former land use. Areas of agricultural land would be restored quickly, whereas hedgerow reinstatement would take comparatively longer to re-establish along with reinstatement of acid grassland. Direct effects would also include occasional vehicle movement along short sections of monitoring access routes. The routeing, design and mitigation of the Proposed Project has been designed as far as possible to avoid impacts on the Suffolk Coast and Heaths AONB. Consideration of this issue and the need to reduce effects have been embedded into the design of the project from an early stage and as a result there are no significant adverse effects predicted on the AONB arising from the Proposed Project for any stage of development.
7.7.2	Impact of the Suffolk Converter Station on the landscape character of local residential areas	NPS EN-1 paragraph 5.10.5 recognises that *'Virtually all nationally significant energy infrastructure projects will have adverse effects on landscape'.* Notwithstanding the screening benefit from the existing vegetation network within the landscape which provides a degree of screening to views from the settlements of Saxmundham and Sternfield, consideration has been given to reducing these effects through aiming to utilise existing screening, locating the Converter Station towards the southern extent of the site away from the B1119 and the gateway approach into Saxmundham and to maximise the opportunity for landscape integration planting and screening to improve landscape fit and minimise visual effects on the surrounding residential areas. This is secured in Table 3.1 of the **Application Document 7.12.1 Design Principles – Suffolk [APP-366]**, which states that the detailed design shall aim to locate the smallest feasible compound and the building mass within it, as far south as possible within the defined LoD to reduce visual impact and assist following projects in optimising their locations to mitigate cumulative impacts of the masterplan, where this does not conflict with other principles (e.g. need to retain space for future projects). The assessment on visual amenity is summarised within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** and detailed in **Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]**. The representative viewpoints chosen include Important Views identified in the Saxmundham Neighbourhood Plan as well as other residential receptors including on the edge of Saxmundham and within the wider landscape. The likely effects arising from the Suffolk Onshore Scheme has also informed the proposed mitigation plans, including proposed native woodland on the northern edge of the Saxmundham Converter Station. Mitigation planting along the permanent access route has also been developed in collaboration with the cultural heritage team to also minimise heritage impacts.

Reference	Topic	Applicant's Response
		Under Friston Scenario 1, at Year 15 of operation and maintenance, nine out of the 23 representative viewpoints within the landscape and visual study area would experience moderate or major (significant) adverse effects arising from the Suffolk Onshore Scheme. This comprises receptors from representative viewpoints 1, 3, 4, 5, 15, 19, and 21 which are all located in the highly localised landscape around Saxmundham Converter Station from all directions, and representative viewpoints 2 and 20 to the west of the River Fromus bridge crossing. The permanent infrastructure of the Suffolk Onshore Scheme would remain permanently visible in a proportion of the horizontal extent of view from nearby receptors, with the remainder of the panorama unaffected. By Year 15, the proposed landscape mitigation planting around the Suffolk Onshore Scheme would provide partial screening and landscape integration within the immediate landscape context. The planting around the Saxmundham Converter Station would have matured and some would be located on bunding, providing some additional height and screening benefit. This would aid the softening of views in the direction of the permanent infrastructure; however, the upper extents of the Saxmundham Converter Station would remain visible and a noticeable change in the composition of the view would remain, due to the scale and massing of the infrastructure. The planting associated with the River Fromus bridge would create new green infrastructure links and assist in partially restoring the permanent tree loss along the River Fromus including replacement of plantation woodland with native woodland.
7.7.3	Construction of the Suffolk Converter Station leading to a change in the landscape character of the wider character of the area, transforming from a rural landscape to an industrial one. Impact on the setting of Hurts Hall and St John's Church.	NPS EN-1 paragraph 5.10.5 recognises that *'Virtually all nationally significant energy infrastructure projects will have adverse effects on landscape'.* The effects arising from the Suffolk Onshore Scheme on landscape character is 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 sets out anticipated changes to key characteristics of published Landscape Character Areas and landscape designations at different project stages. The impacts on cultural heritage are assessed in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]**. The potential for impacts on the setting of heritage assets was discussed with key stakeholders including Suffolk County Council and Historic England and, as part of this procedure, a list of assets to be fully assessed was agreed. The Saxmundham Converter Station has been sited and designed to minimise the impact on landscape character, whilst acknowledging that it is not possible to remove effects entirely due to the scale and nature of the development. The construction activity would have an impact upon the southern rural approach to Saxmundham but would not affect the historic connection between Hurts Hall and St John's Church, Saxmundham. The effects would be relatively localised as the part of the Fromus Valley Landscape Character Area in which the Suffolk Onshore Scheme lies has a degree of separation from other smaller-scale parts of the Fromus Valley Landscape Character Area. The construction activity would also reduce the tranquillity and increase movement in the localised part of the Landscape Character Area; however, the existing influence of road and railway infrastructure should be noted. The construction activity, including construction vehicles along the access route, would introduce further movement into part of the Fromus Valley Landscape Character Area with existing influence of vehicle movement along the B1121. Following design and mitigation measures implemented to reduce the impact of the Suffolk Converter Station at the Fromus Bridge, there are not predicted to be any significant adverse heritage effects on Hurts Hall or St John's Church as a result of the Proposed Project.
7.7.4	Mitigation in the form of planting will not be effective in screening the Suffolk Converter Station due to its height and large scale.	National Grid acknowledges that it will take some time for planting to establish and that the scale of the Saxmundham Converter Station will result in landscape mitigation screening being unable to visually screen the upper extents of the infrastructure. The mitigation planting heights that have been used within

Reference	Topic	Applicant's Response
		the year 15 photomontages were informed by arboriculture specialists and evidence of growth rates from a local planting scheme near to the Suffolk Onshore Scheme provided by East Suffolk Council. Such planting heights are set out within **Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]**. These growth rates are considered to be conservative and have considered the future requirements of climate resilience with the variety of species proposed within the indicative species mixes. Further details on the mitigation planting should be referred to within **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]** and **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**. This includes the introduction of native hedgerow and tree planting along sections of the B1119 to create vegetative layers within the landscape and partially screen views of the Saxmundham Converter Station, whilst maintaining some views of the planted edge of Saxmundham (identified in the Saxmundham Neighbourhood Plan as an important aspect of the setting and in views when approaching along the B1119 from the east).
7.7.5	Impact of the Kent landfall on the landscape of Pegwell Bay.	The key characteristics of the Pegwell Bay landscape are noted including the long panoramic views seaward and perceptual qualities relating to tranquillity and remoteness, as noted within **Application Document 6.3.3.1.B ES Appendix 3.1.B Landscape Baseline [APP-144]**. The assessment of effects arising from the Kent Onshore Scheme on landscape character is 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 includes reference to the potential effects of the landfall on the relevant published Landscape Character Area. Table 3.1 in **Appendix 3.1C** assesses the effects on Thanet District Landscape Character Area F1 Pegwell Bay during construction and concludes that there would be direct effects on the **Landscape Character Area** associated with the cable laying barge and other vessels temporarily within Pegwell Bay and out at sea. There would also be direct effects associated with construction access within the northern part of the **Landscape Character Area**, including along the former hoverport site. These effects would have a negligible significance of effect during construction and were scoped out of the operational assessment as the only direct effect on the **Landscape Character Area** would be a very short section of monitoring access with occasional use. From a visual amenity perspective Viewpoint 2 is representative of recreational users of Pegwell Bay Country Park and the visual receptor is recognised as being of a 'very high' sensitivity. The Proposed Project is predicted to have a 'small' magnitude of effect and a 'minor' adverse effect, which is not significant at construction and this would reduce to 'negligible adverse', also not significant, at operation and maintenance. A trenchless construction method would be used to install cables beneath the surface around the landfall point at Pegwell Bay, therefore minimising disturbance to the natural environment at this point and reducing effects.
7.7.6	Impact of the Kent Converter Station on the flat, rural landscape and the setting of local cultural sites such as Richborough Fort.	The effects arising from the Kent Onshore Scheme on landscape character is summarised within **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**, the landscape assessment is detailed within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-145]** and the visual assessment is detailed within **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]**. This includes reference to the potential effects of the Minster Converter Station and Substation on the published Landscape Character Areas and representative viewpoints. NPS EN-1 paragraph 5.10.5 recognises that *'Virtually all nationally significant energy infrastructure projects will have adverse effects on landscape'.* Given the size and nature of the Minster Converter Station and Substation, there are predicted significant adverse landscape effects in the area where the

Reference	Topic	Applicant's Response
		Minster Converter Station is located. However, the effects have been minimised through the optioneering process and proposed landscape mitigation. Richborough Saxon Shore Fort stands in an elevated position on the south side of an area formally occupied by the Wantsum Channel. The value of this asset derives from its archaeological interest, and the information it could provide relating to the history and development of the Roman military in the area, as well as the associated civilian settlement. It also has some architectural value from the above ground remains that survive. As a scheduled monument, it is considered to be of high value. The potential for impacts on the setting of heritage assets was discussed with key stakeholders including Kent County Council and Historic England and, as part of this procedure, a list of assets to be fully assessed was agreed. This would be further reduced because of the distance between the Minster Substation and Minster Converter Station and the fort. Furthermore, the alterations to the overhead lines and the new pylons required to accommodate the new overhead connection would not result in a significant change to the existing wirescape of the Minster Marshes when viewed from the fort. Finally, as the above ground infrastructure is located to the north and northwest, while the Ebbsfleet enclosure is located to the north-northeast, the Kent Onshore Scheme would not sever any views that that may have existed, or been significant, between the fort and the large enclosure on the Ebbsfleet Peninsula. The assessment concludes the magnitude of impact is negligible and therefore on an asset of high value this would result in a minor adverse effect which is not significant. Therefore, no further design changes are required to address the effect on this asset. Impacts on cultural heritage in **Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]**. Representative viewpoint 8 is located on the viewing platform at Richborough Fort and the visual receptor is deemed to be of a 'very high' sensitivity. The effects are reported to be minor adverse, which is not significant, at all project stages largely due to the filtered views of the Kent Onshore Scheme being within the distance in a small part of the view. Any views of the infrastructure would also be within the context of existing energy infrastructure within the view, including at Richborough Energy Park, and infrastructure which breaks the skyline, including the existing towers and OHL and a communication mast. Dover District Landscape Character Area H1: Richborough Bluff is reported as having a minor adverse effect at construction and negligible adverse effects at operation and maintenance, which are not significant. Any effects would typically be indirect and at a distance. The effects would be within part of the edge of the marsh landscape where existing vegetation cover is present and within the context of the existing towers and overhead line and Richborough Energy Park.
7.7.7	Impact of overhead lines for the Kent Onshore Scheme on the landscape character of the area.	The effects arising from the Kent Onshore Scheme on landscape character (including the effects of the new overhead lines in Kent) is summarised within **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** and assessed in detail within **Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]**. This includes reference to the potential effects of the proposed overhead lines on the relevant published Landscape Character Areas. At Statutory consultation, National Grid consulted on two options for overhead lines: a lower number of pylons with a higher height, and a higher number of pylons with a lower height. The first option was selected and was presented at Targeted consultation. The option selected results in fewer pylons, which reduces the area of habitat affected by the footprint of the towers. The solution proposed also reduced the area between lines to reduce the risk of birds becoming trapped between the existing and proposed overhead lines. Additionally, the location of these pylons was refined to reduce the size of the triangular area that would be formed by the construction of pylons between the existing overhead line and the proposed substation. On balance, the solution with fewer towers was considered to be preferred from an environmental perspective, with this decision being ecology driven.

Reference	Topic	Applicant's Response
		The effects on landscape character arising from the proposed overhead lines is considered where appropriate within the landscape assessment. This includes reference to the context of the existing overhead lines and towers which acknowledges increasing the concentration of towers and wirescape. This would typically not be dissimilar to the existing context which reduces effects on key characteristics of the landscape. There would also be effects associated with bird diverters present on the section of the proposed overhead line which would have reflective properties at low light and would have localised effect on the strong rural character of the landscape, albeit within the context of the nearby road network.
7.7.8	Undertake landscape planting ahead of construction.	This principle has been incorporated into the application documents where possible. Where planting areas do not conflict with construction compounds and activities, advanced planting will be undertaken in the first available planting season prior to construction commencing. These areas will be developed in detail as part of the detailed LEMP but, subject to contractor discussions, could include the areas identified on **Figure 3 Saxmundham Converter Station Outline Landscape Mitigation - Timing of Planting** and **Figure 3 Minster Converter and Substation Outline Landscape Mitigation - Timing of Planting** within **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]** and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]**.
7.7.9	The design of the converter stations should allow them to blend in with their surroundings.	National Grid acknowledges the comments regarding the design of the converter stations to blend in with their surroundings. The assessment on potential landscape character and visual effects is set out in **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** and **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**. National Grid's landscape strategy has been developed to minimise effects on landscape and visual receptors, as set out within the embedded mitigation section of the ES. Mitigation includes screening in the form of proposed woodland, hedgerow and hedgerow tree planting and has been designed in collaboration with relevant stakeholders. The design of these structures, in terms of the building form and the external materials, has been developed alongside consultation and stakeholder feedback including engagement with a Design Review Panel as explained in **Application Document 7.11.2 Design Approach Document – Kent [APP-365]** and **Application Document 7.11.1 Design Approach Document – Suffolk [APP-364]**. Design Principles have been provided with the application for development consent. The Design Principles provide guidance regarding the design intent that would be adopted and embedded into the detailed design of the structure. Refer to **Application Document 7.12.2 Design Principles – Kent [APP-367]** and **Application Document 7.12.1 Design Principles – Suffolk [APP-366]**. The Design Principles set out in **Table 3.1** of both documents contain principles that ensure consideration is given to assimilating the converter stations into the landscape through design, roofline, materials, colours and massing. Landscaping proposals set out in **7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059]** and **7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent (Clean) [PDA-035]** also proposed landscaping measures to further assist in blending in with the landscape as far as possible. The design has therefore evolved to address this comment, which has also been discussed in meetings with key stakeholders.
7.7.10	Light pollution	The assumptions made about the lighting design that have informed the landscape and visual impact assessment are set out in **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-018]**. Consideration of the landscape and visual effects of light pollution during construction and operation is presented in **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**, **Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]**, **Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character**

Reference	Topic	Applicant's Response
		Assessment [APP-145] and **Application Document 6.3.3.1.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]**. Light pollution will be minimised during construction and operation as far as possible, whilst meeting National Grid specifications for lighting for safety, security and operational purposes. Measures to reduce light pollution from offshore and onshore development respectively are incorporated into **Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339]and Application Document 7.5.3 Outline Onshore Construction Environmental Management Plans[AS-127]** and their appendices.

~~Table 7.8~~ Table 7.8 Applicant's Response to the Relevant Representations that raise the Issue of Safety

Reference	Topic	Applicant's Response
7.8.1	Concerns that the Proposed Project is vulnerable to attack/sabotage outside from outside agencies.	As an operator of national infrastructure, the Applicant commits significant resources and investment into maintaining the security of their sites and assets. The Applicant liaises with the Department for Energy Security and Net Zero, other government departments and agencies, and law enforcement on security matters including the threat from hostile nation states, terrorism, and other security threats. Through these partnerships, appropriate protective security controls are identified and put in place to mitigate threats across their network. They follow government advice, industry standards and best practice, and the network is designed to allow for potential equipment failure or disruption and be able to continue to deliver safe, secure and reliable electricity. As new assets are built, significant changes are made to any site, or the threat landscape changes, security is considered/reviewed. The Applicant would be unable to comment further on security measures.

~~Table 7.9~~ Table 7.9 Applicant's Response to the Relevant Representations that raise Onshore Mitigation

Reference	Topic	Applicant's Response
7.9.1	Concerns over prioritising mitigation over avoidance in proposal	As set out in **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology [APP-046]**, the Environmental Impact Assessment (EIA) for the Proposed Project has followed the mitigation hierarchy (i.e. avoidance, minimisation, rehabilitation/restoration, and offsetting). Each topic chapter of the Environmental Statement (ES) has identified proposed mitigation measures that are required to address potential significant adverse effects of the Proposed Project, following the mitigation hierarchy. The Proposed Project has gone through a robust process of route selection and design development informed by the environmental impact assessment process, ground investigations, various consultation stages and feedback received from consultees. As such the proposals have, whenever possible, avoided impacts through sitting and routeing, design layout and/or timing of works. Where avoidance has not been possible, measures to minimise, rehabilitate/restore and/or offset impacts have been identified within the individual ES topic chapters and within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**. .
7.9.2	Mitigation measures proposed do not address the harm the Proposed Project will likely cause	The ES provides a comprehensive suite of mitigation measures that are proportionate and effective in addressing residual effects. Mitigation measures have been developed in line with the mitigation hierarchy and are consistent with best practice and statutory guidance. The ES demonstrates that most of these measures are adequate to reduce significant adverse effects to acceptable levels. The Applicant recognises that even after applying a robust mitigation hierarchy, some residual significant environmental effects may remain.
7.9.3	No feasible mitigation measure to minimise the impact to a level acceptable within Heritage Coast/ Suffolk	Impacts from construction of the onshore cable on the RSPB Reserve, Leiston-Aldeburgh SSSI and Sandlings SPA have all been considered in the design, construction methods and programme for the Proposed Project. This assessment has been discussed with Natural England, Suffolk Council and East Suffolk Council. The outcome of the assessment identified areas where mitigation was required. Significant disturbance is to be avoided by a combination of construction methods (adopting a trenchless construction solution rather than open cut trenching), technical mitigation (noise reduction measures), and embedded measures such as moving the construction compound further from the SPA than was identified at Statutory consultation, and phasing the most potentially disturbing elements of work in that area to avoid the bird nesting season. All control and management measures and additional mitigation is committed to within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**. The Applicant has assessed the Proposed Project's impact on The King Charles III England Coast Path has also been considered where any management and mitigation measures are required given its significance. See **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]** and **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]**. Effects on the landscape of the Suffolk Heritage Coast are summarised within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** and the detailed assessment contained within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**. Regarding the Suffolk Heritage Coast, this also includes an area offshore which would have direct effects at construction due to the presence of a cable laying barge. This would be in the context of occasional large-scale marine vessels out at sea and the presence of offshore wind farms. The landfall construction activity would slightly affect the visual relationship with the predominantly rural coastline, however in a localised geographical area. There would be a temporary and localised displacement on fishing and water-based recreational activities during construction. It is considered that there would be a minor adverse (not significant) effect on the Suffolk Heritage Coast as a result of the Suffolk Onshore Scheme at construction and Year 1 of

Reference	Topic	Applicant's Response
		operation and a negligible adverse (not significant) effect on the Suffolk Heritage Coast as a result of the Suffolk Onshore Scheme at Year 15 of operation.
7.9.4	The development of green energy does not mitigate the devastation to biodiversity and the natural environment	The Applicant acknowledges that the Proposed Project has the potential to have adverse impacts across a range of environmental and social disciplines. A comprehensive Environmental Statement (ES) has been prepared as part of the DCO submission. The ES summarises the findings of the EIA and is intended to inform decision-makers (in this case the Secretary of State) about the environmental implications of the Proposed Project. Wherever possible significant effects have been addressed through committed mitigation measures that are set out within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**.

~~Table 7.10~~ Table 7.10 Applicant's Response to the Relevant Representations that raise Traffic and Transport

Reference	Summary of relevant representation	Applicant's Response
7.10.1	Concerns over the suitability of the local road network in Suffolk to accommodate construction traffic.	The description of the route and the assessment as detailed within **Application Document ES 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** sets out all of the road links, junctions and PRoW (including national walking and cycling routes) that may be subject to potential effects as a result of the Proposed Project. The construction vehicle routing has been designed to minimise impacts across the highway network (including the A1094, B1122, B1069 and B1119 for example), as set out within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]**. The traffic and transport assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** 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. The proposed management and mitigation relating to construction traffic to minimise impacts on the surrounding highway network is set out within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [AS-087]**.
7.10.2	Impact of construction traffic on the villages of Saxmundham, Leiston and Friston in Suffolk.	Although the Proposed Project is located close to a number of towns/villages including Saxmundham, Leiston and Friston, only a small proportion of trips are expected to either originate from or pass through these settlements during the construction, operation and maintenance, and decommissioning phases. The routes to/from the proposed site accesses are illustrated by the HGV routing plan shown in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. 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 forecast to accommodate almost all (around 97%) of the construction vehicle trips associated with the Proposed Project. The routing strategy is designed to minimise the number of construction vehicles using less suitable routes such as the B1122 Leiston Road (through Theberton and Leiston), B1121 Saxmundham Road (through Friston), B1121 Main Road and B1119 Church Street (through Saxmundham) and Grove Road. For example, construction traffic travelling to/ from the B1119 and through Saxmundham 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 addition, the B1122 from Yoxford through Leiston to the B1353 at Aldringham will only be used by cable drum abnormal vehicles under careful management, as set out within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]**. Otherwise, this route will not be used by HGVs to avoid construction traffic passing through Leiston and Coldfair Green and the Proposed Project is not therefore expected to have any impacts on this route. Further details of construction vehicle routing and the limitations of construction traffic vehicle movements on these parts of the network are set out within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]**. Should any commitments be required to limit HGV movements on any specific parts of the highway network, then this will be reviewed with SCC Highways and set out within the Detailed CTMTP if necessary.
7.10.3	Concerns over the cumulative impact of traffic from all the projects in Suffolk, particularly the proposed Sizewell development.	It is acknowledged that Sea Link will be under construction alongside other schemes in the area. The assessment of inter-cumulative effects is considered within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]** based on **Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List [APP-093]**, which includes more than 25 developments including Sizewell C Nuclear Power Station, East Anglia One North Offshore Windfarm, East

Reference	Summary of relevant representation	Applicant's Response
		Anglia Two Offshore Windfarm and LionLink. This includes assessment criteria relating to traffic and transport, as covered within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. The cumulative assessment of Sizewell C includes a review and assessment of the main development site, the A12 Bypass, Yoxford roundabout, Sizewell link road, Northern Park and Ride, Southern Park and Ride and Sizewell C related rail improvements and rail extension route. In addition, **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]** includes complimentary management measures, controls and monitoring information to those set out within the management plans for Sizewell C and East Anglia Projects where applicable. A further review of the Traffic and Transport Cumulative Assessment has been carried out following the submission of the DCO application to provide further details that support the original conclusions. This provides further information on the assessment methodology, the findings of the respective ES prepared for Sizewell C, East Anglia ONE North and East Anglia TWO in terms of residual effects for certain receptors, as well as the durations over which any cumulative effects are likely to be experienced. These findings were presented to SCC during a thematic meeting held on 6 August 2025. **Application Document 9.26 Traffic and Transport Cumulative Assessment (Suffolk)** will be submitted during the Examination at Deadline 1 to provide more detail about the methodology and findings of the cumulative assessment, in consideration of various construction programmes and potential overlaps of different projects, to further inform and provide reassurance about the findings, including with respect to mitigation. This note concludes that the duration of any potential effects of overlapping peak construction activity (third party scheme and the Proposed Project) would be limited to a five consecutive months (short-term) at most, or avoided altogether, resulting in effects that are not significant. Furthermore, the Applicant has prepared **Application Document 7.10 Coordination Document [APP-363]** which describes how Sea Link has approached, and will continue to approach, coordination with other projects with the aim of reducing cumulative impacts on the environment and local communities. Several opportunities are listed in paragraph 7.4.2 of **Application Document 7.10 Coordination Document [APP-363]** to reduce construction sites, materials and traffic. In terms of a combined mitigation strategy and coordination, the Applicant is actively coordinating with Sizewell C, NGV, and SPR to minimise highways impacts on host communities. This includes exploring shared use of facilities such as Park and Ride sites and aligning construction schedules where feasible. Coordination is detailed in the DCO submission, specifically in Application Document 7.10 Coordination Document [APP- 363] and cumulative traffic impacts are assessed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. The Applicant remains open to further collaboration, including shared delivery management systems or permitting platforms, to reduce disruption. The Applicant has produced Application Document 7.10 Coordination Document [APP-363] to minimise environmental and local community effects of the Proposed Project in combination with other projects.
7.10.4	Impact on and loss of quiet lanes in Suffolk.	The Applicant acknowledges the concerns regarding quiet lanes and 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]**. The Applicant considers sensitive receptors when drawing up the proposed construction access routes. For example, Grove Road (which is designated as a quiet lane) will only be used as a vehicle crossover between two proposed access points, to allow construction vehicles to continue along the haul road. Grove Road will not therefore be used by construction vehicles, other than when these are required to cross Grove Road (which will be managed). As above, the impacts will be temporary during the construction phase and mitigation measures will be put in place to minimise any potential impacts; see **Application Document 7.5.1.1 Construction Traffic Management and Travel Plan – Suffolk [AS-008]**.
7.10.5	Impact of construction traffic on the villages of Minster and Cliffsend.	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 –**

Reference	Summary of relevant representation	Applicant's Response
		Kent [APP-338]. The Applicant has undertaken a complete and full assessment of traffic routes for construction. Details are contained in **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**. The assessment 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 routes through Minster and Cliffsend. For example, 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 0.3% 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 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. It is similarly the case for Cliffsend where minor (not significant) effects are reported, largely due to the short duration of the impact.
7.10.6	Delay to emergency services during construction and operation.	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. 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 [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 the **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [AS-087]**.
7.10.7	Query over policing of construction contractors to ensure they are following the adopted rules and procedures	Controls regarding construction traffic movements will be secured as part of **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]** and **7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]**, which includes a section on monitoring and enforcement, to ensure contractors adhere to the measures outlined within the document. The proposed measures and controls within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]** and **7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]** are set out as follows: • working hours restrictions (secured through Requirement 7 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [AS-087]**); • road condition surveys; • delivery management system; • traffic management and monitoring;

Reference	Summary of relevant representation	Applicant's Response
		• defining HGV routes; • HGV timing restrictions; • banksmen and site management; • communication strategy; • appropriate site access arrangements; • necessary escort, permits and traffic management for AILs; and • measures to minimise/safely manage interactions with pedestrians and cyclists. In addition, **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]** and **7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]** include a section on community engagement and public information. A community relations team will be appointed 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 to allow these to be investigated and appropriately managed. These Plans are secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [AS-087].**
7.10.8	Concerns over the use of B1353 for construction traffic, particularly in relation to HGVs as the road is not wide enough to allow HGVs to pass. Concern over the use of the B1122 for construction traffic	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]**. The B1122 is proposed as an abnormal loads access only and is not proposed to be used as a main construction route to avoid routing construction traffic through Leiston and Coldfair Green. No construction vehicles are expected to travel along the B1353 as a result of the Proposed Project. The traffic and transport assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** 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, including for the parts of the network identified (B1353 and B1122). The mitigation measures are contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [AS-087]**.
7.10.9	Concern that the traffic impact assessment is based on average traffic movements and not based on site specific information and circumstances, such as holidays and cultural events.	The traffic and transport assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** is based on the peak construction phase and the busiest day of the construction programme in terms of total construction vehicle movements and is therefore robust. Furthermore, this includes an assessment of seven different time periods including the weekday network peak hours, the weekday development/ shoulder peak hours, the Saturday lunchtime peak, as well as 12-hour average weekday and 24-hour average day. The assessment 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.
7.10.10	Concerns over the new permanent bellmouth access onto the A256 in the location shown due to its close proximity to Ebbsfleet Lane North. Issues with motorcyclists crossing the grassed verge from the A256 to gain access onto Ebbsfleet Lane North. Further details requested.	The Applicant has conducted additional consultation with Kent County Council and has prepared a Memorandum of Understanding (MoU) as part of this process. The MoU covers additional items relating to the A256 access and road safety audits for example. In terms of the A256 access, the junction has been designed to be fully compliant with DMRB and a Stage 1 Road Safety Audit (RSA) has been carried out and shared with Kent County Council. A Designer's Response to the RSA Stage 1 has been produced outlining the changes made in response to the RSA's comments. The proposed design/ layout of the A256 access has been revised to consider any recommendations where necessary. In terms of vehicles potentially accessing Ebbsfleet Lane North from the A256 access, the new access will have fencing and gates to prevent unauthorised access. There will be no connection to Ebbsfleet Lane North

Reference	Summary of relevant representation	Applicant's Response
		from the proposed access road other than the cycle/pedestrian crossing point. It is considered that the proposed design will provide greater security than the existing arrangement in this area.

~~Table 7.11~~ Table 7.11 Applicant's Response to the Relevant Representations that raise Noise and Vibration

Reference	Summary of relevant representation	Applicant's Response
7.11.1	Concerns over the impact of construction noise on residential properties close to the landfall and cable route in Suffolk.	An assessment of construction noise impacts has been undertaken as part of the Environmental Statement, including consideration of any potential night-time works. The assessment indicates that with mitigation in the form of Best Practicable Means, significant adverse effects from construction activities can be avoided at all nearby properties. Further detailed assessments will be conducted by the contractor and specific mitigation measures will be identified and incorporated in the works. Further details are contained in **Additional Submission 6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise & Vibration (Clean) [AS-109]**.
7.11.2	Impact of elevated noise and vibration levels, 7am-7pm 7 days a week, during construction in Kent.	An assessment of construction noise impacts has been undertaken as part of the Environmental Statement, including consideration of any potential night-time works. The assessment indicates that with mitigation in the form of Best Practicable Means, significant adverse effects from construction activities can be avoided at all nearby properties. Further detailed assessments will be conducted by the contractor and specific mitigation measures will be identified and incorporated in the works. Further details are contained in **Additional Submission 6.2.3.9 (B) Part 3 Kent Chapter 9 Noise and Vibration (Clean) [AS-111]**.
7.11.3	Impact of elevated noise and vibration levels, 7am-7pm 7 days a week, during construction in Friston.	An assessment of the potential impacts of the Friston Substation during construction is provided in **Additional Submission 6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise & Vibration (Clean) [AS-109]**. During the construction of the Substation, the Environmental Impact Assessment did not identify any significant adverse effects as a result of increased noise on nearby Noise Sensitive Receptors, including identifying no significant adverse effects in the village of Friston.
7.11.4	Impact of elevated noise and vibration levels during construction on the independent special school at Ebbsfleet.	The potential impacts of the Proposed Project on the school have been assessed in **Additional Submission 6.2.3.9 (B) Part 3 Kent Chapter 9 Noise and Vibration (Clean) [AS-111].** Under the assessment, the school was classified as a receptor of high sensitivity and prior to the adoption of any specific mitigation measures, the assessment concluded that there would be no significant impacts during construction. During construction, Best Practicable Means will be applied to works in the vicinity of this receptor to reduce the potential effects of construction noise.
7.11.5	Impact of elevated noise levels on Benhall and Sternfield from HGV traffic.	Construction traffic noise has been assessed within **Additional Submission 6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise & Vibration (Clean) [AS-109]**. An assessment of construction traffic noise impacts has been undertaken as part of the Environmental Statement. The assessment indicates that construction traffic noise would not lead to significant adverse effects on Noise Sensitive Receptors close to any proposed construction traffic route. Construction traffic will not be routed through Sternfield.
7.11.6	Impact of 24-hour noise during operation of the Converter Station in Suffolk on local residents and wildlife.	An indicative assessment of operational noise from the proposed Saxmundham Converter Station, based on current design information, is presented in **Additional Submission 6.3.2.9.D (B) Appendix 2.9.D Suffolk Operational Noise Assessment (Clean) [AS-119]**. **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]** considers the impact of noise on wildlife. The Converter Station will not be a significant source of noise of a type to disturb wildlife, being comparable to that produced by other substations for which there is no evidence of wildlife disturbance.

Reference	Summary of relevant representation	Applicant's Response
		With standard embedded mitigation measures in place, the operational noise impact from the proposed Saxmundham Converter Station on all nearby Noise Sensitive Receptors has been assessed as low in magnitude during both daytime and night-time periods, considering contextual factors. Consequently, the effect is classified as minor adverse and not significant. The assessment is based upon a typical converter station design for the purpose of demonstrating that significant adverse effects can be avoided. The assessment is based on early design information and standard noise mitigation measures. Further detailed design would be undertaken by the developers, including consideration of specific noise mitigation measures.
7.11.7	Impact of 24-hour noise during operation of the Friston substation on local residents and wildlife.	In agreement with the Planning Inspectorate, the impact of the operation of switchgear was scoped out of the Environmental Impact Assessment (**6.15 Scoping Opinion 2022 [APP-300]**). However, indicative assessments of operational noise from auxiliary equipment within the proposed Friston Substation and alterations to overhead lines have been prepared at the request of East Suffolk Council and are reported in **Application Document 6.3.2.9.E (B) Appendix 2.9.E Friston Substation and OHL Operational Noise Information (Informative) (Clean) [AS-121]**. The assessments indicate that operational noise from auxiliary equipment within the proposed Friston Substation and alterations to overhead lines would not be significant.
7.11.8	Impact of 24-hour noise during operation of the converter station in Kent on local residents and wildlife.	An indicative assessment of operational noise from the proposed Minster Converter Station, based on current design information, is presented in **Additional Submission 6.3.3.9.D (B) ES Appendix 3.9.D Kent Operational Noise Assessment (Clean) [AS-123]**. With standard embedded mitigation measures, the impact of operational noise from the proposed Kent Converter Station on all nearby Noise Sensitive Receptors, 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 Significant Receptors, which is considered to be not significant.
7.11.9	Concerns over noise levels from the proposed overhead lines in Suffolk and Kent.	At the Scoping stage of the Environmental Impact Assessment (EIA) for the Proposed Project, potential noise impacts from overhead line operation were excluded from further assessment, as the nearest Noise Sensitive Receptor is approximately 500 m from the closest proposed overhead line. Subsequent indicative assessments confirm that operational noise from overhead line alterations would be negligible and not significant This is stated in **Additional Submission 6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise & Vibration (Clean) [AS-109]** and **Additional Submission 6.2.3.9 (B) Part 3 Kent Chapter 9 Noise and Vibration (Clean) [AS-111]**.
7.11.10	Suggestions to provide screening of the converter stations and Friston Substation during construction in the form of barriers or planting to provide noise attenuation.	During construction working areas will be fenced; the type of fencing will depend on the area to be fenced and the needs of fencing such as providing acoustic or visual screening. Planting is not typically considered as an effective means of noise mitigation. Vegetation will be retained wherever practicable. Once constructed, native planting will be provided including woodland, hedgerows and tree planting; details can be found in **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349]**.

Reference	Summary of relevant representation	Applicant's Response
7.11.11	Concern about decline in tourism in Suffolk due to increased noise during construction.	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. The Applicant has undertaken a comprehensive and robust EIA, through which no residual significant effects have been identified for socio-economics, recreation and tourism following the application of appropriate mitigation. 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 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 additional mitigation will be required.
7.11.12	Impact of noise on seals at Pegwell Bay.	Project-specific monthly surveys were undertaken in the period September to November 2024 and August 2025 with the aim of identifying the specific haul-out locations of seals in the River Stour in Pegwell Bay (**Application Document 6.4.4.4.A (B) Pegwell Bay Seal Survey Report**, submitted at Deadline 1). During all surveys, hauled-out seals were only found in the lower River Stour on the exposed mudflats during low tide and on the adjacent saltmarsh during high tide, not within the construction area within Pegwell Bay. An assessment of airborne sound disturbance on River Stour seals during the Construction Phase was undertaken as part of the Environmental Statement and has since been updated to incorporate refined construction activities in Pegwell Bay and to consider M-weighted parameters applicable to phocid hearing (see **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals**, submitted at Deadline 1). The detailed modelling and results are available in **Application Document 9.49 Seals and Airborne Sound Disturbance Technical Note**, also submitted at Deadline 1. The assessment indicates that the noisy construction activities in Pegwell Bay are not predicted to result in auditory injury to seals hauled-out in the River Stour. The haul-out location in the River Stour is approximately 670 m away from the closest construction works in Pegwell Bay which includes the use of excavators to bury anchor points used by the cable-lay vessel and their associated movements across the mudflats. Vibratory piling used to install HDD pits in Pegwell Bay is occurring approximately 880 m away and is expected to produce the most noise. For all construction activities assessed in **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals** and **Technical Note – Seals and Airborne Sound Disturbance**, auditory injury in seals would either only occur within very short distances of the construction activities (i.e. a worst-case distance of 13 m for vibratory piling) or construction activities would not be loud enough to result in auditory injury. The worst-case sound levels predicted to occur at the haul-out site within the River Stour are also not considered loud enough to result in a behavioural response such as fleeing the area. Effects from airborne noise on seals in Pegwell Bay are therefore considered to be not significant. Further details are available in **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals** and **Application Document 9.49 Seals and Airborne Sound Disturbance Technical Note**, both submitted at Deadline 1.

~~Table 7.12~~ Table 7.12 Applicant's Response to the Relevant Representations that raise Ornithology

Reference	Summary of relevant representation	Applicant's Response
7.12.1	Impact of the Suffolk and Kent Onshore Schemes on migrating bird species of international importance.	The Applicant recognises the importance of the English East Coast and its coastal wetlands (to include Pegwell Bay) as being globally important for migratory waterbirds using the East Atlantic Flyway which extends from the Arctic to South Africa. The importance of the English East Coast and these wetland sites is reflected by a series of existing protected nature conservation areas, designated for their international importance, including SPAs and Ramsar Convention Wetlands of International Importance and underpinned by other national designations such as SSSIs. Impacts on bird passage along the River Stour corridor between Pegwell Bay and Minster Marshes (as well as Stodmarsh) have been considered in **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity**, **Application Document 6.2.3.2 (D) Part 3 Kent Chapter 3 Ecology and Biodiversity**, **Application Document 6.2.4.5 (C) Part 4 Chapter 5 Ornithology** and **Application Document 6.6 (C) Habitats Regulations Assessment Report,** all submitted at Deadline 1. These documents assess the impacts of the Proposed Project on important sites for waterbirds and waterbird populations, and thus the relevant components which contribute to the East Atlantic Flyway. It has been agreed with Natural England that the proposed new section of overhead line is 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 assessments conclude that whilst there would be some significant adverse effects on ornithology in the short-medium term, the creation of habitats as part of the Proposed Project would lead to a significant beneficial effect on ornithology, in the long term.
7.12.2	Impact on the red-throated diver	The red-throated diver has been the subject of a separate assessment within **Application Document 6.2.4.5 (C) Part 4 Chapter 5 Ornithology**, submitted at Deadline 1. A specific protocol has been developed for this species of bird (**Application Document 7.8 Red Throated Diver Protocol [APP-361]**) which is secured through Requirement 5 of Schedule 3 of **Application Document 3.1 (D) draft Development Consent Order [AS-087]**. Furthermore, in discussion with Natural England, and based on their most recent advice for the red-throated diver, the Applicant has committed to a seasonal restriction (1 November – 31 March) for offshore cable burial activities in the Outer Thames Estuary SPA and a seasonal restriction (1 January – 31 March) for landfall cable installation activities at the Suffolk landfall in Aldeburgh. The assessment presented in the ES submitted with the DCO application reflects this seasonal restriction, which is included in **Application Document 7.8 Red Throated Diver Protocol [APP-361]** secured by Requirement 5 **Application Document 3.1 (D) draft Development Consent Order [AS-087]**.
7.12.3	Impact on the golden plover in Kent	Meetings have been held with Natural England where the approach to addressing loss of functionally-linked land for golden plover has been discussed at length. Overall, there will be a net increase in habitat for most ecological receptors, including ornithology, as a result of the Proposed Project. The possibility of creating new wetland south of the River Stour was explored prior to Statutory consultation but technical challenges were identified in discussion with hydrologists and Natural England with keeping it sufficiently wet. Therefore, an alternative approach has been pursued (discussed and agreed in principle with Natural England) to instead enhance an area of arable land close to the coast and adjacent to the A256 for non-breeding golden plover. This was consulted on at Targeted consultation. This commitment is contained in **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Commitments and Actions (REAC),** submitted at Deadline 1 which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 (D) draft Development Consent Order [AS-087]**. The mitigation measures incorporated into the application, including the delivery of 10ha of off-site arable enhancement primarily for golden plover in the Thanet Coast and Sandwich Bay SPA/Ramsar. This habitat enhancement would mean that the residual effects on the SPA would be negligible and would also lead to a moderate beneficial impact in the long-term on a receptor of up to District (for nesting birds) and Regional (for non-breeding birds) due to habitat creation. This is a long-term moderate beneficial effect which is significant

Reference	Summary of relevant representation	Applicant's Response
7.12.4	Impact on birds from the proposed overhead lines	The assessment provided in **Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity** and **Application Document 6.6 Habitats Regulations Assessment Report**, both submitted at Deadline 1 includes assessment of impacts on all bird species, including large birds flying through the area of the proposed overhead lines. The Applicant has commissioned various surveys looking at the potential impacts of the overhead lines on several bird species. These surveys included a collision survey and a carcass survey. The assessment of avian collision risk is an annex to **Application Document 6.3.3.2.F ES Appendix 3.2.F 2023-2024 Vantage Point Survey [APP-152]** and the surveys are reported in **Application Document 6.3.3.2.G ES Appendix 3.2.G OHL Mortality Monitoring Report [APP-153].** This shows that for the majority of species the risk of collisions is fewer than one individual annually. The Kent Onshore Route has been designed to reduce the number of towers required and the area between the lines has been kept to a minimum to help prevent birds from getting trapped. The potential impacts on birds in Kent is presented in **Application Document 6.2.3.2 (D) Part 3 Kent Chapter 3 Ecology and Biodiversity**, submitted at Deadline 1. Mitigation has been commented upon and agreed with Natural England. Mitigation for any potentially significant effects is set out in the above documents, as well as in **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 1 and **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]**. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 (D) draft Development Consent Order [AS-087]**. With the implementation of the mitigation measures, it is concluded that no significant residual adverse effects will remain.

~~Table 7.13~~ Table 7.13 Applicant's Response to the Relevant Representation the Socio Economic, Recreation and Tourism Impacts

Reference	Summary of relevant representation	Applicant's Response
7.13.1	Impact of the Suffolk Onshore Scheme on tourism.	A complete assessment of socio-economic effects has been undertaken. This is set out in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Tourism and Recreation [APP-057]** and concludes that there are no anticipated significant effects as a result of the Proposed Project. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [APP-057]** identifies business premises and activity within 500 m of the Proposed Project's Order Limits, including golf clubs, holiday lets, pubs and restaurants. Where there are receptors located beyond 500 m that could still be impacted by the project, these have also been considered in the assessment. The impact of the Suffolk Onshore Scheme on these business premises is considered within Section 10.9 Assessment of Impacts and Likely Significant Effects. This assessment considers impacts in terms of land take and severance, concluding that there are no anticipated significant effects. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [APP-057]** conducts an assessment of tourism assets within 500 m of the Suffolk Onshore Scheme Order Limits, in terms of any temporary or permanent land take impacts and severance of access. The study area of 500 m was determined based on experience from other schemes and Design Manual for Roads and Bridges (DMRB) LA 112: Population and human health guidance, as this is the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits. There are no tourist and visitor attractions which would be affected by land take required for the Suffolk Onshore Scheme or to which access would be required. Additionally, **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** concluded there are no significant effects in terms of severance on the roads assessed during construction. Therefore, the socio-economic assessment concluded there would be no severance effects between residents or visitors and tourism assets due to the construction of the Suffolk Onshore Scheme. No additional impacts have been identified during the operation and maintenance phase. Amenity impacts on residents, businesses, development sites, and users of open spaces and community facilities within 500 m of the Order Limits 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 additional 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 extended working hours on these routes. Section 10.9 of **Application Document 6.2.2.10 Part 2 Suffolk 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. Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated. 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

Reference	Summary of relevant representation	Applicant's Response
		result in significant effects on tourism or visitor numbers. Sizewell C's visitor perception survey indicated that the majority of respondents would not be discouraged from visiting the local area during the construction phase. 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 Suffolk Onshore Scheme, as concluded within **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [APP-057]**.
7.13.2	Impact of the Kent Onshore Scheme on tourism.	A complete assessment of socio-economics effects has been undertaken. This is set out in **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070]**. The chapter concludes that there are no anticipated significant effects as a result of the Proposed Project. **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070]** identifies business premises and activity within 500 m of the Proposed Project's Order Limits, including golf clubs, holiday lets, pubs and restaurants. Where there are receptors located beyond 500 m that could still be impacted by the project, these have also been considered in the assessment. The impact of the Kent Onshore Scheme on these business premises is considered within Section 10.9 Assessment of Impacts and Likely Significant Effects. This assessment considers impacts in terms of land take and severance, concluding that there are no anticipated significant effects. **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070]** conducts an assessment of tourism assets within 500 m of the Kent Onshore Scheme Order Limits, in terms of any temporary or permanent land take impacts and severance of access. The study area of 500 m was determined based on experience from other schemes and Design Manual for Roads and Bridges (DMRB) LA 112: Population and human health guidance, as this is the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits. There are no tourist and visitor attractions which would be affected by 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]** concluded there are no significant effects in terms of severance on the roads assessed during construction. Therefore, the socio-economic assessment concluded there would be no severance effects between residents or visitors and tourism assets due to the construction of the Kent Onshore Scheme. No additional impacts have been identified during the operation and maintenance phase. Amenity impacts on private, community, recreation and tourism receptors are assessed in **Application Document 6.2.3.11 Part 3 Kent 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 significant effect on tourism assets arising from construction of the Kent Onshore Scheme and therefore no additional 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 Project on these routes. 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. Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated.

Reference	Summary of relevant representation	Applicant's Response
		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, were selected as case studies in their own right, but also to assist consideration specifically of the Suffolk area. Each of these project 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 has typically 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 during construction. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070]**.
7.13.3	Concern over the loss of jobs in the tourism industry and requests to provide local people with job opportunities.	A complete assessment of socio-economics effects has been undertaken. This is set out in Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism. Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [APP-057] identifies visitor attractions, business premises and activity within 500 m of the Proposed Project's Order Limits, including golf clubs, holiday lets, pubs and restaurants. Where there are receptors located beyond 500 m that could still be impacted by the project, these have also been considered in the assessment. The impact of the Suffolk Onshore Scheme on these receptors is considered within Section 10.9 Assessment of Impacts and Likely Significant Effects. The assessment considers impacts such as land take and severance and concludes that no significant effects are anticipated. As a result, job losses at visitor attractions and tourism-related businesses are considered unlikely to occur as a result of the Proposed Project. In terms of local job opportunities, the Applicant notes 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 National Grid cannot dictate this to them as the required skills may not be available locally. As set out in Table 10.23 of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [APP-057]**, in the construction phase, an estimated 65 average net additional jobs per annum will be created by the Proposed Project. This assessment estimates 30% of the construction workforce will be sourced from the surrounding area, based on benchmarks against similar energy infrastructure schemes. This equates to approximately 20 full-time equivalent (FTE) roles, providing job opportunities for local residents.
7.13.4	Impact on local house prices (Suffolk and Kent).	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.
7.13.5	Concern that the economic benefits to the local community will be transient and there will be no lasting benefit.	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

Reference	Summary of relevant representation	Applicant's Response
		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
7.13.6	Concerns over the demands placed on local services in Suffolk during the construction phase.	Potential impacts on the local services, including social infrastructure and visitor and tourism accommodation, are assessed in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [APP-057]**. This analysis demonstrates that taking a 'worst case scenario' approach, at peak workforce employment and typical seasonal occupancy levels, all of Suffolk Onshore Scheme's construction workers could be accommodated within a 60 minute drive time of the Order Limits. Given this, it is assessed that there would be negligible magnitude of impact on the visitor and tourism accommodation sector arising from the Suffolk Onshore Scheme. It is anticipated that accommodation providers would be able to accommodate employees working at the Suffolk Onshore Scheme without any significant adverse effects on the sector. Additionally, it is acknowledged that the construction workforce required for the Suffolk Onshore Scheme would place additional demand on the local health facilities. Taking a worst-case scenario approach, if all 86 of the average FTE gross direct workers register with local GPs, the GP:patient ratio would total 1:1,614 which remains lower than i.e. better than the recommended GP:patient ratio of 1:1,800. As such it is deemed that the Suffolk Onshore Scheme would have a negligible and not significant effect on social infrastructure and primary healthcare provision locally.
7.13.7	Concern that there will be insufficient accommodation space for construction workers.	The Applicant notes concerns regarding the potential for adverse impacts on visitor and tourism accommodation. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [APP-057]** undertakes 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 construction workforce. The assessment shows that the construction workforce could be accommodated within the visitor and tourist accommodation sector, comprising hotels, bed and breakfasts, inns and private rental properties. Under a worst-case scenario where the total peak construction workforce (327 FTE) required accommodation, there would still be approximately 1,331 rooms available, equating to 17.7% spare capacity. Therefore, the assessment concludes that there are no significant effects anticipated from the Suffolk Onshore Scheme and no additional mitigation will be required.

~~Table 7.14~~ Table 7.14 Applicant's Response to the Relevant Representation of Terrestrial Ecology

Reference	Summary of relevant representation	Applicant's Response
7.14.1	Impact on ecologically sensitive sites in Kent: Minster Marshes, Thanet Coast and Sandwich Bay SPA, Sandwich Bay and Hackling Marshes SSSI, Sandwich and Pegwell Bay NNR.	The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce ecology and biodiversity 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 Applicant can confirm that geotechnical investigation has established that trenchless methods are appropriate for traversing statutory designations, and these confirm the depth of the of bore. The DCO will therefore not include an option for surface trenching in the SSSI. Further details are contained in Appendix A of **Application Document 7.3 Design Development Report [APP-321]**. The commitment to a trenchless solution is contained in **Application Document 7.5.3.2 Register of Environmental Commitments and Actions (REAC) [APP-342]** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [AS-012]**. An extensive programme of environmental surveys has been undertaken including for breeding and non-breeding birds, reptiles, invertebrates, badger, riparian mammals, dormice and plants. A rigorous 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, Suffolk County Council, East Suffolk Council and Suffolk Wildlife Trust, Thanet Council, Dover Council, Kent Council and Kent Wildlife Trust have taken place and the survey data and impact assessment has informed avoidance, mitigation or (where necessary) habitat compensatory provision requirements. The Applicant is also committed to achieving 10% Biodiversity Net Gain on its major projects. Further details relating to the ecology assessment are contained in **Application Document ES 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049].** Further details regarding biodiversity net gain are contained in **Application Document 6.12 Biodiversity Net Gain Feasibility Report [AS-055].**
7.14.2	Biodiversity Net Gain shows a net loss, breaching Environment Act 2021 and policy requirements.	There is currently no legislative requirement for BNG in respect of NSIPs, as such there is also no guidance for the application and delivery of BNG for NSIPs. Current guidance for BNG assessments has been developed for the mandatory TCPA framework. In the absence of specific BNG guidance relating NSIPs this assessment has followed the majority of the principles and rules of the TCPA guidance documentation where appropriate. The Applicant will deliver a minimum 10% BNG with wider environmental and societal benefits. The Proposed Project will seek to provide BNG in three broad ways: • on land in The Applicant's ownership; • through purchase of biodiversity units from commercial registered providers; and • through collaborative delivery off-site with trusted partners. Further information can be found in **Application Document 6.12 Biodiversity Net Gain Feasibility Report [AS-055].**
7.14.3	Construction in statutory designated areas in Suffolk such as the Sandlings SPA, Leiston to Aldeburgh SSSI and the RSPB North Warren Nature Reserve.	The Applicant acknowledges the sensitivity of the mentioned sites. Separate assessments of the Sandlings SPA and the Leiston to Aldeburgh SSSI as well as details of the necessary mitigation is included within **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity**

Reference	Summary of relevant representation	Applicant's Response
		[PDA-017]. The design has evolved to include trenchless methods for the installation of cables to avoid direct impacts on Sandlings SPA or Leiston-Aldeburgh SSSI. The commitment to a trenchless solution is contained in **Application Document 7.5.3.2 CEMP Register of Environmental Actions and Commitments (REAC) [APP-342]** which is secured through **Requirement 6 of Schedule 3 of the draft DCO [AS-012]**. Furthermore, following Statutory consultation, the proposed construction compound in this area has been reduced in size and moved further away from the mentioned Statutory designations. In addition to reducing the potential for ecological effects, these changes have also helped to lessen the impact on nearby relevant receptors, residential properties, and the flood zone. This revised design was presented at Targeted consultation.
7.14.4	Impact on the North Warren Nature Reserve, Leiston-Aldeburgh SSSI and the Sandlings SPA.	Impacts from construction of the onshore cable on the RSPB Reserve, Leiston-Aldeburgh SSSI and Sandlings SPA have all been considered in the design, construction methods and programme for the Proposed Project. This assessment has been discussed with Natural England, Suffolk Council and East Suffolk Council. The outcome of the assessment identified areas where mitigation was required. Significant disturbance is to be avoided by a combination of construction methods (adopting a trenchless construction solution rather than open cut trenching), technical mitigation (noise reduction measures), moving the construction compound further from the SPA than it was identified at Statutory consultation, and phasing the most potentially disturbing elements of work in that area to avoid the bird nesting season.
7.14.5	Impact of the Suffolk and Kent Onshore Schemes on migrating bird species of international importance.	The Applicant recognises the importance of the English East Coast and its coastal wetlands (to include Pegwell Bay) as being globally important for migratory waterbirds using the East Atlantic Flyway which extends from the Arctic to South Africa. The importance of the English East Coast and these wetland sites is reflected by a series of existing protected nature conservation areas, designated for their international importance, including SPAs and Ramsar Convention Wetlands of International Importance and underpinned by other national designations such as SSSIs. Detailed assessments are provided in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 3 Ecology and Biodiversity[PDA-017]**, **Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity [PDA-021]**, **Application Document 6.2.4.5 Part 4 Chapter 5 Ornithology and Application Document [AS-115], 6.6 Habitats Regulations Assessment Report [AS-007]**, which consider the impacts of the Proposed Project on important sites for waterbirds and waterbird populations, and thus the relevant components which contribute to the East Atlantic Flyway. The assessments conclude that whilst there would be some significant adverse effects on ornithology in the short-medium term, the creation of habitats as part of the project would lead to a significant beneficial effect on ornithology, in the long term.
7.14.6	Light pollution to ecological receptors	**Suffolk** Commitments made within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**to reduce light pollution are as follows: • Light-coloured rough textured surface to the proposed crossing of the River Fromus will be considered as part of the crossing design/specification in order to mitigate reflected polarised light pollution (B19). • There would be no lighting within 10m of any badger setts and a 40m setback between the identified main badger setts and construction compounds S04 and S08 (B26).

Reference	Summary of relevant representation	Applicant's Response

Lighting for construction should only be needed around construction compounds and the trenchless compound (S10). This would be targeted directional lighting with cowling and other lighting controls to manage (and in the case of the trenchless compound avoid) incidental illumination (B38).

Therefore, to ensure bat roosts, foraging, and commuting routes are not disturbed, nighttime lighting would be limited to the minimum needed for safety at only the construction compounds, converter station and substation construction sites, and the trenchless compound (S10). This would be targeted directional lighting with cowling and other lighting controls to manage (and, in the case of the trenchless compound, avoid) incidental illumination. Around construction compounds and the converter station and substation construction site, direct illumination of boundary features would be avoided. Lighting would be designed to comply with published guidelines such as that from Bat Conservation Trust referenced above. There would also be no lighting required for the haul road, and no direct lighting of features of value for commuting bats during construction. These requirements are contained within commitment B38 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**.

There would also be little need for operational lighting at the Saxmundham Converter Station and Friston Substation, with lighting limited to security lighting and task lighting as needed during any maintenance works. Lighting contour plans indicate that light levels at both the Saxmundham Converter Station and Friston Substation would fall below 1 lux within approximately 13-15 m of the lighting fixtures and therefore within the boundary of both the substation and converter station. This is a sufficiently low light level that bird foraging and roosting around vegetation beyond the fenced areas will not be affected.

Lighting would be the minimum required for the safe working of the proposed Saxmudnham 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 avoid light spill onto Bloomfield's Covert woodland and immediately surrounding habitat. This is commitment B39 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**. New planting would be implemented between the woodland and converter station. See **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk [AS-059]** for details. Lighting contour plans indicate that light levels at both the Saxmundham Converter Station and Friston Substation would fall below 1 lux within approximately 13-15 m of the lighting fixtures and therefore within the boundary of both the substation and converter station. This is a sufficiently low light level that bat commuting and foraging around vegetation beyond the fenced areas will not be affected.

Further information can be found in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017].**

Kent

Commitments made in regards to lighting within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** include:

- There will be no lighting near any badger setts or any significant sources of noise that would affect badgers during construction (B49).
- Lighting will be designed to comply with published guidelines (B53).
- There will be no lighting directed towards any of the four trees with bat roost potential identified in the surveys for the Kent Onshore Scheme (B57).
- 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

Reference	Summary of relevant representation	Applicant's Response
		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 (B58). To ensure bat foraging, and commuting routes are not disturbed, nighttime lighting will be limited to the minimum needed for safety at only the construction compounds and the HDD compound. This will be targeted directional lighting with cowling and other lighting controls to manage (and, in the case of the HDD compound, avoid) incidental illumination. Around construction compounds, direct illumination of boundary features (e.g. hedgerows, ditches, and woodland blocks) will be avoided with a view to keeping lighting at those features at or below 1 lux where that level is not already exceeded by baseline light levels. Lighting will be designed to comply with published guidelines such as that from Bat Conservation Trust referenced above. There will also be no lighting required for the haul road, and no direct lighting of features of value for commuting bats during construction. These measures are secured by **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**. The construction compounds would not be utilised before 07.00 hours or after 19.00 hours Monday to Friday, and before 07.00 hours or after 17.00 hours on Saturdays, Sundays and Bank Holidays, and lighting would only be used during construction hours as limited by Requirement 7 of the DCO. There would also be little need for operational lighting at the proposed Minster Converter Station and Substation, with lighting limited to security lighting and task lighting as needed during any maintenance works. Lighting contour plans indicate that light levels at the Minster Converter Station and Substation would fall below 1 lux within approximately 13-15 m of the lighting fixtures. This is a sufficiently low light level that bird foraging and roosting around vegetation beyond the fenced areas will not be affected. This is commitment B58 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**. Further information can be found in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**.
7.14.7	Impact to Ash Levels	There would be no loss of pools and scrapes in the Local Wildlife Site as these would be avoided by the works, with the nearest new pylon being located approximately 50 m away from the nearest pool/scrape. However, during construction of the new section of overhead line, and the connection of the new overhead line to the existing Richborough to Canterbury overhead line, there would be temporary loss of 30 ha of land from the Local Wildlife Site due to works areas and the haul road necessary to reach the pylon construction areas. This is approximately 4 % of the LWS, leaving more than 95% unaffected, although note that the Local Wildlife Site is primarily designated for its ditch flora. Approximately half of the loss would be from arable land, with the remainder from floodplain grazing marsh and small sections of ditch. The evidence from the works associated with the existing Richborough to Canterbury overhead line, which also undertook construction works in this area (completed by 2021), shows that the habitat can recover in a relatively short period (1-2 years). On balance, the extent of loss but its reversible nature leads to this being a moderate adverse impact on a receptor of Regional importance. Without additional mitigation this would therefore be a **moderate adverse** effect that is **significant**. In order to provide enhancement to the Local Wildlife Site as a result of the Kent Onshore Scheme, opportunities for habitat improvement along the River Stour have been considered. During Modular River Physical (MoRPH) surveys of the River Stour undertaken to inform the Biodiversity Net Gain assessment, bank top water related features were identified to have an indicator score of 0, since none were recorded in the surveyed sections. Creating scrapes or ponds on both banks and associated wetland areas with short non-woody vegetation, tall non woody vegetation, and shrubs and trees would

Reference	Summary of relevant representation	Applicant's Response
		help to increase this indicator. This would also improve the bank top tree feature richness indicator score, which is 0 due to the lack of trees. It is therefore proposed as part of the Kent Onshore Scheme to deliver a series of small shallow riverside scrapes with riparian planting (B52), and some alder and willow planting, along the stretch of the River Stour within the Order Limits and (on the south side of the River Stour) within the Local Wildlife Site, before the end of construction. In addition, invasive water fern (*Azolla filiculoides*) has been recorded in the ditches on site. This can be managed by introducing the Azolla weevil[1] into the watercourses. This weevil consumes the fern but then dies and is consumed by fish. Therefore, as part of the Kent Onshore Scheme the Azolla weevil would be released into the watercourses to control the invasive fern; this would be targeted to locations where the infestation is greatest and control therefore most beneficial (B52). This is set out in **Application Document 7.5.7.2 Landscape and Ecological Management Plan – Kent [PDA-035]**. With the above additional mitigation included, there would be a moderate adverse impact on a receptor of Regional importance in the short-term (lasting for 1-2 seasons as the works are completed and vegetation recovers) but this is reversible and there would be a minor beneficial impact in the long-term due to habitat creation. This is considered a long-term **minor beneficial** residual effect which is not significant. The same water quality control and management measures that apply to the protection of European sites discussed above, would also apply to the protection of other designated sites, ensuring no significant effect is likely to arise. Pollution is therefore considered a negligible impact on receptors of National (the SSSI) and Regional (the local wildlife sites) importance, leading to a **negligible** effect that is not significant. There would be potentially dust generating activities within 200m of Sandwich Bay to Hacklinge Marshes SSSI, Ash Level & South Richborough Pasture Local Wildlife Site and Non-statutory Site TH12 (Woods & Grassland, Minster Marshes). It is not feasible to quantify the degree of dust that might deposit on vegetation in the absence of mitigation as a wide range of factors affect the amount of dust that may arise; these are not readily quantified and there are no calculation tools available to do this. However, it can be stated that for any deposited dust to have an adverse effect it would need to be sufficiently thick in depth of layer coating leaves, and long in duration (i.e. not being washed off by rainfall) to materially interfere with photosynthesis. It is considered necessary to implement dust control measures, as are implemented as standard on construction sites, in order to ensure dust deposition is sufficiently insignificant no material dust build up would occur. **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** forms an appendix to **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan (CEMP) [AS-127]**. The Onshore CEMP is secured through Requirement 6 of the draft DCO (Application Document 3.1). The standard dust control measures included in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** are: • GG17: Where required, wheel washing would be provided at each main construction works compound access point on to the highway. An adequate water supply would always be made available at these locations. Road sweepers would be deployed on public roads where necessary to prevent excessive dust or mud deposits. • GG18: Use water-assisted dust sweeper(s) on the access and local roads to remove, as necessary, any material tracked out of the site. Avoid dry sweeping of large areas.

[1] https://www.cabi.org/what-we-do/cabi-centres/azolla-control/

Reference	Summary of relevant representation	Applicant's Response

- GG19: Earthworks and stockpiled soil would be protected by covering, seeding or using water suppression where appropriate.
- GG20: Bonfires and the burning of waste material would be prohibited.
- AQ02: Carry out regular site inspections to monitor compliance with the Air Quality Management Plan (AQMP), record inspection results, and make an inspection log available to the local authority when asked.
- AQ02: Increase the frequency of site inspections by the person accountable for air quality and dust issues on site when activities with a high potential to produce dust are being carried out and during prolonged dry or windy conditions.
- AQ03: Erect solid screens or barriers around dusty activities or the site boundary so that they are at least as high as any stockpiles on site, or fully enclose site or specific operations where there is a high potential for dust production and the site is active for an extensive period.
- AQ03: Keep site fencing, barriers and scaffolding clean using wet methods.
- AQ03: Remove materials that have a potential to produce dust from the site as soon as possible unless they are being reused on site.
- AQ04: Impose and signpost a maximum speed limit on unsurfaced haul roads and work areas.
- AQ05: Use enclosed chutes and conveyors and covered skips.
- AQ05: Minimise drop heights from conveyors, loading shovels, hoppers and other loading or handling equipment, and use fine water sprays on such equipment wherever appropriate.
- AQ08: Inspect on-site haul routes for integrity and investigate necessary repairs to the surface as soon as reasonably practicable.
- AQ08: Record all inspections of haul routes and any subsequent action in a site logbook.
- AQ08: Ensure vehicles entering and leaving sites are covered to prevent the escape of materials during transport.

With these measures in place dust deposition is considered a negligible impact on receptors of National (the SSSI) and Regional (the non-statutory sites) importance, resulting in a **negligible** effect that is not significant.

The haul road across the railway line (and thus Non-statutory Site TH12 (Woods & Grassland, Minster Marshes)) and that south of the river to install the new overhead line would both traverse Ash Level and South Richborough Pasture Local Wildlife Site. However, this is not a through route and would only be used by construction traffic with an AADT much lower than that already reported for the A256. No significant elevation of annual pollution concentrations or deposition rates would arise.

Atmospheric pollution is therefore considered a negligible impact on a receptor of Regional importance, leading to a **negligible** effect that is not significant.

There would be a small permanent overall loss of 300 m^2 of floodplain grazing marsh from Ash Level and South Richborough Pasture local wildlife site (site DO21) due to the bases of two new overhead line towers (PC 53B and PC 54C) associated with the new section of overhead line (there is an overall increase of four overhead line towers in the local wildlife site but two are in arable land).

Reference	Summary of relevant representation	Applicant's Response
		However, this loss would be offset by the aforementioned wetland habitat creation along the River Stour. As a result there would be a minor beneficial (positive) impact in the long-term on a receptor of Regional importance. This is a long-term **minor beneficial** effect which is not significant Further information can be found in **Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021]**.
7.14.8	Impacts to microorganisms	Micro-organisms are not a receptor considered in ecological impact assessments and there are no established methods of survey or impact assessment. However, based on experience of other projects, replanted habitats are able to thrive in areas where construction has previously taken place.
7.14.9	Mitigation (Discovery Park) land unsuitable for waders and wildfowl	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 (10ha compared to 3.8ha) 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.
7.14.10	Impacts on the Haven SSSI	There is no identified potential for any impact of the Suffolk Onshore Scheme on The Haven SSSI. In their Relevant Representation Natural England have not identified any concern over this SSSI.
7.14.11	Impacts to barn owls	**Suffolk** To avoid disturbance of nesting barn owls, the existing barn owl nest box near the River Fromus bridge would be removed during the winter and three replacement barn owl boxes would be installed in trees further south of the River Fromus bridge (B34). Similarly either the barn owl box north of compound S08 would be moved when it is not occupied to ensure it is located at least 100m from the compound, or additional barn owl boxes will be erected and the compound will be established when barn owls are not nesting. If barn owls commence nesting after the compound is established and operational it can be assumed they are not disturbed by the activity. Further information can be found in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]**. **Kent**
7.14.12	Noise impacts on wildlife	During pre-application discussions with Natural England the following assumptions were agreed that have informed the assessment of noise impacts on ecological receptors • Birds generally give no reaction to noise levels of 55 dB or below ~~**Invalid source specified.**~~; and • A change above 3 dB is required to make the difference perceptible. It was also agreed that there is a difference between being perceptible as a change and being disturbing. Therefore, while a 3 dB change is a suitable threshold for perceiving change, a greater change would likely be needed to cause disturbance. If the threshold for no reaction is 55 dB, and any noise would need to be at least 58dB to be perceptibly louder (i.e. 3 dB greater than 55 dB), then it was agreed with Natural England that a reasonable precautionary threshold for significant disturbance would be 60 dB (i.e. 5 dB above 55 dB). The use of a 60 dB threshold has also been agreed with RSPB as part of the Proposed Project's ongoing engagement.

Reference	Summary of relevant representation	Applicant's Response
		Best practical means such as noise fencing or similar effective noise reduction methods around works areas where required to avoid significant disturbance and also prevent visual disturbance. Noise monitoring would be included adjacent to Sandlings SPA and Leiston-Aldeburgh SSSI to confirm the mitigation measures met the required noise thresholds (B23). There is potentially a 10 dB to 20 dB reduction available through the use of quieter plant, alternative methods and suitable handling techniques. The use of standard noise control methods is set out in commitment B23 of **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**. Works that can be scheduled to take place between September and January inclusive are, therefore, unlikely to result in disturbance of nesting nightjar or woodlark. Trenchless compound (S10) set-up is programmed to occur outside the nesting season (February to August). This is secured as provision B27 of **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**. With this additional mitigation included the noise impact on the SPA is a negligible impact on a receptor of international importance, which is a negligible residual effect that is not significant. In terms of disturbance of nesting birds outside the Order Limits and outside designated sites, a 60 dB LAmax potential noise disturbance zone has been identified for each phase and the overall contour is presented in Figure 3 Map of 60dB average Lamax contour at Suffolk within **Application Document 6.6 Habitat Regulations Assessment Report [AS-007]**; this threshold has been agreed with Natural England as the zone in which disturbance may arise as a general rule. Operational noise has been modelled and the overall contour is presented in Figure 3 Map of 60dB average Lamax contour at Suffolk within **Application Document 6.6 Habitat Regulations Assessment Report**. **[AS-007]** The disturbance threshold of 60 dB LAmax referenced earlier would only be exceeded 10 m from the Saxmundham Converter Station and Friston Substation. This does not intersect with any designated sites. Further information can be found in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]**. **Kent** Commitments made in regards to noise impacts on ecological receptors within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** include: • Noise fencing or similar effective noise reduction methods around works areas where required to avoid significant disturbance on noise sensitive receptors, particularly the SSSI and birds. Noise monitoring would be included adjacent to the SSSI to confirm the mitigation measures met the required noise thresholds (B44). • There will be no lighting near any badger setts or any significant sources of noise that would affect badgers during construction (B49). The aforementioned consultation with Natural England for Suffolk also applies to Kent. Thanet Coast & Sandwich Bay SPA/Ramsar and Sandwich Bay SAC Noise modelling undertaken for all elements of construction (such as the overhead line installation, the haul road construction and the converter station platform creation) of the Kent Onshore Scheme has identified that the 60 dB contour would not reach Thanet Coast & Sandwich Bay SPA/Ramsar site.

Reference	Summary of relevant representation	Applicant's Response
		There would thus be no disturbance of breeding or non-breeding birds for which the SPA/Ramsar site is designated. This is therefore a negligible impact on a receptor of international importance, resulting in a **negligible** effect that is not significant. Sandwich Bay to Hacklinge Marshes SSSI During site preparation, earthworks and foundation creation for the proposed Minster Converter Station and Substation, including associated piling, the 60 dB LAmax noise contour would at times extend up to 120 m into Management Unit 11 (Weather Lees Hill) of the SSSI, and thus cover 5.8 ha of the SSSI (0.3 % of the SSSI or 20.5 % of the Management Unit). This is the predicted noise level even after the implementation of standard mitigation such as 2 m high close-board noise fencing around the works area (related to commitment B44 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**). The construction of the permanent access road north of the SSSI would also raise noise levels in the SSSI above 60 dB LAmax up to 40 m into the adjacent part of the SSSI, thus affecting 1 ha or 0.06 % of the SSSI or 3.5 % of Unit 11. It is anticipated this section of permanent access road construction would be completed in approximately 4-6 weeks. During other construction activities associated with the construction of the proposed Minster Converter Station and Substation, best practicable noise mitigation would keep noise levels in the SSSI below 60 dB LAmax. In addition, the establishment of the two pairs of new overhead lines (PC 54A, PC 54B, PC 53C and PC 53D) either side of the 1.5 ha SSSI strip along the railway line (totaling 5% of Unit 11 or 0.08 % of the SSSI) would elevate noise in that strip above 60 dB LAmax even after incorporation of noise mitigation, particularly during the tower foundation works (including associated piling). These overhead lines are scheduled to be installed during early March to early May 2028, with the foundation creation occupying approximately the first six weeks of that period. They would thus leave the later part of the bird nesting season unaffected. This is commitment B45 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]** which states '*Installation of overhead line* overhead line towers *either side of Sandwich Bay to Hacklinge Marshes SSSI will not cover the entire breeding season but will either take place outside the bird breeding season or will only occupy approximately two months of the breeding season'*. Natural England has identified that Unit 11 of the SSSI supports the 'Assemblages of breeding birds-Lowland open waters and their margins' feature of the SSSI. These birds would nest in water features present within the Unit and roost elsewhere in the Unit. Therefore, potential for noise disturbance of parts of this SSSI Unit would exist during the identified phases of work even with the use of standard noise mitigation such as 2 m high close-boarded fencing around the works area. The construction of the platform for the Minster Converter Station and Substation, and the two pairs of overhead line towers either side of the SSSI strip along the railway, would occur in different years, and would each affect different parts of the SSSI Unit. Therefore, in any nesting season only a proportion of the Management Unit (and a very small proportion of the SSSI) would be affected, and the greatest extent of impact would occur in a single nesting season. It is also important to note that the 60 dB LAmax contour is the maximum noise level experienced during an activity, not the typical or average noise level, which is much lower. Levels above 60 dB would therefore not be experienced continuously. Farm machinery used in routine operations such as ploughing, seeding and pesticide application routinely produced LAmax levels above 60 dB. Nonetheless, as a precaution it is concluded that disturbance resulting from site preparation, earthworks and foundation creation for the Minster Converter Station and Substation, construction of the section of permanent access road immediately north of the SSSI, and installation of the pairs of

Reference	Summary of relevant representation	Applicant's Response
		overhead line towers either side of the SSSI, would result in a moderate adverse impact on the SSSI (national value) which would be a moderate adverse effect and thus significant. Therefore, additional mitigation is required. In order to minimise the area of SSSI subject to noise disturbance in any season, the site preparation, earthworks, and foundation creation for the Minster Converter Station and Substation, and the section of permanent access north of the SSSI (the most potentially disturbing activities, affecting the greatest part of the SSSI) are programmed to avoid the March to June period and thus avoid the nesting season. This is commitment B50 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**. This would reduce the overall noise impact to a minor adverse impact on a receptor of national importance, which given the temporary and thus reversible nature and the fact it would only last for 1-2 nesting seasons, is considered to be a **minor adverse** residual effect which is not significant. In terms of indirect noise disturbance and displacement of nesting birds outside the Order Limits, a 60 dB LAmax noise disturbance zone (calculated to be after implementation of best practicable noise reduction methods such as standard close-boarded noise fencing around the site perimeter) has been identified for each phase as discussed above in paragraphs **Error! Reference source not found.** to 0 for designated sites. The overall contour is presented in Figure 5 Map of 60dB average LAmax contour at Kent within **Application Document 6.6 Habitat Regulations Assessment Report [AS-007]**. The 60 dB LAmax threshold has been agreed with Natural England as the zone in which disturbance may arise as a general rule. There would inevitably be some disturbance and displacement of nesting birds beyond the Order Limits. This would take place for at least one nesting season in each affected location. However, disturbing works would not take place simultaneously across the entire Kent Onshore Scheme. Most works would move across the site fairly quickly (cable/haul route/culvert installation can occur at a rate of approximately 100-300 m per week on average based on programme). As such it is only around the HDD compound (K05), the Minster Converter Station and Substation site, construction compounds, installation of the temporary bridge across the River Stour, and the new overhead line towers where a lengthy period of continued exposure to a fixed noise source would arise. The largest medium-term area of displacement would be around the Minster Converter Station and Substation construction site, and the construction compound fields to the north (K01 and K02). The 60 dB LAmax contour in this area would typically extend approximately 40m beyond the boundaries of the fields within which construction would occur (though as noted above in the section on designated sites it would extend further than this distance into the SSSI to the south). Note that this is the LAmax contour (i.e. the maximum noise level), which would only be reached periodically. The average noise level (LAeq) 60 dB contour is much closer to the area of construction and is the noise level to which birds would generally be exposed throughout construction in those areas. It should be noted that standard arable farming activities (e.g. ploughing, seeding, and harvesting) would all also result in noise levels exceeding 60 dB LAmax. Therefore, while the 60 dB contour indicates the zone within which disturbance may arise, it does not mean disturbance would arise, and some birds would habituate. Nonetheless, it has been assumed for the purposes of this impact assessment that some displacement of nesting birds would occur. In the primarily arable landscape north of the river/railway, the affected habitats (other than Unit 11 of the SSSI already discussed in the section on designated sites) are ditches, open arable fields and some hedgerows and are abundant in the wider local landscape. As such, there is thus no shortage of habitat for displaced birds to temporarily move into. The construction of these three pairs of new overhead line towers would not only be spaced in time but would also be physically separated (as would their noise impact zones) being at least 200 m from one

Reference	Summary of relevant representation	Applicant's Response
		another. Therefore, there would be disturbance and displacement of nesting birds in this area during the 2028 breeding season, but the zone of impact at a given time would be localized and all disturbance due to installation of the new overhead line close to the River Stour (the most sensitive part of the Kent Onshore Scheme) would take place entirely within one season. Moreover, there would be a long-term overall increase in wetland habitat as already discussed. The temporary bridge over the River Stour that would be used to gain construction access south of the river to create the new section of overhead line is a modular structure but would have piled foundations. Its creation would therefore generate localized noise. These foundations are programmed for March 2028, with the deck added in April 2028. A nesting territory was recorded near the footprint of the bridge during both 2023 and 2024 nesting seasons. However, the Cettis warbler nesting season commences in April. Therefore, disturbing works (foundation creation) would have already been undertaken in this location prior to the start of the Cetti warbler nesting season. If Cetti warbler choose to nest while the bridge is in place, it can be concluded they do not find its presence disturbing. There is ample other ditch habitat in the wider landscape, or other parts of Abbey Farm Wetlands more distant from the bridge, for Cetti's warbler and other breeding wetland birds to displace to during construction of the bridge. Vehicle movements across the haul route will not generate extensive noise as vehicle movements will be slow, relatively few in number and not at night, and the bridge will not be illuminated. Moreover, there is a public footpath past Abbey Farm Wetlands on the north bank of the River Stour such that some exposure to human presence is part of the background for this area. Commitments to protect nesting Cetti warbler from disturbance in line with legislation are captured in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]** where commitment B48 states '*Ensure disturbing works commence in an area prior to the start of the Cetti warbler nesting season where possible. A 20 m buffer will be implemented during construction around any Cetti's warbler nests that do establish within the construction area in each nesting season. A specific decision will then be undertaken in discussion with the ecological clerk of works over the construction activities that can take place in that area while the nest is active'.* As a result, there would be a negligible disturbance impact on a receptor of Regional importance in the short term. Disturbance is therefore considered a **negligible** effect which is not significant. Once the Proposed Project is operational there would be little requirement for day-to-day presence of people (typically two individuals at any time). Operational noise has been modelled and is presented in Figure 5 Map of 60dB average LAmax contour at Kent within **Application Document 6.6 Habitat Regulations Assessment Report [AS-007]**. The disturbance threshold of 60 dB LAmax referenced earlier would only be exceeded 10 m from the Minster Converter Station and Substation. This does not intersect with any designated sites.
7.14.13	Impacts to scrubland	In both Kent and Suffolk there will be a net increase in woody habitats as a result of the proposed development due to extensive planting around the converter station and substation in particular.
7.14.14	Impacts to cuckoos	Impacts on birds are considered in the Kent Ecological Assessment [PDA-021], including during construction and operation. There will be a net increase in habitat for nesting birds following completion of construction through the net planting of woodland, grassland and wetland habitats.
7.14.15	Impacts to peregrine falcons	**Kent** Peregrines do not nest within the Order Limits, although they nest nearby. No reduction in peregrine foraging habitat will arise. Earth wires are thought to be responsible for a much higher rate of collisions than the thicker, often bundled conductor wires. Earth wires are harder for birds to see, being thinner in diameter and typically positioned at the top of the wire array. Birds trying to gain height to avoid the

Reference	Summary of relevant representation	Applicant's Response
		larger more visible conductor wires may fail to see earth wire. The key birds perching would be peregrine and corvids. However, the line spacing is sufficient that even for a large wingspan bird they would not be touching two wires. Although there will be a temporary overhead line diversion with temporaryoverhead line towers, this will essentially consist of shifting the existing overhead line slightly north and is on a similar alignment to the existing overhead line towers .
7.14.16	Impacts to ravens	**Kent** Extensive ornithology surveys have been undertaken for the Kent Onshore Scheme: two seasons of wintering bird survey including nocturnal visits, two seasons of breeding bird survey, 12 months of vantage point survey focused on the area for the proposed overhead line, and a bird carcass search of the existing overhead line to inform the collision risk assessment. A population of ravens has been identified nearby associated with Richborough Power Station. However, the nesting location for the ravens will not be affected by the Proposed Development and ravens are highly opportunistic feeders that will forage on a wide range of animals and other food sources. As such they are found foraging in farmland, landfill sites, and urban areas. There is therefore no basis to consider the Proposed Development would materially affect foraging opportunities for ravens.
7.14.17	Impacts to buzzards, twites, egrets, herons, dunlin, green and red shanks, oystercatchers, swifts, bittern, peregrine falcons, turtle doves, swans, red throated divers, turnstones, ravens, curlew, slow worms and grass snakes, long eared owls, sparrow, rabbits, stoats, harvest mice, foxes, squirrels, frogs, toads, newts, snake worms, nightingales, hares	A detailed programme of protected species surveys including for birds (wintering and breeding), reptiles, mammals and other features have been undertaken to inform the Sea Link project. These have informed a detailed impact assessment and mitigation proposals for all these receptors which is reported in the ecology and biodiversity chapters of the environmental statement [see PDA-021 and PDA-017].
7.14.18	Impacts to hedgehogs	**Suffolk** Hedgehogs are a declining species in the UK[2]. While the reason for this decline is unclear, it is likely permanent hedgerow loss is a significant contributing factor in rural environments. There would be some temporary hedgerow loss as a result of the Suffolk Onshore Scheme, but the majority of these gaps would be restored following works, and the gaps created represent a relatively small amount of the overall hedgerow resource in the area. In the long-term the temporary gaps in hedgerows for construction would be more than offset by permanent gains in woodland and hedgerow planting around the Saxmundham Converter Station and Friston Substation and along the permanent access roads. This is therefore a negligible impact on a receptor of District importance resulting in a **negligible** effect that is not significant.
7.14.19	Impacts to badger	Commitments made within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** in relation to badger are: – While the haul road would be fenced this fence would not go entirely to ground level so mammals such as badger would be able to pass (B15). – There would be no lighting near any badger setts and a 40m setback between the identified badger sett and construction compounds S04 and S08 (B26). Temporary habitat loss is considered a minor adverse impact on badgers, a receptor of Local importance, leading to a minor adverse effect that is not significant. Moreover, in the long-term there would be an overall increase in habitat of value for badgers due to the extensive woodland planting

[2] SoBH-2022-Final.pdf

Reference	Summary of relevant representation	Applicant's Response
		around the Saxmundham Converter Station and Friston Substation which would be a **minor beneficial** effect on badgers in the long-term, which is not significant.
7.14.20	Impacts to deer	**Suffolk** It is understood from local feedback that large herds of red deer sometimes congregate in the field where the trenchless launch pit would be located. Therefore, this field would be unavailable to red deer during a part of the construction period (approximately. 6 months). It would become available again once construction had ceased in that location. Red deer are a common and widespread game species in the UK and are expanding in both geographic range and abundance[3]. They are therefore low conservation priority and receive no legal protection other than through the Deer Act 1991 which governs when and how they can be hunted. Being large animals they have a large home range (typically a minimum of 200 ha and often much larger) such that this field is likely to be a small part of a much larger area used by the deer. During works in this location there would therefore be a considerable area of remaining habitat available to their use. This is therefore a negligible impact on a receptor of Local importance resulting in a **negligible** effect that is not significant.
7.14.21	Impacts to geese, swans and perching birds	**Suffolk and Kent** Part 2.9.3 of NPS-EN states that: *"Electricity networks infrastructure pose a particular potential risk to birdlife including large birds, such as swans and geese, and perching birds. These may collide with overhead lines and risk being electrocuted. Large birds may also be electrocuted when landing or taking off by completing an electric circuit between live and ground wires. Even perching birds can be killed as soon as their wings touch energised parts of the infrastructure."* No new section of overhead line is being delivered as part of the Suffolk Onshore Scheme. The only overhead line works involved are modifications to an existing overhead line. Therefore, no new collision risk is introduced by the Suffolk Onshore Scheme.
7.14.22	Impacts to orchids	**Suffolk** Orchids have been identified and where possible the cable route would be micro-sited to avoid these using an ecologist providing guidance on the ground. This is measure B29 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)**. **Kent**
7.14.23	NG should use the Species Threat Abatement and Restoration (STAR) metric to ensure that all the impacts have been properly assessed.	The STAR metric is one tool available but in the UK assessment methods follow the guidance produced by the Institute of Ecology and Environmental Management.
7.14.24	Impacts to hedgerows	**Suffolk** As set out in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan-Suffolk [AS-059]** vegetation removed from hedgerows and ditches would be retained as close to the area of removal as possible, retaining intact root balls, where feasible and desirable, such that it can be re-used. Even if hedgerow material dies during this process, it can still be of value in quickly establishing a natural structure in the gap. Minimising hedgerow gaps is part of general good practice and in line with commitment B11 of **Application Document 7.5.3.2 CEMP Appendix B Register of**

[3] https://bds.org.uk/information-advice/about-deer/deer-species/red-deer/

Reference	Summary of relevant representation	Applicant's Response
		Environmental Actions and Commitments [APP-342]. Hedgerow gaps would be planted once works are complete with 'light standards' or feathered trees, while gaps in ditch marginal vegetation would either be planted with mature emergent vegetation purchased from nurseries or left to recolonize naturally from the adjacent ditch vegetation. Note that because of the linear nature of the vast majority of the temporary landtake outside arable land, the vast majority of the lengths or areas of hedges and ditches that would be traversed by the Suffolk Onshore Scheme would be retained during the construction period. However, the losses documented above are not permanent losses. This is because there would be extensive habitat creation as part of the Proposed Project, around the Saxmundham Converter Station and Friston Substation, along the permanent access road where hedgerows would be planted and around the permanent crossing of the River Fromus. This is being done for reasons of landscape design and to facilitate drainage. For Important Hedgerows (and particularly Hedgerows 3 and 5 if compound options S04 and S05 are selected, and Hedgerow 23 adjacent to Friston Substation) the hedgerows would need to be fenced to avoid incidental damage in line with commitment B31 of **Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**). With this additional mitigation included, temporary loss of habitats is considered a minor adverse impact on a receptor of up to Regional importance (this being the value accorded the acid grassland, hedgerows, and semi-natural broadleaved woodland), leading to a residual effect that is minor adverse in the medium term, becoming **moderate beneficial** in the long term. In the long-term this would be a positive significant effect. Further information can be found in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]**. **Kent** Measures relevant to the control and management of impacts during construction have been included within **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**. For hedgerows, this includes: • Creation of 6.5 ha of woodland, 5 ha species rich neutral grassland, 1 km native hedgerow, 2 ha of balancing pond, and swales along the permanent access road (B41) as set out in **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent**. The final habitat creation proposals will be developed through the final Landscape and Ecological Management Plan so may deviate from areas/habitats presented here. • Minimising the width of the cable corridor at ditch and hedgerow crossings to 20 m where possible (B11). • Mature vegetation removed from hedgerows and ditches will be retained as close to the area of removal as possible, retaining intact root balls, where feasible and desirable, such that it can be re-used (B12). See **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]**. • Hedgerow gaps will be planted once works are complete with 'light standards' or feathered trees, while gaps in ditch marginal vegetation will either be planted with mature emergent vegetation purchased from nurseries or left to recolonise naturally from the adjacent ditch vegetation (B13). See **Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [PDA-035]**. • B07: Where the works require the crossing or removal of hedgerows, the gap will be reduced to a width required for safe working. Where hedge removals are necessary, 'dead

Reference	Summary of relevant representation	Applicant's Response

hedging' should be used, where practicable, in the interim periods to retain connectivity during construction. Dead hedging can comprise vegetation arisings or artificial provision, such as willow screening panels or Heras fencing covered in camouflage netting. New hedgerow planting will contain native, woody species of local provenance.

Although temporary gaps in hedgerows and woodland belts would be closed, the new planting would not be immediately mature, with shrub and tree growth potentially taking 10 years or longer to reach that state. Mature vegetation removed from hedgerows and ditches would be retained as close to the area of removal as possible, retaining intact root balls, where feasible and desirable, such that it can be re-used, as set out in commitment B12 of the REAC and **Application Document 7.5.7.2 Landscape and Ecological Management Plan – Kent [PDA-035]**. Even if hedgerow material dies during this process, it can still be of value in quickly establishing a natural structure in the gap. Hedgerow gaps would be planted once works are complete with 'light standards' or feathered trees, while gaps in ditch marginal vegetation would either be planted with mature emergent vegetation purchased from nurseries or left to recolonize naturally from the adjacent ditch vegetation. Note that because of the linear nature of the vast majority of the temporary landtake outside arable land, the vast majority of the lengths or areas of hedges, woodland, grazing marsh and ditches that would be traversed by the Kent Onshore Scheme would be retained during the construction period.

As a result there would be a moderate adverse impact and thus **moderate adverse** effect on a receptor of up to Regional importance (hedgerow, ditches, woodland and the grazing marsh south of the river) in the short to medium term, lasting for between 1-2 seasons (for easily restored habitats such as ditches) to 5-10 years or longer for sections of hedgerow and woodland, as the works are completed and vegetation recovers. This would be a significant residual effect in the short to medium term.

However, the losses documented above are not permanent losses. This is because there would be extensive habitat creation as part of the Proposed Project, around the Minster Converter Station and Substation, along the permanent access road, for reasons of landscape design and to facilitate drainage, and along the River Stour. This includes 6.5 ha of woodland, 5 ha species rich neutral grassland, 1 km native hedgerow, and 2 ha of balancing pond around the Minster Converter Station and Substation resulting in an increase in riparian perimeter of 1.38 km, and a series of small shallow riverside scrapes with riparian planting, and some alder and willow planting, along the River Stour within the Order Limits before the end of construction (amounting to approximately 600 m^2). See **Application Document 7.5.7.2 Landscape and Ecological Management Plan – Kent [PDA-035]**. for planting details. As a result there would be a long-term overall increase in woody and wetland habitats due to the Kent Onshore Scheme, increasing the ecological value of what is currently (north of the River Stour) a predominantly arable landscape of relatively low botanical value or diversity, or diversity of habitat structure.

Since the losses described earlier in this section are therefore temporary, there would be a moderate beneficial impact in the long-term due to habitat creation. This is a long-term **moderate beneficial** residual effect which is significant.

There would be temporary loss of sections of ditch, hedgerow, grassland and woodland for breeding birds including Cetti's warbler and amber list birds such as yellow wagtail, yellowhammer, and reed bunting, although for the size of the survey area relatively few nesting territories have been found away from the River Stour corridor. There would also be temporary loss of arable land (used mainly by red list ground nesting skylark) due to construction compounds K01 and K02 in particular.

Areas of temporary habitat loss other than at construction compounds (which is mainly loss of arable field habitat) and along the haul routes would be typically for one growing season (for example, cable installation by trenching can move at 100-300 m per week on average based on the construction

programme presented in **Application Document 6.2.1.4 Part 1 Introduction Description of the Proposed Project [AS-093]**).

As a result there would be a moderate adverse impact and thus **moderate adverse** effect on a receptor of district importance (inland nesting birds) and regional importance (inland non-breeding birds) in the short to medium term, lasting for between 1-2 seasons (for easily restored habitats such as grazing marsh or ditches) to 5-10 years or longer for sections of hedgerow and woodland, as the works are completed and vegetation recovers. This is a significant residual adverse effect in the short to medium term.

Nonetheless, it has been assumed for the purposes of this impact assessment that some displacement of nesting birds would occur. In the primarily arable landscape north of the river/railway, the affected habitats (other than Unit 11 of the SSSI already discussed in the section on designated sites) are ditches, open arable fields and some hedgerows and are abundant in the wider local landscape. As such, there is thus no shortage of habitat for displaced birds to temporarily move into.

There would be the following permanent habitat loss due to the presence of the Minster Converter Station and Substation and associated planting, the permanent access road, visibility splays, and the overhead line:

- Approximately 650 m (the entirety) of two parallel hedgerows with 0.5 ha of species poor neutral grassland between, which lie entirely within converter station footprint;

As a result there would be a moderate adverse impact and thus **moderate adverse** effect on a receptor of up to Regional importance in the short to medium term, lasting for between 1-2 seasons (for easily maturing habitats such as balancing ponds and grassland) to 5-10 years or longer for sections of hedgerow and woodland, as the works are completed and new planting matures. This would be a significant adverse residual effect in the short to medium term.

As identified above for habitats, there would be some permanent loss of woody and riparian nesting habitat for breeding birds, and arable habitat for breeding birds (particularly skylark) and wintering birds (particularly flocks of golden plover and lapwing). As a result there would be a moderate adverse impact and thus **moderate adverse** effect on a receptor of up to Regional importance in the short to medium term, lasting for between 1-2 seasons (for easily maturing habitats such as balancing ponds and grassland) to 5-10 years or longer for sections of hedgerow and woodland, as the works are completed and new planting matures. This would be a significant residual effect in the short to medium term.

There is no evidence of dormouse within the operational footprint of the Kent Onshore Scheme. As noted above, there would be a permanent loss of existing woody habitat for potential dormouse colonization due in particular to the removal of the parallel hedgerows that lie within the Minster Converter Station and Substation footprint. However, as for ornithology this would not constitute an overall loss. This is because there would be extensive habitat creation as part of the project around the Minster Converter Station and Substation, including 6.5 ha of woodland and 1 km native hedgerow. See **Application Document 7.5.7.2 Landscape and Ecological Management Plan – Kent [PDA-035]** for details. As a result there would be a long-term overall increase in woody habitats due to the Kent Onshore Scheme, increasing the value for potential dormouse colonization of what is currently (north of the River Stour) a predominantly open arable landscape with relatively little woody vegetation beyond Weather Lees Hill and the railway line.

There would be a moderate beneficial impact in the long-term due to habitat creation. This is a long-term **moderate beneficial** effect which is significant.

There would be a small permanent loss of existing woody habitat for bat foraging, due in particular to the removal of the parallel hedgerows that lie within the Minster Converter Station and Substation

Reference	Summary of relevant representation	Applicant's Response
		footprint. Habitat loss would therefore be a minor adverse impact and thus minor adverse effect on a receptor of up to Regional importance in the short to medium term, lasting up to 5-10 years as the new habitat matures. This is not significant. Moreover, this would not constitute a long-term overall loss. This is because there would be extensive habitat creation as part of the Proposed Project, around the Minster Converter Station and Substation. As a result there would be a long-term overall increase in woody habitats due to the Kent Onshore Scheme, increasing the value for bats of what is currently (north of the River Stour) a predominantly arable landscape with limited shelter or linear woody features. See **Application Document 7.5.7.2 Landscape and Ecological Management Plan – Kent** for details. There would be a moderate beneficial impact in the long-term due to habitat creation on a receptor of Regional importance. This is a long-term **moderate beneficial [PDA-035]** effect which is significant. As noted above, there would be a permanent loss of existing habitat for potential reptiles due in particular to the removal of the parallel hedgerows that lie within the Minster Converter Station and Substation footprint and the associated strip of neutral grassland. At this location a small population of slow worm and common lizard were recorded. Habitat loss would therefore be a minor adverse impact and thus minor adverse effect on a receptor of up to local importance in the short to medium term, lasting up to 5 years as the new habitat matures. This is not significant. Moreover, this would not constitute a permanent overall loss. This is because there would be extensive habitat creation as part of the Proposed Project, around the Minster Converter Station and Substation, along the permanent access road and along the River Stour. As a result there would be a long-term overall increase in woodland margin and wetland habitats due to the Kent Onshore Scheme, increasing the value for reptiles of what is currently (north of the River Stour) a predominantly arable landscape. See **Application Document 7.5.7.2 Landscape and Ecological Management Plan – Kent [PDA-035]** for details. There would be a moderate beneficial impact in the long-term due to habitat creation on a receptor of local importance. This is a long-term **moderate beneficial** effect which is significant. As noted above, there would be a permanent loss of existing habitat for terrestrial and riparian invertebrates due in particular to the removal of the parallel hedgerows that lie within the Minster Converter Station and Substation footprint and the associated strip of neutral grassland. This was one of the key locations where some notable invertebrates were recorded during surveys. However, this would not constitute an overall permanent loss. This is because there would be extensive habitat creation as part of the Proposed Project, around the Minster Converter Station and Substation, along the permanent access road and in the form of new scrapes along the River Stour. As a result there would be a long-term overall increase in woodland margin and wetland habitats due to the Kent Onshore Scheme. See **Application Document 7.5.7.2 Landscape and Ecological Management Plan – Kent [PDA-035]** for details. Moreover, material that is worth keeping from those hedgerows would be transplanted south and used to strengthen the existing hedgerow and boundary with Weather Lees Hill. There would be a moderate beneficial impact in the long-term due to habitat creation on a receptor of District importance. This is a long-term **moderate beneficial** effect which is significant. • Larger gaps in hedgerows or woodland belts would be reduced to 10 m maximum during the night by hurdles or similar. Around construction compounds, direct illumination of boundary features will be avoided. Lighting will be designed to comply with published guidelines (B53). •

Reference	Summary of relevant representation	Applicant's Response
7.14.25	Impacts to great crested newt~~GCN~~	**Suffolk and Kent** There is no discussion below of great crested newt because it has been agreed with Natural England that the Proposed Project would use the Suffolk District Licensing Scheme for this species. As such, there has been no need to undertake surveys, impact assessment or delivery of specific mitigation. District level licensing is an alternative approach to mitigation licensing for planning applications to develop sites which could affect great crested newts. District level licensing aims to increase the number of great crested newts by providing new or better habitats in targeted areas to benefit their wider population. It is a simpler, quicker process than mitigation licensing because planning applications do not need to include surveys of great crested newts or plans to carry out mitigation work to move newts to safety. The financial contribution to the licensing scheme ensures delivery of measures as a strategic level to support a conclusion of no likely significant effect. Further information can be found in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]**.
7.14.26	Impacts to dormice	**Suffolk** Based on the dormouse survey undertaken for the Suffolk Onshore Scheme, dormice are assumed to be absent from the Order Limits, since no confirmed records of dormouse were identified from the nest tubes placed on site. However, due to a record of 'possible' dormouse nests, and the presence of harvest mouse (a NERC Act species), a precautionary approach to the removal of vegetation suitable for dormouse would be followed. This commitment is made within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** and is stated as follows: – A precautionary method would be followed when undertaking vegetation clearance potentially suitable for dormice which would be undertaken in two stages under supervision of a suitably qualified ecologist (B14). Vegetation clearance would be undertaken in two stages. The first stage would comprise an initial cut to 150-300 mm, with a second cut at least 24 hours later to ground level. Prior to each stage of clearance commencing, the Suitably Qualified Ecologist (SQE) would carry out a fingertip search of the area. The SQE would hold (or be accredited to work under) a WML-CL10a Natural England hazel dormouse class license (Class 1 survey license). They would check the area for signs of hazel dormice, including nests. Clearance would only proceed if hazel dormice are confirmed to be absent. The SQE would remain on site until the vegetation suitable for hazel dormouse is cleared. All clearance works of vegetation that is suitable for dormouse must be undertaken using hand-held tools such as strimmers and chainsaws. In the unlikely event that a hazel dormouse or signs of hazel dormice are encountered during the search it would be left in situ, works would cease, and a European Protected Species Mitigation License obtained from Natural England Since dormice are assumed absent based on survey data for the Suffolk Onshore Scheme, habitat loss is considered a negligible impact leading to a **negligible** effect that is not significant. **Kent** A commitment made within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** is. • A precautionary method will be followed when undertaking vegetation clearance potentially suitable for dormice which will be undertaken in two stages under supervision of a suitably qualified ecologist (B14).

Reference	Summary of relevant representation	Applicant's Response
		Based on the dormouse survey undertaken for the Kent Onshore Scheme, dormice are assumed to be likely absent from the Order Limits, since no confirmed records of dormouse were identified from the nest tubes placed on site. However, due to some records of 'possible' dormouse nests (some of which were later confirmed to be other species i.e. wood mouse) and anecdotal information from landowners regarding possible dormouse presence, a precautionary approach to the removal of vegetation suitable for dormouse would be followed. Vegetation clearance would be undertaken in two stages. The first stage would comprise an initial cut to 150-300 mm, with a second cut at least 24 hours later to ground level. Prior to each stage of clearance commencing, the Suitably Qualified Ecologist (SQE) would carry out a fingertip search of the area. The SQE would hold (or be accredited to work under) a WML-CL10a Natural England hazel dormouse class license (Class 1 survey license). They would check the area for signs of hazel dormice, including nests. Clearance would only proceed if hazel dormice are confirmed to be absent. The SQE would remain on site until the vegetation suitable for hazel dormouse is cleared. All clearance works of vegetation that is suitable for dormouse must be undertaken using hand-held tools such as strimmers and chainsaws. In the unlikely event that a hazel dormouse or signs of hazel dormice are encountered during the search it would be left in situ, works would cease, and a European Protected Species Mitigation License obtained from Natural England. Since dormice are assumed absent based on survey data for the Kent Onshore Scheme, and there would be a considerable overall increase in suitable habitat for dormice as a result of the Kent Onshore Scheme due to the proposed landscape planting around the Minster Converter Station and Substation, habitat loss is considered a negligible impact leading to a **negligible** effect that is not significant.
7.14.27	Impacts to terrestrial invertebrates	**Suffolk** The areas of temporary habitat loss discussed previously for habitats are also of value to rarer species of invertebrates. Key habitat with regards to terrestrial invertebrates are: • East of Leiston Road. TM458585. Two fields of improved grassland, used for hay or silage to the east of Leiston Road. • South Warren (East). TM450585. An area of rough scrub and a field used for hay or silage, north of the Aldeburgh golf course. • South Warren (West). TM444586. Two fields used for hay or silage, with scattered scrub, north of the Aldeburgh golf course. The acid grassland where most of the temporary loss documented in the bullets above would occur is immediately adjacent to Leiston-Aldeburgh SSSI and the golf course and is therefore contiguous with much larger residual areas of acid grassland and heathland. As part of the broader habitat mitigation proposals for the Proposed Project approximately 6 ha of existing acid grassland, which would be of value to terrestrial invertebrates as well as (mentioned previously) nesting birds and reptiles, would be enhanced (such as through removing dense stands of bracken and achieving a more diverse structure) and maintained as such for 10 years following creation to offset the lag time in restoration of the existing acid grassland that can be expected once the compound and cable trench works are complete. Temporary loss of habitats is considered a minor adverse impact on a receptor of District importance, leading to a **minor adverse** effect that is not significant.

Reference	Summary of relevant representation	Applicant's Response
		There is no permanent habitat loss from habitats of particular importance for terrestrial invertebrates. Moreover, there would be extensive habitat creation as part of the Proposed Project, including permanent attenuation ponds around the Saxmundham Converter Station and Friston Substation (in the scenario where the substation is built as part of the Proposed Project) and large areas of woodland and wetland creation. See **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan - Suffolk [AS-059]** for details. As a result, there would be a long-term overall increase in habitats for invertebrates (a receptor of District importance) due to the Suffolk Onshore Scheme, resulting in a moderate beneficial impact and a **moderate beneficial effect** that is significant. **Kent** In general, individual terrestrial and riparian invertebrates are less important for conservation than the population as a whole, and in particular ensuring that sufficient habitat persists for those species in connectivity to areas in which they are already found. This is due to the short lifespan and rapid generation time of most invertebrate species. As already discussed there would be temporary losses of habitat suitable for terrestrial invertebrates due to construction works. This would arise from the cable corridor and haul road traversing areas of hedgerow and woodland belt along the A256 and the various ditch crossings across the Kent Onshore Scheme. However, these losses would amount to small sections in larger features and would therefore not materially affect the ability of the invertebrate populations on site to persist. Moreover, in the long-term there would be a substantial overall increase in woodland planting, and riparian margin, as a result of the habitat creation associated with the Minster Converter Station and Substation. Therefore, this is concluded to be a minor adverse medium-term impact on a receptor of District importance, leading to a moderate beneficial impact in the long-term due to habitat creation. This is a long-term **moderate beneficial** effect which is significant. A series of rules were set to identify suitable parcels of land for golden plover mitigation, those that apply to soil invertebrates are as follows: • The management will minimise pesticide (herbicide and insecticide) use as much as possible. An absolute prohibition on pesticide use is being investigated, but to ensure that continued farming viability is not compromised, a specific ban on soil applied insecticides (including seed treatments) is considered to be sufficient, as this will ensure no harm to the soil biota. Insecticides will not be applied to the Spring cereal crop after around mid-March, until it is harvested. Insecticides that affect soil invertebrates will not be applied. • Where the ground is bare some recultivation during the extended bare ground period may be useful to bring soil invertebrates to the surface. As part of implementation of the mitigation the fields would be assessed for compaction and any subsoiling requirements identified to maximize the number of soil invertebrates present (in particular earthworms). There is a proposed permanent access route into the saltmarsh at Pegwell Bay off Sandwich Road and through the former hoverport site. The hoverport site is known to support rare invertebrates, including fiery clearwing moth and Sussex emerald moth, both of which are legally protected under Schedule 5 of the Wildlife & Countryside Act 1981 (as amended). It also contains habitat suitable for reptiles and supports populations of man orchid and lizard orchid. However, this route is for inspection and maintenance via light vehicles and a few qualified personnel with very minor access needs at a regular interval. Access will use the existing track and hardstanding to reach the saltmarsh and as such there will be no habitat loss.

Reference	Summary of relevant representation	Applicant's Response
		As noted above, there would be a permanent loss of existing habitat for terrestrial and riparian invertebrates due in particular to the removal of the parallel hedgerows that lie within the Minster Converter Station and Substation footprint and the associated strip of neutral grassland. This was one of the key locations where some notable invertebrates were recorded during surveys. However, this would not constitute an overall permanent loss. This is because there would be extensive habitat creation as part of the Proposed Project, around the Minster Converter Station and Substation, along the permanent access road and in the form of new scrapes along the River Stour. As a result there would be a long-term overall increase in woodland margin and wetland habitats due to the Kent Onshore Scheme. See **Application Document 7.5.7.2 Landscape and Ecological Management Plan – Kent [PDA-035]** for details. Moreover, material that is worth keeping from those hedgerows would be transplanted south and used to strengthen the existing hedgerow and boundary with Weather Lees Hill. There would be a moderate beneficial impact in the long-term due to habitat creation on a receptor of District importance. This is a long-term **moderate beneficial** effect which is significant.
7.14.28	Impacts to beavers	Surveys were conducted for beavers as part of the suite of ecological surveys undertaken to inform the application. No evidence of beavers was found within the Order Limits except the River Stour which will not be affected by the Proposed Development except by a temporary bridge during construction. That bridge will not affect the banks and therefore will not impede beaver movements or activity. See **Application Document 6.2.3.2 (C) Part 3 Kent Chapter 2 Ecology and Biodiversity [PDA-021**] for further detail.
7.14.29	Impacts to reptiles	**Suffolk** Two areas of the most suitable habitat were surveyed for reptiles: the acid grasslands north of Aldeburgh golf course and west of the North Warren RSPB reserve, and areas of semi-improved grassland east of the Saxmundham Converter Station. This was on the basis that taking into account both habitat suitability and connectivity, these were the areas where significant reptile populations were most likely to be found. Reptiles were only recorded within the acid grasslands, and all four species were observed: common lizard, slow worm, grass snake and adder. Approximately 9 ha of this habitat would be removed for both the trenchless pit and associated compound (S10), haul road and cable trenches during construction and although temporary, the loss may not necessarily be short-term due to the reestablishment time of the habitat. The acid grassland where most of the temporary loss would occur is immediately adjacent to Leiston-Aldeburgh SSSI and the golf course and is therefore contiguous with much larger residual areas of acid grassland and heathland. There is thus no potential for reptile populations to be concentrated in small areas of habitat, although some increase in reptile density can be expected. Nonetheless, as part of the broader proposals to mitigate for the loss of acid grassland during construction, the Proposed Project would enhance approximately 6 ha of existing acid grassland. This will enhance the grassland and also render it more suitable for reptiles (such as by removing dense bracken and invasive species, and by providing a more varied vegetation structure). This management would be maintained as such for 10 years following introduction to offset the lag time in restoration of the existing acid grassland that can be expected once the compound and cable trench works are complete. Temporary loss of habitats is considered a minor adverse impact on a receptor of District importance which is a **minor adverse** effect that is not significant. Measures relevant to the control and management of impacts during construction have been included within **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**. For reptiles this includes:

Reference	Summary of relevant representation	Applicant's Response
		B05: All habitats suitable for common reptiles will be subject to two-stage habitat manipulation that will take place between mid-March and mid-October. Firstly, vegetation will be cut to approximately 150 mm (with the arisings removed) under the supervision of an ECoW and the site left for a minimum of two days to allow reptiles to naturally disperse from the area. Secondly, vegetation will be cleared down to ground level under the supervision of an ECoW. Vegetation will be cleared using appropriate equipment based on the type of vegetation to be removed, the area affected, and the risk of mortality or injuring reptiles. Construction works could commence immediately after completion of the second stage. Reptile hibernacula will be retained and protected during construction where practicable. If unavoidable, the removal of vegetation and groundworks at hibernacula will be timed to avoid the hibernation season (late October to early March). Replacement hibernacula and refugia will be provided. The haul route would only be used by a low number of vehicles travelling at low speed and would therefore not constitute a barrier to reptile movement. There would therefore be negligible disruption to habitat connectivity for reptiles (District importance) leading to an effect that is **negligible** and not significant. Since only part of the entire suitable areas of acid grassland would be temporarily lost, and they are surrounded by large areas of other acid grassland and heathland habitat (the SPA with regard to east of Leiston Road and the golf course with regard to west of Leiston Road) reptiles would be cleared from suitable habitat using a displacement method (i.e. strimming to approximately 150 mm and then again to ground level to drive reptiles into the surrounding habitat). This is measure B05 of **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-341]**. With these precautions in place, the risk of killing or injuring is considered a negligible impact on a receptor of District importance, resulting in a **negligible** effect that is not significant. No reptile populations have been identified in areas to be subject to permanent landtake. Therefore, no likely significant effects has been identified.
7.14.30	Impacts to lapwing	**Kent** As identified above for habitats, there would be some permanent loss of woody and riparian nesting habitat for breeding birds, and arable habitat for breeding birds (particularly skylark) and wintering birds (particularly flocks of golden plover and lapwing). As a result there would be a moderate adverse impact and thus **moderate adverse** effect on a receptor of up to Regional importance in the short to medium term, lasting for between 1-2 seasons (for easily maturing habitats such as balancing ponds and grassland) to 5-10 years or longer for sections of hedgerow and woodland, as the works are completed and new planting matures. This would be a significant residual effect in the short to medium term. However, as already discussed under the habitats section above, this does not constitute an overall permanent loss of habitat. This is because there would be extensive habitat creation as part of the Proposed Project, around the Minster Converter Station and Substation, along the permanent access road and along the River Stour. As a result there would be a long-term overall increase in woody and wetland habitats due to the Kent Onshore Scheme, increasing the ecological value of what is currently (north of the River Stour) a predominantly arable landscape. See **Application Document 7.5.7.2 Landscape and Ecological Management Plan – Kent [PDA-035]** for details. Moreover, as already discussed for designated sites, there would also be 10 ha of off-site arable land enhancement for ornithology mitigation, targeted to wintering farmland birds (particularly golden plover) but which would also be managed favourably for nesting farmland birds, through inclusion of skylark nesting plots at a rate of at least 4 plots per hectare (twice the density required by Countryside

Reference	Summary of relevant representation	Applicant's Response
		Stewardship). This favourable farming regime would occur throughout the operational life of the Minster Converter Station and Substation. This is set out in commitment B54 of **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-341]** and in **Application Document 7.5.7.2 Landscape and Ecological Management Plan – Kent [PDA-035]**. There would be a moderate beneficial impact in the long-term on a receptor of up to District (for nesting birds) and Regional (for non-breeding birds) due to habitat creation. This is a long-term **moderate beneficial** effect which is significant.
7.14.31	Impacts to marsh harrier	With regard to wintering birds, the assessment is similar to that for nesting birds. Non-breeding hen harrier, marsh harrier, skylark and lapwing were recorded using the inland survey area in occasionally notable numbers, either for foraging or resting. However, for birds wintering in and around the wetlands and floodplain grazing marsh at Abbey Farm Wetland and south of the River Stour, the main source of potential disturbance (the creation of the foundations for the new overhead line towers to support the overhead line connection to the Richborough to Canterbury overhead line and that for the temporary bridge across the Stour). In the absence of additional mitigation, impacts on wintering birds south of the River Stour due to the most disturbing part of overhead line construction (the Overhead line tower bases) is considered to be a moderate adverse impact on a receptor of regional importance, resulting in a **moderate adverse** effect that is significant. Therefore, additional mitigation has been introduced by programming the overhead line pylon base installation to avoid the core wintering period of October to February, thus considerably reducing the extent of disturbance and displacement of wintering birds. This is commitment B51 in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-341]**.
7.14.32	Impacts to Minsmere	No impact has been identified to Minsmere-Walberswick Heaths and Marshes, which is located a considerable distance from the Proposed Project. Potential for impacts on this site are discussed in the Habitats Regulations Assessment **[AS-007]**.
7.14.33	Impacts to eels	Construction phase impacts which were considered included those relating to fish passage, pollution, noise and vibration, and light. Operational phase impacts included pollution and fish passage." Following embedded and additional mitigation measures, all potential effects were deemed minor or negligible and not significant. A number of embedded and additional mitigation measures have and will be applied at the design, construction and operational phases of the scheme in order to ensure that the European eel is not adversely affected by the proposed development. Embedded mitigation measures were as follows as follows: B08: During culvert installation there would be a watching brief and fish rescue where required. Where over pumping is required, pumps would be fitted with 2 mm screens to prevent injury to fish or eels. Securing Mechanism: DCO Schedule 3, Requirement 6 Onshore Construction Environmental Management Plan. B10: The foundations of the bridge across the River Stour would use soft-start non-percussive piling techniques to limit disturbance, which would assist in allowing sounds to increase gradually allowing fish in the immediate vicinity to swim away. Securing Mechanism: DCO Schedule 3, Requirement 6 Construction Environmental Management Plan. W03: Riverbank and in-channel vegetation will be retained where not directly affected by installation works. Where ditches retaining seasonal flows are crossed, culverts in waterbodies will either preserve

Reference	Summary of relevant representation	Applicant's Response
		the natural bed or be box culverts with inverts sunk a minimum of 300 mm below the hard bed of the watercourse and natural / existing bed material placed across the inside of the culvert, to maintain existing channel gradients and habitat for aquatic invertebrates, as well as to ensure continued passage for in channel species. Securing Mechanism: DCO Schedule 3, Requirement 6 Onshore Construction Environmental Management Plan. Once the potential adverse effects on eels were established, the following additional mitigation measures were recommended: In order to ensure that the passage of eels is not impeded, it is proposed that 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 riverbed. Given the relative short duration of the culvert installation at the start of the enabling works, this is considered unlikely to impact migratory species. This is secured in commitment W03 (Securing Mechanism: DCO Schedule 3, Requirement 6 Onshore Construction Environmental Management Plan). With regard to the potential for piling noise to impact fish, there will be no piling (or any other construction work) undertaken the watercourse and that the piling will be 8 m back from the bank edge at its closest. This setback distance means the sound and pressure waves will likely dissipate through the geology of the bank, reducing their potential to impact fish. In addition, there is a commitment to vibro-piling and the use of a soft start method. This is secured within commitment B10 (Securing Mechanism: DCO Schedule 3, Requirement 6 Construction Environmental Management Plan). Vibro-piling is non-percussive, meaning it generates continuous, non-impulsive sound, which will further reduce the potential for propagation of noise within the watercourse. The soft start piling method will ensure that in the unlikely event that sound were to propagate into the watercourse, it will increase gradually allowing fish in the immediate vicinity to swim away. Therefore, it is unlikely that noise and vibration as a result of pilling for the proposed temporary bridge over the River Stour would affect fish species present (including migratory species such as European eel and salmonids). In order to mitigate the impact of light on eels where compound lights are near watercourses, lights will not pointed towards the watercourses at any time when in use, particularly during eel migratory peak periods (May-July and October-November) and lights will not be used outside of construction working hours. This is included within commitment GG21 (Securing Mechanism: DCO Schedule 3, Requirement 6 Onshore Construction Environmental Management Plan). This is to reduce diurnal and migratory issues as a result of the light intrusion. Once the mitigation measures described above are taken into account, lighting from construction compounds are considered a minor adverse impact on a receptor of Regional importance resulting in a **minor adverse** effect on fish that is not significant.
7.14.34	Impacts to coastal and marine habitats	Impacts on coastal and marine habitats have been assessed within Part 4 (marine assessment) of the Environmental Statement
7.14.35	Impacts to endangered species	Impacts of the Proposed Project on endangered species has been explicitly discussed in the Kent [and Suffolk ecology and biodiversity chapters
7.14.36	Impact of the Scheme on bats	Impacts of the scheme on bats has been explicitly discussed in the Kent and Suffolk ecology and biodiversity chapters
7.14.37	Impact of the Scheme on amphibians	Impacts of the scheme on amphibians (specifically great crested newts) has been explicitly discussed in the Kent **[PDA-021]** and Suffolk **[PDA-017]** ecology and biodiversity ES chapters.
7.14.38	Impact on the golden plover in Kent.	Meetings have been held with Natural England where the approach to addressing loss of functionally-linked land for golden plover has been discussed at length. Various strategies have been discussed with Natural England. The possibility of creating new wetland south of the River Stour was explored prior to Statutory consultation but technical challenges were identified in discussion with hydrologists

Reference	Summary of relevant representation	Applicant's Response
		and Natural England with keeping it sufficiently wet. Therefore, an alternative approach has been pursued (discussed and agreed in principle with Natural England) to instead enhance an area of arable land close to the coast and adjacent to the A256 for non-breeding golden plover. This was consulted on at Targeted consultation. This commitment is contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC) [APP-342]** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [AS-012]**. The mitigation measures incorporated into the application, including the delivery of 10 ha of off-site arable enhancement primarily for golden plover in the Thanet Coast and Sandwich Bay SPA/ Ramsar. This habitat enhancement would mean that the residual effects on the SPA would be negligible and would also lead to a moderate beneficial impact in the long-term on a receptor of up to District (for nesting birds) and Regional (for non-breeding birds) due to habitat creation. This is a long-term **moderate beneficial** effect which is significant.
7.14.39	Impact of the Scheme on wildflowers	The air quality impacts on ecology receptors are assessed within **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]**. The air quality assessment within both **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality** and **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-055]** have considered ecological receptors. Measures relevant to the control and management of impacts during construction have been included within **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-342]**. **Application Document 7.5.6.1 Air Quality Management Plan – Suffolk [AS-129]** and **Application Document 7.5.6.2 Air Quality Management Plan – Kent [APP-347]**. These measures together will ensure no unacceptable construction phase air quality impacts on sensitive habitats and plant communities.
7.14.40	Habitat segregation in Kent	Careful attention has been paid in the design and construction programme/methods for the Proposed Project to the possibility of habitat severance. In the coastal zone this will be avoided through use of a trenchless construction solution. In those areas away from the coast, which will be crossed by open trench, a series of protected species surveys have been undertaken to inform mitigation measures and the works will be undertaken in such a way as to retain connectivity, such as through the inclusion of mammal ledges in culverts and hurdles or similar to close gaps in hedgerows overnight for bats. The cable will be buried as each section is installed and habitats restored above the cable.
7.14.41	Loss of habitat for golden plover	Meetings have been held with Natural England where the approach to addressing loss of functionally-linked land for golden plover has been discussed at length. Various strategies have been discussed with Natural England. The possibility of creating new wetland south of the River Stour has been explored prior to Statutory consultation, but technical challenges were identified in discussion with hydrologists and Natural England with keeping it sufficiently wet. Therefore, an alternative approach has been pursued (discussed and agreed in principle with Natural England) to instead enhance an area of arable land close to the coast and adjacent to the A256 for non-breeding golden plover. This was consulted on at Targeted consultation. This commitment is contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC) [APP-342]** which is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [AS-012].**
7.14.42	Failure to carry out ecological surveys and suggestions on what surveys need to be undertaken.	As part of the ES, in addition to desk study data the Applicant has undertaken an extensive programme of environmental surveys including for breeding and non-breeding birds, reptiles, invertebrates, badger, aquatic wildlife, riparian mammals, dormice and plants. The survey results were not available during Statutory consultation but are presented as part of the application.
7.14.43	Impact of the Suffolk and Kent Onshore Schemes on migrating bird species of international importance.	The Applicant recognises the importance of the English East Coast and its coastal wetlands (to include Pegwell Bay) as being globally important for migratory waterbirds using the East Atlantic Flyway which

Reference	Summary of relevant representation	Applicant's Response
		extends from the Arctic to South Africa. The importance of the English East Coast and these wetland sites is reflected by a series of existing protected nature conservation areas, designated for their international importance, including SPAs and Ramsar Convention Wetlands of International Importance and underpinned by other national designations such as SSSIs. Detailed assessments are provided in **Application Document 6.2.2.2 Part 2 Suffolk Chapter 3 Ecology and Biodiversity [PDA-017], Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity[PDA-021], Application Document 6.2.4.5 Part 4 Chapter 5 Ornithology and Application Document 6.6 Habitats Regulations Assessment Report [AS-115]**, which consider the impacts of the Proposed Project on important sites for waterbirds and waterbird populations, and thus the relevant components which contribute to the East Atlantic Flyway. The assessments conclude that whilst there would be some significant adverse effects on ornithology in the short-medium term, the creation of habitats as part of the project would lead to a significant beneficial effect on ornithology, in the long term.
7.14.44	Impact on birds from the proposed overhead lines.	The Applicant commissioned various surveys looking at the potential impacts of the overhead lines on birds. These surveys included a collision survey and a carcass survey. The assessment of avian collision risk is an annex to **Application Document 6.3.3.2.F ES Appendix 3.2.F 2023-2024 Vantage Point Survey [APP-152]** and the surveys are reported in **Application Document 6.3.3.2.G ES Appendix 3.2.G OHL Mortality Monitoring Report [APP-153].** The Kent Onshore Route has been designed to reduce the number of towers required and the area between the lines has been kept to a minimum to help prevent birds from getting trapped. The potential impacts on birds in Kent is presented in Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity. Mitigation measures are detailed in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of Application Document 3.1 draft Development Consent Order [AS-012]. .
7.14.45	Impact on seals within Pegwell Bay.	The Applicant acknowledges the importance of Pegwell Bay to wildlife. Project-specific monthly surveys were also undertaken in the period September to November 2024 with the primary aim of determining the specific haul-out locations of the Pegwell Bay seals (**Application Document 6.4.4.4.A Pegwell Bay Seal Survey Report [APP-279]**). During all three surveys hauled out seals were only found in a relatively restricted area of the lower River Stour moving between the sandbanks in the river channel at low tide and up to the top of the riverbank, to rest on the saltmarsh. The haul out locations are over 1 km away from works in Pegwell Bay, including the exit pit for the trenchless installation from the onshore. At low tide seals are out of direct line of sight of Pegwell Bay as they haul-out on the low tide riverbank. Impacts on seals are reported in Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [AS-053]. No significant adverse effects are predicted.

Table 7.15 Applicant's Response to the Relevant Representations that raise issues relating to Walking Cycling and Horseriders

Reference	Summary of relevant representation	Applicant's Response
7.15.1	Concerns over the impact of the Proposed Project on the PRoW (including bridleways) in Suffolk and Kent including the Heritage Coast footpaths, e.g. the King Charles III England Coast Path and RSPB Footpaths.	The Applicant has rigorously assessed the Proposed Project's impact on footpaths adhering to the mitigation hierarchy by avoiding, minimising, restoring, and offsetting impacts. It acknowledges that there will be a temporary disruption to footpaths during the construction phase. Where the Applicant has a temporary impact on a PRoW during construction, mitigation measures will be put in place. Where there is a permanent impact on a footpath, a suitable diversion will be provided and implemented prior to the closure. Impacts on PRoW and recreational routes are considered in **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [APP-057]** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070]**. Potential impacts on PRoW and walking and cycling routes including the King Charles III England Coast Path with respect to severance, pedestrian delay, fear and intimidation and non-motorised user amenity are also considered within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** and **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**. Separate Outline PRoW Management Plans have been prepared for Suffolk and Kent as part of the DCO application. These have been developed in consultation with the relevant local highways authorities and PRoW officers and provide details on PRoW diversions, closures and management during the construction, operation and decommissioning phases of the Proposed Project. The King Charles III England Coast Path has also been considered where any management and mitigation measures are required given its significance. See **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]** and **Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-.353]**. Effects on the visual amenity of users of the PRoW network in Suffolk and Kent has been assessed using representative viewpoints in the surrounding landscape, this includes users of footpaths within the Suffolk Heritage Coast and along the King Charles III England Coast Path. This is 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.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment High Resolution [APP-098]** for Suffolk and 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.D ES Appendix 3.1.D Visual Amenity Baseline and Assessment [APP-146]** for Kent. Recreational access is also considered where this forms an aspect of a key characteristic of a relevant landscape receptor, which where relevant is detailed within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]** for Suffolk and **Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]** for Kent.
7.15.2	Concerns over the safety of cars and of pedestrians using pavements on the B1121.	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** includes a review of the collision record (based on full Personal Injury Accident data obtained from Suffolk County Council) and an assessment of Road Safety and Hazardous/Large Loads for the study area during the peak construction phase based on peak daily construction traffic (including HGVs). The assessments include the A12/ B1121 junction and the B1121 Main Road to the south of Saxmundham, given these receptors would be used by construction traffic when travelling to/ from the proposed access S-BM09 on the B1121 Main Road. This 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 road safety of the B1121, with the proposed embedded mitigation and control and management measures in place, as identified within the **Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [AS-008]**.

~~Table 7.16~~ Table 7.15 Applicant's Response to the Relevant Representations that raise issues relating to the Water Environment

Reference	Summary of relevant representation	Applicant's Response
7.16.1	The construction of the Suffolk Converter Station, Friston Substation and the associated roadways and cabling in a floodplain and the risk of flooding to outlying areas.	Flooding concerns are noted. **Application Document 6.8 Flood Risk Assessment [APP-292]** has collected and considered information on historical and recent flooding incidents in the locality. The Proposed Project has engaged with the Environment Agency, the Lead Local Flood Authority (County Council) and Internal Drainage Boards regarding the proposed works within areas prone to flooding and has agreed a flood risk mitigation strategy. The mitigation measures are contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [AS-087]**, which also requires the preparation of a Flood Management Plan, which must also be "*submitted to and approved by the relevant planning authority or other discharging authority as may be appropriate to the relevant plan*". Surface water runoff arising from the Proposed Project during both its construction and operation would be captured, suitably treated where necessary and attenuated prior to discharge into the surrounding water environment at rates no greater than existing (inclusive of suitable climate change allowances over the Proposed Project's lifetime). In addition, where the Proposed Project interacts with existing land drainage infrastructure, e.g. ditches, there is a commitment in the Water Environment section of the REAC to manage any severance through provision of temporary alternative drainage routes, and those drainage systems would be permanently reinstated or re-routed ensuring their existing function is maintained. At the Suffolk landfall, there is a commitment to monitor flood defences to ensure their integrity during construction of the Project and to bring the cables onshore using trenchless techniques in order to avoid temporary works within the floodplain.
7.16.2	Construction of the Kent Converter Station and landfall in an area prone to flooding. Risk of flooding to Proposed Project infrastructure and outlying areas.	During Statutory Consultation, one of the key themes raised was construction in areas prone to flooding. The weight of feedback led to the Applicant undertaking additional studies investigating the flood risk of the Proposed Project, particularly at the proposed Kent converter station site. The studies revealed the necessity to change the engineering solution at the Kent Converter Station to address groundwater flooding concerns which led to an increase in its height. This was consulted on at Targeted Consultation. At the Kent landfall, there is a commitment to monitor flood defences to ensure their integrity during construction of the Project and to bring the cables onshore using trenchless techniques in order to avoid temporary works within the floodplain. Relevant mitigation measures are contained in Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of Application Document 3.1 draft Development Consent Order [AS-087], which also requires the preparation of a Flood Management Plan, which must also be "*submitted to and approved by the relevant planning authority or other discharging authority as may be appropriate to the relevant plan*".
7.16.3	The impact of climate change on the Proposed Project. Particular concern over the role of the marshes to buffer impacts of climate change in terms of flooding, and how concreting over the marshes may impact this.	A climate change risk assessment is included within **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change [APP-085]**. This assessment includes an assessment of climate change risks (including flooding) in accordance with the Institute of Environmental Management and Assessment good practice guidance for climate change risk assessments in EIAs. The project has been designed to be resilient to predicted climate change impacts as far as possible, and in terms of flooding and mitigating the impacts of the Project on flood risk and land drainage, the Sustainable Drainage Systems that will serve the Project are designed with allowances for climate change in accordance with Environment Agency guidance, in order to attenuate runoff prior to its release back to ground or to watercourses at controlled rates.
7.16.4	The Proposed Project will limit the expansion of the Southern Water sewage treatment plant at Weatherlees. Emphasis in RRs of the pressure from new housing developments in Kent, and the impact that increased pressure on the WTW could have on water quality.	The Applicant is aware of Southern Water's requirements and is maintaining ongoing dialogue with them about the potential impacts of the Proposed Project upon its assets in terms of ongoing maintenance, future needs, and access to the waste water treatment works (WTW). The Applicant therefore intends to include protective provisions for the benefit of statutory undertakers in Schedule 14 of **Application Document 3.1 Draft Development Consent Order [AS-087]**. The applicant does

Reference	Summary of relevant representation	Applicant's Response
		not consider that the Proposed Project in any way limits the potential for expansion of the sewage treatment works, though noting that there is no current application to do so.
7.16.5	Effect of river crossings in Kent and effect on any existing drainage infrastructure.	The effects of the proposed permanent watercourse crossings have been assessed within **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]** and its supporting documents: **Application Document 6.8 Flood Risk Assessment [APP-292]** and **Application Document 6.9 Water Framework Directive Assessment [APP-293]**. The Proposed Project team has engaged with the Environment Agency regarding the proposed crossings of main river watercourses, with key design parameters for the crossings having been agreed. Measures are embedded within the designs of these crossings to mitigate for any potential to increase fluvial flood risk. The DCO secures a commitment to monitor existing flood defences during the cable installation in agreement with Environment Agency protocols, to ensure no detriment to the integrity of the defences. This commitment is contained in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Commitments and Actions (REAC) [APP-342]**. Compliance with the REAC is secured through Requirement 6 of Schedule 3 of **Application Document 3.1 draft Development Consent Order [AS-087]**.
7.16.6	Changes to the hydrology and the water levels within the Leiston-Aldeburgh SSSI and RSPB North Warren nature reserve from the use of trenchless construction technologies.	**Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]** confirms the use of trenchless technology under the Leiston to Aldeburgh SSSI and the North Warren RSPB reserve. This is in order to minimise surface-level disruption to this habitat. The characteristics of the geology beneath the reserve provide an impermeable barrier between surface water hydrology and ground water resources. This assessment has concluded that there would be no significant effects arising as a result of the tunnelling activity. Furthermore, Commitment GH02 in **Application Document 7.5.3.1 Outline Code of Construction Practice [APP-341]** includes for the provision of a Foundation Works Risk Assessment, where required in areas proposed for trenchless crossings. This will be undertaken in accordance with Environment Agency guidance and will include the risk of drilling fluid loss.
7.16.7	Deterioration of water quality in Kent, in particular the River Stour.	The impacts of the Proposed Project on water quality have been assessed within **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]** and **Application Document 6.9 Water Framework Directive Assessment [APP-293].** The measures embedded within the Proposed Project's design to mitigate the risks of pollution of the watercourses that would receive drainage discharges from operational above ground infrastructure (AGI) are summarised in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]**, which is secured through the Onshore CEMP as per Requirement 6 in Schedule 3 of the **Application Document 3.1 draft Development Consent Order [AS-087]**. A summary of embedded and good practice measures (as identified in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**) relevant to the WFD assessment is provided in **Appendix A** of **Application Document 6.9 Water Framework Directive Assessment [APP-293]**.
7.16.8	Deterioration of water quality in Suffolk, in particular the River Fromus.	The impacts of the Proposed Project on water quality have been assessed within **Application Document 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051]** and **Application Document 6.9 Water Framework Directive Assessment [APP-293]**. The measures embedded within the Proposed Project's design to mitigate the risks of pollution to the watercourses that would receive drainage discharges from operational AGI are summarised in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)**

Reference	Summary of relevant representation	Applicant's Response
		[APP-342] which is secured through the Onshore CEMP as per Requirement 6 in Schedule 3 of the **Application Document 3.1 draft Development Consent Order [AS-087]**. A summary of embedded and good practice measures (as identified in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]**) relevant to the WFD assessment is provided in **Appendix A** of **Application Document 6.9 Water Framework Directive Assessment [APP-293]**.
7.16.9	Speculation that aggregate for flood proof concrete for the converter station will be dredged from Goodwin Sands, reducing natural flood defence in the area from storm surges etc. (e.g. RR-1186 and several other RRs)	Although the source of materials will be determined at detailed design once the main works contractor is onboard, the Applicant is committed to looking for sustainable sources for all construction materials where practicable and will incentivise its contractors towards this goal.

~~Table 7.17~~ Table 7.16 Applicant's Response to the Relevant Representations that raise Benthic Ecology

Reference	Summary of relevant representation	Applicant's Response
7.17.1	Concern over the extent of damage to marine benthic habitats as a result of the marine cable construction.	At a maximum of 0.18 km^2, the area of habitat expected to be permanently lost due to cable protection measures is relatively small. Many of the seabed habitats comprise subtidal muds and mixed sediments, which are widespread and of low value. Lasting impact on saltmarsh and mudflats will be avoided by the Proposed Project's commitment not to use open cut trenching in Pegwell Bay for the transition between the Kent Onshore Scheme and Offshore scheme. See separate response below. The Proposed Project will, where possible, use cable protection materials that are locally sourced or environmentally benign (control measure **BE04** in Section 2.8 in **Application Document 7.5.3.1 Appendix A Outline Code of Construction Practice [APP-341]**). Two of the key aspects of the evolution of the Offshore Scheme were the Applicant's decision to firstly avoid the Margate and Long Sands SAC and to then re-route a 3.2 km section of the Offshore Scheme to also avoid passing through the Goodwin Sands MCZ (the route initially was located just inside the MCZ boundary). By directly avoiding these designated sites, the cable corridor does not intersect any sites specifically designated to protect ecologically important benthic habitats including subtidal sands and gravels, *Sabellaria spinulosa* aggregations, blue mussel beds, and circalittoral rock communities. This approach is consistent with the precautionary principle and mitigation hierarchy. The Applicant will be required to complete pre-construction surveys to inform final cable route design and installation. Where habitats of principal importance are identified during these pre-construction surveys, and there is potential for impacts on these habitats, the Applicant will prepare a Benthic Mitigation Plan, in consultation with the MMO and SNCBs. This commitment was included in **Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology** and **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** both of which were submitted at Deadline 1. It is concluded in **Application Document 6.6 (C) Habitat Regulations Assessment Report**, submitted at Deadline 1, that there are no adverse effects on any SACs designated for benthic habitats or species. It is also concluded in **Application Document 6.11 (B) Marine Conservation Zone Assessment,** submitted at Deadline 1, that the Proposed Project will not hinder the conservation objectives of any MCZs. Therefore, there are no requirements to identify any additional mitigation (in addition to measures already implemented during cable routing and designed in measures) to avoid or reduce potential effects. The impacts on benthic ecology are presented in **Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology**, submitted at Deadline 1.
7.17.2	Concern of trenching on the environment	The total area of expected temporary disturbance at the Suffolk Landfall is 0.0002 km^2 and the Kent Landfall is 0.02 km^2, and the total area of temporary disturbance in the Offshore Scheme associated with cable trenching is 3.05 km^2 (**Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology -**Table 2.17). This represents a worst-case scenario, assuming equipment with the largest footprint will be used throughout the construction phase. The impacts on benthic ecology are presented in **Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology** submitted at Deadline 1.
7.17.3	Destroy a fragile ecosystem and habitat of the marshes	The use of a trenchless technique for the installation of the cable in the transition between the onshore and offshore schemes will avoid the saltmarsh habitat entirely, with the HDD entry/exit points located 105 m to 140 m seaward from the edge of the saltmarsh. There will also be no vessels or vehicles interacting with the saltmarsh. Therefore, impacts on coastal saltmarsh have been scoped out of the assessment and are not considered further. The habitat below the saltmarsh is mudflat which is also a habitat of 'principal importance' under Section 41 of the NERC Act (2006) and so is considered in the impact

Reference	Summary of relevant representation	Applicant's Response
		assessment. Detailed information on the feasibility of trenchless technology focusing on horizontal directional drilling (HDD) and landfall assessment at Pegwell Bay can be found in **Appendix A Landfall HDD Feasibility Technical Note**, part of **Application Document 7.3 Design Development Report [APP-321**]. The impacts on benthic ecology are presented in **Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology,** submitted at Deadline 1.
7.17.4	The cumulative impact of construction, trenching, noise, and habitat loss could be catastrophic for marine life (such as […], Sabellaria reefs, and mussel beds and other species),	The impacts on benthic ecology are presented in **Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology,** submitted at Deadline 1. During the 2021 benthic survey, individual blue mussels were observed at a number of sampling stations but were only present in mussel bed form around KP15 but were found to comprise patches rather than a continuous reef, thus no Annex I (1170) – Biogenic Reef was identified (**Application Document 6.3.4.2.A Appendix 4.2.A Benthic Characterisation Report (Original Report)**). During the additional 2023 benthic survey blue mussels were observed in high density in DDV images at two locations, in an area of the Offshore Scheme adjacent to Goodwin Sands MCZ (**Application Document 6.3.4.2.D (B) Appendix 4.2.D Additional Subtidal Survey Report (Additional Surveys) [AS-006]**). There were three patches in the transects that were identified as a potential mussel bed, but they were not determined to qualify as Annex 1 reef. Goodwin Sands MCZ is designated for the protection of 'blue mussel Mytilus edulis beds' and has a conservation objective to recover this feature. The Offshore Scheme Boundary does not overlap with the Goodwin Sands MCZ, instead, running directly adjacent to the boundary for approximately 3.2 km from KP107.3 to KP110.5, thus avoiding direct impacts on the MCZ (**Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]**). Two of the key aspects of the evolution of the Offshore Scheme were the Applicant's decision to firstly avoid the Margate and Long Sands SAC and to then re-route to avoid passing through the Goodwin Sands MCZ. By avoiding these designated sites, the cable corridor does not intersect any sites specifically designated to protect ecologically important benthic habitats including subtidal sands and gravels, *Sabellaria spinulosa* aggregations, blue mussel beds, and circalittoral rock communities. This approach is consistent with the precautionary principle and mitigation hierarchy.
7.17.5	The method of rock backfill in high risk areas. The extensive use of rock backfill in high-risk areas (KP35-KP58 and KP81.5-KP96.5) could alter seabed morphology and disrupt sediment transport processes, impacting benthic habitats.	Rock backfill will be carried out along approximately 38 km of the route, between KP35.0 to KP58.0 and KP 81.5 to KP 96.5 (totalling 31.15% of the Offshore Scheme). The potential effect on seabed morphology and sediment transport processes was assessed in **Application Document 6.2.4.1 (C) Part 4 Marine Chapter 1 Physical Environment**, submitted at Deadline 1 and the impact found to be negligible and therefore, not significant. The habitat type most commonly identified as requiring rock backfill was sublittoral coarse sediment (Figure 6.4.4.2.3 in **Application Document 6.4.4.2 ES Figures Marine Benthic Ecology [APP-273]**). The habitat loss impact of rock backfill on benthic ecology is presented in **Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology**, submitted at Deadline 1.

~~Table 7.18~~ Table 7.17 Applicant's Response to the Relevant Representations that raise Commercial Fisheries

Reference	Summary of relevant representation	Applicant's Response
7.18.1	Restriction to fishing grounds and displacement during cable works is of key concern. Further consultation and dialogue with industry is needed to understand the extent to which inshore fishers may be impacted by cable works and ways this could be mitigated	The temporary loss of fishing grounds is primarily associated with loss of access to fishing grounds during cable installation activities. During construction all fishing activity will be temporarily excluded from discrete areas by guard vessels around cable laying vessels, support vessels, and sections of temporarily exposed cables as set out in **Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093].** This includes the need for static fishing gear to be absent from the extent of the Offshore Scheme Boundary during the Construction Phase. As a result, some fishers may potentially be unable to access some of their fishing grounds for short periods of time. As set out in **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries [APP-081]** key fish fisheries identified along the route of the Offshore Scheme include cockle dredgers which account for 36% of the yearly landings in the study area and focused around the Thames Estuary area; pots and traps (whelks, lobster and crab) which account for 19% of the yearly landings in the study area; demersal trawls and seines (squid, horse mackerel and red mullet) which account for 26% of the yearly landings for the study area, 78% of which were landings by foreign vessels; and netting (fixed and drift which target mainly sole and bass) and account for 9% of the yearly landings for the study area. Potential effects of restricted access to fishing grounds and displacement during cable works are discussed further in the responses below. Where there is potential for impacts on fisheries (all) the Applicant has committed to appointing a Fisheries Liaison Officer (FLO) and preparing a Fisheries Liaison and Co-existence Plan (FLCP) which will provide a framework for ongoing engagement and consultation with the fishing industry to understand the extent to which inshore fishers may be impacted by cable works and ways this could be mitigated.
7.18.2	Concern over the impact of the construction of the marine cable on the fishing industry.	Potential effects of restricted access to fishing grounds during construction has been assessed in **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries [APP-081]**. This assessment concluded that for all fisheries, with the exception of static gear fisheries, potential effects without additional mitigation would not be significant. Where there is potential for significant effects on static gear fisheries, these effects will be mitigated through a FLCP which, in addition to providing an framework for ongoing communications with the fishing industry will establish a protocol and procedures for compensating fisheries for the removal or relocation of fishing gear where there is restricted access to fishing grounds and there is evidence that their daily operations and livelihood's will be impacted by the Proposed Project. This commitment is included in **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC).** With the implementation of this mitigation there will be no significant effects on commercial fisheries that are operating along the route of the Offshore Scheme. Potential effects on fisheries have also been assessed during operation. The assessment presented in **Application Document 6.2.4.8 Part 4 Marine Chapter 8 Commercial Fisheries [APP-081]** concluded that there would be no significant effects with the exception of static drift net fishers. Potential significant effects on drift net fishers were identified due to the potential for an increased risk of gear damage as a result of snagging on cable protection. However, with the implementation of mitigation measures set out in the FLCP including a commitment to ongoing engagement with drift net fisheries including consultation on cable protection designs to minimise the potential risk of snagging as well as procedures for claims for damage to or a loss of fishing gear, it was concluded that these effects would be reduced and would not be significant. The FLCP as committed to in **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** applies to all fisheries that are potentially impacted by the Proposed Project during construction, operation or decommissioning. It will be prepared in cconsultation with all fisheries and will provide the basis of a fisheries communications and mitigation strategy moving forward.
7.18.3	Query regarding whether there will be no trawling areas over the marine cable and how it will be protected from trawling.	Notably, demersal and beam trawlers have a large operational range, covering much of the southern North Sea and the English Channel (**Application Document 6.3.4.8.A (B) ES Appendix 4.8.A Commercial Fisheries Technical Report,** submitted at Deadline 1). The data show that the Offshore Scheme overlaps with a small portion of their

		grounds, with higher or equally valuable areas located in other areas not affected by the Offshore Scheme. As such, trawlers are considered to be highly adaptable to the temporary loss of access to fishing grounds during construction and this is likely to have limited impact on the landings. The Applicant will not be implementing any 'no trawl areas' along the routes of the Offshore Scheme. The primary aim of the Applicant is to achieve target Depth of Lowering (DOL) of the cables (which will be bundled together in one single trench) through burial in the seabed (e.g. without the requirement for any additional cable protection). However, due to varying ground conditions along the route of the Offshore Scheme there is potential that some additional cable protection such as rock backfill (placement of rock in the trench up to or just below seabed level) or rock berms (placement of rock over the cable and cable trench). There will also be requirements for rock berms where the Offshore Scheme is required to cross other third party assets. In areas where there is no rock protection there will be no change to the seabed. Where there are requirements for rock protection this will introduce a new obstruction on the seabed. However, as set out above, the Applicant is committed to working with the fishing industry to understand where the placement of rock (if required) is considered to be of greatest risk to fishing and to consult on potential design options for reducing potential risks to fisheries whilst fishing in the area. There is no plan to restrict fishing along the Offshore Scheme and where possible the Applicant is committed to taking necessary steps and implementing appropriate measures such as ongoing consultation and procedures for claiming compensation where there is damage or loss to fishing gear that can be attributed to the Proposed Project to ensure there are no long term restrictions to fishing activities along the route of Offshore Scheme. As built surveys of the cables will also be conducted, and their positions (including locations of external protection) will be reported to the UKHO and Kingfisher for inclusion on Admiralty and KIS-ORCA charts. These details will also be shared with relevant fisheries stakeholders.

~~Table 7.19~~ Table 7.18 Applicant's Response to the Relevant Representations that raise Fish and Shellfish Ecology

Reference	Summary of relevant representation	Applicant's Response
7.19.1	Concern over the impact on fish due to construction of the marine cable.	The potential impact of the Proposed Project on fish is assessed in **Application Document 6.2.4.3 (B) Part 4 Marine Chapter 3 Fish and Shellfish Ecology [AS-022]**. There are no significant impacts on fish predicted.

~~Table 7.20~~ Table 7.19 Applicant's Response to the Relevant Representations that raise Marine Archaeology

Reference	Summary of relevant representation	Applicant's Response
7.20.1	Concern over the impact on maritime heritage from the marine cable and landfall sites in both Suffolk and Kent. Concern over what provisions / mitigations are in place to protect archaeology and important underwater heritage.	As part of the Environmental Statement that accompanies the DCO application, the Applicant has undertaken an assessment of the potential impacts on marine archaeology to include physical disturbance activities causing direct damage and/or loss of heritage receptors on and below the seabed, and physical disturbance activities causing changes to hydrodynamic and sedimentary regimes leading to sediment reduction on the seabed and scour, causing adverse indirect effects on seabed heritage receptors. The assessment also considered activities that may influence the setting of identified heritage receptors and the character of the historic seascape. These evaluations were undertaken by archaeological specialists in accordance with recognised good practice guidance. The results of the assessment are found in **Application Document 6.2.4.6 (B) Part 4 Marine Chapter 6 Marine Archaeology**, submitted at Deadline 1. A number of sources of primary and synthesised information were consulted for the assessment which are contained in **Application Document 6.3.4.6.A (C) ES Appendix 4.6.A Marine Archaeological Technical Report**, submitted at Deadline 1. The assessment did not identify any potential significant adverse effects of the Proposed Project on marine archaeology.
7.20.2	Concern if adequate surveys have been taken to confirm the project won't impact marine archaeology and heritage.	As set out in **Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology [APP-079]** a number of sources of primary and synthesised information were consulted for the marine archaeological assessment (**Application Document 6.3.4.6 (B) Appendix 4.6.A Marine Archaeological Technical Report)**: - geophysical survey datasets: - acquired by MMT in 2021 comprising sub-bottom profiler (SBP), sidescan sonar (SSS), magnetometer (Mag.) and Multibeam Echo Sounder (MBES); - acquired by Next Geo (Next) in 2024 comprising SBP, SSS, Mag. and MBES; - gradiometer survey data acquired by SEP Hydrographic (SEP) in 2024 as Unmanned Aerial Vehicle (UAV) Mag. data; - associated reports for the above geophysical data (MMT, 2021; SEP Hydrographic, 2024; Next Geo, 2024); - geotechnical data including 69 provisional vibrocore logs provided by MMT in 2021; - the UKHO data for charted wrecks and obstructions (received 4 April 2022 and refreshed 23 July 2024); - the National Marine Heritage Record (NMHR) maintained by Historic England, comprising data for terrestrial and marine archaeological sites, findspots and archaeological events (received 23 March 2022); - Historic Environment Records results for Suffolk (provided by AECOM's Historic Environment and Cultural Heritage team) and Kent (received 23 March 2022) comprising databases of their recorded archaeological sites, findspots, and archaeological events; - the National Heritage List for England maintained by Historic England, comprising data of designated heritage assets including sites protected under the Protection of Military Remains Act 1986 (Protection of Military Remains Act 1986 c.35) and the Protection of Wrecks Act 1973 (Protection of Wrecks Act 1973 c.33); - results of the walkover surveys for both landfalls; - coastal archaeological findspots and sites from CITiZAN's coastal map (CITiZAN, 2023);

Reference	Summary of relevant representation	Applicant's Response
		- datasets comprising the Historic Seascape Characterisation (HSC): Consolidating the National HSC Database (Land Use Consultants, 2017). - relevant background mapping from the area including British Geological Society (BGS), Admiralty Charts from the UKHO, aerial photographs from the Channel Coastal Observatory, historic maps and Ordnance Survey; and applicant supplied geophysical survey report (MMT, 2021); The key survey data included the geotechnical survey data and geophysical survey data. The geotechnical survey data comprised geotechnical logs and core photographs from vibrocores collected across two separate surveys (MMT survey in September 2021 and a survey by Next in October 2024. The survey method used during the October 2024 survey was agreed with Historic England. The geophysical survey data was acquired across three surveys, August to September 2021 (MMT); November 2023 to March 2024 and a survey in June 2023 which focused specifically on Pegwell Bay. Due to the timing and ongoing evolution of the Offshore Scheme including route changes to avoid other sensitive features and designated sites, the total coverage of the nearshore geophysical survey does not fully align with the extents of the Offshore Scheme Order Limits in Pegwell Bay. This is due to an extension to the Order Limit boundary prior to submission to account for possible anchoring of vessels in the nearshore area during cable installation and for vehicles to access the trenchless crossing exit pits from the former hoverport. To address these discrepancies between the survey data coverage and the extents of the Offshore Scheme Order Limits, the Applicant has committed to completing further pre-construction geophysical surveys within Pegwell Bay. Results from this additional survey will be used to inform the identification of any potential features of archaeological importance located beyond the extent of the previous survey to determine, based on planned activities in the extended Order Limit boundary, the potential for any effects on these features. This commitment is included in **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC)**. Additionally, the Applicant has already prepared and submitted **Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation [PDA-033]**. This document addresses unavoidable impacts that may occur anywhere in the Offshore Scheme and particularly where the nature of the Proposed Project means that some details have not been confirmed when an application is submitted, allowing flexibility within clearly defined parameters (Rochdale Envelope or Design Envelope) in accordance with archaeological best practice. This information can also be found in commitment MA01 within **Application Document 6.2.4.6 (B) Part 4 Marine Chapter 6 Marine Archaeology** submitted at Deadline 1.

~~Table 7.21~~ Table 7.20 Applicant's Response to the Relevant Representations that raise Issues relating to Marine Mammals

Reference	Summary of relevant representation	Applicant's Response
7.21.1	Impact on seals within Pegwell Bay – noise and vibration from construction works, UXO detonation)	The Applicant acknowledges the importance of Pegwell Bay to wildlife, including seals which haul-out in the River Stour. Project-specific monthly surveys were undertaken in the period September to November 2024 and August 2025 with the aim of identifying the specific haul-out locations of seals in the River Stour in Pegwell Bay (**Application Document 6.4.4.4.A (B) Pegwell Bay Seal Survey Report**, submitted at Deadline 1). During all surveys, hauled-out seals were only found in the lower River Stour on the exposed mudflats during low tide and on the adjacent saltmarsh around high tide. The haul-out location in the River Stour is approximately 670 m away from the closest construction works in Pegwell Bay which includes the use of excavators to bury anchor points used by the cable-lay vessel and their associated movements across the mudflats. Vibratory piling used to install HDD pits in Pegwell Bay is occurring approximately 880 m away and is expected to produce the most noise. For all construction activities assessed in **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals** and **Application Document 9.49 Seals and Airborne Sound Disturbance Technical Note**, submitted at Deadline 1, auditory injury in seals would either only occur within very short distances of the construction activities (i.e. a worst-case distance of 13 m for vibratory piling) or construction activities would not be loud enough to result in auditory injury. Seals are some distance away from construction activities and so auditory injury is highly unlikely. The worst-case sound levels predicted to occur at the haul-out site within the River Stour are also not considered loud enough to result in a behavioural response, such as fleeing the area. The seals hauled out in the River Stour have also demonstrated significant habituation to noise due to the very regular passage of seal sightseeing vessels close to haul-out locations. Detailed airborne noise modelling undertaken in relation to seals in the River Stour is provided in **Application Document 9.49 Seals and Airborne Sound Disturbance Technical Note**, submitted at Deadline 1. All potential impacts to seals in Pegwell Bay and the River Stour are assessed in **Application Document 6.2.4.4 (E) Part 4 Marine Chapter 4 Marine Mammals**, submitted at Deadline 1. Unexploded Ordnance (UXO) detonation has not been included within the current Application. As the presence, location, and clearance methods for UXO are presently unknown, it is not possible at this stage to undertake a robust and proportionate assessment of potential impacts on marine mammals. Should UXO clearance be required, it will be subject to a separate Marine Licence application, accompanied by an impact assessment addressing potential effects on marine mammals.

Table 7.21~~Table 7.22~~ Applicant's Response to the Relevant Representations that raise Shipping and Navigation

Reference	Summary of relevant representation	Applicant's Response
7.22.1	Concerns over the impact of the construction of the marine cable on existing marine traffic. Concern over cable crossing for shipping and navigation in the area.	As part of the Environmental Impact Assessment undertaken for the Proposed Project, the Applicant undertook an assessment of the potential impacts on shipping and navigation, **Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation**, submitted at Deadline 1. The assessment recommended the establishment of communication plans with clear protocols to ensure effective communication and coordination between all relevant shipping and navigation stakeholders as a key mitigation for minimising shipping and navigation impacts during the construction phase. During construction and operation, the Applicant will develop a well-coordinated communication strategy, and proactive planning of operations, to ensure safe and efficient operations with minimal disruption to shipping and navigation. A Navigation Installation Plan is being produced post-DCO application submission to provide a mechanism to achieve this. The Applicant has submitted a draft Outline NIP to PINS on 1st September 2025, as part of the Applicant's response to the ExA's s89(3) letter dated 5 August 2025. The Proposed Project currently routes south of the Sunk Deep-Water Anchorage and north of the Sunk W1 Buoy to be further from the Sunk Pilot Station in accordance with requirements of the Harwich Haven Authority, avoiding potential disruption to this navigational feature during the construction phase.
7.22.2	Query as to how inspection and maintenance of the marine cable will be undertaken Concern over permanent and temporary impacts of installation and repair / maintenance of the cable.	The cable system has been designed to maintain its integrity without the need for routine maintenance. However, monitoring may reveal specific sections that require attention. While cable repairs can occur at any time, they are anticipated to be infrequent. During the operational lifetime of the cable several inspections to examine integrity are foreseen. This is expected to take place annually via remote operated vehicle (ROV)/autonomous underwater vehicle (AUV) in the early stages of the operation moving to every 2 – 5 years once suitable functional/operational stability is established.
7.22.3	Concern over the impact of pipeline crossings on the River Stour with regard to navigation. Concern over transport and access to the River Stour (port) during construction and operation of the Sea Link project.	The Proposed Project is not proposing a pipeline crossing on the River Stour. Further details of the Proposed Project are contained within **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-087]**. A temporary bridge structure will span across the River Stour for the duration of the construction period. The public right of navigation along the River Stour will be temporarily stopped up/closed for one to five days whilst the bridge is lifted into place and secured. The bridge will be designed so that, once in place, the river remains navigable. Sensitivity of open space receptors is assessed to be high, due to their local importance and limited alternatives available for substitution in the local area. The Proposed Project will require a short-term stop-up/closure of river navigation. However, when considering the closure in the context of the duration of the construction period, the magnitude of impact will be negligible. Overall, this results in a temporary negligible effect, which is not considered to be significant. Further information is contained within **Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism**, submitted at Deadline 1.
7.22.4	Suggestion that no cable joints should be in the Sunk area to protect existing shipping movements. Requests for no cable joints to be located in the Sunk area due to navigational safety concerns.	This suggestion has been factored into routing and noted in **Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation** and **Application Document 6.3.4.7.A (B) ES Appendix 4.7.A Navigational Risk Assessment**, both submitted at Deadline 1. As stated in the NRA, the Proposed Project has committed to avoiding disruption to the Sunk anchorage area and Sunk pilot boarding area during construction by minimising time spent in this region during construction and avoiding cable joints in this area where possible. The number of campaigns is currently projected to be 2, each of c. 60 km. The jointing point of the cables will aim as far as practicable to be outside the Sunk area and the higher risk area to the cables in this heavily trafficked portion of the route. If a single lay campaign is proposed by the Installation Contractor, there will be no need for a joint (only

Reference	Summary of relevant representation	Applicant's Response
		if the cable is accidentally damaged or suffers a technical failure within the Sunk area (i.e. post installation campaign) will a repair joint will be required).
7.22.5	Requirement for cable installation (and associated works) to be north of both the Storm Buoy and the W1 buoy, and south of the charted Sunk deepwater anchorage. - Concerns over proximity to Sunk due to possible restrictions on access requirements. - Requests of cable to be north of both the Storm Buoy and the W1 buoy, and south of the charted Sunk deepwater anchorage, due to navigational safety concerns.	Through discussion with Harwich Haven Harbour Authority, the route has been refined to route north of the Sunk W1 buoy and south of the Sunk deep-water anchorage, as requested, to minimise disruption to the Sunk pilot boarding station during the construction phase. This is discussed in **Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation** and **Application Document 6.3.4.7.A (B) ES Appendix 4.7.A Navigational Risk Assessment**, both submitted at Deadline 1.

~~Table 7.23~~ Table 7.22 Applicant's Response to the Relevant Representations that raise Alternative Solutions

Reference	Topic	Applicant's Response
7.23.1	The possible alternate location has not been considered thoroughly, and brownfield sites located closer to London	In developing the Proposed Project, National Grid 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 all the alternative sites suggested. The Proposed Project is a reinforcement project that is required to enhance the network due to the change in predicted generation and use of electricity by 2030. The need case for the Proposed Project has identified that connection is required within the Sizewell area, therefore delivery outside of this area would not fulfil the network reinforcement requirement that the Proposed Project is intended to provide. National Grid 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 3.5 GW from the proposed Princess Elisabeth Island will be connected to the onshore network by up to ten 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. National Grid have listened to community feedback in order to understand concerns about the impact of the Proposed Project and minimised these impacts onshore and offshore where possible. The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce 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. Further information on the reasoning behind the connection location for the Proposed Project, the alternatives considered (including brownfield sites), 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 7.10 Coordination Document [APP-363]**; and • **Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [AS-093]**.

Reference	Topic	Applicant's Response
7.23.2	Why should this project go ahead when there are less destructive alternatives	National Grid have listened to community feedback in order to understand concerns about the impact of the Proposed Project and minimised these impacts onshore and offshore where possible. The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce 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. Further information on the reasoning behind the connection location for the Proposed Project, the alternatives considered (including brownfield sites), 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 7.10 Coordination Document [APP-363]**; and **Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [AS-093]**.
7.23.3	This project should be built somewhere else	In developing the Proposed Project, National Grid 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 all the alternative sites suggested.
7.23.4	Alternatives are available, including using Modular Offshore Hybrid Assets and Offshore Converter Stations	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 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.
7.23.5	There should be consideration of offshore locations	In developing the Proposed Project, National Grid 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 all the alternative sites suggested. The Proposed Project is a reinforcement project that is required to enhance the network due to the change in predicted generation and use of electricity by 2030. The need case for the Proposed Project has identified that connection is required within the Sizewell area, therefore delivery outside of this area would not fulfil the network reinforcement requirement that the Proposed Project is intended to provide. National Grid is constantly assessing new technologies and looking for different ways in which to future-proof the electricity transmission network.

Reference	Topic	Applicant's Response
		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 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. National Grid have listened to community feedback in order to understand concerns about the impact of the Proposed Project and minimised these impacts onshore and offshore where possible. The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce 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. Further information on the reasoning behind the connection location for the Proposed Project, the alternatives considered (including brownfield sites), 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 7.10 Coordination Document [APP-363]**; and • **Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [AS-093]**.

~~Table 7.24~~ Table 7.23 Applicant's Response to the Relevant Representations that raise Climate Change

Reference	Summary of relevant representation	Applicant's Response
7.24.1	Concerns about the impacts on the Proposed Project from climate change	A climate change assessment is included within **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change (APP-085)**. This includes an assessment of climate change risks (including flooding) in accordance with the Institute of Environmental Management and Assessment (IEMA) good practice guidance for assessing climate change in Environmental Impact Assessments (Institute of Environmental Management and Assessment, 2022; Institute of Environmental Management and Assessment, 2020). A separate flood risk assessment has been conducted within **Application Document 6.8 Flood Risk Assessment (APP-292).** The flood risk assessment involves detailed modelling and assessment, and accounts for the impacts of climate change on flooding. The Proposed Project has been designed taking into account future climate change and is designed to be as resilient as possible to its effects. The climate change assessment concluded that the effects of the Proposed Project on the global climate are likely to be not significant because the Proposed Project's GHG impacts are fully consistent with applicable existing and emerging policy requirements set by the government to support them in reaching their net zero target and move away from the use of fossil fuels. The assessment also concludes that the effect of climate change impacts on the Proposed Project is anticipated to be not significant. Where any climate change impacts are identified they will be managed through the appropriate mitigation.
7.24.2	Concerns over the use of greenhouse gases within Friston Substation	A key aim of the Proposed Project is to provide the necessary upgrades to the transmission network to connect offshore wind, interconnectors and nuclear power. These technologies are vital for the achievement of net zero, with the project enabling reductions in greenhouse gas emissions through facilitating the delivery of these projects. The decision to progress with a gas insulated substation (GIS) rather than air insulated substation (AIS) was taken for several reasons including 1) the reduced size of the resulting substation, following commitments in the SPR DCO to minimise the size of the NGET substation, 2) change to the network operating requirements, which results in a different overhead line connection and 3) the availability of SF6 free GIS equipment.

~~Table 7.25~~ Table 7.24Applicant's Response to the Relevant Representations that raise Community Benefits and Enhancements

Reference	Topic	Applicant's Response
7.25.1	Criticism that there is no consideration for community improvements in the Proposed Project proposals.	The Applicant supports the delivery of community benefits associated with transmission infrastructure and already has a number of established programmes which deliver this. 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
7.25.2	Suggestions made for community improvements and enhancement.	The Applicant is working to understand local and regional aspirations and priorities in relation to community benefits. It welcomes the suggestions for delivering community benefits and as the Proposed Project progresses, it will work with stakeholders and local communities to further inform this.

~~Table 7.26~~ Table 7.25 Applicant's Response to the Relevant Representations that raise Coordination with Other Projects

Reference	Topic	Applicant's Response
7.26.1	Concern that there is a lack of coordination between the Proposed Project and other energy projects in the Suffolk area and that consequently, the cumulative impact is not being adequately assessed or mitigated.	The Applicant has assessed the inter-project cumulative effects, i.e. the effects of the Proposed Project in addition to any other contemporaneous development within the same zone of influence, and this is presented in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].** The methodology used for the assessment of inter-project cumulative effects is detailed in **Application Document 6.3.1.5.A Part 1 Introduction Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]** and follows the Planning Inspectorate's *Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment* (Inspectorate, 2024)~~(Inspectorate, 2024)~~. As indicated in this application document, meetings were held with Suffolk County Council and East Suffolk Council to discuss the Inter-Project Cumulative Effects Short List, during which the Councils indicated that the inter-project cumulative effects assessment methodology was appropriate. All mitigation measures, including additional mitigation measures to avoid or reduce likely significant environmental effects as far as practicable, have been identified in the relevant topic chapters of the Environmental Statement and are recorded in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].** The Applicant is aware of the importance of coordination with other projects, as highlighted in the National Policy Statements (NPS) for Energy, specifically Overarching National Policy Statement for Energy EN-1 (NPS EN-1) (DESNZ, 2024) ~~(DESNZ, 2024)~~, National Policy Statement for Renewable Energy EN-3 (NPS EN-3), and National Policy Statement for Electricity Networks EN-5 (NPS EN-5). Policies in these NPSs require the consideration and evaluation of coordination for onshore and offshore electricity transmission infrastructure to minimise adverse impacts on the local environment and host communities. The Applicant has set out the Proposed Project's compliance with the relevant coordination policies in **Application Document 7.10 Coordination Document [APP-363].** This document provides an overview of the various coordination approaches that have been considered and, where practicable, implemented by the Sea Link Project. Coordination efforts include, for example, developing a Coordination Masterplan for the Suffolk Converter Station site in Saxmundham considering how the Converter Stations for Sea Link, Lionlink and Nautilus (should it be required in this location) would work together on the site (see **Application Document 7.10 Coordination Document Appendix A NGV Coordination Masterplan [APP-363].** This shows that a coordinated strategy has been developed by National Grid Ventures and the Applicant for the site. The Applicant has also been working closely with Scottish Power Renewables (SPR) on the development of the site at Friston that will be constructed under the SPR consent (scenario 1) or as part of the Proposed Project (scenario 2). This engagement has also included initial discussions on development of the Friston site, including the overall landscaping approach and how the Applicant's cables interact with the SPR landscaping (including cable routeing and construction techniques). The Applicant remains committed to ongoing engagement with the other projects identified in **Application Document 7.10 Coordination Document [APP-363]** to secure coordination benefits and explore further opportunities for coordination.
7.26.2	Concern that there is a lack of coordination between the Proposed Project and other energy projects in the Kent area and that	The assessment of inter-project cumulative effects, i.e. the effects of the Proposed Project in addition to any other contemporaneous development within the same zone of influence, js presented in **Application Document 6.2.3.13 Part 2 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073].** The methodology

Reference	Topic	Applicant's Response
	consequently, the cumulative impact is not being adequately assessed or mitigated.	used for the assessment of inter-project cumulative effects is detailed in **Application Document 6.3.1.5.A Part 1 Introduction Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]** and follows the Planning Inspectorate's *Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment* (Inspectorate, 2024)~~(Inspectorate, 2024)~~. As indicated in this application document, meetings were held with Kent County Council, Thanet District Council and Dover District Council to discuss the Inter-Project Cumulative Effects Short List, during which the Councils indicated that the inter-project cumulative effects assessment methodology was appropriate. All mitigation measures, including additional mitigation measures to avoid or reduce likely significant environmental effects as far as practicable, have been identified in the relevant topic chapters of the Environmental Statement and are recorded in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342].** The Applicant is aware of the importance of coordination with other projects, as highlighted in the National Policy Statements (NPS) for Energy, specifically Overarching National Policy Statement for Energy EN-1 (NPS EN-1) (DESNZ, 2024)~~(DESNZ, 2024)~~, National Policy Statement for Renewable Energy EN-3 (NPS EN-3) **~~Invalid source specified.~~**, and National Policy Statement for Electricity Networks EN-5 (NPS EN-5) **~~Invalid source specified.~~**. Policies in these NPSs require the consideration and evaluation of coordination for onshore and offshore electricity transmission infrastructure to minimise adverse impacts on the local environment and host communities. The Applicant has set out the Proposed Project's compliance with the relevant coordination policies in **Application Document 7.10 Coordination Document [APP-363].** This document provides an overview of the various coordination approaches that have been considered and, where practicable, implemented by the Sea Link Project and details of the coordination with other projects. The Applicant remains committed to ongoing engagement with the other projects identified in **Application Document 7.10 Coordination Document [APP-363]** to secure coordination benefits and explore further opportunities for coordination.
7.26.3	Concerns that the Applicant has not presented a complete picture of all the energy projects in the Suffolk area, and that a coordinated review needs to be undertaken.	The Applicant has assessed cumulative effects of the Proposed Project and the other projects planned in Suffolk. This is presented in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].** The methodology used for the assessment of inter-project cumulative effects is detailed in **Application Document 6.3.1.5.A Part 1 Introduction Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]** and follows the Planning Inspectorate's *Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment* (Inspectorate, 2024)~~(Inspectorate, 2024)~~. This document provides guidance about the type and scale of other developments that should be considered in the assessment of cumulative effects with other projects. In order to determine a long list of developments that would progress through the cumulative effects assessment, the following criteria were applied: • Development Consent Order DCO) applications for Nationally Significant Infrastructure Projects (NSIPs) in England, contained in the Register of Applications on the National Infrastructure Planning website **~~Invalid source specified.~~**; • local authority planning applications that represent 'major developments', the definitions and thresholds for which are set out in The Town and Country Planning (Development Management Procedure) (England) Order 2015, as amended;

Reference	Topic	Applicant's Response
		• any major development projects being progressed through other statutory procedures; and allocations identified in the adopted and emerging development plans of the local planning authorities. In order to determine the short list, the method outlined in the Planning Inspectorate's advice note (Inspectorate, 2024)~~(Inspectorate, 2024)~~ was applied to the long list. Developments on the short list which are (i) already under construction, (ii) are expected to be fully operational by the time that the Proposed Project construction activities commence and (iii) where operational and maintenance activities are minor, have been considered as part of the future baseline conditions. This short list was kept under review throughout the preparation of the ES and will continue to be updated as required. The Applicant is aware of the importance of coordination with other projects, as highlighted in the National Policy Statements (NPS) for Energy, specifically Overarching National Policy Statement for Energy EN-1 (NPS EN-1), National Policy Statement for Renewable Energy EN-3 (NPS EN-3), and National Policy Statement for Electricity Networks EN-5 (NPS EN-5). Policies in these NPSs require the consideration and evaluation of coordination for onshore and offshore electricity transmission infrastructure to minimise adverse impacts on the local environment and host communities. The Applicant demonstrates the Proposed Project's compliance with the relevant coordination policies in **Application Document 7.10 Coordination Document [APP-363].** This document provides an overview of the various coordination approaches that have been considered and, where practicable, implemented by the Sea Link Project and details of the coordination with other projects. The Applicant remains committed to ongoing engagement with the other projects identified in the **Application Document 7.10 Coordination Document [APP-363]**to secure coordination benefits and explore further opportunities for coordination.
7.26.4	Criticism that National Grid have not properly coordinated with developers of all the projects planned in the Suffolk area.	The Applicant is aware of the importance of coordination with other projects, as highlighted in the National Policy Statements (NPS) for Energy, specifically Overarching National Policy Statement for Energy EN-1 (NPS EN-1), National Policy Statement for Renewable Energy EN-3 (NPS EN-3), and National Policy Statement for Electricity Networks EN-5 (NPS EN-5). Policies in these NPSs require the consideration and evaluation of coordination for onshore and offshore electricity transmission infrastructure to minimise adverse impacts on the local environment and host communities. The Applicant demonstrates the Proposed Project's compliance with the relevant coordination policies in **Application Document 7.10 Coordination Document [APP-363].** This document provides an overview of the various coordination approaches that have been considered and, where practicable, undertaken by the Sea Link Project and details of the coordination with other projects, in both the Suffolk, Kent and offshore areas. The Applicant remains committed to ongoing engagement with the other projects identified in **Application Document 7.10 Coordination Document [APP-363].** to secure coordination benefits and explore further opportunities for coordination.

~~Table 7.27~~ Table 7.26Applicant's Response to the Relevant Representations that raise Design Issues

Reference	Topic	Applicant's Response
7.27.1	Query on whether the trench that will be excavated for the onshore cable will be fully reinstated and query about tree replanting along the cable route.	The Applicant can confirm that land required temporarily will be reinstated following cable installation. All trenches will be reinstated to ground level, topsoil replaced and appropriate planting developed. Trees cannot be planted over the cable itself, so where new trees are to be planted they will be planted away from the cable route. Where the land is being restored to agricultural use, **Measure AS02** of the **CEMP Appendix A Outline Code of Construction Practice [APP-341]** requires the applicant to aim to restore land to the pre-construction ALC grade (unless otherwise agreed with the landowner).
7.27.2	Query as to whether the Friston Kiln Lane Substation and Converter Station can be sunk into the ground to reduce the visual impact.	The Applicant has assessed the ground conditions at Friston Kiln Lane Substation and has concluded that they are not suitable to allow for the 'sinking' of the substation'. Similarly, ground conditions for the Converter Station also are not amenable to fully sinking the converter station. The **Design Approach Document – Suffolk** document confirms at **Part 3.1** that: 'U*nless restricted by ground conditions, drainage, flood risk, or other technical constraints, the converter station development plateau should be kept as low as possible, while also seeking to balance cut and fill on the site This is to mitigate visual impact by keeping the project's overall height above ordnance datum (AOD) as low as possible*.' The landscape and visual chapter (**Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**) also sets out the embedded mitigation to aim to reduce and where possible avoid landscape and visual effects, including design principles for the proposed built form.
7.27.3	Query on the width and depth of proposed trenching for the HVDC Cables.	Notwithstanding that the HVDC cables in the marine environment will be bundled together, it is anticipated in the terrestrial environment there will be a degree of separation of the HVDC Cable for thermal efficiency and ease of maintenance. For the onshore cables the Applicant will be installing two HVDC cables in a trench approximately 2.3 m wide and 1.5 m deep which reflects the typical width and depth for this type of cable installation as set out in **Chapter 4 Description of the Proposed Project of the ES [AS-093]**.
7.27.4	Suggestions that all cables (in both Suffolk and Kent) are installed using horizontal directional drilling.	The potential effects of undergrounding the cables, or opportunities for trenchless techniques to be utilised, have been assessed as part of the Environmental Statement, and the considerations of options such as trenchless options and overhead lines are assessed in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]**. Where cables are routed through sites with statutory designations, the Applicant will employ trenchless solutions. It acknowledges that there will be temporary impact until the trench is fully reinstated and any planting established. This commitment is secured through the Landscape and Ecological Management Plan (LEMP) through Requirement 6 of Schedule 3 of **Application Document 3.1 draft development Consent Order [AS-087]**. Details are set out in the **Outline LEMP [AS-059]**. Horizontal directional drilling is generally less economically efficient than open-cut trenching in most areas. As a regulated business, the Applicant must ensure that all expenditure is justified to protect

Reference	Topic	Applicant's Response
		customers from unnecessary costs on their bills. Therefore, this method cannot be used for the installation in all locations.
7.27.5	Query as to whether the Kent Converter Station can be underground or to increase the footprint and reduce the height.	As set out in **Part 3.1 of 7.11.2 Design Approach Document – Kent [APP-365]** Unless restricted by ground conditions, drainage, flood risk, or other technical constraints, the converter station and substation development plateau should be kept as low as possible in order to mitigate visual impact by keeping the project's overall height above ordnance datum (AOD) as low as possible. It is not however possible to accommodate all of the infrastructure underground due to the ground conditions and the nature of the technology being used at the Converter Station.
7.27.6	Suggestions that all cabling should be underground and overhead lines should not be used.	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]**.

~~Table 7.28~~ Table 7.27 Applicant's Response to the Relevant Representations that raise Health and Wellbeing

Reference	Topic	Applicant's Response
7.28.1	Concern over the mental well-being of those in close proximity to the Proposed Project and those not having the same access to public open spaces	The health and safety of the public, local communities and employees is central to everything that National Grid does. Throughout the development of the proposals, 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. A complete health and wellbeing assessment has been undertaken. This is set out in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003].** These conclude that there are no anticipated significant effects as a result of the Proposed Project. Specifically, the Applicant recognises the importance of local amenity and access to open space. In response to this concern, **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003]** assess 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 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** and **Application Document** 6.**2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]**. No significant adverse effects are identified with regards to human health and wellbeing. With regard to electromagnetic fields (EMFs), the UK has a carefully thought-out set of policies for protecting the general public against EMFs, the main component of which is exposure guidelines. These exposure guidelines are set by independent scientific bodies and are based on decades-long studies into the effects of EMFs and ill-health. After those decades of research, the weight of evidence is against there being any health risks of EMFs below the guideline limits. It is the Applicant's policy to ensure that all of its equipment comply fully with these exposure limits. Further information can be found in **Application Document 6.5 Electric and Magnetic Field Compliance Report [APP-289].**
7.28.2	Impact on the freedom of movement in the Proposed Project area	Outline PRoW Management Plans have been prepared for both Suffolk and Kent as part of the DCO Application. These have been developed in consultation with the relevant local planning authorities and provide detail on PRoW diversions, closures and management during the construction, operation and decommissioning phases. See **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]** and **Application Document 7.5.9.2 Outline Public Right of Way Management Plan – Kent [APP-353]**. The majority of interactions with the PRoW are short term in nature for a temporary period during construction. The proposed management measures in the Management Plans above seek to retain access to PRoW during all phases of the Proposed Project, with temporary diversions only being proposed where these are required to bypass any temporary closures during the construction phase where necessary. Two PRoW will be permanently stopped up (with permanent diversions) as a result of the Suffolk Onshore Scheme which comprise PRoW E-354/006/0 due to the location of the Friston Substation and PRoW E-491/005/0 due to the location of the Saxmundham Converter Station. Permanent diversions would be implemented for these routes retaining freedom of movement.

Reference	Topic	Applicant's Response
		The proposed diversion routes will be put in place prior to the stopping up of these PRoW so that PRoW users are able to continue their journey. These 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 practicable. The proposed diversion routes will be set out in the final Public Rights of Way Management Plans, which are subject to approval of Suffolk County Council. There is also a section of cycleway/footway that will be permanently diverted for a very short distance in Kent, adjacent to the Richborough Way. **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** assesses the likely significant effects on amenity of PRoW users, drawing on assessment from of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** [**APP-057]** and **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**. The cumulative impact is also assessed in **Application Document 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. No significant adverse effects are identified with regards to human health and wellbeing.
7.28.3	Concerns over the health effects of the proposed overhead lines	The health and safety of the public, local communities and employees is central to everything that the Applicant does. Throughout the development of the proposals, 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. With regard to electric and magnetic fields (EMFs), the UK has a carefully thought-out set of policies for protecting the general public against EMFs, the main component of which is exposure guidelines. These exposure guidelines are set by independent scientific bodies and are based on decades-long studies into the effects if EMFs and ill health. After those decades of research, the weight of evidence is against there being any health risks of EMFs below the guideline limits. It is the Applicant's policy to ensure that all of its equipment comply fully with these exposure limits. The proposed overhead lines have been designed to ensure they are fully compliant with guidelines and policies. This ensures that health concerns are properly and adequately addressed. Where possible, the required cabling has been placed underground. Further information can be found in **Application Document 6.5 Electric and Magnetic Field Compliance Report [APP-289]**.
7.28.4	Impact on residents' wellbeing due to negative effects on tourism	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, through which no residual significant effects have been identified following the application of appropriate mitigation. **Section 10.9** of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]** and **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism [APP-070]** assess potential effects of the Proposed Project 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 amenity effects arising from construction of the Proposed Project 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]** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 (B) Health and Wellbeing [AS-003]**. 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 Proposed Project and therefore no mitigation will be required.

Reference	Topic	Applicant's Response
7.28.5	Reduction in green spaces correlating to a decrease in residents' mental health	The Applicant recognises that the construction and operation of major infrastructure projects can cause stress, uncertainty and anxiety that may impact on people's mental health. Throughout the development phase of the Proposed Project, the Applicant has therefore tried to clearly communicate the proposals including the establishment of dedicated contact channels, a project website and by holding multiple rounds of public consultation as the plans become more refined. As the Proposed Project has progressed, the Applicant has sought to provide certainty on the plans wherever possible. There will be some temporary disruption to the landfall areas during construction, but as the cables would be installed a using trenchless solutions, there will be no long-term impacts on access for the public. A complete health and wellbeing assessment has been undertaken for both Suffolk and Kent. These are set out in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003].** These conclude that there are no anticipated significant effects as a result of the Proposed Project. Specifically, the Applicant recognises the importance of local amenity and access to open space. In response to this concern, **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003]** assess 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 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** and **Application Document** 6.**2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]**. No significant adverse effects are identified with regards to human health and wellbeing. A Construction Code of Practice will help control and manage aspects of the development scheme that could affect health and wellbeing **Applicant Document 7.5.3.1 Construction Environmental Management Plan Appendix A Outline Code of Construction Practice [APP-341]** which is secured through Requirement 6 of Schedule 3 of the **Application Document 3.1 draft Development Consent Order [AS-013]**.

~~Table 7.29~~ Table 7.28 Applicant's Response to the Relevant Representations that raise Major Accidents and Disasters

Reference	Topic	Applicant's Response
7.29.1	Concern over increased risk of fires from discarded cigarettes /glass from increase in footfall in area	During operation the Applicant will follow all relevant health and safety policies to reduce the risk of fire and explosion. All Proposed Project buildings will be constructed in accordance with buildings regulations which includes consideration of measures needed in the event of a fire or an explosion. Furthermore, a fire risk assessment will be carried out and the project buildings will be constructed in line with this risk assessment. All buildings are equipped with relevant fire suppression equipment and systems. In accordance with best practice, the fence line of all buildings is placed at a distance to contain an event, such as a fire or explosion, within its confines. Within the fenceline, vegetation is removed to reduce the possibility of the spread of fire. An Emergency Response Plan would be provided for operation and as part of this Plan, resilience exercises are conducted to test the systems and procedures. The fire and rescue service are a key consultee whom the Applicant is engaging with. They have had a chance to comment on the Proposed Project and the Applicant will produce guidance for them for operation. In addition, there is no oil-containing equipment at Friston and so there is less risk of toxic fumes from the Substation.
7.29.2	Concern over potential risks in the event of fire or targeted attacks. Is there appropriate emergency infrastructure in place in such an event.	The Applicant is working closely with the Emergency Planning Departments at Suffolk County Council and Kent County Council with regard to emergency situations. Proposed Project buildings will be constructed in accordance with buildings regulations.

~~Table 7.30~~ Table 7.29 Applicant's Response to the Relevant Representations that raise Onshore and Offshore EMF Issues

Reference	Topic	Applicant's Response
7.30.1	Query regarding the measures that will be put in place regarding electromagnetic fields	In the UK there are exposure limits in place to protect against EMF effects. Those exposure limits have been set independently by an international commission of scientists who carefully review all the research which has investigated EMF and health effects. There have been over four decades of research looking into whether EMFs can cause health effects, and there are no established effects below the exposure limits. The magnetic fields produced by cables are extremely localised. They quickly with distance from the source. Details are contained in **Application Document 6.5 Electric and Magnetic Field Compliance Report [APP-289]**. All of the Applicant's electricity equipment is designed to produce EMFs below the limits set by the Government that are in place to protect us all.

~~Table 7.31~~ Table 7.30 Applicant's Response to the Relevant Representations that raise Timescale and Programme Issues

Reference	Topic	Applicant's Response
7.31.1	Concerns over the length of the timeframe for the Proposed Project together with other projects in the area; concerns over the cumulative impacts	The construction programme as a whole is estimated to be around four years, however, exact details of the different stages are yet to be confirmed. The Applicant has engaged with other project developers to identify opportunities for co-ordination, whilst still maintaining obligations to facilitate network connection agreements by providing the required network reinforcement. The Applicant, as part of its application for development consent, has produced a report on coordination which covers how it has approached coordination with other major projects with the aim of reducing the impact on the environment and local communities (see **Application Document 7.10 Coordination Document [APP-363]**). The cumulative impact assessment for the Proposed Project was based on the most up-to-date information for other projects in the area. Information can be found in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. **Application Document 6.3.2.13.A ES Appendix 2.13.A Descriptions of Other Developments [APP-141]** contains information regarding other likely project timescales, although the cumulative assessment has used a worst case, i.e. that the major energy projects could all be under construction simultaneously. Further details are outlined within **Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]**. Whilst the Applicant acknowledges the number of projects in the area, the team have worked with other developers to reduce the impact of projects on communities and the environment.
7.31.2	Requests to provide a detailed programme	An indicative construction programme is provided in **Application Document 6.2.1.4 (B) Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]**. The design-life of the different Proposed Project elements are also provided. A detailed construction programme cannot be completed until the construction contractors are appointed. Requirement 4 of the draft Development Consent Order (**Application Document 3.1 draft Development Consent Order [AS-012]**) requires that development cannot commence until a written scheme setting out all stages of the proposed development has been submitted to the relevant planning authority, ensuring that the local planning authority is aware of the planned programme.
7.31.3	Suggestions that the construction works in the area are coordinated	The Applicant has engaged with other project developers, seeking to identify opportunities for co-ordination whilst maintaining its obligations to facilitate network connection agreements by providing the required network reinforcement. 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 of reducing the impact on the environment and local communities, see **Application Document 7.10 Coordination Document [APP-363]**. Additionally, the cumulative effects of the Proposed Project and the other projects planned in Suffolk is considered in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].
7.31.4	Concerns over long-term programme consequences	Requirement 4 of the draft Development Consent Order (**Application Document 3.1 draft Development Consent Order [AS-012]**) requires that development cannot commence until a written scheme setting out all stages of the proposed development has been submitted to the relevant planning authority, ensuring that the local planning authority is aware of the planned programme. This will set out the sequencing of construction work.
7.31.5	Concerns over construction timeline and traffic impacts	A detailed construction programme cannot be completed until the construction contractors are appointed. Requirement 4 of the draft Development Consent Order (**Application Document 3.1 Draft Development**

Reference	Topic	Applicant's Response
		Consent Order [AS-012]) states that development cannot commence until a written scheme setting out all stages of the proposed development has been submitted to the relevant planning authority, ensuring that the local planning authority is aware of the planned programme. Available information of the proposed methods and programme of construction is provided in **Application Document 6.2.1.4 (B) Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]**. Outline information on the proposed permanent access roads, temporary haul roads and compounds is also provided. The estimates regarding HGV movements and workforce profiles have been derived by the engineering team based on the anticipated construction programme and construction compounds/ activities at each access point. The assessments within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] and Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] are based on the peak construction phase and the assumptions relating to construction vehicle trip generation and trip distribution are robust. These assessments demonstrate that the additional construction traffic to be generated by the proposals during the peak construction phase is not expected to result in any significant effects on the surrounding highway networks, following the measures identified within Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337] and Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338].
7.31.6	Prolonged project timeline amplifying other impacts such as tourism	A complete assessment of socio-economics effects has been undertaken. This is set out in **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070]** and **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Tourism and Recreation [APP-057]**. Section 10.9 of both chapters assess potential effects of the Proposed Project on private and community assets, recreation and tourism receptors, and the assessment identified no significant effects on visitor attraction receptors. **Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [APP-070]** and **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Tourism and Recreation [APP-057]** also conduct assessments 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. The assessments concludes that existing visitor and tourism accommodation providers would be able to accommodate employees working at the Suffolk and Kent Onshore Schemes without any adverse effects on the sector. Therefore, no significant effects are anticipated from the Proposed Project, and therefore no additional mitigation will be required. The Applicant recognises that there is potential for effects arising from construction of the Proposed Project 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] and Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003]. 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 Proposed Project.
7.31.7	Concerns over the sequencing of construction work and the potential for work to cross several bird breeding/wintering seasons	The Applicant acknowledges concerns regarding timeframes for construction. Impacts on birds are assessed in **Application Document ES 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [PDA-017]**, **Application Document 6.2.3.2 Part 3 Kent Chapter 3 Ecology and Biodiversity [PDA-021]** and **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Ornithology [AS-115]**. Commitments made within **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [APP-342]** will reduce the impacts arising from construction on birds, including, where appropriate, restrictions on works in certain areas at specific times of the year. Requirement 4 of the draft Development Consent Order (**Application Document 3.1 draft Development Consent Order [AS-012]**) requires that development cannot commence until a written scheme setting out all

Reference	Topic	Applicant's Response
		stages of the proposed development has been submitted to the relevant planning authority, ensuring that the local planning authority is aware of the planned programme. This will set out the sequencing of construction work and enable it to be considered in the context of bird breeding and wintering seasons.
7.31.8	Impact of programme length on residents' mental health	**The Applicant recognise that the construction and operation of major infrastructure projects can cause stress, uncertainty and anxiety that may impact on people's mental health.** There will be some temporary disruption to the area during construction, but as the works in the Pegwell Bay area will be conducted using trenchless solutions, there will be no long term impacts on access for the public. Only two PRoW will be permanently closed and both would have permanent diversions in place prior to their closure ensuring access to PRoW is retained. A complete health and wellbeing assessment has been undertaken. This is set out in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** and **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003].** These conclude that there are no anticipated significant effects as a result of the Proposed Project. The cumulative impact is also assessed in **Application Document 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** and **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]**. No significant adverse effects are identified with regards to human health and wellbeing. A Construction Code of Practice will help control and manage aspects of the development scheme that could affect health and wellbeing (Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341] which is secured through Requirement 6 of Schedule 3 of Application Document 3.1 draft Development Consent Order [AS-012].

~~Table 7.32~~ Table 7.31 Applicant's Response to the Relevant Representations that raise Project Finance and Cost of the Proposed Scheme

Reference	Topic	Applicant's Response
7.32.1	Concerns that National Grid is putting cost before the environment when developing the Proposed Project.	The need to reinforce the network in this area determines the geographical parameters for delivering the Proposed Project. The Applicant is seeking to minimise potential impacts through careful consideration of construction methods and design. The Environmental Impact Assessment process is responsible for establishing the baseline environmental condition of the Proposed Project area. This then determines the mitigation that must be put in pace and is then discussed with the relevant statutory stakeholders. These will be subject to discussion through the Examination process and will be secured through the Requirements set out in the **Application Document 3.1 (D) draft Development Consent Order [AS-087]**. As set out in the **Application Document 7.1 (C) Planning Statement [AS-057**] the Applicant is required, under Section 38 of the Electricity Act 1989, to comply with the provisions of Schedule 9 of the Act. Schedule 9 Schedule 9(1)(a) and (b) requires licence holders, in the formulation of proposals to transmit electricity, to: "*(a) …have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest;' and* *(b) …do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects."*
7.32.2	Suggestion that the Proposed Project is not good for customers and is not financially viable due to the high level of compensation and mitigation required.	The Government and the Regulator (Ofgem) expect the Applicant to find a balance when developing proposals, taking account of the duties set out in the Electricity Act 1989 to be efficient, coordinated and economical and to have regard to the desirability of preserving amenity. When looking at the costs of a new connection, the Applicant is guided by the laws, policies and regulations that have been set by Government on behalf of electricity consumers and society. The Applicant is required through those to balance affordability to the electricity bill payer with the impact of the proposals on the environment. The Applicant considers that the Proposed Project strikes a justifiable balance in the context of national policy and the Applicant's statutory duties, which include the need to be economic and efficient.
7.32.3	Concern over impact on property prices.	Diminution in property value known as 'injurious affection' and any other appropriate heads of claim will be considered on an individual basis in accordance with current legislation. The Compulsory Purchase Compensation Code allows for a claim of compensation for the loss that property owners may have suffered as a direct result of the retained part of their property ownership being worth less as a direct result of the works. The Applicant has undertaken an assessment of the costs of implementing the Proposed Project, including the estimated value of compensation payable in relation to disturbance, severance and injurious affection, third party professional fees, blight and claims arising under both Section 10 of the Compulsory Purchase Act 1965 and Part 1 of the Land Compensation Act 1973.

Reference	Topic	Applicant's Response
7.32.4	Concerns that residents and businesses will not receive adequate compensation.	The Applicant recognises that compulsory acquisition of land can be upsetting and stressful for landowners. The Compulsory Purchase Compensation Code outlines the entitlement for compensation when compulsory purchase orders come into force. These include value of the land taken, disturbance payments, loss payments, and severance and injurious affection. The Applicant has undertaken an assessment of the costs of implementing the Proposed Project, including the estimated value of compensation payable in relation to disturbance, severance and injurious affection, third party professional fees, blight and claims arising under both Section 10 of the Compulsory Purchase Act 1965 and Part 1 of the Land Compensation Act 1973. Further information is available in **Application Document 4.1 Funding Statement [APP-011]**.
7.32.5	Suggestion that an alternative, offshore, solution would be more cost-effective.	In developing the Proposed Project, the Applicant assessed a variety of potential areas for new infrastructure. 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 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 20km 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 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. Further detail on alternative solutions considered by National Grid is available in **Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]** and **Application Document 7.2 Strategic Options Back Check Report [APP-320]**.

~~Table 7.33~~ Table 7.32 Applicant's Response to the Relevant Representations that raise the Need for the Proposed Project

Reference	Topic	Applicant's Response
7.33.1	Relevant Representations questioned whether the network between Suffolk and Kent need to be reinforced?	The Proposed Project addresses a number of strategic issues with the transmission network in East Anglia and the South East as set out in **Part 1.2** of **Application Document 7.3 Design Development Report [APP-321]**: *"The existing transmission network infrastructure in East Anglia and the south-east of England was not originally designed to accommodate the large volumes of generation capacity that is planned to connect to the network in these areas. The network in and between East Anglia and the south-east of England therefore needs reinforcing for four main reasons:* • *the existing transmission network was not designed to transport electricity from where it is increasingly being generated (largely offshore);* • *the growth in offshore wind, interconnectors and nuclear power means that more electricity will be generated in the years ahead than the current network is able to reliably transport;* • *as a country, electricity demand is forecast to at least double by 2050, increasing the amount of energy needed to be transported to homes and businesses; and* • *upgrading the existing network (such as through replacing cables to carry more power) will not be enough to meet the increasing need for electricity whilst operating to required standards*." The Applicant owns, builds and maintains the electricity transmission network in England and Wales holds a transmission licence under the Electricity Act 1989 and the Proposed Project is brought forward by the Applicant consistent with their statutory duty as a transmission licence holder to: "*develop and maintain an efficient, co-ordinated and economical system of electricity transmission*." 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 4.2 Strategic Options Report (October 2023)**; • **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-263]**; and **Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-093]**.
7.33.2	RR raised whether the Proposed Project is not required if there was an offshore hub and converters station located onshore utilising brownfield sites	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. In developing the Proposed Project, 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 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]**;

Reference	Topic	Applicant's Response
		• **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]**. 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 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.
7.33.3	RR's expressed concerns from Suffolk residents on the number of infrastructure and electricity projects that are located within the county	**Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** presents the assessment of inter-project cumulative effects. National Grid recognises that at present there are a number of projects being proposed in the Suffolk area and the disruption this is causing to residents. A significant amount of the electricity generation for Great Britain is off the east coast. This electricity needs to come ashore and be delivered to the whole of the country as over 80% of UK electricity demand is outside of London, therefore it is vital that new infrastructure is provided for the whole country and the electricity generated is distributed accordingly.
7.33.4	Suggestions from a number of RRs over whether there has been a lack of a coordinated strategic approach for the multiple projects that are under consideration in the Proposed Project area.	The Applicant has engaged with other project developers to identify opportunities for co-ordination, whilst still maintaining obligations to facilitate network connection agreements by providing the required network reinforcement. This includes, for example, developing a Coordination Masterplan for the Suffolk Converter Station site in Saxmundham considering how the Converter Stations for Sea Link, Lionlink and Nautilus (should it be required in this location) would work together on the site (see **Application Document 7.10 Coordination Document [APP-363]**). This shows a coordinated strategy and strategic approach has been taken by NGV and the Applicant for the site. The Applicant has also been working closely with SPR on the development of the site at Friston, including inputting into the design for the Substation at Friston that will be constructed under the SPR consent (scenario 1) or as part of the Proposed Project (scenario 2). This joint working has also included initial discussions on development of the Friston site, including the overall landscaping approach. National Grid, as part of its application for development consent, has produced a report on coordination which covers how it has approached coordination with other major projects with the aim of reducing the impact on the environment and local communities, including the two examples above (see **Application Document 7.10 Coordination Document [APP-363]**). The cumulative effects of the Proposed Project together with other projects in the area is assessed in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. Whilst the Applicant acknowledges the number of projects in the area, the team have worked with other developers to reduce the impact of projects on communities and the environment.

~~Table 7.34~~ Table 7.33 Applicant's Response to the Relevant Representations that raise the Interproject Cumulative Effects of the Proposed Project

Reference	Topic	Applicant's Response
7.34.1	Inter-project cumulative effects on fisheries – few alternative fishing grounds are available and those that are, are heavily contested. "Adaptability" is only viable if alternative species and grounds exist within legal and seasonal limits.	With the implementation of mitigation measures, the preliminary assessment of cumulative effects considers there to be **no likely significant cumulative effects** to commercial fisheries receptors. Further information can be found within **Application Document 6.2.4.11 Inter-Project Cumulative Effects**.
7.34.2	Inter-project cumulative effects from Friston substation	The potential inter-project cumulative effects with other projects including East Anglia ONE North, East Anglia TWO, and LionLink, all of which connect into the Friston Substation are considered within **Application Document 6.2.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].**
7.34.3	Inter-project cumulative effects from Thanet Parkway	As Thanet Parkway is already constructed and operational, it forms part of the baseline against which the effects of the Proposed Project are assessed. No effects have been identified that are interrelated between Thanet Parkway and the Proposed Project.
7.34.4	Inter-project cumulative effects from road projects / car parks	**Application Document 6.2.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** outlines the cumulative effects assessment undertaken. The following road and car park projects were considered: • A12 Bypass (also known as the 'two village bypass') • Yoxford roundabout • Sizewell link road • Sizewell C Northern park and ride • Sizewell C Southern park and ride A12 Major Road Network Improvement Scheme, Seven Hills to Woods Lane
7.34.5	Inter-project cumulative effects from Thanet Earth	An additional greenhouse was consented in November 2023 which was under construction in 2025. This will therefore be within the baseline for the Proposed Project, with no overlap in the construction periods, given the Proposed Project would not commence construction until 2026.
7.34.6	Inter-project cumulative effects on the sewage system	As the proposed project alone is not anticipated to have any adverse effects on the sewage system in either Suffolk or Kent, it is not anticipated that there could be any inter-project cumulative effects on the sewerage system.
7.34.7	Inter-project cumulative effects from Sizewell B	No significant cumulative effects have been identified from the Suffolk Onshore Scheme and Sizewell B. Further information can be found in **Application Document 6.2.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**.
7.34.8	Inter-project cumulative effects from housing developments	The potential inter-project cumulative effects with proposed housing developments are considered within **Application Document 6.2.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** and **Application Document 6.2.3.13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073].** The long list of other developments considered is provided in **Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List [APP-092]** and the short list is provided in **Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List [APP-093]**
7.34.9	A cumulative assessment has not been provided	The potential inter-project cumulative effects with other proposed developments are considered within **Application Document 6.2.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** and **Application Document 6.2.3.13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073].** The long list of other developments considered is provided in **Application Document 6.3.1.5.B ES Appendix 1.5.B**

Reference	Topic	Applicant's Response
		Inter-Project Cumulative Effects Long List [APP-092] and the short list is provided in **Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List [APP-093]**
7.34.10	Inter-project cumulative impacts from NESO. NESO is planning to build another cable from Scotland to Richborough post 2030	Only projects that are reasonably foreseeable, and for which there is certainty of information can be considered in the Inter-Project Cumulative Effects Assessment. As there is no information about this development it would be impossible to assess.
7.34.11	Inter-project cumulative impacts from LionLink.	The potential inter-project cumulative effects with LionLink are considered within **Application Document 6.2.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**
7.34.12	Inter-project cumulative impacts on local communities, businesses, visitors to the area (tourism)	The assessment of total cumulative effects for socio-economics, recreation and tourism has identified that there are three relevant developments that have potential to result in cumulative effects upon shared residential properties, business premises, visitor attractions, community facilities and open space receptors. However, following further analysis, no significant cumulative effects on socio-economics, recreation and tourism are expected as a result of the Suffolk Onshore Scheme in aggregation with the Proposed Project. Further information is provided in **Application Document 6.2.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. Additionally, **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060]** also assesses the cumulative impact of the Proposed Project alongside five other NSIPs, on local accommodation capacity. Under a worst-case scenario whereby the peak construction workforces of the cumulative schemes overlap, and all workers require accommodation, the chapter concludes that no significant effects are expected. As a result, no additional mitigation will be required. The Applicant will however discuss these concerns with the appointed contractor.
7.34.13	Inter-project cumulative impacts on heritage	The assessment of total cumulative effects for cultural heritage has identified that there is the potential for four of the other projects to result in a cumulative impact on heritage receptors. These impacts include physical impacts on archaeological remains that potentially extend outside of the Order Limits of the Suffolk Onshore Scheme, as well as impacts on the setting of heritage assets. However, the overall assessment of cumulative effects is currently assessed as 'not significant'. Further information can be found in **Application Document 6.2.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**.
7.34.14	Inter-project cumulative impacts from construction and operational noise	There are several projects which overlap with the noise ZOI and therefore there is potential for cumulative effects from construction noise at shared receptors. However, with the committed mitigation implemented, as detailed in outlined in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** and **Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan – Suffolk [AS-132]**, this is considered unlikely to be significant. The preliminary assessment of total cumulative effects for noise and vibration has not identified any significant cumulative effects. Further information can be found in **Application Document 6.2.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**.
7.34.15	Inter-project cumulative impacts from air, dust and light pollution	The potential inter-project cumulative effects with other proposed developments are considered within **Application Document 6.2.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** and **Application Document 6.2.3.13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073].** The long list of other developments considered is provided in **Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List [APP-092]** and the short list is provided in **Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List [APP-093]**

Reference	Topic	Applicant's Response
7.34.16	Inter-project cumulative impacts from East Anglia 1 North and East Anglia 2	The potential inter-project cumulative effects with other projects including East Anglia ONE North and East Anglia TWO are considered within **Application Document 6.2.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**
7.34.17	Inter-project cumulative impacts from Galloper and Greater Gabbard wind farms	
7.34.18	Inter-project cumulative impacts from Sizewell C	The potential inter-project cumulative effects with Sizewell C are considered within **Application Document 6.2.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**
7.34.19	Inter-project cumulative impacts from BL Solar 12 (Helios Energy Park) Ltd - 249.9 MWac Energy Park, comprising ground-mounted solar and BESS.	As stated on the Suffolk County Council website: "*The Applicant, BNRG, soft launched the project in June 2025. A formal launch of the development is anticipated in late 2025.* *The scheme is in receipt of a grid connection offer for 249.9MW import and export capacity for the Friston 4000kV substation.* *Helios Energy Park is anticipated to interact with a fellow proposed NSIP - Sea Link 2GW Multi-Purpose Interconnector, promoted by National Grid Electricity Transmission. Helios Energy Park submitted a Relevant Representation to the Sea Link proposals on 23 June 2025 thereby announcing their project."* The applicant has no more information about these proposals that what was included in the relevant representation from BNRG. When further details are published, the applicant will consider these and, if time allows, will provide initial information about the potential for cumulative effects. However, it is likely that detailed cumulative effects assessment will need to be provided by BNRG, within its application for consent.
7.34.20	Inter-project cumulative impacts on the A12	A comprehensive cumulative assessment of forecast traffic impacts of Sea Link and other projects on the Suffolk highway network has been undertaken, the findings of which are reported in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This considers cumulative effects with other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink. The Traffic and Transport cumulative assessment includes the A12 to the north and south of the study area and the additional traffic to be generated on this part of the network by the Proposed Project and other cumulative schemes. The assessment concludes that no significant cumulative effects are likely to arise in relation to Traffic and Transport receptors, including on the A12. Considerations relating to the Strategic Road Network (SRN) including the A12 corridor between the A14 and Lowestoft are set out in the **Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122]**.
7.34.21	Inter-project cumulative impacts on the Suffolk Heritage Coast	When considering the cumulative baseline of Sizewell C - main development site, East Anglia ONE & TWO Offshore Windfarms and LionLink Offshore Interconnector, the addition of the Proposed Project would likely result in an intensification of the cumulative effects that were reported separately for each of the other developments during the construction and decommissioning stages on the Suffolk Heritage Coast. There is no additional mitigation available to address this intensified cumulative effect, which remains significant during construction and decommissioning. No significant cumulative effects are anticipated for operation and maintenance.
7.34.22	Inter-project cumulative impacts on the SPAs	All of these developments (including Sizewell C - main development site, East Anglia ONE & TWO Offshore Windfarms, Saxmundham to Peasenhall Water Mains Installation, Sizewell B Relocated Facilities, Town Farm Solar Farm, UKZ139 BC Wissett Solar Farm, LionLink Offshore Interconnector, South Saxmundham Garden Neighbourhood Sizewell A and the Suffolk Onshore Scheme) lie within 10 km of the SPA. They could all

Reference	Topic	Applicant's Response
		therefore potentially affect functionally-linked habitats (wetlands, farmland) used by white-fronted goose for which the SPA is partly designated. However, surveys have confirmed that the only part of the Suffolk Onshore Scheme which supports a significant population of birds that may be associated with this SPA is the wetland part of RSPB North Warren which will be traversed by HDD. Moreover, noise modelling has confirmed that only a very small part of the wetland will be subject to noise levels above 60 dB during construction, which will therefore not cause material disturbance. All of the developments (including East Anglia ONE & TWO Offshore Windfarms, Saxmundham to Peasenhall Water Mains Installation, LionLink Offshore Interconnector, South Saxmundham Garden Neighbourhood and the Suffolk Onshore Scheme) lie within 2 km of the Alde-Ore Estuary SPA. They could all therefore potentially affect functionally-linked habitat used by non-breeding birds for which the SPA is partly designated. However, surveys have shown the Suffolk Onshore Scheme does not support significant numbers of birds associated with this SPA except for the wetland part of RSPB North Warren which will be traversed by HDD. Moreover, noise modelling has confirmed that only a very small part of the wetland will be subject to noise levels above 60 dB during construction, which will therefore not cause material disturbance.
7.34.23	Inter-project cumulative impacts on landscape and seascape character	The total cumulative assessment has been undertaken separately for a number of Landscape Character Areas (LCAs) and Seascape Character Types (SCTs) in the study area, including LCA L1 Heveningham and Knodishall Estate Claylands, LCA B4 Fromus Valley, LCA K3 Aldringham and Freston Sandlands, LCA 01 Benhall Estate Sandlands and SCT 03 Nearshore Waters. The cumulative baseline includes a number of different variations of cumulative schemes depending on location of the receptor, including Sizewell C - main development site, East Anglia ONE & TWO Offshore Windfarms, LionLink Offshore Interconnector, A12 Bypass, South Saxmundham Garden Neighbourhood, Town Farm Solar Farm, Sizewell Link Road-Bridge across rail tracks. With respect to LCA L1 Heveningham and Knodishall Estate Claylands, when considering the addition of the Proposed Project there is likely to be an intensification of the cumulative effects that were reported separately for each of the other developments at all project stages. This is primarily as a result of the Suffolk Onshore scheme, East Anglia ONE & TWO Offshore Windfarms and LionLink; however, the remaining projects may also contribute in a minor way to the total effect. There is no additional mitigation available to address this intensified cumulative effect, which remains significant at all project stages. With respect to LCA K3 Aldringham and Freston Sandlands, when considering the addition of the Proposed Project there is likely to be an intensification of the cumulative effects that were reported separately for each of the other developments at construction and decommissioning stages. This is primarily as a result of the Suffolk Onshore scheme, East Anglia ONE North & TWO Offshore Windfarms and LionLink; however, Sizewell C main development site may also contribute in a minor way to the total effect. There is no additional mitigation available to address this intensified cumulative effect, which remains significant during construction (including decommissioning). With respect to SCT 03 Nearshore Waters, when considering the addition of the Proposed Project there is likely to be an intensification of the cumulative effects that were reported separately for each of the other developments during the construction and decommissioning stages on SCT 03 Nearshore Waters. There is no additional mitigation available to address this intensified cumulative effect, which remains significant during construction and decommissioning. The cumulative effects on the other project stages for the above receptors and the other landscape receptors are not anticipated to result in significant cumulative effects.

Reference	Topic	Applicant's Response
7.34.24	Inter-project cumulative impacts on the AONBs	When considering the cumulative baseline of Sizewell C - main development site, East Anglia ONE & TWO Offshore Windfarms and LionLink Offshore Interconnector, the addition of the Proposed Project would likely result in an intensification of the cumulative effects that were reported separately for each of the other developments during the construction and decommissioning stages on the Suffolk Coast and Heaths AONB. There is no additional mitigation available to address this intensified cumulative effect, which remains significant during construction and decommissioning. No significant cumulative effects anticipated for operation and maintenance.
7.34.25	Inter-project cumulative impacts on SSSIs	The potential inter-project cumulative effects with other proposed developments are considered within **Application Document 6.2.2.13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** and **Application Document 6.2.3.13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]**.
7.34.26	Inter-project cumulative impacts on the RSPB Reserves	All of these developments (including Sizewell C - main development site, East Anglia ONE & TWO Offshore Windfarms, Saxmundham to Peasenhall Water Mains Installation, Sizewell B Relocated Facilities, Town Farm Solar Farm, UKZ139 BC Wissett Solar Farm, LionLink Offshore Interconnector, South Saxmundham Garden Neighbourhood Sizewell A and the Suffolk Onshore Scheme) lie within 10 km of the SPA. They could all therefore potentially affect functionally-linked habitats (wetlands, farmland) used by white-fronted goose for which the SPA is partly designated. However, surveys have confirmed that the only part of the Suffolk Onshore Scheme which supports a significant population of birds that may be associated with this SPA is the wetland part of RSPB North Warren which will be traversed by HDD. Moreover, noise modelling has confirmed that only a very small part of the wetland will be subject to noise levels above 60dB during construction, which will therefore not cause material disturbance. All of the developments (including East Anglia ONE & TWO Offshore Windfarms, Saxmundham to Peasenhall Water Mains Installation, LionLink Offshore Interconnector, South Saxmundham Garden Neighbourhood and the Suffolk Onshore Scheme) lie within 2 km of the Alde-Ore Estuary SPA. They could all therefore potentially affect functionally-linked habitat used by non-breeding birds for which the SPA is partly designated. However, surveys have shown the Suffolk Onshore Scheme does not support significant numbers of birds associated with this SPA except for the wetland part of RSPB North Warren which will be traversed by HDD. Moreover, noise modelling has confirmed that only a very small part of the wetland will be subject to noise levels above 60 dB during construction, which will therefore not cause material disturbance. Therefore, no significant cumulative effects have been identified at RSPB Reserves.
7.34.27	Inter-project cumulative impacts on Public Rights of Way (PRoW)	**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. It is acknowledged that there is the potential for cumulative effects to arise on several PRoW receptors as a result of proposed PRoW closures/ diversions associated with the Proposed Project and other cumulative schemes such as East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink, which has been assessed within **Application Document 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].** I These will therefore be coordinated with other committed developments where possible (as identified above) to reduce the potential for significant cumulative effects. **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** assesses the likely significant effects on amenity of PRoW users, drawing on assessment from of **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** [**APP-057]** and **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**. The cumulative impact is assessed in **Application Document 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project**

Reference	Topic	Applicant's Response
		Cumulative Effects [APP-060]. No significant adverse effects are identified with regards to human health and wellbeing 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'.
7.34.28	Inter-project cumulative impacts on traffic	A comprehensive cumulative assessment of forecast traffic impacts of the Proposed Project and other major projects on the Suffolk highway network has been undertaken within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. This considers other major infrastructure projects such as Sizewell C, East Anglia ONE North Offshore Windfarm, East Anglia TWO Offshore Windfarm and LionLink. In summary no significant cumulative effects on traffic and transport receptors are expected as a result of construction traffic associated with the Proposed Project when combined with construction/ operational traffic associated with each of the committed developments in isolation. In addition, no significant cumulative effects are expected when considering construction/ operational traffic associated with all committed developments combined on the same basis, given that the peak construction phases for each scheme are unlikely to fully overlap. In any case, the duration of any effects would be limited in duration (ato few months) if peak construction traffic levels for the Proposed Project and other committed developments overlapped precisely. There would be no potential for significant cumulative effects based on average (rather than peak) traffic levels for the Proposed Project, given this would result in a Negligible effect for the Proposed Project. In terms of PRoW closures/ diversions, these will be coordinated with other committed developments where possible to reduce the potential for significant cumulative effects. In view of the above, no additional mitigation is expected to be required to that already outlined within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [APP-337]** and **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]**. Notwithstanding the above, a further review of the Traffic and Transport cumulative assessment has been carried out following the submission of the DCO application to provide further details in support of the conclusions. This provides further information on the assessment methodology, the findings of the respective ES' prepared for Sizewell C, East Anglia ONE North and East Anglia TWO in terms of residual effects for certain receptors, as well as the durations over which any cumulative effects are likely to be experienced. These findings were presented to SCC during a thematic meeting held on 6 August 2025. **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** will be submitted during the Examination at Deadline 1 to provide more detail about the methodology and findings of the cumulative assessment work, in consideration of various construction programmes and potential overlaps of different projects, to further inform and provide reassurance about the findings, including with respect to mitigation.
7.34.29	Inter-project cumulative impacts on employment	The assessment of total cumulative effects for socio-economics, recreation and tourism has identified that there are five relevant other developments that have the potential to result in cumulative effects upon construction workforce generation and labour supply. Table 13.43 of **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Interproject Cumulative Effects [APP-060]** sets out the assessed impacts on the construction workforce labour supply. Under a worst-case scenario whereby all relevant major infrastructure schemes require their peak construction workforce at the same time and seek employees residing within the 60-minute drive time, there is still expected to be availability within the local construction labour force. Therefore, there is not anticipated to be any significant effect on the available construction workforce for the Suffolk Onshore Scheme.
7.34.30	Inter-project cumulative impacts on visual amenity	When considering the cumulative baseline of Sizewell C - main development site, A12 Bypass, East Anglia ONE & TWO Offshore Windfarms, LionLink Offshore Interconnector, Town Farm Solar Farm and South Saxmundham

Reference	Topic	Applicant's Response
		Garden Neighbourhood the addition of the Proposed Project would likely result in an intensification of the cumulative effects from some viewpoints that were reported separately for each of the other developments. This is primarily as a result of the Suffolk Onshore Scheme and multiple other developments appearing together within a view. There is no additional mitigation available to address this intensified cumulative effect, which remains significant from some representative viewpoints at all project stages. The health and wellbeing CEA anticipates no significant adverse effects on mental health due to reduced visual amenity. This assessment 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.
7.34.31	Inter-project cumulative impacts on well-being	The health and wellbeing CEA draws upon the conclusions of other relevant environmental aspects, including 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 Proposed Project, followed by a combined assessment of all cumulative schemes together with the Proposed Project. 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. The conclusion, that no significant adverse cumulative effects on health and wellbeing are anticipated, is based on a comprehensive, receptor-focused evaluation across all relevant determinants. The assessment takes into account overlapping construction or operational phases of other NSIPs, ensuring that any potential cumulative mental health burden has been robustly considered and the conclusion of 'not significant' remains valid, proportionate, and precautionary.
7.34.32	Inter-project cumulative impacts from noise	There are a number of projects which overlap with the noise ZOI and therefore there is potential for cumulative effects from construction noise at shared receptors. However, with the committed mitigation implemented, as detailed in outlined in **Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** and **Application Document 7.5.8.1 Outline Construction Noise and Vibration Management Plan – Suffolk [AS-132]**, this is considered unlikely to be significant. The preliminary assessment of total cumulative effects for noise and vibration has not identified any significant cumulative effects.

~~Table 7.35~~ Table 7.34 Applicant's Response to the Relevant Representations that raise the Combined Effects of the Proposed Project

Reference	Topic	Applicant's Response
7.35.1	Concerns over the range of impacts the Suffolk Onshore Scheme would have such as disruption to local residents in tranquil residential areas, impact on local roads, impact on local tourism, impact on dark skies and internationally important wildlife habitats such as RSPB reserves, AONBs and SSSIs.	The Applicant acknowledges that the Proposed Project has the potential to have adverse impacts across a range of environmental and social disciplines. A comprehensive Environmental Statement has been prepared as part of the DCO submission. The Environmental Statement reports the findings of the Environmental Impact Assessment and is intended to inform decision-makers (in this case the Secretary of State) about the environmental implications of the Proposed Project, including the commitments the applicant has made to mitigate adverse effects wherever possible.
7.35.2	The combined impact of the Kent Onshore Scheme on terrestrial ecology, agricultural land, noise and air impacts, impacts on local roads, potential for increasing flooding and landscape and visual impacts, among others.	The Applicant acknowledges that the Proposed Project has the potential to have adverse impacts across a range of environmental and social disciplines. A comprehensive Environmental Statement has been prepared as part of the DCO submission. The Environmental Statement summarises the findings of the Environmental Impact Assessment to inform decision-makers (in this case the SoS) about the environmental implications of the Proposed Project, including the commitments the applicant has made to mitigate adverse effects wherever possible. A full intra-project effects assessment has been carried out for the Proposed Project. For the Suffolk Onshore Scheme, the full assessment is available **within Application Document 6.2.3.12 Part 3 Kent Chapter 12 Intra-Project Cumulative Effects [APP-060]**. Should the DCO be granted, the Applicant will continue to look for ways to \address any remaining significant residual effects.

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