

# Sea Link

## Volume 7: Other Documents

Document 7.4.6: Draft Statement of Common Ground Between National Grid Electricity Transmission and Dover District Council.

Planning Inspectorate Reference: EN020026

Version: C  
January 2026

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 Regulation 5(2)(q)

**Page intentionally blank**

# Contents

<b>1.</b>	<b>Introduction</b>	<b>1</b>
1.1	Overview	1
1.2	This Statement of Common Ground	1
1.3	Role of Dover District Council in the DCO Process	2
1.4	Description of the Proposed Project	2
1.5	Format of Document and Terminology	4
<b>2.</b>	<b>Record of Engagement</b>	<b>7</b>
2.1	Summary of pre-application discussions	7
<b>3.</b>	<b>Areas of Discussion Between the Parties</b>	<b>15</b>
3.1	Policy, consenting route, coordination and site selection	15
3.2	Draft DCO	17
3.3	Consultation	20
3.4	Landscape and Visual	21
3.5	Ecology and Biodiversity	25
3.6	Cultural Heritage	34
3.7	Water Environment and Flood Risk	35
3.8	Geology and Hydrogeology	37
3.9	Agriculture and Soils	38
3.10	Traffic and Transport	39
3.11	Air Quality	42
3.12	Noise and Vibration	43
3.13	Socioeconomics, Recreation and Tourism	45
3.14	Health and Wellbeing	46
3.15	Cumulative Effects	47
<b>4.</b>	<b>Approvals</b>	<b>49</b>
<b>5.</b>	<b>References</b>	<b>50</b>

## Table of Tables

Table 1.1 Abbreviations	4
Table 2.1 Pre-application discussions	7
Table 3.1 Policy, consenting route, coordination and site selection	15
Table 3.2 Draft DCO	17

Table 3.3 Consultation	20
Table 3.4 Landscape and Visual	21
Table 3.5 Ecology and Biodiversity	25
Table 3.6 Cultural Heritage	34
Table 3.7 Water Environment and Flood Risk	35
Table 3.8 Geology and Hydrogeology	37
Table 3.9 Agriculture and Soils	38
Table 3.10 Traffic and Transport	39
Table 3.11 Air Quality	42
Table 3.12 Noise and Vibration	43
Table 3.13 Socioeconomics, Recreation and Tourism	45
Table 3.14 Health and Wellbeing	46
Table 3.15 Cumulative Effects.	47

---

**Version**

<b>Date</b>	<b>Version</b>	<b>Status</b>	<b>Description / Changes</b>
March 2025	A	DRAFT	Issued with DCO application
November 2025	B	DRAFT	Issued to PINS for Deadline 1
January 2026	C	DRAFT	Issued to PINS for Deadline 3

---



# 1. Introduction

## 1.1 Overview

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared to support the application (“The Application”) for the Sea Link Project (“Proposed Project”) made by National Grid Electricity Transmission Ltd (“the Applicant”). The Application was submitted to the Secretary of State for a Development Consent Order (DCO) and accepted for examination on the 23 April 2025.
- 1.1.2 A Statement of Common Ground (SoCG) is an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be addressed during the Examination. It is prepared jointly between the applicant and another party(s) and sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matters that are under discussion.
- 1.1.3 The aim of a SoCG is to help the Examining Authority manage the Examination Phase of a DCO application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning and provide greater predictability for all participants in Examination. A SoCG may be submitted prior to the start of or during Examination and then updated as necessary or as requested during the Examination Phase.

## 1.2 This Statement of Common Ground

- 1.2.1 This SoCG has been prepared between the Applicant and Dover District Council (DDC). It has been prepared in accordance with the guidance published by the Ministry of Housing, Communities and Local Government (Ministry of Housing, Communities and Local Government, 2024).
- 1.2.2 An early draft (version A) of the SoCG was prepared by the Applicant to submit with the Application, based on engagement with DDC throughout development of the Proposed Project. Since the submission of the Application, the Applicant has continued to work with DDC to resolve issues as the Proposed Project progresses through the Pre-Examination and Examination phases. The SoCG was further shared with DDC during the Pre-Examination phase to enable them to review and update their position. The Applicant subsequently addressed points raised in that review and also incorporated and responded to matters raised in DDC’s Principal Areas of Disagreement Summary Statement (PADSS) as well as issues from the Relevant Representations and discussed during ongoing thematic meetings, ahead of Deadline 1. DDC have since reviewed and updated their position in response to some of these updates and this SoCG reflects their current position at Deadline 3, with updated positions on remaining topics to be provided when the SoCG is next issued.
- 1.2.3 This SoCG will be progressed during the Examination period to reach a final position between the Applicant and DDC and to clarify if any issues remain unresolved. This SoCG will be revised and updated as appropriate and/or required by the Examining Authority at relevant examination deadlines.
- 1.2.4 For the purpose of this SoCG, the Applicant and DDC are jointly referred to as the “Parties”. When referencing DDC alone, they are referred to as “the Consultee”.

## 1.3 Role of Dover District Council in the DCO Process

- 1.3.1 DDC is a local authority for the purposes of section 42(1)(b) of the Planning Act 2008 as some of the land within the Order limits for the project is within its local authority area. Pursuant to Section 42 of the Planning Act 2008, National Grid must consult local authorities if the project is in a local authority's area.
- 1.3.2 The Planning Inspectorate sets out the role of local authorities in the DCO process in Advice Note 2: The role of local authorities in the development consent process (The Planning Inspectorate, 2015). The role and responsibilities of DDC, and local authorities in general, extend throughout the DCO process from pre-application to post decision as set out in the PINS Advice Note 2 and can include:
- Providing the local perspective at the pre-application stage in addition to any views expressed directly to the developer by residents, groups and businesses.
  - Preparing written representations, SoCGs and Local Impact Reports ready for examination.
  - Attending and participating in hearings and/or accompanied site visits.
  - Discharging many of the requirements associated with a DCO if consent is granted.
  - Monitoring and enforcing many of the DCO provisions and requirements.

## 1.4 Description of the Proposed Project

- 1.4.1 The Proposed Project is a proposal by National Grid to reinforce the transmission network in the South East and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as accommodating additional new interconnection with mainland Europe.
- 1.4.2 National Grid owns, builds and maintains the electricity transmission network in England and Wales. Under the Electricity Act 1989, National Grid holds a transmission licence under which it is required to develop and maintain an efficient, coordinated, and economic electricity transmission system.
- 1.4.3 This would be achieved by reinforcing the network with a High Voltage Direct Current (HVDC) Link between the proposed Friston substation in the Sizewell area of Suffolk and the existing Richborough to Canterbury 400 kV overhead line close to Richborough in Kent.
- 1.4.4 National Grid is also required, under Section 38 of the Electricity Act 1989, to comply with the provisions of Schedule 9 of the Act. Schedule 9 requires licence holders, in the formulation of proposals to transmit electricity, to:
- 1.4.5 Schedule 9(1)(a) '*...have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiographical features of special interest and of protecting sites, buildings and objects of architectural, historic or archaeological interest;*' and
- 1.4.6 Schedule 9(1)(b) '*...do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects*'.
- 1.4.7 The Proposed Project would comprise the following elements:

## The Suffolk Onshore Scheme

- A connection from the existing transmission network via Friston Substation, including the substation itself. Friston Substation already has development consent as part of other third-party projects. If Friston Substation has already been constructed under another consent, only a connection into the substation would be constructed as part of the Proposed Project.
- A high voltage alternating current (HVAC) underground cable of approximately 1.9 km in length between the proposed Friston Substation and a proposed converter station (below).
- A 2 GW high voltage direct current (HVDC) converter station (including permanent access from the B1121 and a new bridge over the River Fromus) up to 26 m high plus external equipment (such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, similar small scale operational plant, or other roof treatment) near Saxmundham.
- A HVDC underground cable connection of approximately 10 km in length between the proposed converter station near Saxmundham, and a transition joint bay (TJB) approximately 900 m inshore from a landfall point (below) where the cable transitions from onshore to offshore technology.
- A landfall on the Suffolk coast (between Aldeburgh and Thorpeness).

## The Offshore Scheme:

- Approximately 122 km of subsea HVDC cable, running between the Suffolk landfall location (between Aldeburgh and Thorpeness), and the Kent landfall location at Pegwell Bay.

## The Kent Onshore Scheme:

- A landfall point on the Kent coast at Pegwell Bay.
- A TJB approximately 800 m inshore to transition from offshore HVDC cable to onshore HVDC cable, before continuing underground for approximately 1.7 km to a new converter station (below).
- A 2 GW HVDC converter station (including a new permanent access off the A256), up to 28 m high plus external equipment such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, and similar small scale operational plant near Minster. A new substation would be located immediately adjacent.
- Removal of approximately 2.2 km of existing HVAC overhead line, and installation of two sections of new HVAC overhead line, together totalling approximately 3.5 km, each connecting from the substation near Minster and the existing Richborough to Canterbury overhead line.

1.4.8 The Proposed Project also includes modifications to sections of existing overhead lines in Suffolk (only if Friston Substation is not built pursuant to another consent) and Kent, diversions of third-party assets, and land drainage from the construction and operational footprint. It also includes opportunities for environmental mitigation and compensation. The construction phase will involve various temporary construction activities including overhead line diversions, use of temporary towers or masts, working areas for



construction equipment and machinery, site offices, parking spaces, storage, accesses, bellmouths, and haul roads, as well as watercourse crossings and the diversion of public rights of way (PROWs) and other ancillary operations.

## 1.5 Format of Document and Terminology

- 1.5.1 Section 2 of this SoCG summarises the engagement the Parties have had with regard to the Proposed Project.
- 1.5.2 Section 3 of this SoCG summarises the issues that are ‘agreed’, ‘not agreed’ or are ‘under discussion’. ‘Not agreed’ indicates a final position where the Parties have agreed to disagree, whilst ‘Agreed’ indicates where the issue has been resolved.
- 1.5.3 Abbreviations used within the SoCG are provided in Table 1.1 below.

**Table 1.1 Abbreviations**

Abbreviation/Term	Definition
BTNO	Bramford to Twinstead Reinforcement Project
CEA	Cumulative Effects Assessment
CEMP	Construction Environmental Management Plan
CIRIA	Construction Industry Research and Information Association
CMP	Construction Management Plan
CRTN	Calculation of Road Traffic Noise
CTMP	Construction Transport Management Plan
DCO	Development Consent Order
DDC	Dover District Council
DMRB	Design Manual for Roads and Bridges
EA	Environment Agency
EIA	Environmental Impact Assessment
EH	Environmental Health
ES	Environmental Statement
FRA	Flood Risk Assessment
FRAP	Flood Risk Activity Permit

Abbreviation/Term	Definition
HE	Historic England
HDD	Horizontal Direct Drilling
HGV	Heavy Good Vehicle
HRA	Habitats Regulations Assessment
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IDB	Internal Drainage Board
KCC	Kent County Council
LCA	Landscape Character Areas
LDC	Land Drainage Consent
LEMP	Landscape and Ecology Management Plan
LGV	Large Goods Vehicle
LPA	Local Planning Authority
LVIA	Landscape and Visual Impact Assessment
LWS	Local Wildlife Site
NPS	National Policy Statement
NRMM	Non-Road Mobile Machinery
OHL	Overhead Line
PCZ	Primary Consultation Zone
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
PPA	Planning Performance Agreement
PRoW	Public Rights of Way
SCZ	Secondary Consultation Zone

Abbreviation/Term	Definition
SoCC	Statement of Community Consultation
SoCG	Statement of Common Ground
SoS	Secretary of State
SPA	Special Protection Area
SuDs	Sustainable Drainage Systems
TDC	Thanet District Council
TTM	Temporary Traffic Management

## 2. Record of Engagement

### 2.1 Summary of pre-application discussions

2.1.1 Table 2.1 summarises the consultation and engagement that has taken place between the Parties prior to submission of the DCO application.

**Table 2.1 Pre-application discussions**

Date	Topic	Discussion points
10 November 2021	Thanet District Council (TDC), Dover District Council (DDC) and Kent County Council (KCC) Meeting	Need case, Sea Link project, consenting strategy, emerging preference, routing and siting update, consultation strategy
12 May 2022	DDC and KCC Briefing	Need case, Sea Link project, consenting strategy, emerging preference, routing and siting update, consultation strategy
09 June 2022	TDC, DDC and KCC Meeting	Project and timeline, feedback on draft non-statutory consultation strategy, emerging preference update
11 July 2022	TDC, DDC and KCC Meeting	Project and timeline, project update, non-statutory consultation strategy
11 August 2022	TDC, DDC and KCC Meeting	Project and timeline, project update, non-statutory consultation, EIA scoping, survey access, ground investigation
08 September 2022	TDC, DDC and KCC Meeting	Project and timeline, project update, non-statutory consultation, ground investigation locations
13 October 2022	TDC, DDC and KCC Meeting	Project update and timeline, non-statutory consultation, survey access, ground investigation locations
14 December 2022	TDC, DDC and KCC Meeting	Project update and timeline, non-statutory consultation, ground investigation
14 February 2023	TDC, DDC and KCC Meeting	Project update and timeline, ground investigation works, approach to coordination (in accordance with Planning Inspectorate (PINS) guidance), non-statutory consultation, site visits
14 March 2023	TDC, DDC and KCC Meeting	Project update and timeline, planning performance agreement (PPA) and host authority engagement plan

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
18 April 2023	TDC, DDC and KCC Meeting	Project update and timeline, thematic meetings, PPA and host authority engagement plan
27 April 2023	TDC, DDC, KCC and National Grid- Noise and Vibration Meeting	Discussion relating to the noise and vibration assessment methodology, and baseline noise surveys. DDC have subsequently delegated noise issues to TDC, but DDC copied into pertinent correspondence as required.
10 May 2023	TDC and DDC Meeting – Landscape and Visual	Project update and timeline, viewpoints, study area and photomontages, landscape mitigation strategy and questions / AOB
13 June 2023	TDC, DDC and KCC Meeting	Project update and timeline, landscape design, thematic meetings, PPA and host authority engagement plan, statement of community consultation
11 July 2023	TDC, DDC and KCC Meeting	Project update and timeline, PPA, host authority engagement plan and cost schedule, ground investigation programme, site notices
08 August 2023	TDC, DDC and KCC Meeting	Project update and timeline, PPA, host authority engagement plan and cost schedule, site notices, SoCC feedback
12 September 2023	TDC, DDC and KCC Meeting	Project update and timeline, PPA progress SoCC feedback
16 October 2023	TDC, DDC and KCC – Health and Wellbeing	Discussion relating to the PEIR – covered a high-level project overview, scope, methodology, baseline sources, sensitive receptors.
18 December 2023	DDC Consultation Response Letter to National Grid	Consultation response which set out the main concerns DDC had in respect of the Proposed Project. DDC were broadly supportive of the Proposed Project, with encouragement to National Grid for consideration of the impacts on landscape, ecology, heritage, air quality, noise, traffic, socioeconomics, tourism and recreation. The main concerns DDC had were over the potential for landscape and visual harm, impact on ecology, impact on setting of scheduled monuments.
15 January 2024	TDC, DDC and KCC Meeting	Project update and timeline, statutory consultation, thematic meetings, PPA progress
05 February 2024	TDC, DDC and KCC Meeting	Project update and timeline, statutory consultation, terrestrial ecology thematic meeting, PPA progress



<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
06 February 2024	TDC, DDC, KCC Meeting – Water Environment	Project update and timeline, engagement to date, FRA approach, converter station flood risk note update
07 February 2024	TDC, DDC and KCC Meeting – Air quality	Project update and timeline, air quality assessment methodology and statutory consultation feedback responses
13 February 2024	TDC, DDC and KCC Meeting	Project update and timeline, thematic meetings, PPA progress, statements of common ground (SoCG)
14 February 2024	National Grid, KCC, TDC and DDC – Geology and Hydrogeology Thematic Meeting.	Project update and timelines, statutory consultation overview, geology and hydrogeology updates, thematic meetings, AOB.
19 February 2024	TDC, DDC and KCC Meeting – Socioeconomics, Recreation and Tourism	Project update and timeline, socio-economic statutory consultation feedback and responses (PRoW, study area), discussion, next steps.
20 February 2024	KCC, DDC and TDC Meeting – Landscape and Visual	Project update and timeline, interface with other disciplines, statutory consultation feedback, predicted significant effects on landscape character and visual amenity, design principles and landscape strategy, outline landscape and ecology management plan and questions / AOB
February 2024	DDC and National Grid – Ecology Information Shared	The Kent Vantage Point Survey and collision risk assessment was shared with DDC for information only by National Grid,
12 March 2024	TDC, DDC and KCC Meeting	Project update and timeline, PPA progress, thematic updates, ongoing decision-making, community benefit
02 April 2024	TDC, DDC, EA Meeting – Water Environment	Review of actions from last thematic meeting, groundwater monitoring and flood risk assessment at Kent converter station site, drainage design updates, construction phase dewatering and permitting requirements
16 April 2024	TDC, DDC, KCC and SE England	Project update and timeline, discussion relating to aspects of the LVIA, Approach to outline landscape and

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
	<i>Coast Path National Trail Officer Meeting Landscape and Visual</i>	<i>ecology management plan, Mitigation Design Concepts and questions / AOB</i>
<i>16 April 2024</i>	<i>KCC, TDC and DDC Transport Meeting</i>	<i>Transport meeting to provide a project update, review stat. con. (PEIR) feedback and the transport deliverables including the Outline PRoW Management Plan</i>
<i>17 April 2024</i>	<i>TDC, DDC and KCC Meeting</i>	<i>Project update and timeline, PPA progress, thematic updates, ongoing decision-making</i>
<i>April 2024</i>	<i>DDC and National Grid - Ecology Information Shared</i>	<i>The First Season (2022-2023) Breeding and Wintering bird reports for Kent was shared with DDC for information by National Grid,</i>
<i>02 May 2024</i>	<i>KCC, DDC and TDC – Transport (PRoW) Thematic Meeting</i>	<i>Outline PRoW Management Plan Discussion, PRoW Feedback/Considerations, AOB</i>
<i>14 May 2024</i>	<i>TDC, DDC and KCC Meeting</i>	<i>Project update and timeline, PPA progress, thematic updates, ongoing decision-making</i>
<i>May 2024</i>	<i>DDC and National Grid – Ecology Information Shared</i>	<i>A preliminary noise assessment (contour maps only) for Kent, but not part of the DCO Documentation, were shared with DDC for information only by National Grid.</i>
<i>04 June 2024</i>	<i>DDC and National Grid – Landscape and Visual Information Shared</i>	<i>The Sea Link Provisional Growth Rates, the Kent Indicative Species Mix and the outline LEMP Draft Structure was shared with DDC for agreement.</i>
<i>11 June 2024</i>	<i>TDC, DDC and KCC Meeting</i>	<i>Project update and timeline, PPA progress, thematic updates, ongoing decision-making</i>
<i>18 June 2024</i>	<i>KCC, DDC, and TDC Meeting – Landscape and Visual</i>	<i>Project update and timeline, interface with other disciplines, statutory consultation feedback, predicted significant effects on landscape character and visual amenity, design principles and landscape strategy, outline landscape and ecology management plan and questions/AOB</i>

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
19 June 2024	TDC, DDC and KCC Meeting – Socioeconomics, Recreation and Tourism	Project update and timeline, socio-economic statutory consultation feedback and responses (PRoW, study area), discussion, next steps.
03 July 2024	TDC, DDC and KCC Meeting – Air Quality	Project update and timeline, proposed Air Quality Management Plan, proposed air quality monitoring locations during construction and unclosed statutory consultation topics
23 July 2024	TDC, DDC, KCC Meeting - Transport	Targeted consultation – design changes, additional PEI (Traffic and Transport), Core Working Hours, Public Rights of Way – PEIR Findings (Traffic and Transport), Emerging Design, Statutory Consultation Feedback – AOB.
July 2024	DDC and National Grid – Ecology Information Shared	A note on the creation of wet grassland for golden plover in Kent (now superseded and not a part of the DCO Application) was shared with DDC for information only by National Grid,
02 August 2024	DDC and National Grid – Landscape and Visual Information Shared	National Grid shared the Sea Link Growth Rates and Photosheet VP Template was shared with DDC for agreement.
20 August 2024	TDC, DDC, KCC, ESC, and National Grid – Landscape and Visual Thematic Meeting	Project update and timeline, discussion related to material issued on 4 June 2024 and 2 August 2024 on now superseded growth rates, indicative species mix and outline LEMP, additional LVIA updates, AOB.
28 August 2024	DDC and National Grid – Landscape and Visual Information Shared	National Grid shared the Sea Link Kent Landscape and Visual Value, outline LEMP Draft Structure, Sensitivity Ratings and Sequential Cumulative Visual Assessment with DDC for agreement and the Visual Appendix Structure Example – BTNO1 and 2 for comment.
17 September 2024	TDC, DDC, KCC, Environment Agency (EA) and National Grid	Project update and timeline, progress on Water Framework Directive, project activities on River Stour floodplain, discussions, next steps and AOB.

Date	Topic	Discussion points
	<i>Meeting – Kent Hydrology EIA</i>	
14 October 2024	<i>DDC and National Grid – Landscape and Visual Information Shared</i>	<i>National Grid shared the Kent Indicative Species Mix with DDC for agreement and the Draft Mitigation Design package for comment.</i>
15 October 2024	<i>TDC, DDC, KCC, AECOM – Landscape and Visual Thematic Meetings</i>	<i>Project update and timeline, discussion on materials issued to stakeholders on now superseded growth rates, indicative species mix and outline LEMP, mitigation plans, landscape mitigation function, targeted consultation comments, AOB.</i>
16 October 2024	<i>DDC and National Grid – Air Quality Information Shared</i>	<i>National Grid shared the air quality assessment methodology with DDC to confirm and the construction monitoring locations to be agreed.</i>
16 October 2024	<i>DDC and National Grid – Landscape and Visual Information Shared</i>	<i>National Grid shared the Kent Table of Agreement with DDC for comment.</i>
12 November 2024	<i>DDC and National Grid – Cumulative Effects Information Shared</i>	<i>The Cumulative Effects Long List and Short List was shared with DDC by National Grid for comment and feedback, with comments requested to be provided within 3 days of the date the long and short lists were shared.</i>
27 November 2024	<i>DDC and National Grid – Socioeconomics, Recreation and Tourism Information Shared.</i>	<i>The PRow Technical Note on the approach to assessing the PRow was shared with DDC by National Grid for comment. A response was received by DDC which stated that there were no specific comments to be made on the methodology technical note.</i>
November 2024	<i>DDC and National Grid – Ecology Information Shared</i>	<i>The Kent Vantage Point Survey and collision risk assessment and a summary of the impact assessment and proposed mitigation for Kent (not a part of the DCO documentation, but used as the basis for the Kent ES Chapters) was shared with DDC for information only by National Grid,</i>

<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
November 2024	DDC and National Grid – Ecology Information Shared	The draft Habitat Regulations Assessment (HRA) was shared with DDC for comment by National Grid,
10 December 2024	TDC, DDC, KCC, NE and National Grid Terrestrial Ecology Thematic Meeting (Kent proposals)	Approach to Biodiversity Net Gain
7 January 2025	TDC, DDC, KCC, AECOM – Landscape and Visual Thematic Meetings	Project update and timeline, discussion relating to table of agreement, discussion relating to landscape mitigation plans, AOB.
14 January 2025	TDC, DDC and KCC Meeting	Project update and timeline, thematic updates, ongoing decision-making
21 January 2025	TDC, DDC and KCC Meeting – Air Quality	Project update, assessment findings and proposed air quality monitoring locations during construction.
21 January 2025	TDC, DDC, KCC, , NE and National Grid Terrestrial Ecology Thematic Meeting (Kent proposals)	Discussion of golden plover mitigation parcel, including the fact wintering bird surveys are being undertaken and have confirmed presence of golden plover, and that lighting only affects the eastern boundary. Confirmation that Natural England consider the updated collision risk assessment addresses their main concerns, with only some limited further comments. Confirmation Natural England have no specific comments on the type of deflector chosen for the new section of overhead line. Confirmation there will be a stand-by generator as part of operation of development. Confirmation there will be scrapes created along the River Stour as long-term enhancement within South Richborough Pasture Local Wildlife Site. Use of instant hedges for closing temporary gaps.
11 February 2025	TDC, DDC and KCC Meeting	Project update and timeline, thematic updates, ongoing decision-making
11 March 2025	TDC, DDC and KCC Meeting	Project update and timeline, thematic updates, ongoing decision-making
8 April 2025	TDC, DDC and KCC Meeting	Project update and timeline, thematic updates, ongoing decision-making



<b>Date</b>	<b>Topic</b>	<b>Discussion points</b>
19 May 2025	TDC, DDC and KCC Meeting	Project update and timeline, thematic updates, ongoing decision-making
10 June 2025	TDC, DDC and KCC Meeting	Project update and timeline, thematic updates, ongoing decision-making
8 July 2025	TDC, DDC and KCC Meeting	Project update and timeline, thematic updates, ongoing decision-making
21 July 2025	Landscape Thematic Meeting	A meeting to discuss the landscape related matters raised in KCC, DDC and TDC Relevant Representations,
6 August 2025	Ecology Thematic Meeting	A meeting to discuss the ecology related matters raised in KCC, DDC and TDC Relevant Representations,
12 August 2025	TDC, DDC and KCC Meeting	Project update and timeline, thematic updates, ongoing decision-making
9 September 2025	TDC, DDC and KCC Meeting	Project update and timeline, thematic updates, ongoing decision-making
14 October 2025	Ecology Thematic Meeting	A meeting to discuss the ecology related matters raised in KCC, DDC and TDC Principal Areas of Disagreement Summary Statements.
14 October 2025	TDC, DDC and KCC Meeting	Project update and timeline, thematic updates, ongoing decision-making
18 November 2025	TDC, DDC and KCC Meeting	Project update and timeline, thematic updates, ongoing decision-making
9 December 2025	DDC and KCC Meeting	Project update and timeline, thematic updates, ongoing decision-making

## 3. Areas of Discussion Between the Parties

### 3.1 Policy, consenting route, coordination and site selection

**Table 3.1 Policy, consenting route, coordination and site selection**

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.1.1	N/A	DCO consenting route	The Consultee agrees with the DCO consenting route for the Proposed Project.	On 31 March 2022, the Secretary of State (SoS) issued a direction under Section 35 of the Planning Act that the Proposed Project is to be treated as a proposed application for which development consent is required. In making the direction, the SoS is of the view that the Proposed Project is nationally significant.	Agreed
3.1.2	N/A	National Policy Statements	The Consultee agrees that the Proposed Project will be determined in accordance with the National Policy Statements (NPSs) (NPS EN-1, EN-3 and EN-5).	Section 104 of the Planning Act 2008 requires that the SoS decides the application in accordance with National Policy Statement for Energy (EN-1) (NPS EN-1), National Policy Statement for Renewable Energy Infrastructure (NPS EN-3), and National Policy Statement for Electricity Networks Infrastructure (EN-5) (NPS EN-5).	Agreed
3.1.3	N/A	Local Development Plan	<p>The Consultee has identified the following local planning policy documents that are relevant to the Proposed Project:</p> <ul style="list-style-type: none"> <li>• Dover District Local Plan To 2040 (2024);</li> <li>• Worth Neighbourhood Plan (2015);</li> <li>• Ash Neighbourhood Plan (2021);</li> <li>• Kent Minerals and Waste Local Plan 2024-2039 (2025); and</li> <li>• Kent Mineral Sites Plan (2020).</li> </ul>	While the assessment of the application for development consent for the Proposed Project should be made against the NPSs referred to above, the Development Plan for each Local Authority is likely to be an important and relevant consideration. The Applicant agrees that the local planning policy documents detailed in the column to the left are relevant to the Proposed Project.	Agreed
3.1.4	N/A	Development Plan allocations	The Consultee agrees that there are no Development Plan Allocations that overlap with the draft Order Limits.	The Applicant has not identified any DDC Development Plan allocations that overlap with the draft Order Limits.	Agreed
3.1.5	N/A	Need for the project	The Consultee agrees with the identified need for the Proposed Project.	<p>The network in and between East Anglia and the south-east of England needs reinforcing for four main reasons:</p> <ol style="list-style-type: none"> <li>1) the existing transmission network was not designed to transport electricity from where we increasingly now generate it (largely offshore)</li> <li>2) the growth in offshore wind, interconnectors and nuclear power means that more electricity will be generated in the years ahead than the current network is able to securely and reliably transport</li> <li>3) as a country, electricity demand is forecasted to at least double by 2050, increasing the amount of energy we need to transport to homes and businesses</li> </ol>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
				<p>4) upgrading the existing network as it is today (such as through replacing cables to carry more power) will not be enough to carry the amount of future power whilst operating to required standards.</p> <p>The Proposed Project is just one of several electricity network reinforcements that are needed to ensure the electricity transmission network is fit for the future.</p>	
3.1.6	<b>Application Document 8.3 Strategic Options Report (October 2023) [APP-370]</b>	Strategic Options	The Consultee agrees with the process, methodology and outcome of the strategic options appraisal presented in Strategic Option Report, Version A (see <b>Application Document 8.3 Strategic Options Report (October 2023) [APP-370]</b> ).	The process, methodology and outcome of the strategic options appraisal presented in Strategic Option Report, version A, October 2023, included as part of Statutory Consultation, is agreed (see <b>Application Document 8.3 Strategic Options Report (October 2023) [APP-370]</b> ).	Agreed
3.1.7	<b>Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]</b>	Site selection	The Consultee has reviewed the Option Selection and Design Evolution report (see <b>Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]</b> ) and agree with the methodology and conclusions of the site and route selection.	The methodology and outcome of the site and route selection presented in the Option Selection and Design Evolution Report, Version A, October 2023, included as part of Statutory Consultation, is agreed (see <b>Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]</b> ).	Agreed
3.1.8	<b>N/A</b>	Schedule 1 (authorised project)	The Consultee notes the title above this section states 'In the Districts of Thanet and Dover', however the paragraph also refers to Suffolk. The Consultee questions if the title should refer to the offshore works and if this title should move to Work no. 7. The Consultee notes National Grid's comment regarding the wording and agree this is acceptable.	This work number refers to the cable which starts in Suffolk and then comes ashore again in Dover. The current wording is therefore correct.	Agreed
3.1.9	<b>Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]</b>	Schedule 1 (authorised project)	The Consultee raises the question if there a document detailing how the temporary work compounds will be removed and timings for this	The Environmental Statement Chapter 4 Description of the Proposed Development ( <b>Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]</b> ) includes details of the temporary work compounds. These compounds will be restored following the end of construction at the specific location. The location and timing of the construction and restoration of the temporary work compounds will be confirmed through the onshore Construction Environmental Management Plan ( <b>Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127]</b> ) which will be brought forward under Requirement 6 on the draft DCO.	Agreed

3.2 Draft DCO

Table 3.2 Draft DCO

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.2.1	Application Document 3.1(E) (Version 2, Change Request) draft Development Consent Order [CR1-027]	Schedule 1 (authorised project)	The Consultee queries are the temporary towers included in ‘other works’ or should they be explicitly stated?	The Applicant has confirmed the temporary towers are covered by the Associated Development in Schedule 1.	Agreed
3.2.2	Application Document 3.1 (E) (Version 2, Change Request) draft Development Consent Order [CR1-027]	Schedule 3: Requirements	<p>The Consultee notes Schedule 3: Requirements States: <i>“The authorised development may not commence until a written scheme setting out all stages of the authorised development has been submitted to the relevant planning authority”</i> and similar wording is used in other paragraphs.</p> <p>The Consultee questioned where the works cross the boundaries of two Local Planning Authorities should both be notified and if this is the case, the wording in this section should read authority/authorities.</p>	Article 2 of the draft Order defines the relevant planning authority as meaning <i>“in any given provision of this Order, the local planning authority for the area to which the provision relates”</i> . Therefore, if the provision relates to more than one area, the definition will cover the relevant planning authority for each area, so references should just be to ‘relevant planning authority’ rather than ‘authorities’.	Agreed
3.2.3	<p>Application Document 3.1(E) (Version 2, Change Request) draft Development Consent Order [CR1-027]</p> <p>Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan – Kent [CR1-045]</p>	Schedule 3 (requirements): Management Plans	<p>The Consultee raised the following questions in regards to paragraph 6.2.2 of <b>Application Document 7.5.7.2 Outline Landscape and Ecological Management Plan – Kent [APP-349]</b>:</p> <ol style="list-style-type: none"><li>1. Do the ‘step in’ compulsory acquisition powers extend for the lifetime of the development?</li><li>2. Will the condition of the landscaping be reviewed periodically to ensure the objectives of the landscaping plan and screening are met and if so, how frequently will this be monitored?</li><li>3. Is there an option for a scheme to be required to be submitted which would details of measures that would be taken in the event monitoring shows the land is not effective in</li></ol>	The ‘step in’ compulsory acquisition powers are time limited and can be used for up to 7 years from the date of the DCO decision. The Outline Landscape Environmental Management Plan (LEMP) ( <b>Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan – Kent [PDA-035]</b> ) provides details of how proposed landscaping will be managed (Section 6) and monitored (Section 7), including frequency, with the reinstatement planting being maintained for a five-year period and mitigation planting being maintained for the lifetime of the asset as well as non-compliance (Section 7.3). Paragraphs 7.1.2-7.1.4 specifically set out that this will all be agreed in a monitoring programme with the relevant	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
			mitigating for the loss of FLL based on the bird survey results?	<p>planning authority and included in the detailed LEMP. Results from post-construction monitoring will feed into the management plan, and if required, management may be amended accordingly. DCO Requirement 6 requires that a detailed LEMP is prepared post consent for approval by the relevant planning authority and implemented as approved; with more detail contained within. This detailed LEMP will need to be substantially in accordance with <b>Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan – Kent [PDA-035]</b>.</p> <p>The Outline LEMP is to be updated and issued during Examination to provide further detail on the proposed duration and nature/frequency of golden plover monitoring.</p> <p>It is understood that DDC still have queries around this topic which it is proposed to discuss further during Examination.</p>	
3.2.4	<b>Application Document 3.1 (E) (Version 2, Change Request) draft Development Consent Order [CR1-027]</b>	Schedule 3 (requirements): Construction hours	The Consultee notes percussive piling works hours are proposed and Environmental Protection Officers have previously advised they would want to control piling to daytime weekday hours, given there are dwellings within a mile of the site – the Consultee is waiting for comments from the Environmental Protection Officers, and these comments will be sent to National Grid in due course.	The Proposed Project is required urgently to provide connections to developments required to meet net zero targets. Limiting hours for percussive piling could provide a constraint on the construction period, elongating construction and increasing the risk that timescales will not be met. The Applicant has set out restrictions on percussive piling works to be limited to 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays, with no percussive piling to occur on Bank Holidays unless otherwise approved by the relevant planning authority.	Under discussion
3.2.5	<b>Application Document 3.1 (E) (Version 2, Change Request)</b>	Schedule 3 (requirements): Construction hours	The Consultee's Environmental Protection Officers have advised that whilst there is a significant separation	The Proposed Project is required urgently to provide connections to developments	Under discussion



Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
	draft Development Consent Order [CR1-027]		<p>distance between the development work and the nearest residential within the district (approximately 1 mile), piling has a habit of causing issues with vibration and noise. They raise some concerns in respect of the start hour of 07:00am, suggesting an 8am start, although noting that again, distance would be a factor. They suggest that Thanet District Council, who have residential dwellings much closer to the development site will comment on the piling and working times.</p> <p>In the Consultee's PADSS they have retained the request that the daily start time for piling is 1 hour later than the Applicant seeks (to start at 08:00 instead of 07:00), in the interests of residential amenity.</p>	<p>required to meet net zero targets. Limiting hours for percussive piling could provide a constraint on the construction period, elongating construction and increasing the risk that timescales will not be met. The Applicant has set out restrictions on percussive piling works to be limited to 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays, with no percussive piling to occur on Bank Holidays unless otherwise approved by the relevant planning authority. To be discussed further.</p>	
3.2.6	Application Document 3.1(E) (Version 2, Change Request) draft Development Consent Order [CR1-027]	Schedule 3 (requirements): contaminated land	The Consultee raised the following question with National Grid: Will a verification report be submitted to demonstrate any works required have been carried out in accordance with the approved written scheme?	This question is agreed by the Applicant. A sentence requiring submission of a verification report has been added to the requirement on contaminated land (now Requirement 10) to address this comment.	Agreed

3.3 Consultation

Table 3.3 Consultation

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.3.1	N/A	Consultation Strategy	The Consultee agrees with the Consultation Strategy prepared by National Grid.	The Consultation Strategy has been prepared taking account of input from the Consultee. The final version was issued to the Councils on 20 October 2022. The approach and content are agreed to be adequate and represent a satisfactory approach to consultation.	Agreed
3.3.2	N/A	Consultation Zones	The Consultee agrees that the PCZ and SCZs agreed are adequate and satisfactory.	Primary Consultation Zones (PCZ) and Secondary Consultation Zones (SCZ) identified for the purpose of non-statutory consultation are adequate and satisfactory.	Agreed

### 3.4 Landscape and Visual

**Table 3.4 Landscape and Visual**

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.4.1	<b>Application Document 7.5.9.2 Outline Public Rights of Way (PRoW) Management Plan – Kent [APP-353]</b>	Interface with other disciplines	The Consultee agreed the approach to the interface with other disciplines within the 20 February 2024 meeting.	The Applicant landscape team have been interfacing with other disciplines such as heritage and ecology and as part of a wider multi-disciplinary team to progress the Proposed Project masterplanning and input into documents including <b>Application Document 7.5.9.2 Outline Public Rights of Way (PRoW) Management Plan – Kent [APP-353]</b> , as secured by Requirement 6 of Schedule 3 of <b>Application Document 3.1 (E) (Version 2, Change Request) draft Development Consent Order [CR1-027]</b> .	Agreed
3.4.2	<b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual [APP-061]</b>  <b>Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]</b>	Landscape Character baseline	The Consultee raised no concerns on the basis of the landscape assessment as set out in the PEIR and acknowledged that the ES will provide further information.  The Consultee confirmed agreement to the approach to the landscape character baseline within 16 April 2024 meeting.	The Landscape Character Areas (LCAs) were set out in the baseline section of the PEIR. The Statutory Consultation response from the Consultee requested further detail of the key characteristics of the LCAs which have been included within the ES ( <b>Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]</b> ).	Agreed
3.4.3	<b>Application Document 6.4.3.1 Landscape and Visual [APP-240]</b>	Visual Amenity baseline	The Consultee raised no concerns of the representative viewpoint selection as set out in the PEIR.  The Consultee confirmed agreement on the approach to the visual amenity baseline within the 16 April 2024 meeting.	The representative viewpoints were set out in the baseline section of the PEIR and set out in <b>Representative Viewpoint Visualisations</b> in <b>Application Document 6.4.3.1 Landscape and Visual [APP-240]</b> .	Agreed
3.4.4	<b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual [APP-061]</b>	Assessment of effects	The Consultee acknowledged and agreed this approach to the assessment of effects within the 20 February 2024 meeting.	The assessment of effects on landscape character and visual amenity were presented within the PEIR. The PEIR is a preliminary assessment and effects on landscape character and visual amenity have been further assessed with more detail within the ES chapter ( <b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]</b> ) in line with the methodology and professional judgement. This also includes an assessment of effects at operation year 15.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.4.5	<b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual [APP-061]</b>	Study Area	The Consultee confirmed agreement on the approach to the study area within the 16 April 2024 meeting.	The Study Area, which comprises an area of 3 km from the Order Limits, including the Minster Converter Station and Minster Substation, was set out within the PEIR and is the same for the ES and is covered in <b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]</b> .	Agreed
3.4.6	<b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual [APP-061]</b>  <b>Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]</b>	Growth rates of mitigation planting and photomontages	The year 1 and year 15 photomontage approach was discussed in the 10 May 2023 meeting and no concerns have been raised.  The Consultee initially did not provide comments on the issued growth rates, but there was ongoing works with the growth rates and were to be reissued to the Consultee once ready for review and agreement. The Consultee confirmed agreement to the proposed growth rates in an email sent on 8 January 2025.	The growth rates of mitigation planting have been discussed with the Consultee and the Applicant and this information has been shared for comment, with the Consultee confirming agreement on 8 January 2025. The photomontages have been produced for the ES at year 1 and year 15 of operation.	Agreed
3.4.7	<b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual [APP-061]</b>	LVIA methodology	The Consultee confirmed agreement on the LVIA approach within the 16 April 2024 meeting.	The LVIA methodology was set out within the PEIR and is the same for the ES with minor amendments following the published GLVIA3 Clarifications Technical Guidance Note.	Agreed
3.4.8	<b>Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]</b>	Photomontage methodology	The Consultee confirmed agreement on the approach to the photomontage methodology within 16 April 2024 meeting.	The Photomontage methodology was updated following the PEIR and is the same for the ES.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.4.9	<b>Application Document 7.12.2 Design Principles – Kent [APP-367]</b>	Design principles and landscape strategy and mitigation plans	The Consultee agreed to the design principles and landscape strategy and mitigation plans in an email sent on 8 January 2025.	Design principles have been prepared and accompany the ES and draft mitigation plans have been shared with stakeholders, which are set out in <b>Application Document 7.12.2 Design Principles - Kent [APP-367]</b> .	Agreed
3.4.10	<b>Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan – Kent [CR1-045]</b>	Approach to Outline Landscape and Ecology Management Plan	The Consultee noted that the structure of the outline LEMP will be shared with them in due course and agreed to the approach to separate outline LEMP for Kent and Suffolk in a meeting on 16 April 2024. The Consultee received a draft outline LEMP to review, with confirmation of agreement to the approach sent out to National Grid on 8 January 2025.	Objectives have been set out and these have been developed through in the production of materials to account for the ongoing ecology survey work that has occurred.  The Applicant issued a draft outline LEMP to the Consultee for review, with agreement received on 8 January 2025.	Agreed
3.4.11	<b>Application Document 3.1 (E) (Version 2, Change Request) draft DCO [CR1-027]</b>	Approach to Indicative Species Mix	The Consultee notes that indicative species mix has been discussed during thematic meetings, with the approach to this matter agreed in an email on 8 January 2025.	The Applicant confirm agreement on the indicative species mixes. This includes the proposed mix % distribution and range of heights to be used in the year 15 visualisations (where relevant). This includes a variable distribution across the species to increase future resilience. The indicative species mix can be agreed at the detailed design stage as part of approval of the detailed LEMP under Requirement 6, Schedule 3 of the draft DCO ( <b>Application Document 3.1 (E) (Version 2, Change Request) draft DCO [CR1-027]</b> ).	Agreed
3.4.12	<b>Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]</b>	Photosheet template	The photosheet template, for site photos and images, was issued to the Consultee on 2 August 2024. The Consultee has agreed to and noted agreement to the photosheet template in an email dated 8 January 2025.	The Applicant notes the agreement from the Consultee on the template for the visualisations that have been presented within the ES ( <b>Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]</b> ).	Agreed
3.4.13	<b>N/A</b>	Cumulative sequential visual assessment	The Consultee received the Sequential Cumulative Visual Assessment document for comment on 28 August 2024 and agreed to all matters presented within the assessment on 8 January.	The Applicant issued the Sequential Cumulative Visual Assessment (which is not an application document but was shared for reference) on 28 August 2024 and notes the agreement from the Consultee on the routes that have been assessed within the cumulative sequential visual assessment.	Agreed
3.4.14	<b>N/A</b>	Landscape and Visual value judgements	The Consultee received the Kent Landscape and Visual Value document from National Grid, with comments requested, on 28 August 2024. The Consultee reviewed the document and noted agreement to all matters in an email sent to National Grid on 8 January 2025.	The Applicant issued the Kent Landscape and Visual Value document (which is not an application document but was shared for reference) to the Consultee for review and comment on 28 August 2024. The Applicant notes the agreement from the Consultee on all matters set out in the landscape and visual value judgements that are made within the ES.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.4.15	N/A	Landscape and visual sensitivity ratings	The Consultee received the Sensitivity Ratings document from National Grid, with the request for comments. The Consultee agreed to and noted agreement to all matters set out in the document and provided this to National Grid on 8 January 2025.	The Applicant issued the Sensitivity Ratings document (which is not an application document but was shared for reference) to the Consultee on 28 August 2024 and requested comments to be provided. The Applicant notes the agreement from the Consultee on all matters set out in the sensitivity ratings for the LVIA methodology, provided on 8 January 2025.	Agreed
3.4.16	N/A	Visual Appendix Structure Example	The Consultee received the Visual Appendix Structure Example – BTNO 1 and 2 document from National Grid, with a request for comments to be provided. The Consultee has agreed to and noted agreement to all matters set out in the document and provided this to National Grid on 8 January 2025.	The Applicant issued the Visual Appendix Structure Example – BTNO 1 and 2 (which is not an application document but was shared for reference) to the Consultee on 28 August 2024 and requested comments to be provided. The Applicant notes the agreement from the Consultee on an example application relating to the visual appendix structure, provided on 8 January 2025.	Agreed



## 3.5 Ecology and Biodiversity

**Table 3.5 Ecology and Biodiversity**

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.5.1	<b>Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology &amp; Biodiversity [REP1-049]</b>	Mitigation	Matters have been raised by Kent County Council. Deferred to Kent County Council.	Details of mitigation, including for protected species have been detailed in the ES ( <b>Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology &amp; Biodiversity [REP1-049]</b> ) and are secured through <b>Application Document 9.84 Register of Environmental Actions and Commitments (REAC)</b> submitted at Deadline 3.	Deferred to Kent County Council
3.5.2	<b>Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology &amp; Biodiversity [REP1-049]</b>  <b>Application Document 6.3.3.2.A ES Appendix 3.2.A Extended Phase 1 Habitat Survey Report [APP-147]</b>	Phase 1 Habitat Survey coverage	The phase 1 Habitat Survey is still under discussion between the Consultee and National Grid as the extent and locations for the ongoing and proposed species surveys have not been provided to the Consultee.	The full extent of the survey area, as set out in <b>Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology &amp; Biodiversity [REP1-049]</b> and <b>Application Document 6.3.3.2.A ES Appendix 3.2.A Extended Phase 1 Habitat Survey Report [APP-147]</b> , has now been ground-truthed (verifying information obtained by flyover surveys by obtaining direct measurements and observations) due to improved access. The intertidal zone was not previously targeted for ground truthing as intending to use trenchless techniques.	Agree
3.5.3	<b>Application Document 6.1.2.5 (C) Part 1 Introduction Chapter 5 EIA Approach and Methodology [REP2-003]</b>  <b>Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]</b>	Role of mitigation hierarchy, including avoidance	The role of mitigation hierarchy, including avoidance within the Proposed Project is still under discussion between the Consultee and National Grid. The Consultee notes that the mitigation hierarchy should be adequately applied and should be demonstrated within the ES.	As set out in paragraph 5.4.5 of <b>Application Document 6.1.2.5 (C) Part 1 Introduction Chapter 5 EIA Approach and Methodology [REP2-003]</b> , the mitigation hierarchy has been followed when developing the Proposed Project. Each topic chapter of the ES identifies proposed mitigation measures, which follow the mitigation hierarchy as described in paragraph 5.4.6. Therefore, from an Ecology and Biodiversity perspective, the embedded measures, control and management measures and additional mitigation measures set out in <b>Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]</b> demonstrate how the mitigation hierarchy has been followed. Measures to first avoid potential adverse impacts are set out in the embedded measures, with measures to minimise potential adverse impacts also set out here and in the control and management measures. These are taken account of first in the assessment, with additional mitigation measures applied last to mitigate or offset any remaining likely significant effects.	Under discussion
3.5.4	<b>Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology &amp; Biodiversity [REP1-049]</b>	Use of trenchless solution for Thanet Coast and Sandwich Bay SPA	The use of trenchless solution for Thanet Coast and Sandwich Bay SPA is still under discussion between the Consultee and National Grid as insufficient detail and justification regarding the trenchless methods has been provided.	The Applicant have confirmed that the trenchless solution will be taken. The main works contractor will confirm which specific trenchless technique will be implemented as and when required. The information was included in <b>Application Document 9.13 (B) Pegwell Bay</b>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
				<b>Construction Method Technical Note [REP2-011]</b> published at Deadline 2.	
3.5.5	<p><b>Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology &amp; Biodiversity [REP1-049]</b></p> <p><b>Application Document 9.84 Register of Environmental Actions and Commitments (REAC)</b> submitted at Deadline 3</p> <p><b>Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339]</b></p>	HVDC cable crossing of Thanet Coast & Sandwich Bay Special Protection Area (SPA) and Ramsar site	The HVDC cable crossing of the Thanet Coast & Sandwich Bay SPA and Ramsar Site is still under discussion with the Consultee and National Grid. This is because there has been insufficient consideration of the preliminary effects provided to the Consultee.	<p>The Applicant confirmed that they would not be following the trenched installation method implemented by Nemo Link, with the intention to use trenchless techniques. The Applicant confirmed that trenchless methods will be possible, and this has been committed to in the DCO application under <b>Application Document 9.84 Register of Environmental Actions and Commitments (REAC)</b> submitted at Deadline 3 and <b>Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339]</b>, such that there will be no surface excavation of saltmarsh. Risk of ‘frac out’ is also considered in the ES (<b>Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology &amp; Biodiversity [REP1-050]</b>). Not considered a significant risk of ‘frac out’ as part of the Proposed Project works. Geotechnical studies confirming HDD is possible form part of the DCO documents (<b>Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology &amp; Biodiversity [REP1-050]</b>, <b>Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339]</b> and <b>Application Document 9.84 Register of Environmental Actions and Commitments (REAC)</b> submitted at Deadline 3.</p> <p>Further information was included in <b>Application Document 9.13 (B) Pegwell Bay Construction Method Technical Note [REP2-011]</b>.</p>	Under discussion
3.5.6	<b>Application Document 9.13 (B) Pegwell Bay Construction Method Technical Note [REP2-011]</b>	Horizontal Direct Drilling (HDD)	This matter is still under discussion with the Consultee and National Grid as further information on the location and impacts are required by the Consultee.	The Applicant to provide further information on location and impacts of the HDD as well as the jack-up barge (which is equipment used for offshore drilling) following submission of the DCO application. The information will be included in <b>Application Document 9.13 (B) Pegwell Bay Construction Method Technical Note [REP2-011]</b> .	Under discussion
3.5.7	<p><b>Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology &amp; Biodiversity [REP1-049]</b></p> <p><b>Application Document 6.6 (D) Habitats Regulations Assessment Report [REP2-009]</b></p>	Golden Plover Offsetting Land in Kent	The Consultee notes the strategy has been discussed with Natural England and agreed in principle with this strategy. The Consultee notes Natural England have primacy on this issue since it is an HRA matter.	<p>The Applicant considered options, including identifying an area of farmland in the lower Stour Valley, larger than the area of arable land to be permanently lost, and convert it to grazing marsh/damp grassland. Ultimately enhanced management of an existing arable area was included in the Order Limits. This has been deemed acceptable offsetting to Natural England for other DCOs . The ES sets out that any temporary displacement of the golden plover during construction would be offset in the long term through the enhancement of the arable land identified.</p> <p>The Applicant has noted that the Consultee has asked for confirmation that lighting proposed is not inappropriate. The Applicant confirmed that the golden plover mitigation</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
				area has been subject to wintering bird survey which has recorded golden plover in the area and confirmed the site is not illuminated at night. This has been covered in the <b>Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology &amp; Biodiversity [REP1-049]</b> and <b>Application Document 6.6 (E) Habitats Regulations Assessment Report</b> submitted at Deadline 3.	
3.5.8	<b>Application Document 9.84 Register of Environmental Actions and Commitments (REAC)</b> submitted at Deadline 3	Collision risk from new overhead line	This matter is still under discussion between the Consultee and National Grid and further information on the collision risk is required by the Consultee.	The Applicant confirmed collision risk assessment has concluded that no significant collision risk from birds and has been supported by 12 months of vantage point surveys of the line location, and carcass searches of the existing OHL. Mitigation has been included in the form of hanging bird diverters which have been set out in <b>Application Document 9.84 Register of Environmental Actions and Commitments (REAC)</b> submitted at Deadline 3. Collision risk assessment has been reviewed by Natural England who agree with its basic conclusion.	Under discussion
3.5.9	<b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual [APP-061]</b>  <b>Application Document 9.84 Register of Environmental Actions and Commitments (REAC)</b> submitted at Deadline 3	Recovery of mudflats	The Consultee highlighted to National Grid the need to ensure recovery of the mudflats in the intertidal zone from the HDD connection works. The Consultee will review any details on mudflat recovery following submission of the DCO application.	The Applicant has provided details on mudflat recovery in <b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual [APP-061]</b> and the commitment has been secured in <b>Application Document 9.84 Register of Environmental Actions and Commitments (REAC)</b> submitted at Deadline 3.	Under discussion
3.5.10	<b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual [APP-061]</b>  <b>Application Document 9.84 Register of Environmental Actions and Commitments (REAC)</b> submitted at Deadline 3	Riparian mammal habitat continuity	The Consultee highlights to National Grid the need to provide details of the type of culvert to be used to ensure no disruption of connectivity in ditches. The Consultee will review any details on the type of culvert and the riparian mammal habitat continuity following the submission of the DCO application.	The type of culvert has been set out in the DCO and Register of Environmental Actions and Commitments ( <b>Application Document 9.84 Register of Environmental Actions and Commitments (REAC)</b> submitted at Deadline 3.) These have been designed to preserve the bed of the ditch and allow connectivity for riparian mammals. This can be found in <b>Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]</b> .	Agreed (will also be subject to EA or IDB consent)
3.5.11	<b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b>	Biodiversity Net Gain	BNG assessment indicates 0.485 ha of coastal and floodplain grazing marsh (CFGF) (9.6 units) will be permanently lost as a result of the bases of the overhead line pylons which does not appear to be fully compensated for in the BNG habitat creation proposals and it is not clear how this aligns to the mitigation proposals in the environmental statement (ES) for impacts to the local wildlife site and CFGF priority habitat.	As there were discrepancies between the ES and the BNG report, additional work was undertaken to confirm the accuracy of habitat classifications and areas indicated as permanent habitat loss. The Biodiversity Net Gain Feasibility Report was subsequently updated ( <b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b> ).  Table 3.16 in the <b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b> details the loss of 1.95 ha of CFGF with the loss of 27.41 habitat units. The majority of this habitat loss is temporary	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
			Provide further information on how the loss of these units will be compensated.	and is attributed to the haul road associated with the installation of the OHL Pylon bases.  Of this 1.95 ha a total of 1.91 ha is to be reinstated post development and has been input in the Statutory Biodiversity Metric (SBM) with a 3 year delay to habitat creation as this represents the maximum length the haul road and other associated works will be in place for. The reinstatement of these habitats generates a total of 4.8 habitat units.	
3.5.12	<b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b>	Biodiversity Net Gain	BNG feasibility report is not complete, with no plans included in the appendices, no details of the habitat condition assessments (baseline or proposed) and no biodiversity metric submitted.	Appendix A provides Site Location plans, Appendix B provides Baseline Habitat Plans and Appendix C provides Post Development Habitats.  <b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b> was updated and submitted in response to the Section 89(3) letter from PINS. The updated version which includes all the appendices is: <b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b> .  Condition assessment data for baseline habitats will be issued in due course during the Examination period.	Under discussion
3.5.13	<b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b>	Biodiversity Net Gain	BNG feasibility report states the biodiversity metric trading rules have not been accounted for due to the potential for constraints to delivery of the BNG requirement.  Whilst BNG is not mandatory for NSIPs, NGET has committed to delivering 10% BNG. The TCPA framework for BNG has been applied in calculations and it seems appropriate to adhere to these provisions; submission of the biodiversity metric would allow scrutiny of any deviation from the trading rules, with any deviations subject to commentary and justification by NGET, ensuring clarity and full disclosure for habitats created/enhanced to ensure the project does not result in a loss of biodiversity units and will achieve the intended 10% net gain.  NGET to provide further information on BNG.	There is currently no legislative requirement for BNG for Nationally Significant Infrastructure Projects (NSIPs), however there are policy drivers within the National Policy Statements (NPS) (EN-1 and EN-5). As such there is also no guidance for the application of BNG for NSIPs. Current guidance for BNG assessments has been developed for the mandatory Town and Country Planning Act (TCPA) framework. In the absence of specific BNG guidance relating to NSIPs this assessment has followed the majority of the principles and rules of the TCPA guidance documentation where appropriate.  A key deviation from the SBM guidance is the non-application of trading rules within this assessment. Applying these rules would likely result in disproportionate BNG requirements and could constrain delivery. However, the trading rule summaries have still been used to guide the Proposed Project's aspirations, helping inform the types and distinctiveness levels of habitats it aims to deliver. The Proposed Project will not seek to comply with trading rules assigned within then SBM, Trading rules are to be used as a guidelines for site selection for Off-Site BNG delivery. If opportunities arise to secure habitat enhancement or creation that delivers greater benefits for biodiversity and is in-line with targets in Local Nature Recovery Strategies (LNRS) (where available) and deliver wider environmental and societal benefits these options	Under discussion



Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
				will be taken forward regardless of whether these options align with trading rules.	
3.5.14	<b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b>	Biodiversity Net Gain	Extensive use of tables in the submission to present BNG data is very difficult to interrogate, the biodiversity metric and clear mapping of habitats should be sought.  NGET could provide information in the form of the biodiversity metric and maps of habitats.	Appendices are now provided which includes habitat mapping. <b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b> was updated and submitted in response to the Section 89(3) letter from PINS. The updated version which includes all the appendices is: <b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b> .	Under discussion
3.5.15	<b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b>	Biodiversity Net Gain	In the absence of appendices in the submission, it is not clear which habitat areas have been included in the baseline or post-development BNG assessment.  NGET to provide map of habitat areas included in baseline and post-development BNG assessment.	<b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b> was updated and submitted in response to the Section 89(3) letter from PINS. The updated version which includes all the appendices is: <b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b> .	Under discussion
3.5.16	<b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b>	Biodiversity Net Gain	The submission concludes the proposal will result in a net loss of all three biodiversity metric modules (area, hedgerow and watercourse units) for the Kent site. When summed with the Suffolk BNG assessment, the project will result in a net loss of area and watercourse units, with a small net increase in hedgerow units. Units are required for all three modules to reach the target 10% net gain across the whole project. Proposal indicates off-site units would be secured in accordance with NGET's stated approach. The approach does not include an undertaking to ensure delivery of these off-site units close to the project location(s).  NGET to provide clarification on how the off-site units will be delivered close to the project location.	The Proposed Project is committed to delivering a 10% gain in both Kent and Suffolk, as detailed in paragraph 5.2.3 and 5.3.7, opportunities for additional habitat creation and enhancement on-site are limited, and land outside the BNG parameters line will need to be considered. The Proposed Project is currently engaging with relevant stakeholders to look for options for off-site BNG delivery. The preference for off-site delivery is firstly within the same local planning authority and NCA as the Proposed Project. Only once all options for BNG delivery within this area are exhausted will the search for sites be expanded. Further consultation with the relevant local planning authorities will be undertaken once a shortlist of potential off-site delivery sites has been created.	Under discussion
3.5.17	<b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b>	Biodiversity Net Gain	There is no embedded provision to ensure the local planning authority is funded to undertake any necessary monitoring of the delivery of the approved scheme.  NGET to provide clarification on how this would be addressed.	As stated in the <b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b> <i>"Due to the linear nature of the Proposed Project, meaning that it encompasses land that is within the ownership of a large number of landowners across both the Suffolk and Kent Onshore Scheme, it is not considered feasible to secure legal obligations for active management of land within the BNG Parameters Line (for a 30 year period of monitoring and maintenance)."</i> This statement relates to habitats that are outside the land ownership of the Applicant and that are only subject to temporary impacts.  The habitat creation proposals located within land owned by the Applicant (predominantly surrounding the converter station) is included within the OLEMP ( <b>Application</b>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
				<p><b>Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape &amp; Visual [APP-061])</b> and are to be managed, with associated monitoring, for the lifetime of the asset.</p> <p>As the habitat creation measures included on-site do not deliver a large number of units or cover a large area relative to the size of the order limits, it may be that the created habitats (habitats to be newly created surrounding the converter station) are not classified as a significant enhancement. Non-significant enhancements are not required to be monitored for a 30-year period. This is to be further discussed with Dover District Council, Thanet District Council and Kent County Council.</p> <p>If it is concluded that the on-site habitat creations are deemed to be significant, these will be secured by a suitable legal agreement and will include provision of funds to allow for the relevant local planning authority to undertake necessary monitoring following the delivery of the approved scheme.</p> <p>Furthermore, it is proposed in the <b>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]</b> that long-term management, monitoring and reporting will be undertaken for a minimum of 30 years:</p> <ol style="list-style-type: none"> <li>1. on-site by the Applicant through its supply chain;</li> <li>2. off-site by commercial providers as part of their commercial habitat banking package, secured through a legal agreement;</li> <li>3. off-site through partnership agreements, with arrangements specific to the partner(s) circumstances, secured through legal agreement.</li> </ol>	
3.5.18	N/A	Ecology	<p>It is not adequately demonstrated in the submission how the enhancement proposal contributes to the local wildlife site (LWS) designation.</p> <p>The River Stour forms the northern boundary of the Ash Level and South Richborough Pasture LWS but the designation relates primarily to the botanically species-rich ditches and their marginal vegetation. The outline landscape and ecology management plan (OLEMP) describes the proposed scrapes as enhancements to the River Stour corridor.</p> <p>On the south side of the River Stour, this could also enhance the LWS though as this area appears to already comprise CFGM damp ground and scrapes, alternative locations for enhancement within the LWS would be more beneficial to LWS biodiversity.</p>	<p>The two scrapes on the south bank of the River Stour within Ash Level would contribute botanically to the structural diversity of the Local Wildlife Site by diversifying the wetland habitat opportunities for plants and invertebrates. It would also diversify opportunities for wetland birds similar to other scrapes created in the area and would complement the changes in habitat management that have been introduced by Natural England as part of the Lower Stour Wetland Restoration Project. While these fields are floodplain grazing marsh the areas identified for scrapes do not currently contain any scrapes or similar habitat.</p>	Under discussion



Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
			Provide further information on how the enhancements proposed would contribute to LWS designation.		
3.5.19	<b>Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan – Kent [PDA-035]</b>	Ecology	<p>ES states the invasive non-native water fern (Azolla filiculoides) has been recorded in the ditches on the site but it is not clear whether this relates to ditches in the Ash Level and South Richborough Pasture Local Wildlife Site as these do not appear to have been subject to the aquatic macrophyte survey.</p> <p>Clarification needed.</p>	<p>Azolla is present in the River Stour and therefore is likely to be present within the ditches in Ash Level. In addition to Azolla, the Applicant can confirm that Nuttalls Waterweed has been recorded within the ditches in Ash Level during macroinvertebrate surveys. The Applicant could therefore add this species to the list for which localised control is proposed for Ash Level: NUTTALLS WATERWEED - Environment Controls.</p> <p>Paragraph 5.3.3 of <b>Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan – Kent [PDA-035]</b> does not limit the invasive species control to Azolla but cites Azolla control as a particular example. This is another detail to be confirmed between <b>Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan – Kent [PDA-035]</b> and the Detailed Landscape Ecological Management Plan, which will occur post-DCO and pre-construction.</p>	Under discussion
3.5.20	<b>Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan – Kent [PDA-035]</b>	Ecology	<p>No long-term management of the scrapes is proposed in the OLEMP though annual checks of the planting is proposed for the first five years. No assurance that the scrape features will be retained is provided in the submission. Given the conclusion that these are necessary to mitigate for impacts to the local wildlife site, provision for monitoring of these habitat features will be necessary and should be secured along with any necessary remedial management measures.</p> <p>Submission of measures to secure retention and long-term management of scrapes beyond the first five years and details of remedial management measures which may be required, including who would be responsible for implementing these and monitoring the scrapes.</p>	<p>Noted. The Applicant can confirm that these features are intended to remain for the duration of the converter station (i.e. minimum 40 years) although they should not require much if any long-term management. The Applicant could make that clearer in <b>Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan – Kent [PDA-035]</b>. Paragraph 6.9.1 of <b>Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan – Kent [PDA-035]</b> states regarding these scrapes that ‘...there will be annual checks for the first five years following planting to ensure that the desired species have established, to undertake any remedial planting, and to identify and, if necessary, eradicate any invasive species that colonise.’</p>	Under discussion
3.5.21	<b>N/A</b>	Ecology	<p>With reference to the compensation land proposed for the loss of functionally linked land, the ES should take into account the viability and likelihood of compliance with the rules over the 80 years for which this will be secured.</p> <p>Submission of further information, including monitoring and remedial measures to be taken if this is not successful.</p>	<p>Remedial action for the compensation land would be based on the suitability of management fulfilling prescriptions, since the prescriptions are of a type that would benefit golden plover and deviation from those prescriptions would indicate management is no longer suitable. This could be done through for example submission of cropping plans. The Applicant would be open to discussing how often checks are undertaken to ensure the management is happening in line with requirements and to add in reference to further wintering bird surveys during the functional period.</p> <p>It is intended that the land will be leased to a contractor/farmer to fulfil the cropping and management</p>	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
				restrictions. The terms of the lease will stipulate the farming practices required, should these practices not be delivered or be inadequate. The Applicant has the ability to take back possession of the land and ensure the management is undertaken properly. In relation to the Book of Reference, the land is identified as Class 1 (freehold acquisition) in the Class of Rights to enable the Applicant to control the activities rather than only seeking rights over the land which in these circumstances are more difficult to manage and enforce.	
3.5.22	<p><b>Application Document 6.4.3.2.C ES Figures Kent Wintering Bird 2023-2024 Part 1 of 2 [APP-246]</b></p> <p><b>Application Document 6.4.3.2.C ES Figures Kent Wintering Bird 2023-2024 Part 2 of 2 [APP-247]</b></p>	Ecology	<p>Regarding the proposed compensation land, no details of the reported “wintering bird surveys undertaken since December 2024” are supplied in the submission so cannot be checked or verified.</p> <p>Submission of the wintering bird surveys for the proposed compensation land.</p>	<p>The wintering bird surveys for 2024 were completed and the results of the surveys will be reported during the Examination period. The <b>Application Document 9.28 Winter Bird Use of Golden Plover Enhancement Area [REP2-013]</b> was submitted at Deadline 2.</p> <p>Note that golden plovers were not confirmed using the site (this was an error in referencing the emerging survey data while the survey was ongoing and before the data had been fully analysed) but have been confirmed flying over the site so they are in the area.</p>	Under discussion
3.5.23	N/A	Ecology	<p>Regarding the proposed compensation land, it is not clear if consideration of the potential for proposed developments near to the site limiting its suitability for golden plover has been made.</p> <p>The Council wish to highlight outline planning permission DOV/14/00058 for various development including the erection of 500 dwellings at Discovery Park to the east of this site, which has been implemented and several reserved matters applications for residential development have been granted with some currently pending consideration (including DOV/25/00460, DOV/25/00459, DOV/23/01351). The Council considers this results in the potential for increased noise, lighting and increased use of the A258, as well as increased recreational use of nearby public rights of way and the River Stour corridor; and the Goshall Valley solar array (application DOV/23/01363) proposed on an area of the Ash Level and South Richborough Pasture Local Wildlife Site (southwest of Richborough Roman Fort) currently pending consideration. These potential development constraints to the success of the compensation land should be fully considered.</p> <p>Clarification from NGET that these proposals have been considered in assessing the likely suitability of the proposed compensation land.</p>	The Applicant can confirm that consideration has been given to the proximity of these developments, which were referred to in ecology thematic meetings. Discovery Park is approximately 70 m from the mitigation fields at their closest and is well screened by dense tree growth either side of the A256 (such that the fields are dark at night away from the immediate vicinity of the A256). The vast majority of the mitigation land is much further from Discovery Park. There is no public access to the mitigation fields and there is no intention of introducing public access. There is a public footpath along the River Stour but that is on the opposite bank from the mitigation land and is also separated by a dense wooded belt. The Goshall Valley Solar Farm site is approximately 400 m west of the mitigation fields and is separated by features such as a railway line, the River Stour and a dense wooded belt. It does not separate the mitigation fields from the rest of Ash Level to the west and is not considered to impede the ability of the mitigation land to function.	Under discussion

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.5.24	<b>Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan – Kent [PDA-035]</b>	Ecology	<p>The conclusion in the Report to Inform Habitats Regulations Assessment, that there will be no adverse effect on the site integrity of the Thanet Coast and Sandwich Bay SPA is based on the compensation land being secured and the OLEMP implemented, without which, there remains a risk of an adverse effect on the site integrity of the SPA. Whilst the OLEMP includes a ‘step in’ option for NGET to ensure the management of the compensation land is delivered, annual monitoring of golden plover use of the land is only proposed for the first 5 years, with subsequent monitoring consisting only of a check of management every 5 years in perpetuity (80 years), with no further wintering bird surveys after the first 5 years.</p> <p>This does not seem adequate to ensure the compensation land is functioning effectively and it is not clear from the OLEMP how the need for any remedial action for the compensation land would be identified or enforced.</p> <p>Clarification needed from NGET on how any remedial action for the compensation land would be identified and enforced.</p>	<p>The frequency of monitoring is a matter that could be agreed post-DCO between the outline LEMP and the production of the detailed LEMP. It is not considered that annual bird surveys would be required beyond the first five years but the Application would welcome discussions on how often checks are undertaken to ensure the management is happening in line with requirements and to add in reference to further wintering bird surveys during the functional period.</p> <p>Paragraphs 7.1.2 to 7.1.4 of the <b>Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan – Kent [PDA-035]</b> state that a post-construction monitoring programme and reporting procedure will be formalised, agreed with the relevant planning authority and included within the detailed LEMP, prior to construction works commencing, and that results from the post-construction monitoring will feed into the management plan and, if required, management may be amended accordingly. It is not possible to be specific regarding what remedial measures may be if one or more of the enhancement measures at the golden plover mitigation land proves to be insufficiently effective as it depends on what the issue is as to what would be done to address it.</p>	Under discussion
3.5.25	<b>N/A</b>	Ecology	<p>It is not clear if the local planning authorities would be responsible for discharging conditions (including the LEMP securing habitat enhancement measures) and whether this responsibility extends to monitoring compliance with the approved LEMP (particularly with compensation land being secured for 80 years).</p> <p>Clarity is needed on how the necessary monitoring resource within DDC would be funded and if the LEMP should be secured in a legal agreement so that a monitoring fee can be collected by DDC to support and ensure the effective delivery of the compensation land. Additionally, clarification is sought on what mechanism would be put in place for registering the land as a local land charge for this purpose.</p> <p>Clarification needed from NGET on how they envisage this being monitored for the 80 year period, if monitoring fees would be made available to the Council for this and how this would be secured to ensure the effective delivery of the compensation land.</p>	Matters are being considered and the Applicant will continue to engage with DDC on this point.	Under discussion

## 3.6 Cultural Heritage

**Table 3.6 Cultural Heritage**

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.6.1	N/A	County Council and Historic England	The Consultee agrees that KCC and Historic England (HE) are the primary stakeholders for cultural heritage matters relating to archaeology and scheduled monuments, so the Consultee defers to them on these topics. The Consultee acknowledges that National Grid have been engaging with KCC and HE regarding archaeology and cultural heritage. In relation to built heritage (listed buildings and conservation areas), DDC is the relevant authority.	The Applicant agrees that KCC and Historic England are the primary stakeholders for cultural heritage matters relating to archaeology and scheduled monuments and have been having meetings and discussions with these parties. The Applicant notes that the Consultee has been party to these discussions. In relation to built heritage, the Applicant agrees that DDC is the relevant authority.	Agreed
3.6.2	6.2.3.3 and 6.4.3.3 (part 1 of 2)	Local Policy	The consultee agrees with the Dover District Local Plan to 2040 (2024) policies identified and that there are no designated heritage assets (listed buildings) within the Order Limits.  Policy HE2 deals with Conservation Areas; the nearest being Sandwich Walled Town, however the Council agrees this can be scoped out as there are no conservation areas within the Order Limits.	The Applicant notes the Consultees response.	Agreed
3.6.3	6.2.3.3 and 6.4.3.3 (part 2 of 2)	Photomontages	The consultee agrees with the locations and alignment/directions of photomontages within the Dover District.	The Applicant notes the Consultees response.	Agreed
3.6.4	6.2.3.3	Assessment Criteria	The consultee agrees with the criteria for determining the value of a heritage asset, the criteria for determining the magnitude of impact, criteria for determining the significance of effect, the study area, and the heritage assets identified.	The Applicant notes the Consultees response.	Agreed
3.6.5	6.2.3.3	Assessment of Impacts and Likely Significant Effects	The consultee agrees with the scope of the assessment.	The Applicant notes the Consultees response.	Agreed
3.6.6	6.3.3.3.A	Assessment Methodology	The consultee agrees with the assessment methodology, study area, assets identified in the assessment of heritage significance section (deferring to Thanet District Council on those within its boundary and deferring to Historic England on Richborough Saxon Shore Fort).	The Applicant notes the Consultees response.	Agreed



## 3.7 Water Environment and Flood Risk

**Table 3.7 Water Environment and Flood Risk**

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.7.1	N/A	Project responses to statutory consultation comments	The Consultee agreed that National Grid's responses to the statutory consultation comments were appropriate.	Comments from the statutory consultation relating to flood risk, land drainage and hydrology within the Kent scheme were presented with individual responses showing how these will be addressed going forward. It is noted that the Consultee did not have any specific comments on flood risk as this matter is deferred to KCC for comment, but responses to the consultation comments were presented to the Kent LPAs together.	Agreed
3.7.2	<b>Application Document 6.8 Flood Risk Assessment [APP-292]</b>	Flood Risk Assessment (FRA) approach	The Consultee agreed with National Grid on the proposed scope and approach to the FRA and drainage and defer to KCC as Lead Local Flood Authority and the Environment Agency.	The proposed scope of the FRA prepared to support the DCO application was presented in advance to the Kent LPAs. This covered the sources of flood risk that would be assessed, the policy and guidance that would be followed and the datasets that would be referenced to inform it. This is all set out in <b>Application Document 6.8 Flood Risk Assessment [APP-292]</b> submitted with the DCO application.	Agreed
3.7.3	<b>Application Document 6.8 Flood Risk Assessment [APP-292]</b> <b>Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]</b>	Groundwater flood risk at Kent converter station site	The Consultee agreed with National Grid on the proposed approach to drainage solutions and conclusions of the groundwater flood risk at the Kent Converter site, as set out in <b>Application Document 6.8 Flood Risk Assessment [APP-292]</b> and <b>Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]</b> and defer to KCC as Lead Local Flood Authority and the Environment Agency.	Conclusions of the groundwater monitoring and flood risk assessment at the converter station site show an overall low risk of groundwater emergence at the site. Due to the poor infiltration, drainage solutions relying on infiltration during construction and operation will not be suitable or practical. The Applicant have shared the groundwater flooding technical note with the Consultee, which is not an application document, but was shared for information only. The groundwater flood risk and approach to this is presented in <b>Application Document 6.8 Flood Risk Assessment [APP-292]</b> and <b>Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]</b> .	Agreed
3.7.4	<b>Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]</b>	Dewatering requirements	The Consultee agreed in principle to the proposed dewatering requirements as set out in the National Grid position and defer to KCC as Lead Local Flood Authority and the Environment Agency and the Internal Drainage Board (IDB).	Permits that might potentially be required if dewatering is required: discharge consent, abstraction licence, flood risk activity permit (FRAP)/and land drainage consent (LDC) (for IDB watercourse-related activities). Noted that KCC are the LLFA.	Agreed
3.7.5	<b>Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water</b>	Proposed drainage designs	The Consultee agreed with National Grid and had no comments on approach to the proposed drainage designs, deferring to KCC as Lead Local Flood Authority and the Environment Agency and the IDB.	A combination of filter drains, cut-off drains, and attenuation ponds are proposed to be used along the cable route within construction compounds to manage drainage. All permanent and temporary drainage will be in line with Construction Industry Research and Information Association (CIRIA)	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
	Environment [APP-064] Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 3			Sustainable Drainage Systems (SuDS) guidance. This has been secured in the REAC ( <b>Application Document 9.84 Register of Environmental Actions and Commitments (REAC)</b> submitted at Deadline 3).	



3.8 Geology and Hydrogeology

Table 3.8 Geology and Hydrogeology

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.8.1	Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology & Hydrogeology [APP-065]	Assessment methodology presented in the ES	The Consultee will review the assessment methodology following the submission of the DCO application.	The Applicant includes detail on the geology and hydrogeology assessment methodology in <b>Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology &amp; Hydrogeology [APP-065]</b> .	Under discussion
3.8.2	Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology & Hydrogeology [APP-065]	Mitigation presented in the ES and Outline CEMP	The Consultee will review the proposed mitigation following the submission of the DCO application.	The Applicant sets out the proposed mitigation for geology and hydrogeology in <b>Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology &amp; Hydrogeology [APP-065]</b> . The mitigation is secured via commitments set out in <b>Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127]</b> .	Under discussion
3.8.3	Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology & Hydrogeology [APP-065]	Assessment conclusions presented in the ES	The Consultee will review the assessment conclusions following the submission of the DCO application.	The Applicant includes detail on the geology and hydrogeology assessment set out in <b>Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology &amp; Hydrogeology [APP-065]</b> .	Under discussion

### 3.9 Agriculture and Soils

**Table 3.9 Agriculture and Soils**

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.9.1	<b>Application Document 6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture &amp; Soils [PDA-023]</b>	Assessment methodology presented in the ES	The Consultee will review the assessment methodology following the submission of the DCO application.	The Applicant includes detail on the agriculture and soils assessment methodology in <b>Application Document 6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture &amp; Soils [PDA-023]</b> .	Under discussion
3.9.2	<b>Application Document 6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture &amp; Soils [PDA-023]</b>  <b>Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]</b>	Mitigation presented in the ES and Outline Soil Management Plan	The Consultee will review the proposed mitigation following the submission of the DCO application.	The Applicant sets out the proposed mitigation for agriculture and soils effects in <b>Application Document 6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture &amp; Soils [PDA-023]</b> and <b>Application Document 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]</b> .  The mitigation is secured via commitments set out in <b>Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127]</b> .  The soil management plan will be secured by Requirement 6 of Schedule 3 of <b>Application Document 3.1 (E) (Version 2, Change Request) draft DCO [CR1-027]</b> .	Under discussion
3.9.3	<b>Application Document 6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture &amp; Soils [PDA-023]</b>	Assessment conclusions presented in the ES	The Consultee will review the assessment conclusions following the submission of the DCO application.	The Applicant includes detail on the agriculture and soils assessment in <b>Application Document 6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture &amp; Soils [PDA-023]</b> .	Under discussion

## 3.10 Traffic and Transport

**Table 3.10 Traffic and Transport**

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.10.1	<p><b>Application Document 6.2.3.7 Part 3 Chapter 7 Traffic and Transport [APP-067]</b></p> <p><b>Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [CR1-041]</b></p> <p><b>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]</b></p>	Proposed Project	The Consultee is generally supportive of the overall principal of the Proposed Project, which will improve energy security, provided that the impacts of the project are adequately assessed, appropriately mitigated and compensated as required. However, the Consultee defers to KCC Highways for matters relating to Traffic and Transport, including to review the impact of the development on the highway network.	The Applicant has noted the Consultee's comments. The traffic and transport assessment of the Proposed Project is contained within <b>Application Document 6.2.3.7 Part 3 Chapter 7 Traffic and Transport [APP-067]</b> based on the mitigation measures identified within that chapter, as well as the supporting management plans ( <b>Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [CR1-041]</b> and <b>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]</b> , as secured by Requirement 6 of Schedule 3 of <b>Application Document 3.1 (E) (Version 2, Change Request) draft Development Consent Order [CR1-027]</b> ). The Applicant acknowledge and agree that KCC Highways are the primary consultee for matters relating to the traffic and transport and have engaged in discussions and meetings with them.	Agreed
3.10.2	<b>Application Document 6.2.3.7 Part 3 Chapter 7 Traffic and Transport [APP-067]</b>	Traffic and Transport	The Consultee considers the scope of the Traffic and Transport assessment to be acceptable. Matters relating to traffic and transport will be addressed in any representations from the local highway authority (KCC) who must be consulted.	KCC Highways has been consulted accordingly and an assessment of the potential impact of the Proposed Project on the highway network is set out in <b>Application Document 6.2.3.7 Part 3 Chapter 7 Traffic and Transport [APP-067]</b> .	Agreed
3.10.3	<b>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [CR1-041]</b>	Construction Traffic Management Plan	The Consultee requests a Construction Management Plan (CMP) to alleviate concerns relating to construction traffic and access points. The CMP should provide details of construction vehicle routing, parking/turning areas, timing and number of HGV movements, wheel washing facilities, TTM/signage, access/egress arrangements, construction programme/duration and working hours. The Consultee notes the updates to the outline CTMP in relation to comments made and will review once the DCO application has been submitted.	<b>Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [CR1-041]</b> was prepared and supplied as part of Statutory Consultation for the Proposed Project. This has since been updated to reflect the feedback received and includes the information requested by the Consultee.	Under Discussion
3.10.4	<b>Application Document 6.2.3.7</b>	Policy	The Consultee considers the following policies to be relevant: TI1 – Sustainable Transport and Travel, TI2 –	These policies along with TI3 – Parking Provision on New Development, as well as policies within DDC's Local	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
	<p><b>Part 3 Chapter 7 Traffic and Transport [APP-067]</b></p> <p><b>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [CR1-041]</b></p> <p><b>Application Document 6.3.3.7.A ES Appendix 3.7.A Transport Assessment Note [APP-175]</b></p>		<p>Transport Statements, Assessments and Travel Plans which are from the Dover District Local Plan to 2040. The Consultee notes the approach for <b>Application Document 6.3.3.7.A ES Appendix 3.7.A Transport Assessment Note [APP-175]</b> has been agreed with KCC and defer to KCC for the final comments.</p>	<p>Development Framework are outlined within <b>Application Document 6.2.3.7 Part 3 Chapter 7 Traffic and Transport [APP-067]</b>. Considerations relating to sustainable travel including walking and cycling are provided within <b>Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [CR1-041]</b>, as secured by Requirement 6 of Schedule 3 of <b>Application Document 3.1 draft DCO [CR1-027]</b>. The components which typically form part of a Transport Assessment are sign-posted within <b>Application Document 6.3.3.7.A ES Appendix 3.7.A Transport Assessment Note [APP-175]</b> which supports <b>Application Document 6.2.3.7 Part 3 Chapter 7 Traffic and Transport [APP-067]</b>. The approach for <b>Application Document 6.3.3.7.A ES Appendix 3.7.A Transport Assessment Note [APP-175]</b> has been agreed with KCC.</p>	
3.10.5	<p><b>Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [CR1-041]</b></p>	Core Working Hours	<p>The Consultee requests further clarification on the proposed core working hours which are understood to now include Sundays and Bank Holidays e.g. in terms of the construction programme, how frequently works would be carried out on Sundays/Bank Holidays and potential impacts on traffic levels and PRoW users. The Consultee notes that the outline CTMP sets out the core working hours and agrees to this approach as long as works are completed in accordance with this commitment.</p>	<p>Further clarification is provided within <b>Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [CR1-041]</b>, as secured by Requirement 6 of Schedule 3 of <b>Application Document 3.1 (E) (Version 2, Change Request) draft Development Consent Order [CR1-027]</b>. Works on Sundays and Bank Holidays will be limited and only carried out to provide added flexibility to the programme. HGV arrivals or departures on Sundays and public holidays will be limited to a maximum of 30 HGVs per day. It is also expected that there will be up to 50% fewer LGV and staff vehicle movements on Sundays and Bank Holidays than the number of movements anticipated to be experienced on weekdays and Saturdays.</p>	Agreed
3.10.6	<p><b>Part 3 Chapter 7 Traffic and Transport [APP-067]</b></p> <p><b>Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [CR1-041]</b></p>	Construction Traffic	<p>Seek further detail on the extent of the use of Marsh Farm Road, Richborough Road and Whitehouse Drove, in terms of the duration of the use of these roads, likely number of vehicle movements per day, arrangements to avoid conflict with local residents, farm vehicles and tourists using the route to access Richborough Roman Fort (English Heritage site), given there are limited passing places, traffic would need to cross a level crossing, and part of this route is subject to national speed limits and is the Saxon Shore Way, Stour Valley Walk and public footpath (and crosses several public footpaths).</p> <p>Submission of further information on the intended duration of the use of these roads for construction</p>	<p>Further details are provided below on the requested routes. The only construction vehicles to use Marsh Farm Road will be associated with access K-BM04, to undertake temporary diversion works to the overhead lines (OHL), including constructing a temporary structure, realigning conductors and building scaffold protection towers. Vegetation clearance and survey works will also be undertaken at this access. Construction traffic is only forecast to use Marsh Farm Road for a period of six weeks, with a maximum of 29 daily vehicles including seven HGVs. This represents 0.4% of total construction vehicle trips associated with the Kent Onshore Scheme. As shown on <b>Application Document 6.3.3.7.G ES Appendix 3.7.G Traffic Flow Diagrams [APP-181]</b>, no construction vehicles are expected to travel</p>	Under Discussion

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
			works, number of vehicle movements per day, size of vehicles, management of the route, and that these routes will be included in the construction management plan.	<p>through Minster or along Marsh Farm Road during the peak construction phase. As shown on the HGV Routing Plan within <b>Application Document 6.4.3.7 ES Figures Kent Traffic and Transport [APP-266]</b>, the route through Minster and along Marsh Farm Road does not form a primary construction traffic route. Therefore, it is not forecast that these limited vehicle trips (both in quantity and in duration) will result in any impacts on Marsh Farm Road.</p> <p>The only construction vehicles to use Richborough Road/Whitehouse Drove will be associated with access K-BM05, to undertake piling and foundation works associated with the southern side of the proposed temporary bridge over the River Stour. Once the temporary bridge has been constructed, all works in this area would be accessed via the main site access (K-BM02) on the A256 Richborough Road. Construction traffic is only forecast to use Richborough Road/Whitehouse Drove for a period of one month, with a maximum of 17 daily vehicles including five HGVs. This represents 0.2% of total construction vehicle trips associated with the Kent Onshore Scheme. As shown on the HGV Routing Plan within <b>Application Document 6.4.3.7 ES Figures Kent Traffic and Transport [APP-266]</b>, the route through Minster does not form a primary construction traffic route. Therefore, it is not forecast that these limited vehicle trips (both in quantity and in duration) will result in any impacts on Richborough Road/Whitehouse Drove.</p> <p>The proposed management and mitigation relating to construction traffic is set out <b>within Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [CR1-041]</b> which is secured through Requirement 6 of Schedule 3 of <b>Application Document 3.1 (E) (Version 2, Change Request) draft Development Consent Order [CR1-027]</b>.</p> <p>The proposed management and mitigation relating to Public Rights of Way (PRoW), as well as Saxon Shore Way which shares Public Footpath EE42 is set out within <b>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]</b>. The traffic and transport assessment within <b>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]</b> does not identify any significant impacts on PRoW, or Saxon Shore Way, in terms of diversions and closures, or potential interactions with construction vehicles, with the proposed embedded mitigation and control and management measures in place.</p>	



### 3.11 Air Quality

**Table 3.11 Air Quality**

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.11.1	<b>Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]</b>  <b>Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent [APP-347]</b>	Air Quality Receptors	<p>The Consultee’s EH team’s primary concern would be any possible effect that construction traffic and construction sites set within Dover District may have on nearby residences. The construction of any new pylon system within the Dover District may require access points via local roads or temporary compounds within nearby road networks and it is expected that further details of this will be provided as the proposal progresses.</p> <p>The Consultee notes that the outline Air Quality Management Plan for Kent has been produced and is secured via Requirement 6 of the draft DCO. Therefore, the Consultee is in agreement with the approach that has been taken with the receptors. The Consultee will review the Air Quality ES Chapter and the outline Air Quality Management Plan following submission of the DCO application.</p>	<p>As part of the air quality assessment, construction vehicle emissions have been assessed. Construction dust, NRMM and temporary diesel generator emissions have also been assessed, which is secured by Requirement 6 of Schedule 3 of <b>Application Document 3.1 (E) (Version 2, Change Request) draft Development Consent Order [CR1-027]</b>.</p> <p>Mitigation measures have been proposed to ensure impacts are not significant and have been included in the ES (<b>Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]</b> and <b>Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent [APP-347]</b>).</p> <p>An outline Air Quality Management Plan for Kent has been produced and secured by Requirement 6 of Schedule 3 of <b>Application Document 3.1 (E) (Version 2, Change Request) draft Development Consent Order [CR1-027]</b>.</p>	Agreed
3.11.2	<b>Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]</b>	Assessment methodology presented in the ES	The Consultee will review the assessment methodology following the submission of the DCO application.	The Applicant sets out the air quality methodology that was used in the assessment in <b>Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]</b> .	Under discussion
3.11.3	<b>Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]</b> and <b>Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent [APP-347]</b>	Mitigation presented in the ES and Outline Air Quality Management Plan	The Consultee will review the proposed mitigation following the submission of the DCO application.	The Applicant sets out the proposed mitigation for air quality effects in <b>Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]</b> and <b>Application Document 7.5.6.2 Outline Air Quality Management Plan – Kent [APP-347]</b> .	Under discussion
3.11.4	<b>Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]</b>	Assessment conclusions presented in the ES	The Consultee will review the assessment conclusions following the submission of the DCO application.	The Applicant includes detail on the air quality assessment in <b>Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]</b> .	Under discussion



## 3.12 Noise and Vibration

**Table 3.12 Noise and Vibration**

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.12.1	<b>Application Document 6.2.3.9 (B) Part 3 Kent Chapter 9 Noise &amp; Vibration [AS-111]</b>	Construction noise and vibration	The Consultee agreed the approach in April 2023 but confirmed that noise and vibration matters were generally delegated to TDC with the Consultee being copied into pertinent correspondence.	The Applicant set out the assessment methodology for construction noise and vibration to the Consultee and confirmed that the construction noise and vibration assessment methodology is in accordance with BS 5228:2009+A1:2014. Assessment criteria are agreed based on the lower threshold for the 'ABC' method, which is the method used to decide if construction noise could cause significant effect, with 'A' being the lowest threshold and is used as the worst-case scenario. The Consultee has agreed to this approach and how noise and vibration has been assessed within the DCO application ( <b>Application Document 6.2.3.9 (B) Part 3 Kent Chapter 9 Noise &amp; Vibration [AS-111]</b> ). The Applicant notes that matters on noise and vibration were deferred by the Consultee to TDC.	Agreed
3.12.2	<b>Application Document 6.2.3.9 (B) Part 3 Kent Chapter 9 Noise &amp; Vibration [AS-111]</b>	Noise survey data	The Consultee agreed the approach in April 2023. Noise and vibration matters were generally delegated to TDC with the Consultee copied into pertinent correspondence.	The Applicant confirms agreement with the Consultee on baseline noise survey methodology and resultant typical background noise levels for use in the operational noise assessment, which has been set out within <b>Application Document 6.2.3.9 (B) Part 3 Kent Chapter 9 Noise &amp; Vibration [AS-111]</b> .	Agreed
3.12.3	<b>Application Document 6.3.3.9.D ES Appendix 3.9.D Kent Operational Noise Assessment [AS-123]</b>	Operational noise	The Consultee agreed the approach in April 2023. Noise and vibration matters were generally delegated to TDC with the Consultee copied into pertinent correspondence.	The Applicant confirms agreement with the Consultee on assessment methodology and criteria for operational noise assessment, which has been set out in <b>Application Document 6.3.3.9.D ES Appendix 3.9.D Kent Operational Noise Assessment [AS-123]</b> .	Agreed
3.12.4	<b>Application Document 7.5.8.2 (B) Outline Construction Noise and Vibration Management Plan – Kent [AS-133]</b>	Construction traffic noise	The Consultee agreed the approach in April 2023. Noise and vibration matters were generally delegated to TDC with the Consultee copied into pertinent correspondence.	The Applicant confirms that the Consultee has agreed to the assessment methodology for construction noise assessment based on guidance from the Design Manual for Roads and Bridges (DMRB) LA 111 Noise and Vibration and Calculation of Road Traffic Noise (CRTN). Further details on the methodology to assess construction traffic noise is set out in <b>Application Document</b>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
				7.5.8.2 (B) Outline Construction Noise and Vibration Management Plan – Kent [AS-133].	

3.13 Socioeconomics, Recreation and Tourism

Table 3.13 Socioeconomics, Recreation and Tourism

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.13.1	Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]	Public Rights of Way	The Consultee had no comments on Public Rights of Way and agreed to the approach set out by National Grid and defers matters relating to Public Rights of Way to KCC.	The assessment of effects on PRoW has included recreational routes and routes used for access. The Applicant have reviewed what information has been provided to the Consultee to date on the assessment to determine if further information on the methodology can be provided. An outline PRoW Management Plan has been produced for the ES which includes closures and diversions to PROW routes, which is found in <b>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]</b> .	Agreed
3.13.2	Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-007]	Study Area	The Consultee has not provided any further comments on this matter and agree to the proposed approach as set out in the ES.	The assessment of recreational routes and PRoWs recognised that some PRoW would overlap/go beyond the 500 m study area boundary. Where this is the case, the assessment has considered whether the Proposed Project would impact the route beyond 500 m. Additionally, the PRoW assessment includes consideration of PRoW routes connected via cycle and pedestrian route networks which are impacted by the Proposed Project. This has been included in the ES chapter. The study area has been set out within the ES ( <b>Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-007]</b> ) and the outline PROW Management Plan ( <b>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]</b> ).	Agreed

3.14 Health and Wellbeing

Table 3.14 Health and Wellbeing

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.14.1	Application Document 6.2.3.11 (B) Part 3 Kent Chapter 11 Health & Wellbeing [AS-003]	Project responses to statutory consultation comments	The Consultee agreed with National Grid response to the statutory consultation response and thus, had no further comments to make.	The Applicantpresented their response to the comments on health and wellbeing from the Consultee, where the primary concern was the impact of construction traffic and construction sites on residents in Dover. The mitigation on the impacts on construction traffic has been covered in the <b>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]</b> and further details of the health and wellbeing assessment methodology in <b>Application Document 6.2.3.11 (B) Part 3 Kent Chapter 11 Health &amp; Wellbeing [AS-003]</b> .	Agreed
3.14.2	Application Document 6.2.3.11 (B) Part 3 Kent Chapter 11 Health & Wellbeing [AS-003]	Study Area	The Consultee has raised no concerns regarding the study area during statutory consultation or thematic meetings to date and agrees to the study area as set out in <b>Application Document 6.2.3.11 (B) Part 2 Kent Chapter 11 Health &amp; Wellbeing [AS-003]</b> .	The Study Area comprises three wards within the Consultee’s boundary. These include Little Stour and Ashtone, which are both Dover Villages, was set out within the PEIR and is the same for the ES in Chapter 11 ( <b>Application Document Application Document 6.2.3.11 (B) Part 3 Kent Chapter 11 Health &amp; Wellbeing [AS-003]</b> ). This was also shown at the meeting in October 2023.	Agreed

## 3.15 Cumulative Effects

**Table 3.15 Cumulative Effects**

Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
3.15.1	<b>Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]</b>	Cumulative Schemes - methodology	A meeting was held with the Consultee on 12 November 2024, where the cumulative assessment methodology was presented. The Consultee agreed to the methodology presented in the meeting. However, as this has not been finalised, the Consultee will review the methodology following submission of the DCO application.	The Applicant presented the cumulative assessment methodology on 12 November 2024, and this was agreed with the Consultee.  The Applicant sets out the cumulative effects assessment methodology in <b>Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]</b> .	Under discussion
3.15.2	<b>Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List [APP-092]</b>  <b>Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List [APP-093]</b>	Cumulative Schemes – short list and long list	A meeting was held with the Consultee on 12 November, where the Short List and Long Lists were presented, with any comments requested to be provided to National Grid within 3 days post this meeting. The Consultee raised an additional 10 developments to be added to the short list.  National Grid confirmed that these have been added to the short list. As such, the Consultee agrees to the short list and long list. The Consultee will review the short list and long list following submission of the DCO application.	The long list and short list are provided within <b>Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List [APP-092]</b> and <b>Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List [APP-093]</b> and include the additional 10 developments raised by the Kent LPAs.  The assessment can be updated during examination if developments come forward that would make the short list. This updated assessment would be provided at a suitable deadline in the examination timetable.  The Applicant has provided the Consultees with the cumulative effects short list and long list as set out in <b>Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List [APP-092]</b> and <b>Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List [APP-093]</b> .	Under discussion
3.15.3	<b>Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects [APP-072]</b>  <b>Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project</b>	Conclusions of the Cumulative Effects Assessments	The Consultee is yet to agree with the conclusions set out in the Cumulative Effects Assessment (CEA).  The Consultee will review these conclusions in due course, following submission of the DCO application.	The Applicant sets out the conclusions of the Cumulative Effects assessment in <b>Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects [APP-072]</b> , <b>Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]</b> , <b>Application Document 6.2.5.2 Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project [APP-086]</b> and <b>Application Document 6.2.4.11 (B) Part 4 Marine Chapter</b>	Under discussion



Ref	Relevant Application Document	Summary of Description of Matter	DDC Current Position	The Applicant Current Position	Status
	<p>Cumulative Effects [APP-073]</p> <p>Application Document 6.2.4.10 Part 4 Marine Chapter 10 Intra-Project Cumulative Effects [APP-083]</p> <p>Application Document 6.2.4.11 (B) Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [REP1A-011]</p> <p>Application Document 6.2.5.2 Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project [APP-086]</p>			11 Inter-Project Cumulative Effects [REP1A-011].	

# 4. Approvals

Signed	
On Behalf of	National Grid
Name	
Position	
Date	

Signed	
On Behalf of	Dover District Council
Name	
Position	
Date	

## 5. References

- Ministry of Housing, Communities and Local Government. (2024). *Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects*. Retrieved from <https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects>
- The Planning Inspectorate. (2015). *Advice Note two: The role of local authorities in the development consent process*. Retrieved from [https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010019/TR010019-Advice-00006-2-Advice\\_note\\_2\\_The%20role%20of%20local%20authorities%20in%20the%20development%20consent%20process.pdf#:~:text=The%20Planning%20Act%202008%20](https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010019/TR010019-Advice-00006-2-Advice_note_2_The%20role%20of%20local%20authorities%20in%20the%20development%20consent%20process.pdf#:~:text=The%20Planning%20Act%202008%20).

National Grid plc  
National Grid House,  
Warwick Technology Park,  
Gallows Hill, Warwick.  
CV34 6DA United Kingdom

Registered in England and Wales  
No. 4031152  
[nationalgrid.com](http://nationalgrid.com)