

## **Written rebuttal to the Applicant's thematic responses**

**Project: Sea Link EN020026**

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NG have not even created a response theme for the Habitats Regulations Assessment (HRA), which shows how little they have considered this subject. A majority of my RR concerned the lack of survey and assessment relating to the HRA for the Suffolk onshore scheme. There has been little attempt to respond to these matters, and any response is buried in scattered thematic sections. The only mention of HRA for the onshore Suffolk scheme in the response is where, on several occasions, the Applicant refers the reader to the HRA report document, and states that it concludes a low or insignificant adverse effect. I read the HRA report, and do not need this repeated back to me. What I need is a response to how and why they have come to these conclusions when they have not even surveyed for one of the critical SPA qualifying species, marsh harrier, and do not even mention this species in the Suffolk onshore HRA report.

The section of the response dealing specifically with marsh harriers (7.14.31) refers only to the Kent onshore scheme. There is no mention of why marsh harriers were not considered within the Suffolk scheme, either within the surveys or the HRA, despite the application area being within the routine foraging range of the species (<15km) using nearby SPAs where it is a Qualifying species. The lack of baseline information means the Applicant has no idea of whether any areas within the application site constitute functionally linked land for marsh harrier. This and the resulting omissions in the HRA report, have not been addressed in any way in the Applicant's response.

Finally, my RR clearly addresses the issue of need in relation to the HRA IROPI test. Yet, my name has not been included in relation to Table 7.33 - the response to the Need for the Project.

I therefore feel that almost the whole of my RR has been ignored by the Applicant in their response, and even where in the case of the Project Need it was responded to, my name has not been included as one of the RR raising this issue.

The thematic response framework appears to have failed in its attempt to respond to the various issues raised by the RRs, and I ask the Examining Authority to reject the Applicants method of responding and ask it to supply a more relevant and direct method of response.