



Application by National Grid Electricity Transmission (NGET) for Sea Link

The Examining Authority's written questions and requests for information (ExQ1)

Issued on 17 December 2025

The following table sets out the Examining Authority's (ExA) written questions and requests for information - ExQ1. If necessary, the examination timetable enables the ExA to issue a further round of written questions in due course. If this is done, the further round of questions will be referred to as ExQ2.

Questions are set out using an issues-based framework developed following the Initial Assessment of Principal Issues provided as Annex C to the Rule 6 letter and informed by representations received to date with a view to assessing of the application against relevant policies and legislation

Column 2 of the table indicates which interested parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests. Questions are ordered consistent with the Environmental Statement (ES) i.e. Suffolk, then Kent, then offshore. The order of questions does not imply any form of hierarchy or importance or any judgement on the relative importance of each topic.

Each question has a unique reference number which starts with 1 (indicating that it is from ExQ1) and then has an issue code and a question number. For example, the first question on General and Cross-Topic issues is identified as ExQ 1GEN1. When you are answering a question, please start your answer by quoting the unique reference number.

If you are responding to a small number of questions, answers in a letter format will suffice. If you are answering a larger number of questions, it will assist the ExA if you use a table based on this one to set out your responses. An editable version of this table in Microsoft Word is available on request from the case team: please contact southeastanglialink@planninginspectorate.gov.uk and include 'Sea Link ExQ1' in the subject line of your email.

Due to the period of time between deadline 2 and the issuing of these questions, it has not been possible for the ExA to fully evaluate all the information submitted at that deadline. It is therefore possible that submissions may have already provided the information requested. If that is the case, then there is no need for a party to re-submit the information. Therefore, in response to the question, please signpost where the information can be found by specific reference within a document identified through its [Examination Library](#) reference.



Use of artificial intelligence (AI) in casework evidence

If you use AI to create your submission, you should tell us that you have done this (please refer to ExQ 1GEN1. below). You should specify which systems or tools you have used, the source of the information that the AI system has based its content on, and what information the AI has been used to create or alter. Further information can be found in the Planning Inspectorate's [guidance](#). By following this guidance, you will help the ExA to understand the origin and accuracy of the information submitted, thereby supporting fair and impartial decision-making. **If you do not declare the use of AI in any evidence submission where it has been used or remove evidence such as watermarks we reserve the right to reject the submission.**

The Examination Library

References in these questions set out in square brackets (for example [[APP-001](#)]) are to documents catalogued in the Examination Library.

References in these questions that begin with [RR-] can be found in the [library of Relevant Representations](#).

The Examination Library can be obtained from the following link:

[EN020026- Sea Link - Examination Library.pdf](#)

It will be updated as the examination progresses.

Responses are due by Deadline 3: Friday 9 January 2026.



Abbreviations used:

Abbreviation	Description
AEoI	Adverse Effect on Integrity
ADR	Alternative dispute resolution
AI	Artificial intelligence
AIL	Abnormal indivisible load
BMV	Best and most versatile
BNG	Biodiversity net gain
BoR	Book of Reference
CA	Compulsory Acquisition
CBRA	Cable burial risk assessment
CEFAS	Centre for Environment Fisheries and Aquaculture Science
(o)CEMP	(outline onshore) construction environmental management plan
CIL	Community infrastructure levy
(o)CoCP	(outline) code of construction practice
(o)CSIP	(outline) cable specification and installation plan
(d)DCO	(draft) Development Consent Order
DML	Deemed marine licence
DoL	Depth of lowering
ES	Environmental Statement

Abbreviation	Description
ESC	East Suffolk Council
ExA	Examining Authority
EA	Environment Agency
FLCP	Fisheries liaison and co-existence plan
FLL	Functionally linked land
GIS	Gas insulated switchgear
HDD	Horizontal directional drilling
HE	Historic England
HHA	Harwich Haven Authority
HRA	Habitats Regulations Assessment
HVDC	High Voltage Direct Current
INNS	Invasive Non-Native Species
IP	Interested party
IPMP	In principle monitoring plan
JNCC	Joint Nature Conservation Committee
KCC	Kent County Council
KWT	Kent Wildlife Trust
km	Kilometre
LGP	London Gateway Port Ltd
LIR	Local impact report



Abbreviation	Description
LSE	Likely significant effect
LVIA	Landscape visual impact assessment
MCA	Maritime and Coastguard Agency
MMO	Marine Management Organisation
MMob	Marine mammal observer
MWMP	Material and waste management plan
NE	Natural England
NGET	National Grid Electricity Transmission
NIP	Navigation and installation plan
NL	National Landscape
NPS	National Policy Statement
NPS EN-1	Overarching NPS for Energy
NPS EN-3	NPS for Renewable Energy Infrastructure
NPS EN-5	NPS for Electricity Networks Infrastructure
NRA	Navigational risk assessment
NSIP	Nationally Significant Infrastructure Project
Ofgem	Office of Gas and Electricity Markets
(o)OCEMP	(Outline) Offshore Construction Environmental Management Plan
oLEMP	Outline landscape and ecological management plan
OTE	Outer Thames Estuary (SPA)

Abbreviation	Description
PA2008	Planning Act 2008
PLA	Port of London Authority
PRoW	Public right of way
REAC	Register of Environmental Actions and Commitments
RR	Relevant Representation
RSPB	Royal Society for the Protection of Birds
RTD	Red-throated diver
SAC	Special Area of Conservation
SCC	Suffolk County Council
SDMP	Sediment disposal management plan
SEAS	Suffolk Energy Action Solutions Ltd
SECHNLP	Suffolk & Essex Coast & Heaths National Landscape Partnership
SNS SAC	Southern North Sea Special Area of Conservation
SNCB	Statutory Nature Conservation Body
SPA	Special Protection Area
SPR	Scottish Power Renewables
SSSI	Site of Special Scientific Interest
TCPA	Town and Country Planning Act
TDC	Thanet District Council
TP	Temporary possession



Abbreviation	Description
UXO	Unexploded Ordnance
VMP	Vessel management plan

Abbreviation	Description
WFD	Water Framework Directive
WR	Written Representation



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ExQ1	Question to:	Question:
1. General and Cross-topic Questions (GEN)		
General		
1GEN1.	All Parties	<p>Artificial Intelligence</p> <p>The Planning Inspectorate has guidance in relation to the use of artificial intelligence (AI). Have you used AI to create or alter any part of your documents, information or data? This does not include basic spell-check or grammar tools.</p> <p>If yes;</p> <ul style="list-style-type: none"> • detail what material you have submitted which has been created using AI; • what systems or tools you used; • what the source of the information the AI based its content on was; and • what information or material the AI has been used to create or alter. <p>In addition, if you have used AI, you should do the following:</p> <ul style="list-style-type: none"> • clearly label where you have used AI in the body of the content that AI has created or altered, and clearly state that AI has been used in that content in any references to it elsewhere in your documentation • tell us whether any images or video of people, property, objects or places have been created or altered using AI • tell us whether any images or video using AI has changed, augmented, or removed parts of the original image or video, and identify which parts of the image or video has been changed (such as adding or removing buildings or infrastructure within an image) • tell us the date that you used the AI • declare your responsibility for the factual accuracy of the content • declare your use of AI is responsible and lawful • declare that you have appropriate permissions to disclose and share any personal information and that its use complies with data protection and copyright legislation <p>If you use AI for any future submissions into this examination, ensure it is accompanied by the information as requested above.</p>

ExQ1: Wednesday 17 December 2025

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ExQ1	Question to:	Question:
1GEN2.	Applicant	Security risks National security issues have been highlighted as a possible risk by a number of interested parties (IPs) for the Suffolk and Kent facilities. NPS EN-1 section 4.16 recognises that there may be national security implications for critical energy infrastructure. Can the applicant respond to these requirements clearly setting out the security considerations resulting from the concentration of other UK energy infrastructure in the surrounding Suffolk area.
1GEN3.	Applicant	Emergency service access Having regard to concerns raised in the Suffolk area about limited fire service resources, can the applicant clearly explain what appropriate measures have been taken to ensure fire safety during all stages of development.
1GEN4.	Applicant	Community benefit The ExA is aware of the document produced by the Government Department for Energy Security and Net Zero entitled “Community Funds for Transmission Infrastructure: Guidance”. This sets out the Government’s expectation for how communities that live near onshore electricity transmission infrastructure should benefit from the development of this infrastructure, with the use of community funds. This document also sets out the level of funding recommended, amongst more detail of the expected process. The Government through this document makes clear that it expects engagement with communities at an early stage. Explain any progress made by the applicant to engage with this process and current intention of how to progress with community fund/benefit in the future.
1GEN5.	Applicant	Need The ExA acknowledges that there would be no requirement to apply the National Energy System Operator (NESO) energy transmission design principles to this scheme. However, if they did apply, would the proposed scheme be in accordance with them? If yes, explain how. If the proposed development is not in accordance with the NESO energy transmission design principles explain why this is considered acceptable.

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ExQ1	Question to:	Question:
1GEN6.	Applicant	<p>The Outline Onshore Construction Environmental Management Plan (oCEMP) Appendix A Outline Code of Construction Practice (oCoCP) [APP-341] and CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043]</p> <p>While the two documents relate to both the onshore and offshore schemes, paragraph 1.1.4 of [CR1-043] and paragraph 1.1.8 of [APP-341] states that they are appendices to the onshore CEMP [AS-127] rather than the offshore CEMP [APP-339]. They do not appear on the contents page for either of those two documents. Provide clarification so that it is clear which document they are appended to, taking into account that the REAC includes both onshore and offshore commitments.</p> <p>The ExA suggests that the REAC and oCoCP should be freestanding documents rather than appendices, that can be listed and certified in relation to both the onshore and offshore schemes and the deemed marine licence (DML). The ExA therefore requests that the dDCO and all relevant articles, schedules, requirements and conditions are updated to reflect this suggestion.</p>
1GEN7.	Applicant	<p>Errata within the REAC</p> <p>The measures listed under the heading of shipping and navigation in the REAC [CR1-043] in several cases are identified incorrectly in terms of the potential changes and effects in column (3). For example SN21 and SN22 do not relate to the Sunk. Review column (3) and provided an updated version of the REAC.</p>
Design, parameters and other details of the proposed development		
1GEN8.	Applicant	<p>Pegwell Bay Construction Method Technical Note [REP1-108] - excavators</p> <p>Paragraph 2.2.6 of the technical note states that vehicles accessing the horizontal directional drilling (HDD) exit pits via the former hoverport would include small excavators (15-20 tonnes). Appendix B summary of plant and equipment lists 40 tonne large excavators. Confirm which is correct, since this has implications for the assessment of effects.</p>
1GEN9.	Applicant	<p>Pegwell Bay Construction Method Technical Note [REP1-108] – drill fluid capture</p> <p>Drill fluid is proposed to be captured “where practicable” (paragraph 3.2.2). Explain the circumstances in which capture might not be practicable.</p>

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ExQ1	Question to:	Question:
1GEN10.	Applicant	<p>Pegwell Bay Construction Method Technical Note [REP1-108] – cables/ducts</p> <p>The applicant's description of the proposed development in ES Part 1, Chapter 4 [REP1A-003] table 4.9 states that 4 ducts would be required, 2 for High Voltage Direct Current (HVDC) cables, 1 for fibre optic cable and a spare for repairs. In contrast, the technical note suggests that cables might be bundled within 1 or 2 ducts. Confirm which is correct.</p>
Development Consent Order (DCO) ([CR1-027] unless otherwise stated)		
1GEN11.	Applicant	<p>DCO requirements comparison for Sea Link and SPR scenarios for Friston substation</p> <p>The ExA notes several differences between the requirements within the Sea Link DCO and the made order for Scottish Power Renewables (SPR) at Friston substation.</p> <p>Compare, in detail, in a side-by-side comparison the requirements and schedules of documents to be certified for Sea Link and the SPR made order that relate to Friston Substation. Explain any differences.</p>
1GEN12.	Applicant	<p>Article 2 order of definitions</p> <p>The ExA encourages the applicant to ensure that all definitions within article 2 are in placed in alphabetical order.</p>
1GEN13.	Applicant	<p>Article 2 (Interpretation) “authorised development/project” and “ancillary works”</p> <p>Explain in more detail why you have distinguished between the development (the main works in schedule 1) and the associated development in paragraph 2 of schedule 1 and the project (the same plus the ancillary works in part 2 of schedule 1). This approach should be clearly justified.</p> <p>Explain any overlap between paragraph y of schedule 1 paragraph 2 (the last of the associated works) and the ancillary works listed in part 2.</p> <p>Explain why the definition of “ancillary works” is not limited to those in part 2 but “any other works authorised by this order” and whether this means there is an overlap between the ancillary works in part 2 and other works listed.</p> <p>Update the explanatory memorandum and other core documents accordingly.</p>

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ExQ1	Question to:	Question:
1GEN14.	Applicant Local authorities	<p>Article 2 (Interpretation) “construction environmental management plan” (CEMP) and all other plans listed in Schedule 3 Requirement 6</p> <p>Explain whether it is the applicant’s intention to produce final detailed versions of plans to be certified by the Secretary of State, as described in article 2, or to produce outline plans to be certified by the Secretary of State with the final version being approved by the relevant planning authority as implied by the wording of Requirement 6 and Schedule 19?</p> <p>Explain who would be the relevant planning authorities for the approval of such documents and also for the discharge of Schedule 3 requirements in all locations and how this would work in practice with multiple host local authorities.</p> <p>Please note, PINS Advice Note on Drafting Development Consent Orders states that “For clarity, such requirements should generally be drafted to identify the relevant planning authority by name. This could be made clear in the definitions, for example when defining ‘the relevant planning authority’.”</p> <p>As there is an onshore CEMP and an offshore CEMP, article 2 should be updated to list both.</p>
1GEN15.	Applicant	<p>Article 2 (Interpretation) “maintain”</p> <p>The applicant’s explanatory memorandum [CR1-029] states that the definition of “maintain” reflects the definition included in the Bramford to Twinstead DCO 2024 and the Yorkshire Green DCO 2024. However, the ExA notes that it does not include the wording “but not remove, reconstruct or replace the whole, of the authorised development”, which is included in the wording of the two DCOs mentioned. Explain why this wording is not included.</p> <p>Furthermore, please explain in more detail why the use of robots/drones would be necessary and signpost to similar articles in other made DCOs.</p> <p>Update the explanatory memorandum and other core documents accordingly.</p>
1GEN16.	Applicant	<p>Article 2 (Interpretation) “outline offshore overarching written scheme of investigation”</p> <p>Explain the relationship between the outline offshore overarching written scheme of investigation and the marine archaeological method statement as it is not clear in the article 2 definition. Furthermore, explain why the definition of the outline offshore overarching written scheme of investigation in paragraph 1 of the deemed marine licence (DML) does not match the article 2 definition as it does not reference the marine archaeological method statement.</p> <p>Update the explanatory memorandum and other core documents accordingly.</p>

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ExQ1	Question to:	Question:
1GEN17.	Applicant	Article 2 (Interpretation) “pre-commencement operations” Explain any overlap with the associated development listed in schedule 1, cross-check and remove any duplication. Update the explanatory memorandum and other core documents accordingly.
1GEN18.	Applicant	Article 2 (Interpretation) “landfall” The ExA notes that there is no definition of “landfall” within the dDCO, should there be? Update the explanatory memorandum and other core documents accordingly.
1GEN19.	Applicant	Article 3(2) Explain the link between article 3(2) and section 141 of the Planning Act 2008 (keeping electricity lines installed above ground). The ExA notes that there are no definitions of “install” or “high voltage electricity transmission system” in article 2, should there be? Update the explanatory memorandum and other core documents accordingly.
1GEN20.	Applicant	Article 3(4) Article 3(4) is subject to schedule 3, however, the ExA note that the requirements in schedule 3 are not limited to construction and installation. Review and explain. Update the explanatory memorandum and other core documents accordingly.
1GEN21.	Applicant	Article 4(1) Explain where the exceptions identified in article 4(1) lie, including, but not limited to where there are contrary provisions in the order. Update the explanatory memorandum and other core documents accordingly.

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ExQ1	Question to:	Question:
1GEN22.	Applicant	<p>Article 5</p> <p>The applicant's explanatory memorandum sets out that article 5 allows for lateral and vertical deviation in respect of the linear and non-linear works. It goes on to explain the reasons for the vertical deviation. However, it does not provide a similar explanation for lateral deviation for linear elements set out in article 5(1)(a). Explain the reasons for the wording of 5(1)(a), including why the wording includes "anywhere within the Order limits" and why this differs from the Bramford to Twinstead article 5(1)(a), which includes the wording "deviate laterally from the centreline for the linear works".</p> <p>Update the explanatory memorandum and other core documents accordingly.</p>
1GEN23.	Applicant	<p>Article 5 upwards deviation of pylons</p> <p>Article 5 sets a vertical upwards deviation of the pylons not exceeding 6 metres (m). The Explanatory Memorandum [CR1-029] states that this is the same that was consented in the Yorkshire Green DCO 2024. Explain the reasons for a 6m upwards deviation, rather than, for example, a 4m upwards deviation as set out in the Bramford to Twinstead DCO 2024.</p> <p>Update the explanatory memorandum and other core documents accordingly.</p>
1GEN24.	Applicant	<p>Article 5(4)</p> <p>Article 5(4) sets out the reasons for when the maximum limits of vertical deviation would not apply, including that "these limits would not give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement." Explain why the wording of article 5(4) differs from that used in the Bramford to Twinstead DCO 2024 which states "materially new or materially different environmental effects to those identified in the environmental statement."</p>
1GEN25.	Applicant	<p>Article 8(1)</p> <p>Provide further explanation for article 8(1) and the need to apply the Town and Country Planning Act 1990 for the proposed development.</p> <p>Update the explanatory memorandum and other core documents accordingly.</p>
1GEN26.	Applicant Local authorities	<p>Article 9 Community Infrastructure Levy (CIL)</p> <p>Confirm whether CIL is chargeable within the relevant local authorities and therefore whether article 9 is necessary.</p>

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ExQ1	Question to:	Question:
1GEN27.	Applicant	<p>Article 10</p> <p>The explanatory memorandum explains the effect but not the purpose of Article 10. Update the explanatory memorandum with project-specific justification for the inclusion of this article.</p> <p>Provide details of any existing Town and Country Planning Act (TCPA) or Planning Act 2008 (PA 2008) approvals and identify where these may conflict with the proposed development.</p> <p>Provide details of any TCPA or PA 2008 applications which may be in the pipeline (made but not determined or nearing submission) and identify where these may conflict with the proposed development.</p>
1GEN28.	Applicant Local authorities	<p>Article 11(2), article 15(2) and (5)(b), article 17(1)(b), article 20(3) and (4), article 22(5), article 50(2) and article 55(1)</p> <p>Explain the reasons for the inclusion of the words “which consent shall not be unreasonably withheld or delayed” and define what is meant by this wording, particularly when article 11(3), article 15(9), article 17(2), article 20(9), article 22(8) and article 50(9) include a 35-day decision period.</p> <p>Provide justification for deemed consent in the absence of a decision.</p> <p>Local authorities to also provide comment.</p>
1GEN29.	Applicant Local authorities	<p>Article 11, article 14, article 15 and article 17 consistency of wording</p> <p>Article 11(3) states “beginning with the date on which the application was received” and article 14(5), article 15(9) and article 17(2) state “beginning with the date on which the application was made”. Explain the inconsistency in wording and provide reasoning for why the 35 days should begin with the date on which the application was received or made.</p> <p>Local authorities to also provide comment.</p> <p>Update the explanatory memorandum and other core documents accordingly.</p>
1GEN30.	Applicant	<p>Article 13</p> <p>The Explanatory Memorandum [CR1-029] sets out that similar working is included in the Bramford to Twinstead DCO 2024 for article 13. Explain the reasons for the differences in wording between the two articles.</p> <p>Update the explanatory memorandum and other core documents accordingly.</p>

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ExQ1	Question to:	Question:
1GEN31.	Applicant	Article 14 The ExA notes that the applicant recognises that this is not a model article. Explain the specific circumstances of the proposed development that would justify the need for article 14. Update the explanatory memorandum and other core documents accordingly.
1GEN32.	Applicant	Article 15 Explain why article 15 includes permissive paths. Update the explanatory memorandum and other core documents accordingly.
1GEN33.	Applicant	Article 19 The Explanatory Memorandum [CR1-029] sets out that similar working is included in the Bramford to Twinstead DCO 2024 for article 19. Explain the reasons for the differences in wording between the two articles. Update the explanatory memorandum and other core documents accordingly.
1GEN34.	Applicant	Article 20 Explain the reasons for the inclusion of the word “decommissioning” in article 20(1), 20(5), 24, 51 and 52. Update the explanatory memorandum and other core documents accordingly.
1GEN35.	Applicant	Article 23 Explain the specific circumstances of the proposed development that would justify the need for article 23 (removal of human remains) and how the circumstances of the proposed development are different from those of recently made orders where similar articles have been removed by the Secretary of State. Update the explanatory memorandum and other core documents accordingly.
1GEN36.	Applicant	Article 24 Explain why you are seeking compulsory acquisition of land for decommissioning as well as construction, operation and maintenance. Update the explanatory memorandum and other core documents accordingly.

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ExQ1	Question to:	Question:
1GEN37.	Applicant	Article 26 Bramford to Twinstead made order article 24 includes the same wording as the Sea Link article 26 for paragraphs (1) to (4). Explain why paragraphs (5) and (6) are not included within Sea Link article 26. Update the explanatory memorandum and other core documents accordingly.
1GEN38.	Applicant	Article 27(1) Justify why you consider it necessary and appropriate to allow temporary possession of “any other order land” and explain what steps you have taken to alert all landowners and occupiers within the order limits to this possibility.
1GEN39.	Applicant Statutory undertakers	Article 44 Explain the implications for the inclusion of paragraphs (2) to (4) and signpost to similar paragraphs within made orders. Update the explanatory memorandum and other core documents accordingly. Statutory undertakers to also provide comment.
1GEN40.	Applicant	Article 46 Explain the specific circumstances of the proposed development that would justify the need for article 46. Update the explanatory memorandum and other core documents accordingly.
1GEN41.	Applicant	Article 49 The Bramford to Twinstead Correction Order includes several instances where the word “relevant” was inserted into the equivalent article (45). Confirm whether article 49 should include the same amendments. The reference to the CEMP in article 49(1)(a)(ii) should be amended to the onshore CEMP.
1GEN42.	Applicant	Article 50 Explain the difference between the four weeks plus seven days set out in article 50(3)(a) and (b) and the 35 days set out in article 50(9) and give reasons why both are needed. Should article 50, following article 50(9), include paragraphs similar to article 22(9) and (10). If not, why not?

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ExQ1	Question to:	Question:
1GEN43.	Applicant	Article 51 In light of the number of ancient and veteran trees present within the order limits that are to be retained in accordance with REAC [CR1-043] commitment A05, should article 51 include specific provision excluding these trees or a requirement for approval from the local planning authority for such works? In responding, either provide suitable alternative DCO wording to address this point or explain why such wording is not necessary, to control or prevent works to the trees.
1GEN44.	Applicant	Article 56 Explain the specific circumstances of the proposed development that would justify the need for article 56. Update the explanatory memorandum and other core documents accordingly.
1GEN45.	Applicant	Schedule 1, part 1, work no. 1b and work no. 11 Explain the quantum and purpose of the proposed battery rooms identified in Work No. 1b and Work No. 11.
1GEN46.	Applicant	Requirement 2 time limits The ExA notes that the wording of requirement 2 appears to be based on requirement 2 of the Yorkshire Green made DCO, however, paragraph (2) omits the wording “or if shorter, one year”. Explain why this wording is not included. Update the explanatory memorandum and other core documents accordingly.

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ExQ1	Question to:	Question:
1GEN47.	Applicant/ local authorities	<p>Requirement 3 converter station design</p> <p>The ExA notes that the requirement does not allow the relevant planning authority to approve the design of the converter station, but restricts it to confirming that the details are in general accordance with the Key Design Principles set out in the Converter Station Design Principles. The ExA notes that this allows considerably greater flexibility than similar DCO requirements such as the ones for the Scottish Power Renewables consents for substations at Friston and in effect stops short of giving the relevant planning authorities the ability to control and approve the layout, scale and design. Explain why this approach provides sufficient control and why a similar approach to that set out in requirement 12 of the made East Anglia ONE North DCO is not required.</p> <p>The ExA notes that requirement 3 does not stipulate that the development must be carried out in accordance with the details submitted to the relevant planning authority. Explain whether this is an oversight or whether additional wording is required.</p> <p>The ExA notes that there is no requirement in the dDCO in relation to the submission and approval of the layout, scale or design of the substations in Kent and Suffolk, the River Fromus Bridge or the new pylons. Is this the applicant's intention or is it an oversight? If intentional provide justification for this approach, in the light of the identified likely significant effects of the infrastructure on landscape and visual receptors. If it is an oversight, additional requirements are necessary and the ExA would expect these to provide robust controls over the designs and the carrying out of the development in accordance with approved drawings.</p> <p>Provide an explanation as to why Design Principles - Suffolk [APP-366] and Design Principles - Kent [APP-367] are not included as documents to be certified in Schedule 19 pursuant to article 60 of the dDCO.</p> <p>Local authorities to provide comments on these matters.</p>
1GEN48.	Applicant	<p>Requirement 6 construction management plans to be approved</p> <p>Many of the REAC [CR1-043] mitigation provisions are specifically linked to the use of HDD methods for landfall. Explain how mitigation controls would be secured by the DCO in the event that an alternative method (such as direct pipe or micro-tunnelling) were used to achieve landfall.</p>

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ExQ1	Question to:	Question:
1GEN49.	Applicant	<p>Requirement 7 construction hours</p> <p>Requirement 7 allows for onshore construction work between 07:00 and 17:00 on Saturdays, Sundays and Bank Holidays as part of the core working hours (other than the more restrictive days/hours for Work No.1A and Work No. 1B). There has been concern raised through multiple representations from both Kent and Suffolk regarding the proposed weekend and bank holiday construction working hours proposed. Suffolk County Council (SCC) [RR-5209], for example, stated that: “The potential for construction activities to take place seven days a week and on Bank Holidays would provide host communities with no respite from the impacts of the development activities associated with the Sea Link proposals, including disruption to local roads and Public Rights of Way used for recreational activity at times when they are most frequently used. In turn, this is likely to affect local tourism”. This takes into account additional restrictions for onshore piling works and HGV deliveries, as set out in Requirement 7.</p> <p>The ExA is not currently satisfied that the extent of working hours and days as proposed is reasonable and is aware that, as an example, East Angla 1 DCO requirement 23 limits onshore construction work so that it must only take place between 07:00 hours and 19:00 hours Monday to Friday and 07:00 hours and 13:00 hours on Saturdays, with no activity on Sundays or Bank Holidays, subject to some defined exceptions and emergencies. If the working hours for this proposed development was limited to between 07:00 hours and 19:00 hours Monday to Friday, and 07:00 hours and 13:00 hours on Saturdays, other than some defined exceptions or emergencies, what would this mean for the construction programme length and delivery overall for the proposed development?</p>
1GEN50.	Applicant	<p>Requirement 7 construction hours</p> <p>Percussive piling works are limited to 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on Saturdays and may not occur on Bank Holidays, unless otherwise approved by the relevant planning authority. As presently worded this requirement offers no restrictions on piling works on Sundays. Confirm the construction piling hours or restrictions on Sundays in requirement 7(2).</p>
1GEN51.	Applicant	<p>Requirement 8 retention and protection of existing trees and hedgerows</p> <p>Explain why requirement 8 paragraph (1) only notes “identifying the trees, groups of trees and hedgerows to be retained” and not those to be removed.</p> <p>Explain why the DCO does not contain a specific requirement for the submission and approval of replacement planting schemes.</p>

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ExQ1	Question to:	Question:
1GEN52.	Applicant	<p>Requirement 9 reinstatement schemes</p> <p>The ExA notes that requirement 9(2) disapples the requirement to restore land to a condition suitable for its former use, to land above or within 10 metres of underground cables. This could have wide ranging implications for the likely significant effects, including for agricultural land and soils. Provide an explanation for the need for requirement 9(2). If it is necessary, provide an explanation of its implications for the assessment and mitigation of likely significant effects.</p>
1GEN53.	Applicant	<p>Requirement 11 removal of temporary bridges and culverts</p> <p>The ExA notes that requirement 11 does not require consultation with the relevant lead local flood authority or Environment Agency in advance of seeking any approval for retention of any temporary bridges or culverts over-and-above the time period stipulated in the requirement. Explain why additional wording is not required to secure this consultation.</p>
1GEN54.	Applicant	<p>Requirement 13 decommissioning</p> <p>Explain why substations are excluded from paragraph 13(1). Clarify whether requirement 13 also applies to offshore elements. Update the explanatory memorandum and other core documents accordingly.</p>
1GEN55.	Applicant	<p>Schedule 16 DML</p> <p>Works no 6(b) refers to laying “electric cables and fibre optic cables”. Based on the description of the proposed development in ES Part 1, Chapter 4 [REP1A-003], should this instead read “electric cables and a fibre optic cable”?</p>
1GEN56.	Applicant	<p>Schedule 16 DML - Table 1</p> <p>Ref 12 of the ‘Applicant’s Schedule of Changes to the Draft Development Consent Order’ [CR1-050] states that 10 additional grid co-ordinates have been added to Table 1: Limits of deviation for marine cable area. Clarify which points in the table are new and if any points have been amended, and why they are needed. Provide a plan overlaying the new (and any revised points) over the original order limits.</p>
1GEN57.	Applicant	<p>Schedule 16 DML – condition 1</p> <p>Part 2 condition 1 design parameters does not include parameters relating to cable crossings. Consider whether these need to be included, and if not provide an explanation.</p>

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ExQ1	Question to:	Question:
1GEN58.	Marine Management Organisation (MMO)	<p>Schedule 16 DML – condition 4(4)</p> <p>Part 2 condition 4(4) includes provision for deemed consent where the MMO fails to give a decision within 16 weeks. In this situation, the programme, statement, plan, protocol or scheme would be deemed to be approved by the MMO. Provide your views on this provision for deemed consent.</p>
1GEN59.	Applicant	<p>Schedule 16 DML – condition 11</p> <p>Consider whether Part 2 condition 11 should include provision for MMO approval to be undertaken in consultation with Natural England (NE) or the Joint Nature Conservation Committee (JNCC) as the relevant statutory nature conservation body (s) (SNCB). If not, why not?</p>
1GEN60.	Applicant MMO	<p>Schedule 16 DML – condition 13</p> <p>Provide an explanation of the purpose and effect of condition 13, including justification for the 10 year period. Update the explanatory memorandum accordingly.</p> <p>MMO to provide their view on condition 13.</p>
1GEN61.	Applicant	<p>Schedule 16 DML</p> <p>Part 2 Condition 4 Pre-construction plans and documentation paragraph 4.(1) requires the submission and approval of a number of documents. Where relevant, should it be specified that these documents should be substantially in accordance with the principles set out in the outline version of the document? In some cases there is no wording to require that, for example for the oOCEMP or the marine mammal mitigation plan.</p>
1GEN62.	Applicant	<p>Schedule 16 DML</p> <p>Part 2 Condition 4 pre-construction plans and documentation differs in its format from Schedule 3 Requirement 6 as 4(1) requires the submission of a cable specification and installation plan that includes the information and documents set out in in (a) to (l) inclusive. Is this the applicant's intention, or would it be clearer to require the submission of individual documents, including the cable specification and installation plan?</p>
1GEN63.	Applicant	<p>Schedule 16 DML</p> <p>Part 2 Condition 4(1)(i) requires the submission of the OCEMP. It appears that the REAC [CR1-043] is an appendix to the onshore CEMP [AS-127] (see 1GEN6.) and therefore would not be secured for the offshore scheme through the DML. Provide an explanation for this and make any amendments to the dDCO as necessary to ensure the REAC would be secured.</p>

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ExQ1	Question to:	Question:
1GEN64.	Applicant	<p>Schedule 17 public general legislation</p> <p>Explain the extent to which the guidance in section 25 of Advice Note 15 has been followed. Good Practice Note 10 states that clear justification for the inclusion of such provisions in the “particular circumstance”, should be provided.</p> <p>Provide further justification and include within the explanatory memorandum:</p> <ul style="list-style-type: none"> • the purpose of the legislation/ statutory provision • the persons/ body having the power being disapplied • an explanation as to the effect of disapplication and whether any protective provisions or requirements are required to prevent any adverse impact arising as a result of disapplying the legislative controls • (by reference to section 120 of and schedule 5 to the Planning Act 2008) how each disappplied provision constitutes a matter for which provision may be made in the DCO
1GEN65.	Applicant	<p>Schedule 18 amendment of local legislation</p> <p>Provide further explanation in the Explanatory Memorandum about how the provisions are considered to be inconsistent with draft article 53 and the effect of the disapplication.</p> <p>Please provide a copy of the 1825 act and explain whether you have discussed the inclusion of this provision with the body/ies in whom those existing powers are vested.</p>
1GEN66.	Applicant	<p>Schedule 19 certified documents</p> <p>Schedule 19 should include a table which lists the environmental statement documents in full. This can then be updated and any new documents added as the examination progresses.</p> <p>Furthermore, a full list of plans that comprise the land plans, works plans, etc. should be included.</p> <p>Conduct a thorough audit of the dDCO to ensure that all relevant documents are included in schedule 19.</p>

ExQ1: Wednesday 17 December 2025

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ExQ1	Question to:	Question:
1GEN67.	Applicant Natural England MMO	Surveys and monitoring conditions Applicant - It is common with DMLs as part of DCOs which have an offshore element for there to be a condition requiring details of planned pre-construction surveys and monitoring to be agreed with the MMO and NE. Notwithstanding the details within the submitted oOCEMP, is there a need for such a condition to be within the DML to secure this? Similarly, is there a need for a condition within the DML for post-construction monitoring, to include adaptive management where necessary, with details and methodology to be first agreed with MMO and NE? NE and MMO - If considered necessary is there wording that could be suggested.

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ExQ1	Question to:	Question:
1GEN68.	Applicant	<p>Errata within the DCO</p> <ul style="list-style-type: none"> a) Confirm that article 2 definition of “electronic transmission” should read (a) and (b) rather than (c) and (d) b) Confirm that article 2 definition of “pre-commencement operations” should read (a), (b), (c) onwards rather than (e), (f), (g) onwards c) Confirm that article 2 definition of “traffic regulation order plans” should read “and references to a particular traffic regulation order plan are to be construed accordingly” d) Confirm that article 7(2)(1) should read “except in paragraph (3)” e) Confirm that article 7(3) should read “if those benefits or rights were exercised by the undertaker” f) Confirm that article 9 should read “(b) a building into which people go only intermittently” g) Confirm that article 12(6) should read “(restriction of works following substantial road works)” h) Confirm that article 12(7) should read “(Registers, Notices, Directions and Designations) (England) Regulations 2007(b)” i) Confirm that article 13(4) should read “(application of the permit schemes)” (in line with the Bramford to Twinstead correction order) j) Confirm that article 18(2) should read ““unless otherwise agreed with the street authority, be maintained to the same condition (including any culverts or other structures laid under that part of the highway)” (in line with the Bramford to Twinstead correction order) k) Confirm that article 20(11) should read “or approval under paragraph (4)(a)” l) Confirm that article 33(5) should read “purposes of sub-paragraph (4)(a)” m) Confirm that article 34(1)(a) should read “part of a house, building or factory” n) Confirm that article 43(1) should read “the undertaker of the Order rights will be” o) Article 44(1)(c) should end with a semi-colon p) Articles 50(2) and (6) and article 60(3) should end with a full stop <p>Confirm that article 51(7) should read “if an application for consent under paragraph (4) does not include the statement required under paragraph (6), then the provisions of paragraph (5) will not apply to that application”.</p>

Responses due by Deadline 3: Friday 9 January 2026

ExQ1	Question to:	Question:
Compulsory acquisition (CA) and temporary possession (TP) ([CR1-003] and [CR1-005] unless otherwise stated)		
1GEN69.	Applicant	<p>Alternative dispute resolution</p> <p>Paragraphs 27 and 28 of <i>Planning Act 2008 Guidance related to procedures for the compulsory acquisition of land</i>, September 2013, state that applicants are urged to consider offering full access to alternative dispute resolution (ADR) techniques for those with concerns about CA of their land. Have you offered full access to ADR techniques for those with concerns about the CA of their land or considered other means of involving those affected? If so, give details.</p>
1GEN70.	Local planning authorities Local highway authorities	<p>Alternatives to CA or temporary possession (TP)</p> <p>Are any of the Councils in their roles as the local planning authority and the highway authority aware of:</p> <ul style="list-style-type: none"> • any reasonable alternatives to the CA or the TP which is sought by the applicant? • any areas of land or rights that the applicant is seeking the powers to acquire that you consider would not be needed?
1GEN71.	Applicant	<p>Diligent enquiry into land interests</p> <p>There are a significant number of plots in the Book of Reference (BoR) [REP1-046] that include an unknown interest in the land. We note that these unknown interests are not included in the Land Rights Tracker [REP1-126a]. Provide a list of the plots where there is an unknown interest (this can be done by adding them to the Land Rights Tracker) and detail for each plot what actions you have taken to try and identify who holds the interest and summarise what further steps will you be taking to identify these interests during the examination?</p>
1GEN72.	Applicant	<p>The Equality Act 2010</p> <p>The Statement of Reasons [CR1-033] states that the applicant has taken into account its duties under section 149 of the Equality Act 2010. The Equalities Impact Assessment [APP-362] explains how the pre-application consultation considers those with protected characteristics. Provide further detail and clarification how regard to the Equality Act 2010 has been, and will be had, during the examination, particularly in relation to the powers sought for CA and TP?</p> <p>Have any affected persons been identified as having protected characteristics since the Equalities Impact Assessment was undertaken? If so, what regard has been given to them?</p>

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ExQ1	Question to:	Question:
1GEN73.	Applicant	<p>Funding</p> <p>The funding statement, paragraph 3.2.15 [CR1-031] states that the Project Assessment (in relation to the Accelerated Strategic Transmission Investment framework) for the proposed development has been submitted to the Office of Gas and Electricity Markets (Ofgem) with a decision expected autumn 2026. Explain the consequences, on the funding for this scheme, in respect of the outcome Ofgem's decision.</p>
1GEN74.	Applicant	<p>Construction compounds</p> <p>The ExA's letter dated 5 August 2025 [PD-006] questioned your intention to seek CA of rights over plots identified with temporary uses. Your response [AS-084] confirmed that you intended to create a permanent right (class 4 CA of rights (construction compound)) for plots 1/9, 1/22, 1/26, 1/29, 1/30, 1/39 and 1/42 in Suffolk and plots 2/121 and 2/134 in Kent to enable the construction compounds to be reinstated in the event the asset needed to be rebuilt or substantially replaced during its lifetime.</p> <p>In [REP1-033] you confirmed that you would be content to seek solely temporary possession powers in respect of these compounds and that the land plans, Book of Reference, Statement of Reasons and draft DCO would be updated accordingly.</p> <p>The ExA has identified that in the BoR [REP1-046] plots 1/9 and 1/42 in Suffolk remain identified as class 4 Compulsory Acquisition of Rights - Construction Compound. Update the BoR to correct this error and check all other associated documents (including the Land Rights Tracker) for any other inconsistencies.</p>
1GEN75.	Applicant	<p>Biodiversity net gain (BNG)</p> <p>The Biodiversity Net Gain Feasibility Report [REP1A-025] states that the proposed development is seeking to achieve a 10% net gain in biodiversity. BNG is not currently a requirement for nationally significant infrastructure projects. Accordingly, the ExA considers the compulsory acquisition of land for the sole purpose of meeting BNG may not be justified. Provide a statement demonstrating that land to be the subject of CA for environmental mitigation is proportionate and necessary for the proposed development. Also provide detail (referring to plot numbers) to clarify which land would be considered as contributing to BNG and whether there are any CA plots which would have the sole purpose of achieving BNG.</p>

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ExQ1	Question to:	Question:
1GEN76.	Applicant	<p>Detailed responses to relevant representations (RR) of affected landowners</p> <p>Explain how it was decided which RR from affected landowners would be provided with a detailed response and why detailed responses were not provided to all affected landowners.</p> <p>Provide a detailed response to the RRs of all affected landowners not included within '9.34.3 Applicant's Responses to Relevant Representations from Affected Landowners' [REP1-113].</p>
1GEN77.	Applicant	<p>Inconsistency between land plans for both Suffolk [CR1-003] and Kent [CR1-004] and the revised works plans submitted at deadline 1A for Suffolk [CR1-007] and Kent [CR1-008] and the Statement of Reasons [CR1-033]</p> <p>The ExA has identified several inconsistencies between these documents, including:</p> <ul style="list-style-type: none"> Suffolk plot 2/84 is identified in the land plans as Class 5 (access) but on the works plans as work no.15 (environmental mitigation and landscaping); Kent plots 1/7, 1/14, 1/18 and 1/19 identified on the land plans as Class 8 (temporary use for construction, mitigation, maintenance and dismantling) but on the works plans as work no.14 (proposed accesses for construction, monitoring and maintenance outside linear and non-linear limits of deviation); sheet 2 of the Kent works plans also shades several plots as work no. 14 (proposed accesses) that do not correspond with the class on the land plans; and Work No.14 is titled 'Principal Accesses' in the Statement of Reasons but titled differently in the works plans as 'Proposed accesses for construction, monitoring and maintenance outside linear and non-linear limits of deviation.' <p>All land plans and works plans, BoR, Statement of Reasons and the Land Rights Tracker to be checked for inconsistencies and all relevant associated documents to be updated accordingly.</p>
1GEN78.	Applicant	<p>Clarification regarding Suffolk plots 1/4 and 1/7</p> <p>Suffolk plot 1/4 is identified for class 6 CA of rights (drainage) for work no. 3A access road to the converter station and Suffolk Plot 1/7 is identified for class 5 CA of rights (access) for work no 3A access road to the converter station. However, these plots both appear to relate to the temporary construction compound rather than the access road.</p> <p>Provide an explanation as to why these plots are required and for which work no and update any core documents as necessary.</p>

ExQ1: Wednesday 17 December 2025

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ExQ1	Question to:	Question:
1GEN79.	Applicant	<p>Clarification regarding Suffolk plot 1/10</p> <p>Plot 1/10 is identified for class 8 temporary use for construction, mitigation and dismantling of redundant infrastructure.</p> <p>Explain the difference between the requirement for plot 1/10 which is required on a temporary basis compared to adjacent plots 1/4, 1/7, 1/8 and 1/9 which require permanent rights.</p>
1GEN80.	Applicant	<p>Need for permanent acquisition of the entirety of Suffolk plots 1/11 and 1/11a</p> <p>Your response [AS-084] to the ExA's letter dated 5 August 2025 [PD-006] sets out the reason for the extent of the area required for Suffolk plot 1/11 being considerably larger than the limits of deviation for work no 3A as the land being needed for environmental mitigation planting and screening. The detail of this is explained in Figure 3 of the Outline Landscape and Ecological Management Plan (oLEMP) – Suffolk [CR1-045]. The ExA notes that considering the planting shown on Figure 3 this would leave a considerable area of plot 1/11 with no apparent works or mitigation planting proposed.</p> <p>Explain the need for the permanent acquisition of the entirety of plot 1/11 including plans showing the proposed layout of any environmental mitigation planting and screening.</p> <p>We note that the plot identified as 1/11a in [PDA-005] is now identified as 1/11 [CR1-003]. Clarify the reason for this change.</p> <p>The revised works plans submitted at deadline 1A [CR1-007] indicate that plot 1/11 (previously plot 1/11a) includes the management of 12 hectares of arable land for ground nesting birds, particularly skylark. Clarify whether this plot in its entirety is 12 hectares, and if it is larger, explain why the additional land is needed.</p>
1GEN81.	Applicant	<p>Clarification regarding Suffolk plot 1/12</p> <p>The line of Suffolk plot 1/12 as shown on the Land Plans [CR1-003] includes a variable width of the B1119 highway along its length.</p> <p>Confirm whether this is intentional and the reasons for the extent of plot 1/12 in this location.</p>
1GEN82.	Applicant	<p>Drainage details for Suffolk plot 1/24</p> <p>Signpost to where details of the drainage proposed for the full extent of Suffolk plot 1/24 can be found.</p>
1GEN83.	Applicant	<p>Clarification regarding Suffolk plot 1/97 (previously plot 1/55)</p> <p>Explain the identification of Suffolk plot 1/97 as Class 10 land that is not subject to powers of acquisition within the Land Rights Tracker [REP1-126a].</p>

ExQ1: Wednesday 17 December 2025

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ExQ1	Question to:	Question:
1GEN84.	Applicant	Clarification regarding plot number alterations in Suffolk [CR1-004] Provide a comparison table to explain which plot numbers have been altered and which ones are new. Include detail on the reason for the alteration and clarify if the plot size and location remain the same or have been amended.
1GEN85.	Applicant	Clarification regarding Suffolk plot 4/7 The revised works plans submitted at deadline 1A [CR1-007] indicate that plot 4/7 includes the management of 6 hectares of acid grassland. Clarify whether plot 4/7 in its entirety is 6 hectares, and if it is larger, explain why the additional land is needed.
1GEN86.	Applicant	Clarification regarding Suffolk plots 4/10 and 4/11 Suffolk plots 4/10 and 4/11 appear to relate to the temporary work compound identified on the work plans [CR1-007] as work no.4. Explain why plots 4/10 and 4/11 are identified in the Statement of Reasons appendix A [REP1-043] as class 5 compulsory acquisition of rights - access.
1GEN87.	Applicant	Clarification regarding Suffolk plots 4/16 and 4/18 Explain why two access points across plots 4/16 and 4/18 are required in this location.
1GEN88.	Applicant	Clarification regarding Suffolk plot 5/19 Explain the reasons for requiring a wider area of land for Suffolk plot 5/19, for example, when compared to plot 5/14 which is more restricted to account for the adjacent residential properties.
1GEN89.	Applicant	Clarification regarding Suffolk plot 6/4 Explain why it is necessary to include Suffolk plot 6/4.
1GEN90.	Applicant	Clarification regarding Kent plot 1/6 Explain why the CA of rights for access widens at plot 1/6.
1GEN91.	Applicant	Clarification regarding Kent plot 1/12 Explain the reasons for TP of plot 1/12 which is 12 square metres and is enclosed on all sides by CA of rights for drainage, access and overhead lines (plots 1/8, 1/9, 1/11 and 1/13).

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ExQ1	Question to:	Question:
1GEN92.	Applicant	<p>Clarification regarding Kent plot 2/6</p> <p>Kent plot 2/6 is described on the land plans as CA of rights for drainage and includes an existing track. Explain whether this would affect landowner access through the existing track.</p>
1GEN93.	Applicant	<p>Clarification of works along the river Stour</p> <p>Kent plots 2/60 (crown land), 2/62, 2/63, 2/64 and 2/84-2/103 are for TP along the river Stour. This area is marked for Work No.15 proposed environmental mitigation and landscaping in the revised work plans submitted at deadline 1A [CR1-008]. Explain and signpost to where further information is provided on the need for this land.</p>
1GEN94.	Applicant	<p>Clarification regarding Kent plots 2/123 and 2/133</p> <p>Whilst the works plans provided at deadline 1A [CR1-008] go some way to explaining the works proposed within the various plots, more detail is required to understand the specific layout of the proposed works within Kent plots 2/123 and 2/133 and to explain why the full extent of the land is required.</p> <p>Furthermore, Kent plot 2/133 includes a temporary construction compound which then appears in the oLEMP [PDA-035] to change to a tree planting and grassland mitigation area. Explain why you intend to CA this part of the land, when other mitigation areas have been identified only for CA of rights.</p>
1GEN95.	Applicant	<p>Clarification regarding Kent plots 2/149 – 2/151, 2/155 – 2/157, 2/164, 2/165, 2/171, 2/172, 2/178 and 2/179</p> <p>These Kent plots are identified in the land plans for CA of rights for mitigation, however, the oLEMP [PDA-035] does not show any planting in this area. Explain in detail and signpost to where the detail is provided on the mitigation proposed for these plots.</p>
1GEN96.	Applicant	<p>Clarification regarding Kent plots outside of the limit of deviation for underground cables, including Plots 2/160, 2/183, 3/7, 3/46, 3/48 – 3/51, 3/55, 3/57, 3/60, 3/62, 3/76, 3/78, 3/85, 4/14 – 4/17 and 4/29</p> <p>A number of Kent plots are identified for CA of rights for the underground cabling system that appear to lie outside of the limit of deviation for underground cables. Explain what rights are being sought in relation to these plots with reasons.</p>
1GEN97.	Applicant	<p>Clarification regarding the arrangement of Kent plots 3/41, 3/42 and 3/45</p> <p>Explain the reason for the arrangement of these plots.</p>

ExQ1: Wednesday 17 December 2025

Responses due by Deadline 3: Friday 9 January 2026

ExQ1	Question to:	Question:
1GEN98.	Applicant	Clarification regarding Kent plot 6/1 The statement of reasons appendix A does not contain any detail for Kent plot 6/1. The revised works plans submitted at deadline 1A [CR1-008] state that this land is for 10 hectares of arable enhancement land for golden plover and skylark. Explain the reasons for the CA of the entirety of Kent plot 6/1 (particularly if plot 6/1 is in excess of 10 hectares) and update documents as appropriate.
1GEN99.	Applicant	Clarification regarding landowner Clarify if Northumbrian Water Limited [RR-5598] refers to Essex and Suffolk Water Limited in the Book of Reference [REP1A-002] .
1GEN100.	Applicant	Clarification regarding landowner The Land Rights Tracker [REP1-126a] identifies Edward Martin Spanton as being the owner or occupier of several plots in Kents. The RR listed in the Land Rights Tracker associated with this affected person is [RR-1410] . No RR has been received from Edward Martin Spanton. [RR-1410] is the RR of Dyas Farms (1988) Ltd, submitted by Nicola Hellen Dyas. Amend the Land Rights Tracker accordingly.
1GEN101.	Applicant	Land Rights Tracker Ensure all missing details of RR or written representations (WR) are added to the Land Rights Tracker [REP1-126a]
2. Landscape and visual		
1LVIA1.	Applicant Local authorities	Landscape vision Local authorities: In view of the major adverse likely significant effects, do you consider that there is a clear vision for the landscape for the whole project? If not, make suggestions for how the landscape vision should be developed. Applicant: Provide an explanation of how the recommendations of the Design Review Panel have influenced the landscape vision?

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ExQ1	Question to:	Question:
1LVIA2.	Applicant	<p>Good design</p> <p>In terms of good design, NPS EN-1, for example paragraphs 4.711 and 4.7.12, identifies that the wider impacts of a development, including landscape impacts, are important factors in the design process. In terms of landscape and visual effects, paragraph 5.10.28 identifies that it may be appropriate to undertake landscaping off site, for example filling in gaps in existing tree and hedge lines. Paragraph 5.10.37 states that the Secretary of State should consider whether the development has been designed carefully, to minimise harm to the landscape, including by appropriate mitigation.</p> <p>Provide an explanation as to whether additional landscape planting could result in the mitigation of likely significant landscape and visual effects as identified in table 1.12 of [APP-048] and table 1.13 of [APP-061]. Provide an explanation as to why opportunities for mitigation of residual effects have not been pursued.</p> <p>Although significant adverse cumulative effects are identified in [APP-073] and [APP-060] for landscape and visual, no additional mitigation is identified. Provide an explanation of whether additional landscape planting could result in the mitigation of significant adverse landscape and visual effects. Provide an explanation as to why opportunities for mitigation of cumulative residual effects have not been pursued.</p>
1LVIA3.	Applicant	<p>Design and landscape strategy</p> <p>Provide an explanation as to how the historic maps have informed the design and landscape strategy, in the Design Approach Document – Suffolk [REP1A-029] and Design Approach Document – Kent [REP1A-031]. Provide an update to the Design Approach Documents.</p>
1LVIA4.	Applicant	<p>Lighting</p> <p>The ExA notes the rural and unlit context of the substations and converter stations in Suffolk and Kent and that there is very limited detail in relation to operational lighting in the application documents. Provide additional detail in terms of the height and type of any lighting installations and light contour plans. Provide a night-time assessment of the effects of operational lighting on landscape character or visual amenity. This should include the cumulative effects with other significant light sources, such as Thanet Earth and Richborough Energy Park in Kent. If the applicant considers that an assessment is not required, provide a detailed explanation of your reasoning.</p> <p>Has consideration been given to allowing relevant planning authorities to approve details of operational lighting schemes? If not, why not? Local authorities may also like to comment.</p>

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ExQ1	Question to:	Question:
1LVIA5.	Applicant	<p>Advance planting</p> <p>It is not clear how advance planting would be secured and where it would be located. A more detailed explanation and commitment is required, detailing the mechanism for securing it.</p>
1LVIA6.	Applicant	<p>Adaptive monitoring</p> <p>Provide an explanation of how LV03 and LV04 of the REAC version B [CR1-043] would interact with section 7.3 of the oLEMP – Suffolk version B [AS-059] in relation to the adoption of an adaptive management monitoring programme and section 7.2 of the oLEMP – Kent version B [PDA-035].</p>
1LVIA7.	Natural England, Suffolk & Essex Coast & Heaths National Landscape Partnership (SECHNLP), Suffolk County Council, East Suffolk District Council	<p>National Landscape (NL) duty</p> <p>Provide your comments on Document 9.47 NL Duty Section 85 Duty Technical Note [REP1-120], including the approach to the s85 duty, the natural beauty indicators in table 3.2 and the special qualities indicators in table 3.3 and the cumulative effects on the NL in section 4 and tables 4.1 and 4.2.</p> <p>In your response include consideration of whether the extent and nature of the preferred area of acid grassland on plate 3.2 of [REP1-120] is sufficient and the appropriateness of the maintenance period of 10 years.</p>
1LVIA8.	Applicant	<p>Landscape mitigation for Saxmundham converter station</p> <p>The landscape planting alongside the B1119 is not very clearly shown in relation to the order limits, nor is it clear the extent to which it would consist of hedgerow or trees. Provide a more detailed explanation as to whether the planting includes structural landscape planting that would be capable of integrating the converter station into the existing landscape in longer range views.</p>
1LVIA9.	Applicant	<p>Effects of construction on defined features of the NL</p> <p>Notwithstanding the information provided in [REP1-120], provide a more detailed and thorough response to the comments from SECHNLP that the landscape and visual assessment does not fully consider the impacts on all defined features, including scenic quality, relative tranquillity and relative wildness, during construction. If it is found that significant effects are likely, what mitigation measures are proposed?</p>

ExQ1: Wednesday 17 December 2025

Responses due by Deadline 3: Friday 9 January 2026

ExQ1	Question to:	Question:
1LVIA10.	Applicant	<p>Acid grassland</p> <p>The ExA notes that the preferred area of acid grassland enhancement shown on plate 3.2 of [REP1-120] is considerably smaller than the area shown in the order limits. Is it the applicant's intention to update the extent of area 2 on figure 4 of the oLEMP - Suffolk [CR1-045] to show the smaller area? The ExA also notes that the title of figure 4 is incorrect and needs to be revised.</p> <p>Provide clarification as to whether the applicant still intends to restore area 2 on figure 4 [CR1-045] and whether this would be for the lifetime of the project or some other period of time.</p> <p>Given that enhancement of the acid grassland is to offset damage to acid grassland caused by the proposed development, explain how it can also be considered an enhancement of the NL.</p> <p>Provide a response to NE's comments in [REP2-059].</p>
1LVIA11.	Applicant	<p>Heritage Coast</p> <p>The ES Part 2, Chapter 1 Suffolk Landscape and Visual [APP-048] makes numerous references to the impacts on the Heritage Coast being assessed in appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]. There is very limited assessment of the effects on the Heritage Coast in that document, although the designation is included in tables 1.11 and 1.12 of [APP-048]. Provide an explanation of how the effects on the Heritage Coast have been assessed, including evidence base and methodology, as it is not clear how the summary has been arrived at.</p>

Responses due by Deadline 3: Friday 9 January 2026

ExQ1	Question to:	Question:
1LVIA12.	Applicant	<p>Visualisations</p> <p>The ExA notes that type 1 and type 3 visualisations have been provided in the application documents. In view of the nature and scale of the proposed development, the sensitivity of the context and the magnitude of the effects that have been identified, provide an explanation as to why type 4 visualisations have not been provided, with reference to the guidance in the Landscape Institute Technical Guidance Note 06/19.</p> <p>Provide an explanation of how type 4 visualisations would differ from the type 3 visualisations that have been provided, in terms of the photographic equipment, presentation of the information, locational accuracy and whether the data used is verifiable.</p> <p>Summarise the purpose and use of the type 3 visualisations and the extent to which they have been supplemented by other evidence such as site visits, professional judgement in undertaking the overall assessment?</p> <p>Furthermore, the ExA notes that the winter year 15 visualisations at the following viewpoints do not allow a proper assessment as there are significant obstructions in the foreground due to crops. Therefore, for Suffolk viewpoint 8a provide a year 15 winter visualisation.</p>
1LVIA13.	Applicant	<p>Coordination</p> <p>Applicant - The ExA notes that the Coordination Document [APP-363] sets out opportunities for coordination in terms of project development and project delivery. Several opportunities for coordination in terms of landscape planting and mitigation are identified, particularly in relation to Friston substation and Saxmundham converter station and the phasing of development. The ExA notes that there are also opportunities for coordination in relation to the landfall in Suffolk, that could help to mitigate effects on the NL.</p> <p>Provide an updated version of [APP-363] which explains how coordination would be secured.</p>

Responses due by Deadline 3: Friday 9 January 2026

ExQ1	Question to:	Question:
1LVIA14.	Applicant	<p>Landscape and visual effects of new access from the B1121</p> <p>Provide a response to SCC comments at deadline 2 Ref A1.2 in relation to the need for a more thorough assessment of the effect of a new bell mouth construction and road from the B1121 to the proposed converter station, including the need for appropriate visibility splays along the B1121 to be provided, and the implications for the existing roadside hedge.</p> <p>Provide a response to SCC's comment at deadline 2 that there is a consented and constructed access further south on the B1121 in close proximity which needs to be included in the design considerations.</p>
1LVIA15.	Applicant	<p>Coordination with Friston substation landscape mitigation</p> <p>Provide a response to SCC's comment at deadline 2 Ref A2.1 in relation to the need for HDD to connect to the substation to avoid undermining SPR mitigation planting.</p>
1LVIA16.	Applicant	<p>Pylons</p> <p>Provide clarification as to whether the pylons in Kent assessed in landscape and visual assessment and visualisations include the vertical limit of deviation of up to 6 metres. If they have not been assessed as worst case scenario provide an explanation as to why. If the visualisations have not been based on worst case scenario, provide an explanation as to whether the landscape and visual impact assessment (LVIA) is based on the maximum limits of deviation and therefore takes into account the maximum height of pylons.</p>
3. Ecology and biodiversity		
1ECOL1.	Applicant	<p>Chartered Institute of Ecological and Environmental Management Guidelines</p> <p>The applicant's assessment of likely significant biodiversity effects is based on the Chartered Institute of Ecological and Environmental Management 'Guidelines for Ecological Impact Assessment in the UK and Ireland Terrestrial, Freshwater, Coastal and Marine', September 2018. An update to the guidelines was published in September 2024. Provide commentary on the implications of the updated guidelines, if any, for the assessment of likely significant effects.</p>
1ECOL2.	International Union for Conservation of Nature (IUCN)	<p>International Union for Conservation of Nature</p> <p>Paragraph 1 of the IUCN representation states that "the proposed infrastructure developments are not compatible with the UK commitments to the criteria and standards for an IUCN Category V protected area". Confirm what these commitments comprise.</p>

ExQ1: Wednesday 17 December 2025

Responses due by Deadline 3: Friday 9 January 2026

ExQ1	Question to:	Question:
1ECOL3.	Applicant	River Fromus Bridge – impact on macro-invertebrate passage The ExA notes the EA's [REP2-050] revised position on the soffit height of the River Fromus bridge (now 4m above Q95 flow level but with a monitoring and contingency plan for invertebrates). Confirm whether it is intended to submit an outline monitoring and contingency plan to the examination and if not, why not.
1ECOL4.	Applicant	Suffolk/Kent – HDD failure Consistent with paragraph 2.8.229 of NPS EN-3, provide a mitigation plan to account for the possibility that HDD fails, or signpost to where this information is provided. Any alternative plan should provide justification as to why the alternative plan is the least impactful method possible.
1ECOL5.	Kent Wildlife Trust Natural England Local authorities	Biodiversity net gain measures – Kent landfall Noting that National Grid Ventures is a separate legal entity to the applicant, can Kent Wildlife Trust (KWT) explain whether there are any measures that could be taken to reduce the residual impact of the National Grid Ventures Nemo Link works at the landfall site or to enhance this land. Local authorities to also provide comment.
1ECOL6.	Applicant Kent Wildlife Trust Natural England Thanet District Council	Former hoverport (Kent) – species surveys The applicant's responses to selected RR responses [REP2-022] notes that terrestrial invertebrate surveys (such as for the fiery clearwing moth and Sussex Emerald) were not undertaken at the hoverport site due to lack of access agreement but the open tarmac and hardstanding areas through the site are sufficient for vehicles to access the intertidal area without vegetation clearance. No detailed botanical surveys or reptile surveys have been undertaken at the site, presumably also due to access arrangements. The site has been identified as hosting invasive, non-native (INNS) plant species and being potential reptile habitat. Can the applicant: <ul style="list-style-type: none">• Provide an annotated aerial photograph showing an indicative vegetation-free construction traffic route.• Explain whether any works would be required to reinforce the access route.• Confirm how, in the absence of surveys for reptiles, effects on reptiles can be ruled out and any special measures that might be required to avoid effects on reptiles from construction traffic.• Explain whether as a mitigation or enhancement measure, INNS could be managed at the site as part of the Sea Link proposals.• Explain whether NE, KWT or Thanet District Council (TDC) would be consulted on the access route. These organisations may wish to comment on the need for consultation on a route.

ExQ1: Wednesday 17 December 2025

Responses due by Deadline 3: Friday 9 January 2026

ExQ1	Question to:	Question:
1ECOL7.	Applicant	Azolla Fern ES Part 3, Kent Chapter 2 Ecology and Biodiversity [REP1-049] , paragraph 2.10.2 sets out mitigation for the invasive aquatic plant, the Azolla fern. Explain how the applicant would ensure that Azolla fern is not distributed by the proposed aquatic macrophyte translocation.
1ECOL8.	Applicant	Macrophyte translocation [REP1-049] , paragraph 2.9.262 states that infilling of a 300m ditch would be mitigated by creation of new balancing ponds, scrapes and swales. It is proposed to translocate aquatic macrophytes to reduce effects to minor adverse. What is the success rate of such translocations?
1ECOL9.	Applicant	Bird collision risk modelling The vantage point survey report and collision risk assessment [REP1A-023] for Kent does not appear to take account of the 6m vertical limits of deviation for the proposed pylons. Provide an updated collision risk assessment that takes into account the maximum limits of deviation, explaining any resultant differences in collision risk.
1ECOL10.	Natural England Kent Wildlife Trust	Bird diverters Paragraph 2.10.2 [REP1-049] notes that bird diverters would not be fitted to existing overhead lines. It is not the applicant's intention to do this for existing lines. Does NE consider that there is any need for additional diverters to be fitted to other lines in the area in light of the new mixed wirescape? KWT to also provide comment.
1ECOL11.	Applicant	Deer Provide an update on discussions with Sizewell C regarding their approach to management of deer. Confirm whether any project specific measures are likely to be proposed as a result of these discussions.
1ECOL12.	Applicant	Fencing ES parts 2 and 3, Chapter 2 [REP1-047] and [REP1-049] , paragraph 2.8.5 suggests that the haul road would be fenced but that this fence would not go entirely to ground level so mammals, such as badger, would be able to pass under. Explain whether this provision might reduce the efficacy of noise controls, affect site security and whether there are any areas where this might not be appropriate.

Responses due by Deadline 3: Friday 9 January 2026

ExQ1	Question to:	Question:
1ECOL13.	Applicant	<p>Skylark and golden plover mitigation</p> <p>Paragraph 5.4.1 of the Suffolk oLEMP [CR1-045] states that a 12ha area of land for skylark mitigation "will be secured by agreement with the landowner or by compulsory acquisition powers included within the DCO". Provide an update on any voluntary agreement obtained. Similarly in Kent, provide an update on any voluntary agreement obtained in relation to the proposed area of functionally linked land.</p>
1ECOL14.	Applicant Natural England	<p>Dormouse surveys</p> <p>Paragraph 1.5.7 of the Suffolk hazel dormouse survey report [APP-108] states that preconstruction surveys for dormouse should be undertaken in Zone D. Confirm whether the preconstruction clearance checks identified in paragraph 3.4.3 of the outline Landscape and Ecological Management Plan (oLEMP) [CR1-045] are intended to satisfy this requirement. It is noted that preconstruction surveys are currently limited to birds, bats, riparian mammals and badgers in paragraph 7.1.1 of the oLEMP.</p> <p>NE may wish to comment on the survey requirements.</p>
1ECOL15.	Applicant Kent County Council (KCC) Natural England	<p>Dormouse surveys</p> <p>ES Part 3, Kent Chapter 2 Ecology and Biodiversity [REP1-049], paragraph 2.9.98 highlights that precautionary ways of working would be adopted on the basis that surveys identified possible dormouse nests. Paragraph 1.4.12 of the Kent hazel dormouse survey report [APP-159] states that a 'probable' rather than 'possible' nest was found in Zone C. Does this finding alter the approach, preconstruction survey requirements or assessment of effects? NE and KCC may wish to comment on the survey requirements.</p>
1ECOL16.	Kent County Council	<p>Reptile Surveys</p> <p>With respect to reptile surveys explain:</p> <ul style="list-style-type: none"> • What additional information is required to demonstrate that mitigation for reptiles in Area A and C is achievable. • What additional information is required to demonstrate why no reptile surveys were undertaken on the west site of the proposed converter station. • What additional information is required in relation to impacts on reptiles in Area D.

ExQ1: Wednesday 17 December 2025

Responses due by Deadline 3: Friday 9 January 2026

ExQ1	Question to:	Question:
1ECOL17.	Applicant Local authorities	Tree pruning Paragraph 1.2.11 of the Arboricultural Impact Assessment [APP-294] states that clearance pruning would be required for the site access. Confirm how the deterioration of ancient and veteran trees would be avoided if substantial pruning is required? The local authorities may wish to comment on this matter.
1ECOL18.	Applicant	REAC provision B09 – impacts from potential frac out Provision B09 of the REAC [CR1-043] sets out measures to mitigate the impact of frac out. Confirm whether provision B09 is intended to be a mitigation plan consistent with paragraph 2.8.229 of NPS EN-3. Also explain: <ul style="list-style-type: none">• how impacts on designated habitats would be avoided or how extensive the impacts could be, if frac out were to arise• what discussions the applicant has had with NE or Royal Society for the Protection of Birds (RSPB) to understand the sensitivities of the flora and fauna above the route
1ECOL19.	Applicant	REAC provision B13 – impacts from the loss of hedgerows Provision B13 of the REAC [CR1-043] column three is headed 'Impact from the loss of hedgerows' but includes discussion of ditch marginal vegetation. In column four, it is explained that marginal vegetation would be planted with " <i>mature emergent vegetation purchased from nurseries or left to recolonise naturally</i> ". The heading in column three should be expanded to include ditch marginal vegetation and the applicant should explain what the trigger would be to decide whether to replant or leave banks to recolonise.
1ECOL20.	Applicant	REAC provision B24 - disturbance of woodlark nests Provision B59 of the REAC [CR1-043] states that crops would be cleared between October and February. The ExA considers that this wording is ambiguous as it is unclear whether this means up to the end of January or inclusive of February, which would not take account of comments that woodlark nest as early as February. The ExA notes that B27 takes into account compound set up in Sept – January. Provide alternative REAC wording for consideration.

Responses due by Deadline 3: Friday 9 January 2026

ExQ1	Question to:	Question:
1ECOL21.	Applicant	<p>REAC provision B28 – impacts from loss of acid grassland</p> <p>Provision B28 of the REAC [CR1-043] states that 6ha of acid grassland shall be managed in an enhanced manner for 10 years. The ExA understands that the applicant now proposes to only create 6ha of acid grassland and no longer proposes to enhance an additional 6ha grassland in Suffolk. The ExA therefore suggests that this provision should be amended accordingly. NPS EN-1 para 5.4.44 explains that any habitat creation or enhancement should generally be maintained be for a period of 30 years. Provide further justification for the shorter management period.</p>
1ECOL22.	Applicant	<p>REAC provision B38 – impacts from light pollution</p> <p>Provision B38 of the REAC [CR1-043] addresses the issue of light pollution and refers to compliance with published guidelines but does not state which. In the absence of this information the ExA is unclear what standards would be applied. The applicant is advised to amend the requirement to state the specific guidelines (for example 'Bats and Artificial Lighting in the UK' Guidance Note GN 08 / 23). The applicant should also confirm whether the lighting design would be delivered by a suitably qualified lighting professional.</p>
1ECOL23.	Applicant Kent Wildlife Trust Natural England	<p>REAC provision B45 – impacts on breeding birds from OHL and pylon installation</p> <p>Provision B45 of the REAC [CR1-043] references works above 60dB. The ExA considers that specific noise indices should be stated to make this provision clear. The ExA also notes that the provision retains the option for works to occur during two months of the breeding season. KWT and NE are requested to comment on the appropriateness of this provision and whether any particular two months during this period would be preferable.</p>
1ECOL24.	Applicant	<p>REAC provision B47 – impact on ecological receptors from ditch clearance</p> <p>Provision B47 of the REAC [CR1-043] states that preconstruction surveys would be undertaken for nesting birds and if none are present, marginal vegetation clearance works may take place between 15 February and 15 April. As well as 15 September to 31 October (excluding water voles). Confirm who would be responsible for undertaking these surveys (for example relevant ecological specialists).</p>
1ECOL25.	Applicant Kent Wildlife Trust Natural England	<p>REAC provision B50 – disturbance to breeding birds</p> <p>Provision B50 of the REAC [CR1-043] references March to June as the breeding season. Confirm whether this should read March to September. The ExA notes that provision B65 also references March to June.</p>

ExQ1: Wednesday 17 December 2025**Responses due by Deadline 3: Friday 9 January 2026**

ExQ1	Question to:	Question:
1ECOL26.	Applicant Kent Wildlife Trust Natural England RSPB	REAC provision B59 – impacts of potential frac out Provision B59 of the REAC [CR1-043] allows for the sharing of an HDD landfall method statement and drilling fluid management plan for information with NE only. Confirm whether other parties such as RSPB and KWT should also be party to this provision. Also comment on whether, in light of the potential for impacts on sites for which NE, KWT and RSPB have responsibility, they should also approve or be consulted on these plans. The provision should be updated to explain when these plans should be made available.
1ECOL27.	Applicant	REAC – provision of outline HDD management plan and drilling fluid management plan Can the applicant submit an outline HDD management plan and drilling fluid management plan? If not, explain why.
1ECOL28.	Applicant Natural England RSPB	REAC provision B60 – impacts of potential frac-out Provision B60 of the REAC [CR1-043] allows for notification of NE and RSPB in the event of a frac-out. In light of the sensitivity of the designated sites, is there a need for a more active role in this provision than currently worded for NE and RSPB? For example, to control routing of spotters and agreement of vehicle use on existing accesses.
1ECOL29.	Applicant Natural England RSPB	REAC provision B62 - impacts of HDD on Site of Special Scientific Interest (SSSI) Provision B62 of the REAC [CR1-043] allows for preconstruction botanical surveys to support monitoring of any impact of HDD. Should this provision be to support ‘monitoring and mitigation’ of any impact of HDD, since the location of plants might dictate routes of access and priorities for mitigation amongst other things?
1ECOL30.	Natural England	REAC provision B63 – impacts on shingle habitats Provision B63 of the REAC [CR1-043] requires the applicant to inform NE about proposals to undertake additional groundwater investigation on, or adjacent to, shingle habitats. Is NE content with this provision and should an Ecological Clerk of Works (ECoW) be referenced? The ExA notes that there is a typo ‘urveys’.
1ECOL31.	Applicant Kent Wildlife Trust Natural England	REAC provision B66 – impact on former hoverport ecology Provision B66 of the REAC [CR1-043] allows for botanical survey to inform the construction access route within the hoverport and references foodplants of ‘rarest vertebrates’. The ExA assumes that this should read ‘invertebrates’. The ExA requests comment on whether this provision should also include reptile survey and whether the provision could be expanded to more proactively remove INNS as an improvement measure.

ExQ1: Wednesday 17 December 2025

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ExQ1	Question to:	Question:
1ECOL32.	Applicant Kent Wildlife Trust Natural England	REAC provision B67 – impact on saltmarshes Provision B67 of the REAC [CR1-043] requires confirmation of an access route across the intertidal area to be defined post consent and informed by surveys. No reference is made to consent or approvals from KWT or NE, should it? The ExA notes that B67 seems to overlap with provision B70, can the two provisions be merged?
1ECOL33.	Applicant Kent Wildlife Trust Natural England	REAC provision B68 – Impact on Pegwell Bay Provision B68 of the REAC [CR1-043] provides for a Pegwell Bay landfall construction method statement covering the marine cable pull in and cable burial. Should this provision include cable excavation and laying in the intertidal area too and is there a requirement for the provision to include consultation and/or approval with KWT and NE?
1ECOL34.	Applicant Kent Wildlife Trust Natural England	REAC provision B69 – impact on saltmarshes Provision B69 of the REAC [CR1-043] requires that trenchless exit pits would be at least 105m seaward from the edge of the saltmarsh, however temporary working areas are stated to be a minimum of 50m from the saltmarsh edge. In light of the potential for disturbance of bird species using the saltmarsh is this a sufficient offset distance?
1ECOL35.	Applicant	REAC pollution provisions Explain whether the proposed construction compounds would be lined, for example with geotextile membrane having oil/chemical filtration properties beneath hard core to minimise the risk of ground water contamination? If not, should they?
1ECOL36.	Applicant	REAC provision A18 – access within root protection areas Provision A18 of the REAC [CR1-043] explains that in wet conditions, access within the root protection areas of trees T612k and T614k would be by pedestrian only means. Ground protection would be used if all-terrain vehicle access is required. Explain what access would be necessary in light of the location of the trees on the edge of the site boundary and why it might be necessary to drive ATVs in this location?
1ECOL37.	Applicant	Tree constraints plans – Kent onshore scheme Explain why the key for the updated Kent tree constraints plan [CR1-058] is different from previous plans and has replaced the annotation ‘tree protection fencing’ with ‘root protection area’ and omits the construction exclusion zone (in particular along the HDD route at the landfall).

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ExQ1	Question to:	Question:
1ECOL38.	Applicant	<p>Habitats Regulations Assessment (HRA) – noise contour plots</p> <p>Explain why the extent of the 3dB change noise contour in figure 4 of the HRA [REP2-009] includes the full length of the HDD works at the landfall, when these works would be underground? Should this area be excluded from the contour plots?</p>
1ECOL39.	Applicant	<p>HRA – saltmarsh offset distance</p> <p>The Pegwell Bay construction method technical note [REP2-011] explains that trenchless landfall works would be a minimum of 50m from the saltmarsh area. The HRA [REP2-009] refers to the 105m minimum offset distance of the HDD compound. Confirm that the HRA takes into account noise and vibration impacts on birds using the saltmarsh area that could arise from works at 50m distance.</p>
1ECOL40.	Applicant	<p>HRA – groundwater impacts on Sandwich Bay Special Area of Conservation (SAC)</p> <p>Further explain your position as presented in Appendix F of the HRA Report [REP2-009] regarding the screening out of dewatering as a potential impact pathway for likely significant effects to the Sandwich Bay SAC. The ExA notes that the Qualitative Groundwater Risk Assessment [APP-170] concludes it is unlikely that dewatering would be required at the HDD launch or receptor pits but proposes that further assessment would be carried out post-consent through a hydrogeological risk assessment (secured through the oCoCP, GH09 [APP-341]) if dewatering was subsequently required. In this case, additional mitigation might also be required. The ExA seeks clarification that this pathway has been properly considered in the HRA, as it appears to have been discounted on the basis that dewatering would not be required for the HDD crossing. Is it your position that, whilst dewatering is unlikely to be required, if it were needed for the HDD installation it would be carried out a minimum of 600m from the nearest dune slack habitat, and therefore in accordance with the conclusions of the ES Geology and Hydrogeology chapter 5 [APP-065] outside of the 500m the study area beyond which construction phase dewatering was concluded to result in negligible effects?</p>
1ECOL41.	Applicant	<p>HRA – likely significant effects (LSE) on Sandwich Bay SAC</p> <p>Confirm if a LSE on Sandwich Bay SAC from direct habitat loss has been identified. A LSE is not identified in paragraphs 4.4.2 to 4.4.6 of the HRA Report [REP2-009], however a LSE is identified in paragraph 6.4.1 and appendix A (e-page 174).</p>

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ExQ1	Question to:	Question:
1ECOL42.	Applicant	<p>HRA – implications of vehicle access at the former hoverport</p> <p>In the Change Request: Addendum to Volume 6 ES [CR1-055], it is explained that change 1 would not result in any change to the HRA Report [REP1-071] noting that there would be no change to number and frequency of vehicle movements as assumed in the DCO application. The applicant is requested to confirm how the use of the hoverport access for construction and operational maintenance was considered in the screening of the air quality impact pathways, and explain how it is proposed to limit vehicle numbers using the access.</p>
1ECOL43.	Applicant	<p>HRA – Stodmarsh SPA</p> <p>Several of the species identified in table 3.1 of the HRA Report [REP2-009] for Stodmarsh SPA are not identified on the site citation, nor do they reflect the qualifying features identified for the site in appendix A. The applicant should review and amend the report accordingly.</p>
1ECOL44.	Applicant	<p>HRA – Ramsar sites and criteria</p> <p>Ramsar sites have been added to the summary table in appendix A of the HRA Report [REP2-009]. However, it is unclear whether the LSEs identified are for all criterion listed. For example, for Alde-Ore Estuary SPA a LSE is identified for all criterion for all impact pathways considered. The applicant is requested to clarify the Ramsar criterion for which impact pathways are considered and for which LSEs are identified. This should accord with the conclusions drawn in the main report.</p>
1ECOL45.	Applicant	<p>HRA – Ramsar site impact pathways</p> <p>The impact pathways considered for Ramsars in appendix A of the HRA Report [REP2-009] do not reflect those considered for the equivalent SPA. For example, for the Alde-Ore Estuary and Stodmarsh sites, 4 additional impact pathways are considered for the SPAs that are not considered for the Ramsars (direct habitat loss, disturbance from onshore works, air quality and pollution). Given the geographical overlap of the SPAs and Ramsars and the similarity of features, it is unclear why this is the case. Can the applicant explain, or revise the report to reflect the impact pathways considered for the Ramsar sites.</p>
1ECOL46.	Applicant	<p>HRA – confirmation of qualifying features that use Thanet Coast & Sandwich Bay SPA/Ramsar functionally linked land (FLL)</p> <p>Paragraph 4.4.26 of [REP2-009] notes a LSE on Thanet Coast & Sandwich Bay SPA/Ramsar site due to loss of FLL for golden plover. Appendix A identifies a LSE for golden plover, little tern and turnstone of the SPA. Confirm which qualifying feature(s) the FLL is used by, and therefore for which qualifying feature(s) there is a LSE.</p>

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ExQ1	Question to:	Question:
1ECOL47.	Applicant	<p>HRA – management measures for FLL</p> <p>The HRA Report [REP2-009] identifies a 10ha minimum parcel size of arable land to mitigate against the loss of FLL for golden plover associated with Thanet Coast & Sandwich Bay SPA. Information on the management of the mitigation land is set out within the Outline Landscape and Ecology Management Plan (oLEMP) – Kent [PDA-035]. Should specific management measures be set out, for example the enrichment of soil for invertebrates and topping as suggested by the RSPB [REP1-158]?</p>
1ECOL48.	Applicant	<p>HRA – loss of FLL for white-fronted goose</p> <p>The loss of FLL from the project alone is not identified as a potential impact pathway for white-fronted goose associated with Minsmere-Walberswick SPA in section 4 of the HRA Report [REP2-009]. However, an in-combination LSE for loss of FLL is identified at paragraph 6.5.1. Should loss of FLL therefore be identified as in impact pathway for the project alone?</p>
1ECOL49.	Applicant	<p>HRA – confirmation of LSE identified in-combination but not alone</p> <p>Can the applicant clarify if any LSEs were identified in-combination, that were not identified as a result of the proposed development alone.</p>
1ECOL50.	Applicant	<p>HRA – confirmation of conservation status</p> <p>Confirm the conservation status of the European sites assessed for AEol in the HRA Report [REP2-009]. The ExA notes that for the SPAs and Ramsar sites, it is not stated whether the sites are in favourable or unfavourable condition.</p>
1ECOL51.	Applicant	<p>HRA – further ground investigation to inform HDD feasibility</p> <p>Section 3.1.2 of appendix A to the Design Development Report [APP-321] states that no intrusive investigation has been undertaken along the eastern 400m length of the Kent landfall beneath the intertidal area but boreholes and cone penetration tests were planned in 2025. The ExA understands that this work is ongoing. Confirm the timescales for completion and submission of updated information (and assessment as needed) into examination. Provide a summary interpretation of any interim results and any implications for HDD feasibility at Kent landfall in the interim. Also provide an update on any equivalent works in Suffolk.</p>

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ExQ1	Question to:	Question:
1ECOL52.	Applicant	<p>HRA – Thanet Coast SAC impact pathways</p> <p>Update the relevant impact pathways assessed for AEol of Thanet Coast SAC in section 7 of the HRA Report [REP2-009] to clearly demonstrate how the conservation objectives, and identified threats and pressures have been considered in reaching the conclusions of no AEol.</p>
1ECOL53.	Applicant	<p>HRA – red-throated diver (RTD) vessel disturbance assessment for OTE SPA</p> <p>Paragraph 7.3.14 (p114 as numbering has error) of the HRA Report [REP2-009] excluded AEol to RTD of the Outer Thames Estuary (OTE) SPA from vessel disturbance. Both JNCC [REP1-210] and the RSPB [REP1-158] have challenged the applicant's position that only a small number of RTDs would be affected. The applicant [REP2-034], table 2.23 has not clearly explained why it has not followed JNCC's advice in [REP1-210] to use distribution maps within Irwin et al. (2019) and produce a vessel disturbance assessment for RTD of the OTE SPA. Provide greater detail as to why JNCC's advice has not been followed.</p>
1ECOL54.	Applicant	<p>HRA – pre-lay grapnel runs in OTE SPA</p> <p>The applicant has stated that pre-lay grapnel runs need to be conducted immediately prior to cable installation and that including these works in the seasonal restriction for the OTE SPA would reduce the time available for cable installation in table 2.23 of [REP2-034]. How far in advance of cable installation activities would pre-lay grapnel activities take place? Can the applicant provide an alternative construction programme that excludes all activities, including the pre-lay grapnel run from the seasonally restricted window for RTD?</p>
1ECOL55.	Applicant	<p>HRA – timing of offshore geophysical surveys in OTE SPA</p> <p>Under what circumstances could geophysical surveys be required to take place in the OTE SPA between January and March? In the absence of a firm commitment, provide an assessment of impacts on RTD of the OTE SPA from associated vessel movements, or signpost to where this information is provided.</p>
1ECOL56.	Applicant	<p>HRA – fencing to reduce noise emissions to Sandlings SPA</p> <p>The noise fencing around Sandlings SPA referred to in paragraph 7.2.15 of the HRA Report [REP2-009] is referenced in B23 of the REAC [CR1-043], as being 'where required to avoid significant disturbance'. It is understood from the HRA Report that such fencing is required to achieve the 10dB noise reduction. In addition, the applicant has stated that the noise fence would also act as a visual screen to mitigate impacts from lighting. Can the applicant provide a firmer commitment to ensure the quoted 10dB noise reduction would be achieved prior to construction activities taking place and to mitigate impacts from lighting?</p>

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ExQ1	Question to:	Question:
1ECOL57.	Applicant	<p>HRA – visual screening for Sandlings SPA</p> <p>The applicant considers the noise fence around the Suffolk construction compound would act as a visual screen to birds in the Sandlings SPA. Can the applicant provide further details of the proposed lighting and the proposed screen to support this conclusion?</p>
1ECOL58.	Applicant	<p>HRA - Saxmundham South Garden Neighbourhood</p> <p>The Saxmundham South Garden Neighbourhood is screened in to the in-combination assessment in section 5 of the HRA Report [REP2-009], but not considered in section 8. Can the applicant confirm how the project has been taken into account?</p>
1ECOL59.	Natural England	<p>HRA – screening out of LSE for dune slack qualifying features of Sandwich Bay SAC</p> <p>The applicant provided further justification for its decision to screen out LSE to dune slack qualifying features of the Sandwich Bay SAC from hydrological impacts in its updated HRA Report [REP2-009], based on information in a technical note at Appendix F. Confirm if this addresses your concerns about this impact pathway (as set out in B1, B9, B21, B30 to B33 [RR-3920] [REP1-154A]). If not, advise what further information you consider is required from the applicant to support its position. Provide any evidence you hold that suggests that there is connectivity with the Sandwich Bay SAC.</p>
1ECOL60.	Natural England	<p>HRA – effects on Stodmarsh SAC</p> <p>NE ([RR-3920], appendix B and appendix G) did not dispute the applicant's conclusions of no LSE to Stodmarsh SAC. Can NE confirm if it agrees the conclusion. If not, set out your concerns.</p>
1ECOL61.	Natural England	<p>HRA – LSE conclusions for OTE SPA</p> <p>Further to the applicant's update to the HRA Report [REP2-009] in paragraphs 4.3.41 to 4.3.42, does NE agree with the applicant's conclusion that a LSE on all qualifying features of the OTE SPA can be excluded as result of impacts on their supporting habitats?</p>
1ECOL62.	Natural England	<p>HRA – emergency operation and maintenance activities in the OTE SPA</p> <p>The applicant ([REP2-014], table 2.38, G10) has confirmed it could provide NE with a report on emergency operation and maintenance activities undertaken in the OTE between November and March. Does NE require such a commitment to be made within the RTD protocol?</p>

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ExQ1	Question to:	Question:
1ECOL63.	Natural England	HRA – operational air quality emissions Can NE confirm to which European site(s) its concerns regarding operational air quality emissions ([RR-3920] B24 and B37) relate? The applicant has revised the HRA Report [REP2-009] to confirm that during the operational and maintenance phase, there would be up to 4 daily car/LGV trips associated with staff members for the proposed Minster converter station, and occasional maintenance and inspection. Does NE agree that in-combination LSEs can therefore be excluded and if not, why not?
1ECOL64.	Natural England	HRA – operational in-combination air quality emissions Can NE confirm to which European site(s) its concerns regarding in-combination air quality emissions ([RR-3920] , B18 and B26) relate? The applicant has responded that the predicted project alone effects are too small to show in the model, so it considered there would be no in combination effect ([REP2-014] , table 2.33, B26). Does NE agree that in-combination LSEs can therefore be excluded?
1ECOL65.	Natural England	HRA – acid grassland NE has advised it is essential to understand soil fertility and pH for successful restoration of acid grassland at Sandlings SPA [REP1-154] . Noting that the proposed acid grassland enhancement has been removed from the proposed development, is this information still relevant to the proposed acid grassland creation and would such information be required at pre-consent stage, or can amendments be made to the oLEMP [CR1-045] ?
1ECOL66.	Natural England	BNG metric spreadsheet and feasibility report The ExA requests that NE provide comment on the biodiversity metric spreadsheets [REP1A-040] to [REP1A-042] and on the revised BNG feasibility report [REP1A-025] .
1ECOL67.	Applicant	Offsite BNG provision Explain how the offsite biodiversity improvements required by the applicant to achieve 10% BNG would be secured.
1ECOL68.	Applicant	Local Nature Recovery Strategy Explain whether the publication of the Kent and Medway Local Nature Recovery Strategy in November has any implications for the applicant's BNG approach and if so, whether any updates to the BNG feasibility report [REP1A-025] are required.

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ExQ1	Question to:	Question:
4. Cultural heritage		
1CH1.	Applicant	<p>Suffolk Bronze-Age enclosure</p> <p>SCC's Local Impact Report (LIR) (Section 7 of [REP1-130]) stated that it is now believed that what was initially thought to be a Neolithic Henge is a Bronze Age enclosure, though is still a significant monument. SCC advised that further excavation would be needed, along with further mitigation. Explain in detail what further investigative archaeological works are being undertaken at this heritage asset, the timeframe for this, along with any proposed mitigation.</p>
1CH2.	Applicant	<p>Heritage asset assessment</p> <p>A number of heritage assets, such as listed buildings, have been scoped out of the ES for further assessment. Provide a list of all heritage assets (designated and non-designated) that are within the study areas, with an explanation as to why they were individually scoped out for further assessment and what level of impacts the proposed development would have on them, if any.</p>
1CH3.	Historic England Kent County Council Suffolk County Council	<p>Inclusion of heritage assets in the ES assessment</p> <p>Are there any designated or non-designated heritage assets within either county that were not considered within the ES, or that were scoped out for further assessment within the ES, which should have been assessed? Furthermore, were the study areas used sufficient to include all heritage assets which could be impacted by the proposed development?</p>
1CH4.	Applicant	<p>Geoarchaeological Assessment</p> <p>In section 2 of Historic England's (HE) deadline 1 submission [REP1-199] it notes that geoarchaeology work has not been undertaken and that this was a missed opportunity to evaluate key areas of the proposed development. Explain why a programme of geoarchaeological assessment has not yet been undertaken and if this is intended to be done within the examination period.</p>
1CH5.	Applicant Historic England Suffolk County Council Kent County Council	<p>Areas not currently assessed</p> <p>SCC in section 7 of its LIR [REP1-130] states that there are areas within the order limits that have not been included in the trench evaluations undertaken to this point, such as areas around the proposed Friston substation site, which would still need assessing. For the applicant, provide a plan to show areas that still require archaeological assessment and confirm when this will be done. Also, explain why this remaining assessment work has not yet been undertaken.</p>

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ExQ1	Question to:	Question:
		For Historic England, SCC and KCC: If there are areas where further assessment work is required, should this be done before the close of examination so that the results can be considered along with any necessary mitigation? Or could this be done after any potential consent through secured commitments/requirements?
1CH6.	Applicant	Strategy for ongoing protection of in situ remains and a historic environmental management plan SCC in its LIR (section 7 [REP1-130]) has required a strategy for ongoing protection of any archaeology that is to remain in situ as part of a mitigation strategy, and also to provide a detailed historic environmental management plan (HEMP). Submit these strategies/plans, at least in outline form, or explain why these cannot be submitted.
1CH7.	Applicant	Requirement 14 suggested changes SCC [REP1-130] , paragraph 7.140 provides an alternative wording for requirement 14 of the draft Development Consent Order [CR1-027] . Provide your response to the suggested amended wording, with an explanation of changes made or where they have not been amended.
1CH8.	Historic England	Wood Farmhouse Wood Farmhouse near Saxmundham has been de-listed. Can Historic England clarify if the building now has any remaining historic value or if it is still a heritage asset?
1CH9.	Historic England Kent County Council	Ebbsfleet Peninsular multi-period complex archaeological site Historic England [REP1-199] describes the Ebbsfleet Peninsular multi-period complex as being of schedulable quality and of national importance. Explain why this is a non-designated heritage asset but not a Scheduled Ancient Monument, given its high value.
1CH10.	Applicant	Impact to the Ebbsfleet Peninsular multi-period complex Historic England [REP1-199] considers that the proposed development could result in major adverse impact to the multi-period complex, which would be a significant effect. Are there further mitigation options, other than those currently proposed, that could be adopted which could lessen the impact so that a significant impact could be avoided? Is so, set this out in detail in your response.
1CH11.	Applicant Local Planning Authorities Historic England	Stakeholder involvement in the converter station design Within its deadline 1 submission, HE [REP1-199] stated it has concern that dDCO [CR1-027] Schedule 3 requirement 3 (Converter Station Design) as drafted makes no explicit provision for stakeholder engagement on the issue of the design beyond the County Council. Given the proximity of heritage assets to the proposed large-scale converter stations, such as Richborough Roman Fort, the ExA asks the applicant to consider amending the

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ExQ1	Question to:	Question:
		wording so that this requirement makes it is necessary for the local planning authorities to consult also with HE on the design details of the converter stations. HE and LPAs – Are there any comments on the inclusion of HE for consultation as part of this requirement?
1CH12.	Kent County Council	Geophysical surveys in Kent Confirm whether there are any additional geophysical/archaeological surveys needed for areas of Kent that should be undertaken by the applicant.
1CH13.	Applicant	Additional field assessment works or submissions Other than anything mentioned by the applicant in the responses to other heritage questions in ExQ1, is there further survey or assessment work being undertaken in Kent or Suffolk relating to archaeology or heritage assets, and are there intended to be further documents submitted in regard to heritage/archaeology during this Examination period?
5. Water environment		
1WE1.	Environment Agency Suffolk County Council Kent County Council	Sequential and exception test Provide a response with respect to the acceptability and policy compliance of the applicant's sequential and exception test as included in the Flood Risk Assessment [APP-292]? In answering, although the ExA notes that the proposed substations, converter stations and cable transition joint bays are all located in Flood Zone 1, specifically cover the manner in which the Exception Test has been applied by the applicant regarding the presence of some components of the scheme (construction routes and cables etc) being necessarily in Flood Zones 2 and 3.
1WE2.	Applicant	Firewater runoff – substation and converter station attenuation The applicant's response to the Environment Agency RR set out in [REP2-014] Reference 2.4.1.F states that 'The attenuation features associated with each of the compounds will provide sufficient storage for firewater runoff in the event that an isolation chamber could not be reached safely.' Provide evidence / calculations which support this statement.
1WE3.	Applicant	Minster Marshes – flood plain Explain the role of Minster Marshes in acting as a flood plain now and in the future and clearly explain the impact that the proposed development would have on this? In answering, confirm the specific implications regarding any loss of storage due to providing 2m of fill which a number of RRs claim would be required to take the proposed

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ExQ1	Question to:	Question:
		level above the flood plain.
1WE4.	Applicant	<p>Minster Marshes – existing pollutants</p> <p>Explain how the implications of siting the construction of the convertor station on Minster Marshes has been considered, addressed and any necessary mitigations secured in order to adequately address mobilisation of existing pollutants in buried salt layers during construction.</p>
1WE5.	Applicant Kent County Council Environment Agency	<p>Weatherlees Hill Wastewater Treatment Works</p> <p>Confirm if there are any plans to extend the Weatherlees Hill wastewater treatment works, and if so how that could be affected by the proposed development.</p>
1WE6.	Applicant Environment Agency	<p>Water Framework Directive(WFD) – River Fromus bridge</p> <p>The Environment Agency RR [RR-1586] identified that a crossing over the River Fromus, with a soffit height of 4m, could have an impact on weak dispersing polarotactic invertebrates, leading to a deterioration under WFD. The ExA notes that discussions are ongoing regarding this matter and that the Environment Agency D2 submission [REP2-050] indicates that a soffit height of 4m is acceptable subject to a monitoring and contingency plan for the invertebrates. However, can both parties specifically set out their positions with respect to WFD compliance and any implications arising from an increased soffit level of +0.716m for the 4m option respectively due to the updated Q95 flow level as identified in Table 4.3 in the River Fromus Visualisations document [REP1-298].</p>
6. Geology and hydrogeology		
1GH1.	Applicant	<p>Unexploded ordnance</p> <p>Explain what separate terrestrial consenting process and construction safety procedures are in place to appropriately deal with any unexploded ordnance? In answering, specifically cover matters (including risk identification and mitigation) relating to:</p> <ul style="list-style-type: none"> • ecology • designated sites <p>The applicant should also supply the unexploded ordnance survey reports referenced in section 2.11 of Appendix 3.5.C Ground Investigation Report – Kent [APP-171] and section 2.10 Appendix 2.5.D Ground Investigation</p>

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ExQ1	Question to:	Question:
		Report – Suffolk [APP-119].
7. Agriculture and soils		
1AS1.	Applicant	<p>Agricultural land classification</p> <p>Provide an update to your letter of 16 September 2025 [AS-106] in response to the ExA's section 89(3) letter dated 5 September 2025 [PD-008] with regard to the provision of agricultural land classification (ALC) and soil surveys, as well as updates to the relevant documents and mitigation measures with a timetable for the submission of the information to the ExA.</p>
1AS2.	Applicant	<p>Soil reinstatement</p> <p>REAC commitments AS02 and AS11 indicate that soils would be restored to their previous condition and land to its pre-construction ALC. RR have raised concerns that due to the nature of soils, the recovery from works such as construction compounds, temporary access roads and the cable run would take several years. ES Part 2 Suffolk Chapter 6 Agriculture and Soils [PDA-019] and ES Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023] do not appear to give this consideration in their assessment of effects. Provide an update to [PDA-019] for Kent and Suffolk, giving an estimate of the likely success of restoration of soils and land to pre-construction condition for land required temporarily within the order limits. Where relevant, update the assessment of effects and outline the remedial measures that would be followed to minimise the loss of best and most versatile (BMV) agricultural land.</p> <p>Provide an explanation of any adaptive post-construction management that would be followed to ensure that BMV land is restored to its pre-construction condition and how such measures would be secured by the DCO.</p>
1AS3.	Applicant	<p>Depth of cable burial</p> <p>REAC commitment AS02 gives a minimum depth of soil over buried cables of 0.9 metres but 1.2 metres elsewhere. Provide an explanation of why 0.9 metres is sufficient.</p> <p>RRs (for example [RR-2426]) have raised concerns at the depth of burial of cables across arable land, and the effect on the future use of the land. Provide a response in terms of minimising the loss or degradation of BMV land.</p>
1AS4.	Applicant	<p>Grazing at North Warren</p> <p>Provide a detailed response to the concerns raised by the RSPB [REP1-158] in relation to the effect of the proposed development on the grazing regime of North Warren Nature Reserve, including the following matters. The ability of third-party graziers to move animals through the North Warren Nature Reserve, communication with</p>

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ExQ1	Question to:	Question:
		<p>them, the need to ensure that grazing areas and herds are not fragmented, and the ability of grazing animals to access drinking water.</p> <p>Would the commitments in the REAC, in particular AS03, AS04, GG24, GG26 apply to graziers, if not why not?</p>
8. Traffic and transport		
1TT1.	Applicant	<p>Peak construction times</p> <p>Within the Suffolk Onshore Scheme Inter-Project Cumulative Effects documents [APP-060] it states that no significant cumulative effects are expected when considering construction/operational traffic associated with all committed developments combined, given that the peak construction phases for each scheme are unlikely to fully overlap. What certainty does the applicant have that the peak construction times are unlikely to overlap, given the number of variables typical in large scale construction programmes? Having identified that a full overlap is unlikely, is it therefore likely that there would be a partial overlap of peak construction times. If so, what would be the implication of this?</p>
1TT2.	Applicant	<p>Benhall railway bridge - minor works</p> <p>The applicant's '9.76.5 Change Request: Addendum to Volume 6 Environmental Statement' [CR1-055], suggests that one of the options for crossing Benhall Railway Bridge with abnormal indivisible loads (AILs) during construction is to undertake minor works to the bridge (Option 2). It is stated that the worst-case for a temporary road closure of the B1121 is 28 days to do this work. Explain the applicant's assumptions that 28 days would be the maximum time needed to do the works necessary and what variables this would be dependent on.</p>
1TT3.	Applicant Network Rail Sizewell C	<p>Impacts to the rail network</p> <p>Applicant - If Benhall Railway Bridge was being fixed by the applicant under Option 2, would this mean that there would need to be a closure of the railway line under the bridge for up to 28 days?</p> <p>Network Rail – Would the railway line under the bridge need to be closed if there were works being undertaken to fix current deficiencies of Benhall railway bridge by the applicant; and if so, what impacts would this have?</p> <p>Sizewell C – If the railway line under Benhall bridge was shut for up to 28 days, could this impact on the construction of Sizewell C due to disruption of freight along this line?</p>
1TT4.	Applicant	<p>Use of a mini-bridge over Benhall railway bridge</p> <p>With the overbridging scenario, it is stated [CR1-055] that this would mean 15 temporary road closures of the B1121 throughout the construction period for AIL use. Would it be possible to reduce the maximum number of</p>

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ExQ1	Question to:	Question:
		periods when the road could be closed, such as by programming multiple AIL deliveries for each time the mini-bridge is in place? If not, please explain why this would not be feasible.
1TT5.	Applicant	<p>Inter-project traffic cumulative methodology</p> <p>In both counties inter-project cumulative effect assessments [APP-060] [APP-073], the applicant states that “Specifically, in relation to traffic and transport in the Stage 4 assessment, where a scheme is expected to be approximately 50% built out, 50% operational trip generation has been adopted, and where the development is expected to be 75% built out, 75% operational trip generation has been assumed, and so on.” Explain the basis for this assumption given that the proposed development and other development programmes appear to show peaks and troughs in construction traffic over their respective construction periods rather than a progressive decrease in traffic over time? Would it depend on the type of development?</p>
1TT6.	Applicant	<p>A14 near Ipswich</p> <p>What would be the likely traffic impacts on the A14 from the proposed development, particularly the section to the south of Ipswich? Furthermore, what route would the proposed development’s construction traffic need to take if the Orwell Bridge was closed to traffic?</p>
1TT7.	Applicant	<p>Layby facilities</p> <p>SCC [REP1-130] expressed concern with a lack of laybys and other suitable parking, rest or stopover facilities on the A12 and the roads to be used by the proposed development east of the A12, such as the A1094. Noting the applicant’s response in [REP2-026] to SCC’s concerns regarding a lack of laybys, would there be sufficient laybys or stopover/rest facilities in the East Suffolk area for hauliers, taking into account other development and the associated HGVs that may be using these highways at the same time?</p>
1TT8.	Applicant	<p>Safety of cyclists</p> <p>The proposed traffic routes would use some more minor rural roads with narrow carriageways. What can be done to ensure the safety of cyclists on these routes, as they could be considered vulnerable in such circumstances where there is a notable increase in HGV traffic?</p>
1TT9.	Applicant	<p>A12/B1119 junction at Saxmundham</p> <p>HGV traffic is proposed to use the A12/B1119 junction at Saxmundham. SCC [REP1-130] has expressed concern with the use of this junction, even with the planned improvements. Explain in detail (using diagrams to show the junction where possible to demonstrate the points made) why the use of this junction would be acceptable in terms of capacity and safety.</p>

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ExQ1	Question to:	Question:
1TT10.	Applicant	<p>Visibility splays</p> <p>SCC [REP1-130] has highlighted the generic accesses shown in the Design and Layout Plans [APP-037]. It states that these are not based on topographic surveys and questions, for example, the vertical alignment of the existing highway and whether this would compromise visibility. The applicant in its response [REP2-026] has stated that it has supplied preliminary designs, with this detail being appropriate for the DCO application stage. Explain how the applicant can be certain that there would not be a situation where there is a possibility that a proposed access might not be able to achieve necessary safety standards with sufficient visibility, if final details are not submitted until after any consent?</p>
1TT11.	Applicant	<p>Junction modelling</p> <p>The applicant states that it has assessed driver delay at junctions as a result of the proposed development in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement (IEMA, 2023). However, to supplement this assessment the ExA requires detailed junction modelling of all critical junctions, which should be identified and agreed in advance by the Local Highway Authorities (KCC and SCC), that are to be used by construction phase traffic.</p> <p>This junction modelling should provide key junction performance indicators (including ratio of flow to capacity (RFC)/degree of saturation and corresponding average delay per vehicle durations). This should be produced for appropriate scenarios (also agreed in advance with the Local Highway Authorities) to enable identification of specific proposed development impacts compared to a base scenario, which includes all appropriate cumulative traffic associated with approved developments.</p> <p>This is considered to be necessary so that proposed development traffic impacts can be clearly understood, particularly in junctions/locations which are already predicted to be operating at or above capacity, possibly due to the construction activity of Sizewell C for example, and as indicated in the transport model output tables included in the SCC LIR [REP1-130] starting at paragraph 11.106.</p>
1TT12.	Applicant Suffolk County Council Kent County Council	<p>Overlapping construction programmes</p> <p>Applicant - In the applicant's response to RR [REP2-014] (specifically responding to SCC comments) it is stated that there could be a minor/moderate cumulative effect which could persist for up to nine months in total on the B1121 Main Road to the south of Saxmundham if the programmes for the proposed development and other projects (such as Sizewell C and LionLink) overlapped precisely. A possible moderate cumulative impact would potentially be disruptive for people who live in the area, especially if it lasts for nine months. What more can the applicant provide and secure to ensure that this level of cumulative effect is avoided or further mitigated?</p>

ExQ1: Wednesday 17 December 2025

Responses due by Deadline 3: Friday 9 January 2026

ExQ1	Question to:	Question:
		Councils – What is the local highway authorities view of this potential situation?
1TT13.	Suffolk County Council Kent County Council	Cumulative traffic assessment Considering all the information submitted up to and including that received from the applicant at deadline 2, what further data or analysis (if any) would the Local Highway Authorities require from the applicant to be satisfied that the cumulative traffic assessment is sufficiently robust?
1TT14.	Applicant	Abnormal Indivisible Load (AIL) route assessments SCC [REP1-130] has raised concern that there has been no assessment undertaken on the capacity of structures to carry AIL traffic from ports or the strategic road network to the site of construction. Explain why without such assessment the applicant can be sure that the identified routes are feasible and that there would not be the need for alternative routes.
1TT15.	Applicant	Alternative routes Explain if/how it has been assessed whether there would be implications due to drivers (not associated with the proposed development) choosing to travel on minor roads instead of the more major highways to avoid traffic delays.
1TT16.	Applicant	Public right of way (PRoW) – mitigation/compensation SCC [REP-130] has set out a number of enhancements to the local PRoW network, such as creating a new route across the proposed River Fromus bridge crossing which could link with the existing network. Considering the impacts that the proposed development would have to the PRoW network, the ExA requires a response to these suggested enhancements or for the applicant to set out any other enhancement works to the PRoW network it would propose as beneficial in the long-term.
1TT17.	Applicant	Coordination of PRoW closures and diversions Within the REAC [CR1-043] , under commitment GG32, it is stated that to reduce the potential for significant overall cumulative effects, PRoW closures/diversions would be coordinated with East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm. However, whilst this may be the applicant's intention, explain how this could be considered as a secured commitment when it would depend on another developer.
1TT18.	Applicant	Junction between the A14 and the A12 In their deadline 2 submission [REP2-131] National Highways states that the A14/A12 junction is already congested and the additional traffic generated by the proposed development at construction phase could have a

Responses due by Deadline 3: Friday 9 January 2026

ExQ1	Question to:	Question:
		material impact. The ExA requires evidenced assurance from the applicant that this part of the strategic road network in this location would not be adversely impacted by construction traffic arising from the development. Furthermore, the applicant is required to assess the cumulative impact at the junction, with other planned developments in this location, such as the proposals for a significant highway improvement of the A12 (which would include amendments to this junction).
9. Air quality		
1AQ1.	Applicant	Use of sulphur hexafluoride (SF₆) in gas insulated switchgear (GIS) The applicant [APP-055] confirms that it intends to use GIS and that manufacturers produce GIS switchgear with minimal or no leakage and National Grid avoids the use of SF ₆ . Signpost to where SF ₆ has been precluded from use within the application or provide an assessment of the likely environmental effects of using SF ₆ as a worst case and provide an explanation of the alternatives considered consistent with the requirements of NPS EN-5.
1AQ2.	Natural England East Suffolk Council	Air quality modelling for construction compound at Sandlings Suffolk Energy Action Solutions Ltd (SEAS) [RR-5210] suggests that the air quality model is inaccurate and that quantification of emissions from the HDD compound adjacent to Sandlings SPA and from back-up generators is required. Provide comment on the model and explain whether you consider that further quantification is necessary and if not, why not?
1AQ3.	East Suffolk Council	Cumulative air quality effects ESC [RR-1420] notes specific concern with cumulative effects arising from construction traffic (including on air quality). Having reviewed the air quality assessment [APP-055] and [APP-068] and the cumulative vehicle emissions assessment [REP1-123], the council should confirm whether it has any residual concerns about specific road links/receptors in light of the limited effects identified in relation to construction traffic emissions and the relatively low background pollutant levels and if not, why not?
1AQ4.	Applicant	Outline Code of Construction Practice provision GG12 - Euro 7 standards Provision GG12 of the oCoCP [APP-341] sets out the proposed plant and vehicle emissions standards, including the Euro 6 standard. Explain when the Euro 7 standards would apply from and whether the Euro 7 standards and any other updated requirements should apply to the proposed development.
1AQ5.	Applicant	oCoCP commitment GG17 Provision GG17 of the oCoCP [APP-341] provides for wheel washing at each main construction works compound

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ExQ1	Question to:	Question:
		'where required'. Can the applicant explain any circumstances in which wheel washing would not be required and therefore whether this caveat is necessary? In addition, explain what appropriate measures would be used to prevent water passing untreated into watercourses and groundwater.
1AQ6.	East Suffolk Council, Thanet District Council, Dover District Council	REAC commitment AQ11 Are the councils satisfied with the applicant's proposal to use stage 4 non-road mobile machinery (NRMM) as a minimum and stage 5 'where possible'.
1AQ7.	Applicant	REAC commitment AQ11 Provision AQ11 of the REAC [CR1-043] secures specific measures relating to emissions from operational back-up generators in Kent. Explain why there is no equivalent provision for Suffolk.
1AQ8.	East Suffolk Council Natural England Thanet District Council, Dover District Council	Outline air quality management plan (oAQMP) Do the councils or NE have any comment on the proposed air quality monitoring equipment or the proposed air quality monitoring locations set out in the oAQMP [AS-129] and [APP-347] . It is noted that the applicant 'recommends' rather than 'proposes' use of zephyr monitors for dust monitoring. In Suffolk the monitoring location is noted to be south of the HDD compound which is likely to pick up effects on human receptors but not on the ecological designated sites to the north east (the prevailing wind direction).
1AQ9.	Applicant East Suffolk Council	Implications of ozone pollution Representations such as [RR-3640] referenced the potential for tropospheric ozone to be present as a pollutant within the wider area. Comment on whether it has any implications for the assessment of air quality effects.
10. Noise and vibration		
1NV1.	Applicant	ISO 9613-2:2024 ES Part 2, Chapter 9 [AS-109] paragraph 9.4.28 identifies ISO9613-2:2024 as a method for predicting noise levels at sensitive receptors. Provide a copy of this reference to the examination.
1NV2.	Applicant	Identification of noise sensitive receptors Sheet 1 of the 'noise study areas, survey locations, and potential receptors - Suffolk onshore scheme' figure [AS-125] indicates that there are at least 3 'other' receptors in the grounds of Hurts Hall. During the ExA's unaccompanied site inspection, the ExA noted that these receptors appeared to be residential in nature. Can the

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ExQ1	Question to:	Question:
		applicant confirm why these receptors have been classified as 'other'. If the receptors should actually have been classified as residential, provide updated noise impact assessments to account for this.
1NV3.	Applicant	Plant assumption – HK250t drill rig Provide a copy of the HK250t drill rig specification referenced in the applicant's response to supplementary agenda question ISH1.23 [REP1A-033] .
1NV4.	Applicant	Sound source data Explain why appendix B of the revised Pegwell Bay Construction Method Technical Note [REP2-011] omits sound power or level data for the proposed hovercraft.
1NV5.	Applicant	Marsh Farm Road, Whitehouse Drove and Richborough Road Confirm whether there would be any constraints placed on the number of vehicles or hours of use of Marsh Farm Road, Whitehouse Drove or Richborough Road.
1NV6.	Applicant	Atkins noise modelling reports Provide copies of the Atkins noise modelling reports identified in the Design Development Report Appendix A Landfall HDD Feasibility Technical Note [APP-321] .
1NV7.	Applicant	Acoustic enclosures The Design Development Report [APP-321] and the design approach documents [REP1A-029] and [REP1A-030] suggest that acoustic enclosures for transformers may be required. What level of attenuation would acoustic enclosures provide and why are they not being designed in from the outset?
1NV8.	Dover District Council East Suffolk Council Thanet District Council	S61 consents Confirm whether the current wording in section 4.4 of the Construction Noise and Vibration Management Plans [AS-131] and [AS-133] gives sufficient certainty that the applicant's contractor would make use of the s61 process and whether any additional check or approval is required by the local authorities, including in relation to provision NV01 of the REAC [CR1-043] .
1NV9.	East Suffolk Council Thanet District	Construction noise and vibration management plan (CNVMP) Paragraph 1.3.8 of [AS-131] and [AS-133] states that "If rapid action is required to solve a noise or vibration problem and that action may contravene something written in the CNVMP, typically it is preferable to undertake

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ExQ1	Question to:	Question:
	Council Dover District Council	the mitigating action at the earliest opportunity. The CNVMP can then be revised in reasonable time after the event.” Are the local authorities satisfied with this approach or is there a need for strict application of control measures?
1NV10.	Applicant	BS5228 significance criteria Section 9.4 of the Suffolk and Kent ES Chapter 2, Noise and Vibration [AS-109] and [AS-111] refers to construction noise and vibration effects being deemed to occur where a medium or large magnitude impact occurs for a period of at least 10 days in any 15 consecutive days of 40 days in any consecutive 6 month period. This is stated to be based on BS5228-1 and DMRB guidance. Whilst it is acknowledged that BS5228 allows for “other project-specific factors, such as the number of receptors affected and the duration and character of the impact”, the time based criteria are from section E.4 of BS5228 and are the trigger criteria for provision of noise insulation. Explain why it is appropriate to use these criteria specifically, in addition to the ABC criteria, to identify likely significant effects
1NV11.	Dover District Council East Suffolk Council Thanet District Council	Change of noise indices The ExA’s s89(3) letter dated 5 September 2025 [PD-008] queried the applicant’s use of $L_{Aeq10hour}$ in the applicant’s construction noise assessment. The applicant reverted the assessment metrics from $L_{Aeq10hour}$ to L_{AeqT} , providing updated noise and vibration chapters [AS-109] and [AS-111] . Do the local authorities have any comments on the applicant’s amended assessment?
1NV12.	Applicant	Construction vibration thresholds Table 1.2 of the ES appendix 2.9b [APP-136] and [APP-189] summarises representative background sound levels for percussive piling. If another technique, such as vibropiling, was used would the predicted threshold distances still apply?
1NV13.	Applicant	Reversing alarms A number of RR have highlighted the impact of noise from reversing alarms during archaeological and ground investigation works. Confirm whether a REAC commitment to only using white noise reversing alarms could be used to reduce the impact of reversing vehicles on local communities.
1NV14.	Applicant	East Suffolk Council – LIR The applicant’s response to ESC’s LIR [REP2-027] does not address point 6.3.7.8. Provide a response to the

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ExQ1	Question to:	Question:
		suggested discrepancies in the tables.
1NV15.	Applicant	<p>Updated noise level figures</p> <p>Updated predicted maximum noise level figures are provided in [REP2-007]. The ExA notes that these figures use the pre-change request scheme boundary, they also do not make any provision for vehicle traffic crossing the former hoverport. Provide updated figures to account for this. Provide equivalent figures showing the extent of the 3dB L_{Aeq} change contour.</p>
1NV16.	Applicant	<p>Updated noise level figures – assumptions</p> <p>Footnote 7 of the updated ES Part 4, Marine Chapter 5 [REP2-003] explains that the noise model assumes that all ground is soft except for areas of water and intertidal areas at low water. The model assumes a source height of 1.5m. Explain whether:</p> <ul style="list-style-type: none"> the former hoverport area has been modelled as soft ground the assumption of a source height of 1.5m is realistic in light of the types of equipment in use the mapping presented still assumes 10dB reduction due to application of best practicable means
1NV17.	Thanet District Council	<p>Noise complaints</p> <p>Confirm whether any noise complaints were handled by TDC during previous cable installation works in Pegwell Bay. If complaints were received, provide a summary of the complaints and any remedial measures that were employed.</p>

11. Socio-economics, recreation and tourism

1SERT1.	Applicant	<p>Long term impacts to the tourism brand</p> <p>The rural landscape and tranquillity are noted as attractive aspects for tourism, particularly for rural areas like East Suffolk. The change to the landscape from the proposed buildings and pylons would be long-term. What impact would this have on the long-term tourism attraction for these areas of Kent and Suffolk, especially when considered cumulatively with other planned developments?</p>
1SERT2.	Applicant All County and District Councils	<p>Construction worker spending</p> <p>What would be the difference between the spending locally of construction workers, staying locally in accommodation like hotels for example, compared to tourists staying the same areas?</p>

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ExQ1	Question to:	Question:
1SERT3.	Applicant	<p>Future tourism levels</p> <p>In response to the RR from Suffolk Energy Action Solutions Ltd (SEAS) [RR-5210] on the matter of tourism impacts, the applicant [REP2-014] states that 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. The ExA requests that this information/evidence is submitted into the examination with the key points highlighted.</p>
1SERT4.	Applicant	<p>Local tourism sector</p> <p>In response to the SEAS RR [RR-5210] the applicant [REP2-014] states that the local tourism sector remained confident and continued to grow during the construction period for Sizewell B and Hinkley. In this statement, confirm which local tourism sector is being referred to and provide evidence of this confidence and growth.</p>
1SERT5.	Applicant	<p>Tourism industry levels</p> <p>The ES concludes for both Suffolk [REP1A-005] and Kent [REP1A-007] that there would be some minor impacts on public rights of way and open space areas as a result of the proposed development, which could potentially affect the tourism industry. Whilst not more than minor impacts, does the applicant think that overall there would be any notable decline in tourism numbers and tourism industry revenue as a result of the proposed development? If not, explain why this would be the case.</p>
1SERT6.	Applicant	<p>Snape Maltings</p> <p>Snape Maltings is described as a major international cultural destination and home to a world-famous Grade 2* listed Concert Hall by Britten Pears Arts (BPA) [RR-0636] and a draw for large numbers of people to the East Suffolk area. BPA is concerned that there would potentially be a loss of visitors which would result in the loss of income from box office and from retail and commercial activities which would severely impact its work in the community, the talent development programmes and the loss of at least 30 jobs. Whilst noting the applicant's comments in its submissions, including [REP2-034], explain in detail how the potential impact on Snape Maltings as a tourism and economic asset for the area as a result of the proposed development has been assessed?</p>
1SERT7.	Applicant County and District Councils	<p>Employment and skills plan</p> <p>Applicant - It is acknowledged that the ES for Suffolk [REP1A-005] and Kent [REP1A-007] has concluded that there would not be any likely significant adverse effects in relation to construction employment. However, NPS EN-1 at paragraph 5.13.12 states that the:</p> <p>"Secretary of State may wish to include a requirement that specifies the approval by the local authority of an</p>

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ExQ1	Question to:	Question:
		<p>employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted.”</p> <p>Considering the wording of this paragraph of the NPS, explain why the applicant considers that a Skills and Employment Plan is not necessary, especially given the scale of the proposal.</p> <p>Councils – Provide your views on the need for an employment and skills plan, and if it could be of practical benefit over and above commitments currently made by the applicant.</p>
12. Health and Wellbeing		
1HW1	Applicant	<p>Ebbsfleet House and Martins</p> <p>High Quality Lifestyles Limited (Priory Group) [RR-2021] raises concerns that the proposed development poses a significant risk to the wellbeing, safety and quality of life of its residents, who are stated to have complex needs and are highly sensitive to sensory triggers. How have the potential impacts from the proposed development been assessed to these facilities and what could be done to ensure the occupants’ health and wellbeing?</p>
1HW2	Great Oaks Small School	<p>Great Oaks Small School</p> <p>The applicant has stated that [REP1A-007] the proposed works would be undertaken during the Great Oaks Small School holidays and/or at a time agreed with the school, avoiding any effects on vulnerable pupils. In terms of safeguarding the health and wellbeing of pupils at the school, do you consider this measure as sufficient? If not, what further measures would the school suggest should be adopted by the applicant?</p>
13. Cumulative effects (intra-project)		
1CEIntra1.	Applicant	<p>Significant cumulative intra-project impacts to public rights of way and transport</p> <p>The submitted Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059] states that there is potential for a significant intra-project cumulative effect to occur on PRoW users (in the construction and decommissioning phase). Similarly, there is stated to be a significant cumulative effect for some transport routes for all phases of the proposed development, such as to the B1119 and the Suffolk Coastal Cycle Way. However, it is also stated that no mitigation has been confirmed at this stage. The ExA requests the applicant to submit mitigation proposals to address these significant effects, or to explain why further mitigation cannot be achieved.</p>

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ExQ1	Question to:	Question:
1CEIntra2.	Suffolk County Council, Kent County Council, East Suffolk Council, Thanet District Council	Significant intra-project cumulative impacts and mitigation (ISH1) Can the councils comment on the applicant's response to AP8 regarding identification of significant effects [REP1-124] and AP9 with respect to the applicant's approach to mitigation of identified cumulative intra-project significant effects [REP1A-037] ?
14. Cumulative effects (inter-project)		
1CEInter1.	Applicant	Coordinated consideration of network projects Having regard to NPS EN1, paragraph 3.3.79 and 3.3.80, can the applicant explain how all avoidable disruption, inefficiency, and visual impacts etc have been taken account in the strategic and detailed stages of the proposed development having regard to other planned and new energy projects in Suffolk? Include both spatial and temporal considerations in your answer. In answering, ensure that the response has regard to the relevant submissions from Suffolk and Essex Coast & Heaths National Landscape Partnership [REP1-270] .
15. Physical environment		
1PE1.	Applicant	Assessment of sensitivity and significance ES Part 4, Marine Chapter 1 [REP1-051] paragraphs 1.7.70 and 1.7.71 describe Sandwich Bay to Hacklinge Marshes Site of Special Scientific Interest (SSSI) and Sandwich and Pegwell Bay National Nature Reserve (NNR) respectively as being south of the proposed landfall. However, the proposed landfall actually crosses the sites. In addition, the descriptions in section 1.7 make no reference to the Thanet Coast and Sandwich Bay SPA or Ramsar sites. Explain whether these observations have any implications for the assessed sensitivity or significance of effect.
1PE2.	Kent Wildlife Trust Natural England Local authorities	Pegwell Bay – previous cable installation works Confirm whether any residual adverse effects from previous cable installation works within the intertidal area have been identified at Pegwell Bay (exclude reference to the saltmarsh and lagoon, which RRs have previously highlighted).
1PE3.	MMO	Suspended sediments and contamination Do any of the areas of sediment bound contamination along the marine cable route identified as exceeding CEFAS Action Level 1 in section 1.7 of [REP1-051] require special working arrangements to minimise adverse

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ExQ1	Question to:	Question:
		effects (for example, adjacent to Goodwin Sands or within Pegwell Bay?).
1PE4.	MMO	<p>Need for designated disposal area</p> <p>[REP1-051] table 1.18 explains that there is no designated disposal area and that dredged sediment would be disposed within the offshore scheme boundary within the area of pre-sweeping. Confirm whether a designated dredge disposal area is required for any element of the proposed cable route.</p>
1PE5.	Applicant	<p>Pneumatic hammered casing</p> <p>The applicant's comments on WR [REP2-034] suggests that there are no plans to use pneumatic casing insertion. Confirm whether pneumatic casing insertion as referenced in appendix A Landfall HDD Feasibility Technical Note [APP-321] is excluded from use by the dDCO.</p>
1PE6.	Applicant	<p>Release of drill fluid</p> <p>The applicant's [REP1A-033] response to supplementary agenda question ISH1.25 explains how bentonite fluid would be discharged in the nearshore area in Suffolk. [REP1-051] paragraph 1.9.54 explains that some sediment may settle but would otherwise be redistributed in the dynamic environment. Explain what the likely distribution of this sediment would be in the context of nearshore sediment distribution patterns and whether any of this sediment could be deposited in the foreshore environment. It is also noted that the figures presented in [REP1A-033] do not appear to add up to 7,240 cubic metres discussed. Also clarify how the total volume of discharge has been determined.</p>
1PE7.	Applicant	<p>HDD exit location – Suffolk</p> <p>Provide a figure identifying the location of the continuous outcrop of Coralline Crag (as outlined in the applicant's [REP1A-033] response to supplementary agenda question ISH1.27) and REAC commitment GH14. To assist understanding, also overlay the order limits.</p>
1PE8.	Applicant	<p>Outline Code of Construction Practice measure BE04 – cable protection materials</p> <p>Measure BE04 of the oCoCP [APP-341] commits that, where possible, cable protection materials would use locally sourced materials or environmentally benign sources. Is there a definition of what local and environmentally benign mean in this context? Also confirm whether local sources would also be environmentally benign.</p>
1PE9.	Natural England MMO	<p>Microplastics arising from rock armour</p> <p>In other NSIP examinations (for example for Morecambe Offshore Windfarm) the MMO and NE highlighted</p>

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ExQ1	Question to:	Question:
		concerns regarding microplastics. Are MMO or NE aware of any constraints relating to the generation of microplastics from rock armour solutions for this project (for example from rock bags) and if so, are any specific control measures for microplastics required?
16. Benthic ecology		
1BE1.	Applicant	<p>Goodwin Sands</p> <p>At point E34 of NE's RR [RR-3920] regarding benthic ecology, NE stated its concern about the potential for a benthic halo effect into the Goodwin Sands Marine Conservation Zone (MCZ) following placement of structures on the seabed near this designated site. It is noted that the proposed cable route runs alongside the Goodwin Sands MCZ boundary. Whilst the applicant's response regarding the potential for halo effects on the MCZ [REP2-014] is noted, is it possible to re-position the cable route (whilst still being within the order limits) so that there is a buffer between the cable position and the MCZ boundary to avoid any possible halo effects or any other adverse impacts to this MCZ? If not, explain why this is not achievable.</p>
1BE2.	Applicant	<p>Interim Subtidal Survey Report [AS-006]</p> <p>Explain why there is no coverage of Area 1 within this document, other than it being shown within Figure 1-1.</p>
1BE3.	Applicant	<p>Offshore – errata</p> <p>ES Part 4 Marine Chapter 2, Appendix 4.2.A, Benthic Characterisation Report section 1.3.1 geophysical objectives states that “<i>The following geophysical survey activities were carried out prior to the environmental survey campaign on survey vessel M/V Franklin and Mersey Discovery</i>” and then lists a series of what appear to be objectives. Confirm whether this sentence should relate to geophysical objectives rather than activities?</p>
1BE4.	Applicant	<p>In-Principle Monitoring Plan (IPMP)</p> <p>NE [RR-3920] requests that an IPMP is developed to monitor the impacts (temporal and spatial changes) on residual concerns in relation to protected habitats and those of conservation importance. The applicant's response [REP2-014] at point C11 of its response to NE is noted. The ExA acknowledges that an IPMP is important and that an outline version is requested (with a full IPMP to be secured through the DCO), which should also include details of micro-siting and also how adaptive management would be used if the monitoring returned results which were more adverse than anticipated in the ES.</p>

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ExQ1	Question to:	Question:
17. Marine mammals		
1MM1.	Applicant	Effects on seals at Goodwin Sands In relation to seals, paragraph 4.9.49 of ES Part 4 Chapter 4 Marine Mammals [REP1-055] states that installation operations would only be able to take place during high tide, when the sea covers Goodwin Sands and they become completely submerged. Explain how this measure would be secured.
1MM2.	Natural England	Noise effects on seals Provide a response to the Seals and Airborne Sound Disturbance Technical Note [REP1-122] .
1MM3.	Applicant	Visual disturbance to seals ES Part 4 Chapter 4 Marine Mammals [REP1-055] includes consideration of the potential visual effects of construction on seals. However, there is little recognition that there would be a range of construction activities in the intertidal area, including humans and vehicles, and that they would be visible to seals entering or leaving the River Stour. There is no assessment of the visual effects of non-vessel construction activity on seals, taking into account how effects may vary depending on the time of year, and whether seals are breeding, include young pups, or are hunting, for example. A more qualitative assessment is required and an update to [REP1-055] .
1MM4.	Natural England Kent Wildlife Trust	Updated information Provide a response to the following updated documents: <ul style="list-style-type: none"> • ES Figures Marine Mammals [REP1-011] • ES Figures Marine Pegwell Bay Seal Survey Report [REP1-013] • Outline Marine Mammal Mitigation Plan [REP1-025] • ES Part 4 Marine Chapter 4 Marine Mammals [REP1-055]
1MM5.	Applicant Natural England	Marine mammal observer (MMob) Provide a response to KCC's LIR [REP1-129] in relation to the need for a MMob during cable trenching/laying as well as during geophysical surveys.
1MM6.	Applicant	Port Richborough floating pontoons Several RR, for example [RR-5843] have raised concerns at cumulative effects on seals from the Port Richborough floating pontoons increasing boat traffic. Provide a response including whether this development has been taken into consideration in cumulative inter projects effects.

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ExQ1	Question to:	Question:
1MM7.	Applicant	<p>HRA - Revised baseline</p> <p>The applicant has provided a revision to the marine mammal baseline with the Winter SCANS 2025 data in ES Part 4 Marine Chapter 4 Marine Mammals [REP1-055]. Provide an explanation on the implications for the revised baseline on the assessment of effects to the harbour porpoise qualifying feature of the SNS SAC.</p>
1MM8.	Applicant	<p>HRA – in-combination assessment</p> <p>Can the applicant provide in-combination assessment for effects on marine mammal SACs?</p>
1MM9.	Natural England	<p>HRA - screening</p> <p>No additional onshore European sites, or European sites designated for marine mammals were identified in ([RR-3920], Appendices A, B and F) on the applicant's HRA screening in [REP2-009]. Confirm if you agree that all relevant sites have been screened in for these receptors. If not, confirm which additional sites should be considered.</p>
1MM10.	Applicant	<p>JNCC Guidelines</p> <p>Should MM01 and MM02 in the REAC [CR1-043] be updated to refer to specific JNCC guidelines (as currently it refers to just 'JNCC guidelines')?</p>
1MM11.	Applicant	<p>Unexploded Ordnance (UXO)</p> <p>MM01 of the REAC [CR1-043] refers to UXO detonation but elsewhere it is stated that UXO detonation would be carried out under a separate marine licence. Therefore consider whether MM01 is necessary or should be removed from the REAC.</p>
1MM12.	JNCC	<p>HRA – Southern North Sea Special Area of Conservation (SNS SAC)</p> <p>Noting paragraphs 4.3.36 to 4.3.37 of the HRA Report [REP2-009], can JNCC expand upon its concerns regarding how conservation objective 3 of the SNS SAC was considered in the applicant's LSE conclusion?</p>
1MM13.	JNCC	<p>HRA – Southern North Sea Special Area of Conservation (SNS SAC)</p> <p>The applicant in [REP2-016] tables 3.8 and 3.9 and [REP2-009] has stated that less than 2% of the total SNS SAC area could be affected by noise disturbance (applying a 5 kilometre (km) effective deterrent range, which exceeds JNCC's recent guidance of 3km). It states that 581 harbour porpoise could potentially be disturbed, representing a maximum of 3% of the SNS harbour porpoise population. Can JNCC confirm if this information alleviates its concerns regarding noise disturbance to harbour porpoise of the SNS SAC and the need for a</p>

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ExQ1	Question to:	Question:
		seasonal restriction. If not, can JNCC provide further justification as to why it considers a seasonal restriction necessary?
1MM14.	CEFAS/JNCC MMO	HRA – Conclusions regarding prey availability NE has deferred to CEFAS on impacts associated with prey availability impacting marine mammal species. Can CEFAS confirm it agrees with the applicant's conclusion of no LSE to Annex II marine mammal European sites from indirect effects due to availability of prey species. If not, explain why.
1MM15.	Natural England	Comments requested on [REP2-014] Provide a response to the applicant's response [REP2-014] to NE's RR in relation to marine mammals.
18. Marine Ornithology		
1MO1.	Applicant	Effects on bird species using the intertidal area in Pegwell Bay Explain how the marine ornithology assessment's consideration of noise and visual disturbance in section 5.9 of ES Part 4, Marine Chapter 5 [REP2-003] has taken into account the 24 hour and night time nature of disturbance to bird species using the intertidal area.
1MO2.	Applicant	Mitigation for effects on bird species using the intertidal area in Pegwell Bay Having provided the updated construction method technical note for Pegwell Bay [REP2-011] , confirm whether any more detailed information is available regarding the best practicable means available to mitigate noise impacts from the works in Pegwell Bay.
1MO3.	Applicant MMO	Directional lighting on boats Provision O06 of the REAC [CR1-043] suggests that artificial lighting on vessels would be directional and only used when necessary (also noting health and safety requirements). The applicant is requested to comment on the degree to which vessel lighting is directional. MMO may also wish to comment.
1MO4.	Applicant	L_{Amax} noise level decay Explain why an L _{Amax} of 91dB@10m is considered to be the 'typical peak' ([REP1A-033] response to supplementary agenda question ISH1.21), when the previous assessment clearly states that noise levels from vibropiling range from 78-104dB@10m in footnote 6 of [AS-115] . Provide substitute noise level decay tables for the higher value (ie updated ES Marine Chapter 5 [REP2-003] , tables 5.18 and 5.19).

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ExQ1	Question to:	Question:
1MO5.	Applicant	Joint Nature Conservation Committee comments on RTD JNCC [REP1-120] suggests that the majority of the proposed cable route passes through areas of medium RTD density. Explain what the implication of a medium density assessment would be for the assessed magnitude of effect (and therefore significance). Also provide evidence to support the assertion in your comments on WR [REP2-034] that these are areas of lower occurrence.
1MO6.	Applicant	REAC provision O05 disturbance to red-throated diver Provision O05 of the REAC [CR1-043] states that vessels would avoid rafting birds and areas with high densities of birds where practicable. Would vessels be accompanied by an ecological clerk of works, or similar, to ensure that this mitigation can be implemented and if so explain how would this be secured?
1MO7.	Applicant	REAC provision O07 cold weather protocol Provision O07 of the REAC [CR1-043] allows for stopping work during freezing conditions to avoid impacts on birds 'where practicable'. What would make a stoppage not practicable?
1MO8.	Applicant JNCC	HRA - operation and maintenance effects The applicant makes it clear in its comments on WR [REP2-034] that, although unlikely, works of between 2-6 months duration might be required to maintain the installed cable and these works might be during the overwintering period for RTD. Explain how it is possible to rule out an adverse effect on integrity on the RTD qualifying feature of the Outer Thames Estuary SPA for such works. JNCC is also requested to comment on this and to explain whether there are any potential measures available to address the impact of such works.
19. Marine archaeology		
1MA1.	Applicant	Kent Landfall Geophysical Surveys ES Chapter 6 Marine Archaeology, [REP1-057] section 6.4.60 identifies that the Offshore Scheme has been widened at the Kent landfall and additional geophysical survey data has not been obtained in this wider area. Explain when the additional geophysical surveys will be completed and what the implications are for the conclusions of the ES in the absence of these additional surveys?
1MA2.	Applicant	Marine Archaeology Study Area Can the applicant explain why the study area used in the Marine Archaeological Technical Report [REP1-005] (section 6.1.9) appears to be different from that described in section 6.6 of the ES Chapter 6 Marine Archaeology [REP1-057] ? Confirm what the implications are for the findings presented in ES Chapter 6 if the alternative study

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ExQ1	Question to:	Question:
		area is considered?
1MA3.	Historic England	Geoarchaeological Assessment Historic England in [RR-2032] notes that additional geotechnical work undertaken in October 2024 is still in progress and has not been included within the documents submitted at that time. The ExA notes that an updated supplementary Stage 1 and 2 Marine Geoarchaeological Assessment [REP1-005] was provided at deadline A. Can Historic England provide an update on their position with respect to the suitability of the geoarchaeological assessment including identifying any outstanding information?
20. Shipping and navigation		
1SN1.	Applicant	Baseline depths Provide the relevant Admiralty chart extracts at a resolution that shows baseline depths.
1SN2.	Applicant	Depth of lowering (DoL) in the Sunk Provide a timescale for the assessment of the engineering implications of the additional cable DoL set out in [REP1A-038] paragraph 2.3.9 that may be required in the areas of the Sunk Pilot Boarding area that are already shallower than the 22m safeguard level, including the submission of updated documents.
1SN3.	Applicant and relevant stakeholders	Depth of lowering Provide an update on reaching an agreement with the relevant stakeholders on safeguarding current and future navigable water depths. In responding, explain how DoL commitments can most effectively be secured in order to secure existing and reasonable future under keel clearance requirements. If this is to be through protective provisions, provide suggested wording for how this can be appropriately secured. Also explain any alterations or additions to the REAC, for example MPE02.
1SN4.	Applicant	National Policy Statement for Ports (January 2012) Consider whether the National Policy Statement for Ports (January 2012) (Ports NPS) is an important and relevant matter in relation to the proposed development. If so, provide a summary of which aspects of the Ports NPS are important and relevant and a summary assessment of the proposed development in relation to those aspects as an update to the Planning Statement [AS-057] .
1SN5.	Applicant	East Inshore and East Offshore Marine Plan Respond to LGP's assessment [REP1-142] that the proposed development is in conflict with policies PS1, PS3, DD1 of the East Inshore and East Offshore Marine Plan. Provide an explanation of how the conflict, if any, can be

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ExQ1	Question to:	Question:
		overcome.
1SN6.	Applicant	Consultation with the Coastguard Can the applicant provide assurance that His Majesty's Coastguard will be engaged in discussions which impact their jurisdiction in relation to the delivery of the Sunk Vessel Traffic Services, which has been raised by the Maritime and Coastguard Agency (MCA) [REP2-063] .
1SN7.	Relevant stakeholders including London Gateway Port Ltd (LGP), Maritime and Coastguard Agency (MCA), Port of London Authority (PLA), Harwich Haven Authority (HHA)	Cable burial risk assessment (CBRA) Provide comments on the submitted CBRA [PDA-039] .
1SN8.	Applicant	Pre and post construction surveys and activities Provide a detailed response to PLA's suggested restrictions in relation to pre and post construction surveys and activities in paragraph 7.1 of [REP1-155] .
1SN9.	Applicant	Wet storage In its deadline 2 comments on submissions received at deadline 1 and deadline1A, PLA raised consistency with the ES Part 4, Chapter 6 Marine Archaeology [REP2-005] in relation to wet storage. Where relevant update or amend as necessary to ensure consistency.
1SN10.	Applicant	Sediment disposal management plan (SDMP) There is reference in the draft Statement of Common Ground between National Grid Electricity Transmission (NGET) and the PLA [REP1-082] to the submission of a sediment disposal management plan. Provide confirmation that relevant stakeholders will be engaged, including the PLA. Provide an explanation as to whether it should be secured by the dDCO as a certified document.

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ExQ1	Question to:	Question:
1SN11.	Applicant	Cable joints in the areas of interest REAC commitments SN19 and SN20 indicate that cable joints in the Sunk would be avoided where possible and where practicable. Provide a response to the request from the PLA that there would be no planned cable joints within the Areas of Interest due to the disruption to heavily trafficked routes.
1SN12.	Sizewell C Harbour Authority	Engagement with Sizewell C Harbour Authority Provide comments on the updated Navigational Risk Assessment (NRA) [REP1-063] received at deadline 1.
1SN13.	Harwich Haven Authority and London Gateway Port Ltd	Safety zones Provide comments as to whether REAC commitment SN29 meets your requirements.
1SN14.	Applicant Harwich Haven Authority, London Gateway Port Ltd, Maritime and Coastguard Agency, Port of London Authority	Exclusion zones The applicant has stated in section 7.3 of ES Part 4, Chapter 7 Shipping and Navigation [REP1-059] that exclusion zones will not be required. Does this need to be added to the REAC to be secured?
1SN15.	Applicant Maritime and Coastguard Agency	Magnetic compass deviation In the draft Statement of Common Ground with the MCA [REP1-081], the applicant states that a full update to the Electromagnetic Field report will be carried out once a full analysis update has been carried out pre-construction and will be shared with the consultee at the earliest opportunity. Can the applicant clarify whether this will be submitted to the examination or whether it intends for this to be post consent. Can the MCA comment as to whether it is necessary for this information to be made available prior to the decision being made on the DCO.
1SN16.	Applicant MMO	Consultation with MCA Provide confirmation that there would be provision for the MCA to be consulted on the discharge of relevant

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ExQ1	Question to:	Question:
		shipping and navigation related conditions in the DML.
1SN17.	Applicant and relevant stakeholders	<p>Vessel management plan (VMP)</p> <p>Several stakeholders have requested a VMP. Can the applicant confirm that their proposal is that this takes the form of a navigation and installation plan (NIP), for which an outline version has been submitted [AS-104]?</p> <p>Taking into account that section 1.2 of [AS-104] states that project activities outside of the three defined areas of interest are not covered by the NIP, can the applicant confirm that it does not consider that there is a need for a VMP with a wider geographical scope.</p> <p>Can the stakeholders provide comment as to whether they are satisfied that a separate VMP is not required.</p>
1SN18.	UK Chamber of Shipping	<p>Reputational risk</p> <p>The draft Statement of Common Ground [REP1-084] raises concerns about reputational risk. The applicant has updated the NRA [REP1-063] to deal with the commercial risk of a collision. Provide comments as to whether this is sufficient to overcome these concerns.</p>
1SN19.	Applicant Port of Ramsgate	<p>Navigational Risk Assessment</p> <p>Port of Ramsgate to provide comments on the NRA [REP1-064] including in relation to potential future impacts on commercial ferries.</p> <p>Applicant to engage with the MCA in relation to their suggested additional risk mitigation measures [REP1-162] in relation to ensuring that the risk to shipping and safe navigation is As Low As Reasonably Practicable (ALARP).</p>
21. Commercial fisheries		
1CF1.	Relevant fisheries stakeholders	<p>Mitigation and compensation</p> <p>Provide comments on the revised section 8.10 of ES Part 4, Chapter 8 Commercial Fisheries [REP1A-009] which sets out additional mitigation for the identified likely significant effects. In your comments include consideration of whether the proposed provisions for securing mitigation and/or compensation are adequate.</p> <p>Provide comments on whether there is adequate consideration of inter project cumulative effects in table 11.24 of</p>

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ExQ1	Question to:	Question:
		[REP1A-011] ES Part 4, Chapter 11 Inter-Project Cumulative Effects and the need for further mitigation.
1CF2.	Applicant	Fisheries liaison and co-existence plan (FLCP) Section 8.10 of [REP1A-009] sets out that a FLCP will be prepared and this is required by condition 4(1)(j) of the DML. Provide an outline FLCP and update the dDCO to require that the FLCP is substantially in accordance with the principles contained within it.
22. Other sea users		
1OSU1.	Applicant Relevant Stakeholders	Cable crossings Applicant - It is stated in the responses to the Supplementary Agenda Additional Questions [REP1A-033] ISH1.03 that the expectation is that there are no areas where the Sea Link cables cannot be buried, and that surveys indicate that existing in-service cables are buried, so that there would not be a scenario where Sea Link cables would cross over unburied cables. Each individual crossing location would be surveyed in detail and would be agreed with each crossing agreement with the third-party asset owner. Provide an explanation of how this will be secured in the dDCO. Applicant - Stakeholders such as London Gateway Port Ltd (LGP) and Port of London Authority (PLA) require that there are no cable crossings at all in the Sunk, Long Sand or North East Spit. Would it be appropriate to include a requirement or DML condition that prohibits cable crossings in these areas? Applicant and relevant stakeholders - Cable crossing agreements with third-party asset owners have not been included in table 2.1 of the Consents and Agreements Position Statement [APP-010] . Give consideration as to whether they should be added.
1OSU2.	Applicant	Cable crossings with third party assets Provide a full response to PLA's concerns expressed in [REP1-155] about GridLink (KP 101.27) and Q&E North (KP 100.151) in paragraph 6.3.
23. Climate change		
1CC1.	Applicant, Suffolk County Council, Kent County Council, East	R (on the application of Finch on behalf of the Weald Action Group) v Surrey County Council judgment Applicant - The Climate Change assessment [APP-085] states that it is not possible to calculate the likely upstream and downstream direct or indirect effects and any resultant increases or decreases in greenhouse gases. Can the applicant justify their position and provide specific examples of other NSIP which have taken this

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ExQ1	Question to:	Question:
	Suffolk Council, Thanet District Council	approach? Councils – Do you agree with the applicant's position and approach? If not, why not?
1CC2.	Applicant	Climate Change impacts – Flood Risk Can the applicant explain specifically if the flood risk assessments for Kent and Suffolk and findings contained therein have been cognisant of any rising sea levels associated with climate change and summarise their approach? In answering confirm if either the Suffolk and Kent assessment areas are particularly vulnerable to sea level increases due to climate change covering the relevant points made in [REP1-168] .
1CC3.	Applicant	Climate Change Assessment - Embodied Carbon Regarding embodied carbon, does the assessment provide a reasonable worst-case with respect to quantities of used construction material including extraction and delivery processes? Provide an answer which relates to construction activity in both Suffolk and Kent, including both converter stations.
1CC4.	Applicant	Climate Change Assessments - Minster Marshes and other carbon sinks The ExA notes the applicant's position that the climate change assessments follow Institute of Environmental Management and Assessment good practice guidance for climate change risk assessments in environmental impact assessment. However, can the applicant confirm specifically how the assessment has addressed the function of Minster Marshes and other local carbon sinks regarding their role in capturing and storing carbon etc?
24. Other		
1O1.	Applicant	Waste and Materials Schedule 3, requirement 6(1)(n) requires a Material and Waste Management Plan (MWMP) to be submitted and approved. Provide a detailed explanation as to why an outline MWMP is not required, taking into account the quantity of material that would need to be imported to carry out the development and the need to sustainably manage waste. Article 2 of the dDCO [CR1-027] describes the MWMP as a document to be certified under article 60 but it is not listed in schedule 19 as a document to be certified. Amend the dDCO to include a MWMP.