The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.43: Draft Statement of Common Ground Between National Grid Electricity Transmission and the Royal Society for the Protection of Birds

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nationalgrid

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Date	**Version**	**Status**	**Description / Changes**
November 2025	A	DRAFT	Issued to PINS for Deadline 1
January 2026	B	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 matter's 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 the Royal Society for the Protection of Birds (the RSPB). 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 Version A of this SoCG (Application Document 9.43 Draft Statement of Common Ground Royal Society for the Protection of Birds [REP1-085]) was submitted and issued to RSPB at Deadline 1 and was based on RSPB Relevant Representation. Following discussions with the RSPB, the SoCG has been restructured and focused on points of disagreement, to not only reduce its length but also maximize its usefulness for the Examining Authority. In addition, points have been summarized since full details are already within the RSPB's Written Representation [REP1-158].

1.2.3 This version of the SoCG has been reviewed by the RSPB but as they are currently reviewing the Applicant's responses to the Written Representation (**Application Document 9.79 Applicant's Comments on Written Representations [REP2-2034]**), many of the matters raised remain marked as under discussion**.**

1.2.4 This SoCG will be progressed during the Examination period to reach a final position between the Applicant and the RSPB 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.

1.2.5 It is important to note that any matter not covered in this SoCG should not be taken to indicate the RSPB's agreement on that matter or prevent the RSPB from making further representations as may be necessary, based on new information or submissions made

by the Applicant to the Examination. The RSPB is focusing on its key areas of concern around RSPB North Warren and designated conservation sites and important wildlife populations in Suffolk, Kent and the marine environment and is not considering or reviewing all aspects of the project.

1.2.6 For the purpose of this SoCG, the Applicant and the RSPB are jointly referred to as the "Parties". When referencing the RSPB alone, it is referred to as "the Consultee".

1.3 The Role of RSPB in the DCO Process

1.3.1 The RSPB is registered as an Interested Party in part by virtue of Section 57(1) and 102(1)(aa) of the Planning Act 2008 due to its freehold ownership of land at RSPB North Warren which is affected by the Proposed Project.

1.4 Description of the Proposed Project

1.4.1 The Proposed Project is described in **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]**.

1.5 Format of Document and Terminology used

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', 'not agreed but not material', 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. 'Not agreed but not material' indicates that although the parties have not agreed a position on an issue, both parties agree that the issue is not material to determination of the DCO and the matter is considered closed.

1.5.3 Abbreviations used within the SoCG are provided in Table 1.1 below.

Table 1.1 Abbreviations

Abbreviation/Term	Definition
AC	Alternating Current
ALARP	As Low as Reasonably Practicable
BNG	Biodiversity Net Gain
DCO	Development Consent Order
EIA	Environmental Impact Assessment
ES	Environmental Statement

Abbreviation/Term	Definition
ExA	Examining Authority
HDD	Horizontal Directional Drilling
HDPE	High-Density Polyethylene
HOT	Heads of Term
HRA	Habitats Regulation Assessment
HVDC	High Voltage Direct Current
ISH	Issue Specific Hearings
IROPI	Imperative Reasons of Overriding Public Interest
LEMP	Landscape and Ecological Management Plan
MCZ	Marine Conservation Zone
PRoW	Public Right of Way
REAC	Register of Environmental Actions and Commitments
RSPB	Royal Society for the Protection of Birds
SAC	Special Area of Conservation
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
TJB	Transition Joint Bay
UXO	Unexploded Ordnance

2. Record of Engagement

2.1 Summary of discussions

2.1.1 Table 2.1 summarises the consultation and engagement that has taken place between the Parties.

Table 2.1 Record of meetings and correspondence with the RSPB

Date	Topic/Format	Discussion points
9 February 2022	*Introduction to the Proposed Project / Teams meeting*	*The meeting introduced National Grid and the Proposed Project and the Need Case. The call went through the work to date and the indicative timeline.*
22 June 2006	*Update to the Proposed Project / Teams meeting*	*The meeting provided an update on the Proposed Project.*
3 August 2022	*Update to the Proposed Project / Teams meeting*	*The meeting provided an update on the Proposed Project as well as outlining the ground investigation locations in or close to North Warren Reserve and the marine aspect of the Proposed Project.*
November 2022	*Project Introduction and Surveys/ Letter/Emails*	*Initial project introduction and request for survey access.*
January/ February 2023	*Surveys/ Emails*	*Correspondence to agree non-intrusive survey access.*
31 March 2023	*Suffolk Coast Electricity Cable Ecology Group introduction meeting*	*The meeting provided an update on the Proposed Project and timeline as well as option development.*
Summer/Autumn 2023	*Surveys / Emails/ site meetings*	*Meetings and correspondence to discuss, agree and undertake GI surveys in September/October 2023.*
8 September 2023	*Avoidance and Mitigation / Teams Meeting*	*The meeting provided an update on the Proposed Project and timeline as well as option development.*
2024	*Surveys / Emails*	*Correspondence regarding ongoing survey access.*
30 April 2024	*Suffolk Coast Electricity Cable Ecology Group*	*The meeting provided an update on the Proposed Project and timeline as well as option development.*

Date	Topic/Format	Discussion points
	introduction meeting	
8 July 2024	*Targeted Consultation/ Letter*	*Letter to inform of further consultation period.*
20 July 2024	*Suffolk Coast Electricity Cable Ecology Group introduction meeting*	*The meeting provided an update on the Proposed Project and timeline as well as option development.*
1 August 2024	*Targeted Consultation / Teams meeting*	*Meeting with wider RSPB team to discuss project updates at targeted consultation.*
6 November 2024	*Discounting Sizewell / Teams Meeting*	*Meeting to discuss Sizewell.*
24 January 2025	*Heads of Terms (HOTs) / Email/Post*	*Issue template HOTs.*
28 February 2025	*HOTs / Email/Post*	*Issue populated HOTS – first issue.*
4 March 2025	*HOTs/ Teams Meeting*	*Suffolk agents meeting to discuss template HOTs.*
April/May 2025	*HOTs/ Email*	*Various emails with RSPB agent regarding populated HOTs.*
9 May 2025	*HOTs/ Teams Meeting*	*Discuss specific RSPB queries/amendments on HOTs with RSPB agent.*
19 June 2025	*HOTs/ Teams Meeting*	*Suffolk agents meeting to discuss template HOTs.*
May/June 2025	*HOTs/ Email*	*Various emails to RSPB agent (as part of Suffolk agents group) regarding template HOTs.*
June 2025	*Surveys/ Email*	*Various emails with RSPB agent regarding renewing survey access licence.*
June/July 2025	*HOTs/ Email*	*Various emails to RSPB agent to respond to RSPB queries in relation to DCO submission that will impact on HOTs negotiations.*
6 August 2025	*HOTs/ Teams Meeting*	*Finalise HOTs queries to discuss at site meeting with RSPB agent.*
19 August 2025	*HOTs/ Email*	*Issued revised template HOTs to RSPB agent.*
21 August 2025	*HOTs/ Site visit*	*HOTs queries regarding access and frac out.*
06 January 2025	*SoCG/ Teams Meeting*	*Discuss structure of the SoCG.*

3. Areas of Discussion Between the Parties

3.1 Overarching Comments on the Principle of Development within Designated Sites

Table 3.1 Overarching Comments on the Principle of Development within Designated Sites

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.1.1	**Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**	Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Ramsar Sites and Sites of Special Scientific Interest (SSSIs)	The RSPB consider that significant impacts from the Application alone and cumulatively with other projects are likely on the following sites: • Leiston-Aldeburgh SSSI, Suffolk; and • Sandwich Bay to Hacklinge Marshes SSSI, Kent. We also do not agree that adverse effects on integrity can be excluded for the following sites for impacts from the Application alone: • Sandlings SPA, Suffolk; • Minsmere-Walberswick SPA and Ramsar site and Alde-Ore Estuary SPA and Ramsar site (through impacts on functionally-linked land); and • Thanet Coast and Sandwich Bay SPA and Ramsar site and Sandwich Bay SAC, Kent. In relation to the Application in combination with other plans and projects, we do not agree that adverse effects on integrity can be excluded for the following sites: • Sandlings SPA; • Minsmere-Walberswick SPA and Ramsar site and Alde-Ore Estuary SPA and Ramsar site (through impacts on functionally-linked land); • Thanet Coast and Sandwich Bay SPA and Ramsar site and Sandwich Bay SAC; and • Outer Thames Estuary SPA.	The impact of the Proposed Project on ecology and biodiversity in Suffolk has been considered in detail in **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**, **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** and **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3. The assessment includes consideration of potential impacts on designated sites, such as Leiston-Aldeburgh SSSI and Sandlings SPA. The Applicant has undertaken a Habitat Regulations Assessment (HRA) **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3 (in accordance with The Conservation of Habitats and Species Regulations 2017 as amended ('the Habitats Regulations'). The HRA has concluded that the Proposed Project will not result in an adverse effect on the integrity of any European Sites either alone or in combination with other plans or projects.	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.1.2	**Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368]** **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3	Selection of Suffolk Landfall	We do not agree that the information presented demonstrates that adequate weight has been given to the need to avoid impacts on designated sites throughout the evolution of the site selection process. There are also a number of references to the use of trenchless techniques at the Leiston-Aldeburgh SSSI enabling avoidance of direct effects. Whilst the proposal of such techniques as an alternative to open-trenching is welcomed (subject to the caveats discussed below), this assumption does not adequately consider potential impacts such as noise disturbance and risks of technical issues associated with trenchless techniques. In our view, avoidance of impacts would require geographic avoidance of designated sites.	The reasons for the selection of the landfall location are set out in **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368]**. Potential impacts on the Site of Special Scientific Interest (SSSI) as a result of the proposed trenchless technique are addressed in **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** and **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3.	Under discussion
3.1.3	**Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368]** **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]** **Application Document 7.3 Design Development Report [APP-321]**	Selection of Suffolk Landfall	Documents issued at pre-application consultations gave great weight to the capacity of RSPB North Warren (within the Leiston-Aldeburgh SSSI) as the only landfall site (of the options considered) capable of supporting project co-location. This point was used to justify the choice of RSPB North Warren as the final landfall location, despite its significant environmental importance. We are disappointed that, despite the removal of co-location from the proposals, the Applicant has not fully considered options for the Sea Link project alone to avoid the Leiston-Aldeburgh SSSI.	As set out in **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368]** landfall area of search S2 (Aldeburgh) was identified as the emerging preference landfall for the Proposed Project on the basis that Leiston-Aldeburgh SSSI and RSPB North Warren could be crossed using a trenchless technique. However, at the time no ground investigation studies/surveys had been undertaken to confirm the feasibility of a trenchless solution. As such an alternative landfall S3N was included as part of the proposals that were consulted on during the 2022 non-statutory consultation. This conclusion was reached for the Proposed Project in isolation. Given the feedback received from stakeholders requesting that consideration be given to coordination with NGV projects, the concept of consolidation (co-location) of landfalls was explored. Consideration was given to the potential for another project to make landfall immediately adjacent to landfall area of search S2 and it was concluded that co-location was achievable. Landfall S2 therefore remained the preferred landfall area of search and S3(N) remained the alternative. However, it was noted that should the alternative landfall be brought forward, rather than the emerging preference, it was unlikely that a co-located landfall could be achieved. As set out in **Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]** whilst feedback was received at non-statutory consultation regarding the designated nature conservation sites within landfall area of search S2, no different or additional information emerged that altered the preliminary conclusion that landfall area of search S2 was preferred to S3N. In addition, further technical studies had been undertaken, (subject to the results of ground investigations at the	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
				time) which confirmed a trenchless crossing beneath the designated sites to avoid direct effects is achievable. Ground investigations were subsequently undertaken which confirmed the output of the technical feasibility studies that are set out in Appendix A of **Application Document 7.3 Design Development Report [APP-321]**, which concluded that a trenchless crossing technique can be used to cross under the designated sites at this landfall confirming the original appraisal outcome. Refinements to the Order Limits were also made after statutory consultation to reduce the size of the proposed construction compound to the east of Leiston Road to reduce the potential for disturbance to breeding bird species within the Sandlings SPA and North Warren RSPB Reserve and to avoid locating the construction compound within Flood Zone 2. The proposed compound, which was adjacent to the Sandlings SPA, was removed and combined with the Horizontal Direction Drilling (HDD) compound at the TJB.	
3.1.4	**Application Document 7.3 Design Development Report [APP-321]** **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3	Selection of Suffolk Landfall	Given our concerns above, we object to the Sea Link project landfall in Suffolk due to the potential impacts on Leiston-Aldeburgh SSSI (and the functionally-linked Minsmere-Walberswick SPA and Ramsar site and Alde-Ore Estuary SPA and Ramsar site) and on RSPB North Warren and the insufficient consideration of avoidance as the first stage of the mitigation hierarchy. We consider that the approach taken to site selection could set a damaging precedent with regard to construction within SSSIs.	The Proposed Project comprises different components, namely marine HVDC cable, landfalls, terrestrial HVDC cable, converter stations and an Alternating Current (AC) connection to the network connection point. In identifying an overall preferred solution, the appraisals of these individual components are brought together to identify the most appropriate overall design. Therefore, while the Applicant may identify certain areas to be more constrained than alternatives based on certain factors, the preferred design represents the overall most appropriate solution, taking all elements into account. All options within with the study area would result in a likely interaction with a statutory designated nature conservation site either at the landfall or on onward terrestrial cable route. As set out above the selection of the preferred landfall factored in identify the most appropriate overall design. For example, the marine approach to landfall area of search S1 was the least constrained from a marine routeing perspective but it was significantly constrained from an onward terrestrial route perspective due to crossings of the Alde-Ore Estuary. The technical studies set out in Appendix A of **Application Document 7.3 Design Development Report [APP-321]** and ground investigations have confirmed that a trenchless construction technique can be used to avoid direct habitat loss within the Leiston-Aldeburgh SSSI. Effects on designated sites are set out in **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** and **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3.	Under discussion
3.1.5	**Application Document 8.1 Corridor Preliminary Routeing**	Selection of Kent Landfall	We do not agree that the information presented demonstrates that adequate weight has been given to the need under the Habitats Regulations to avoid	In developing the Proposed Project, the mitigation hierarchy has been rigorously applied by the Applicant, as part of the approach to consenting set out in **Application document 7.3 Design**	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
	and Substation Siting study (October 2022) [APP-368] **Application Document 7.1 (C) Planning Statement [AS-057]** **Application document 7.3 Design Development Report [APP-321]** **Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-050]** **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3		impacts on designated sites throughout the evolution of the site selection process.	**Development Report [APP-321]** and as part of the iterative process of Environmental Impact Assessment (EIA). The avoidance of environmental designations and other environmental constraints is an important factor which informs the Applicant's site selection process. This is considered alongside other factors such as engineering feasibility, cost, and other wider environmental and socio-economic matters. In considering these various factors, the Applicant uses reasonable judgement, in the context of the various statutory duties in the Electricity Act 1989 which include the duty to "*develop and maintain an efficient coordinated, and economical system of electricity transmission*" (which includes reducing costs on behalf of consumers), and also the duty to have regard to the desirability of conserving the environment and doing what can reasonably be done to mitigate effects. These duties are set out in **Application Document 7.1 (C) Planning Statement [AS-057]**. As set out in **Application Document 8.1 Corridor and Preliminary Routeing and Siting study (October 2022) [APP-368]**, the Proposed Project considered six landfall areas of search within the Kent study area. National and international designated sites for nature conservation were unavoidable at any of these landfall areas of search with all potential landfall locations resulting in varying degrees of interaction with these designations. For any of the landfalls considered along the north Kent coast the Thanet Coast and Sandwhich Bay SPA and Ramsar and Thanet Coast Marine Conservation Zone (MCZ) and SSSI were unavoidable. For the landfall at Broadstairs the Thanet Coast and Sandwhich Bay SPA and Ramsar and Thanet Coast SAC, MCZ and SSSI were unavoidable. For the landfall in Pegwell Bay the Thanet Coast and Sandwhich Bay SPA, Sandwhich Bay SAC, Sandwhich Bay to Hacklinge Marshes SSSI were unavoidable. The appraisal of the landfalls in conjunction with the connecting marine and terrestrial cable routes took into account the habitat types that were present and the potential for avoidance of the permanent effects on those habitats. The north Kent coast landfall areas of search were ruled out due to significant technical and environmental constraints on the marine approaches. With regards to nature conservation sites Margate and Long Sands SAC, which due to shipping and navigation constraints and bathymetry would have been unavoidable by the marine cable route to a landfall along the north Kent coast. This designation is designated for sandbanks therefore any cable or crossing protection within the designated site would have resulted in permanent habitat loss of the interest features of this site. Natural England expressed concerns regarding the potential impacts of crossing the proposed NeuConnect cable within the Margate and Long Sands SAC as the material required for the crossing could permanently change the protected features in this site. Natural England also advised that their preference was for the project to avoid any cable installation in this protected site. Landfalls at either Pegwell Bay or Broadstairs would avoid this	

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
				permanent habitat loss. In addition to the potential for permanent habitat loss the marine approaches to the north Kent coast landfalls were significantly constrained by an area of mobile sandbank as illustrated on Figure 7.17 of **Application Document 8.1 Corridor and Preliminary Routeing and Siting study (October 2022) [APP-368]**. Mobile sediment is considered to be an important consideration as cable spanning or over burial could result which presents a considerable exposure and engineering risk and interaction with key anchorage areas offshore of Margate. Although taken in isolation the Broadstairs landfall (K1a) would be slightly preferred to the Pegwell Bay landfall from a purely marine routeing perspective, there were significant constraints associated with the onward terrestrial corridor from the Broadstairs landfall to both converter station option areas considered, including existing settlements and further proposed development, (part of which has subsequently been delivered) as illustrated on Figure 8.5 of **Application Document 8.1 Corridor Preliminary Routeing and Siting study (October 2022) [APP-368]**. Whilst nature conservation sites are unavoidable at the Pegwell Bay landalls (as they are at any of the landfall considered) trenchless construction techniques have been proposed to avoid the sensitive saltmarsh habitat thereby avoiding the potential for permanent habitat loss as such the landfall at Pegwell Bay, was identified as the least constrained technically viable landfall option. The effects on the nature conservation sites have been assessed and presented in **Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]** and **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3.	
3.1.6	**Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3 **Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]**	Selection of Kent Landfall	There are also a number of references to the use of trenchless techniques at the Pegwell Bay landfall area as avoidance of direct effects. Whilst the proposal of trenchless techniques as an alternative to open trenching is welcomed (subject to the caveats discussed below), this assumption does not adequately consider potential impacts such as risks of technical issues associated with trenchless techniques or other impacts such as noise and disturbance. It is therefore our view that avoidance of impacts would require geographic avoidance of designated sites.	Technical issues associated with trenchless techniques such as risk of frac-out or stuck drilling rigs, and noise disturbance have been considered in the following Application Documents: • **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3; and • **Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]**.	Under discussion
3.1.7	**Application Document 8.1 Corridor and Preliminary Routeing and Siting study (October 2022) [APP-368]** **Application Document 7.3 Design**	Selection of Kent Landfall	Given our concerns above, we object to the Sea Link project landfall in Kent due to the potential impacts on Thanet Coast and Sandwich Bay Ramsar SPA /Ramsar, Sandwich Bay SAC, and Sandwich Bay to Hacklinge Marshes SSSI, and the insufficient consideration of avoidance and less environmentally damaging alternatives as the first stage of the mitigation hierarchy and considering the Habitats	Please refer to matter 3.2.5 in relation to the selection of the landfall. The Proposed Project is a HDVC link which comprises different components, namely marine HVDC cable, landfalls, terrestrial HVDC cable, converter stations and an AC connection to the network connection point. In identifying an overall preferred solution, the appraisals of these individual components are brought together to identify the most appropriate overall design. Therefore,	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
	Development Report [APP-321]		Regulations. We also consider that the approach taken to site selection could set a damaging precedent with regard to construction within SPA/Ramsar sites, SACs and SSSIs.	in identifying a preferred converter station site the constraints of the landfall, marine HVDC cable route, terrestrial HVDC cable route and AC connection are all taken into consideration. **Application Document 8.1 Corridor and Preliminary Routeing and Siting study (October 2022) [APP-368]** describes this process. At Non-Statutory Consultation the Applicant showed two converter station site Option Areas (Area A and Area B). **Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368]** explained that Option Area A had been selected as preferred as Area A provided an opportunity to site the converter station within an area adjacent to similar infrastructure or industrial land uses and minimised the HVAC connection back to the network. The appraisal also explained that part of the Sandwich Bay to Hacklinge Marshes SSSI (Plates 8-10) extended into this area but that converter station siting could avoid this designation and that while part of this area is within the flood zones 2 and 3 (Plates 8-12) there were opportunities to site a converter station outside of these zones. As set out in Paragraphs 5.4.19 to 5.4.24 of **Application Document 7.3 Design Development Report [APP-321]**, feedback was received through Statutory Consultation that raised concerns around the siting of the proposed Minster Converter Station and Substation in relation Minster Marshes. In addition, ecological site surveys undertaken for the Proposed Project, which were ongoing at the time of Statutory Consultation, identified that the proposed site constitutes functionally linked land related to golden plover, which is an interest feature of the Thanet Coast & Sandwich Bay SPA Ramsar. As a result, the original decision to locate the converter station and substation in this location was reviewed. As part of this review alternative locations within converter site Option Area A and converter site Option Area B (as shown in **Application Document 5.1.7 Appendix F Targeted Consultation [APP-313 and APP-314]** of the Consultation Report) were reconsidered. Paragraphs 5.4.18 to 5.4.24 of **Application Document 7.3 Design Development Report [APP-321]** explain why the proposed site remained unchanged following that review.	

3.2 Suffolk Onshore Scheme

Table 3.2 Suffolk Onshore Scheme – Description of Baseline

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.2.1	**Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**	Proximity to Designated Sites	Need to recognise within PDA-017 Part 2 Suffolk Chapter 2 Ecology and Biodiversity that the project is not merely adjacent to RSPB North Warren and Leiston-Aldeburgh SSSI but instead includes parts of these sites within the Order Limits.	The fact the cable corridor passes under the RSPB reserve has been assessed throughout **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**. However, it is important for the reader to understand that surface construction works are 'adjacent' to the reserve and not within it.	Under discussion
3.2.2	**Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**	Ecological Importance of North Warren	We recommend that the area east of Leiston Road is considered to be of national importance for non-breeding birds, with European White-fronted Goose being of international importance. We also recommend that the breeding Lapwing population is considered to be of county significance.	Since the overall importance has been acknowledged as correct, the points of detail do not ultimately affect the assessment of significance. The Applicant considers 'national importance' is still an overall appropriate valuation for the RSPB reserve east of Leiston Road. The fact it is functionally-linked land for SPAs would not in itself mean it was of international importance as that would equate it with an SPA which is not appropriate. Moreover, changing the value from National to International would not increase the significance of effects. The Applicant has treated the RSPB Reserve as a sensitive receptor in itself rather than give valuations of importance to individual species. We note that a valuation of county significance for lapwing would be below the national significance assigned to the RSPB Reserve as a whole and would therefore not change the assessment.	Under discussion
3.2.3	**Application Document 2.9 Habitats of Protected Species and Important Habitats [APP-029]**	Habitat Mapping	Habitat mapping should recognise importance of ditches, footdrains, acid grassland and scrub/bramble habitats.	It is acknowledged that botanical surveys were more limited in the RSPB Reserve and in land beyond the Order Limits than elsewhere within the Order Limits. This was intentional, since no surface works are proposed within the RSPB reserve. However, since North Warren Reserve has been treated as a nationally important feature (irrespective of precise nature, area and distribution of habitats) and no surface works are proposed within the reserve, these amendments to habitat mapping within the RSPB Reserve would not affect the significance assessment.	Under discussion
3.2.4	**Application Document 6.3.2.2.B ES Appendix 2.2.B Suffolk Wintering Bird Report [PDA-026]** **Application Document 6.3.2.2.C ES Appendix 2.2.C Suffolk Breeding Bird Report [PDA-027]**	Bird surveys	PDA-025 ES Appendix 2.2.B Suffolk Wintering Bird Report should be corrected to state that wintering European White-fronted Goose is a feature of the Minsmere-Walberswick SPA and not the Alde-Ore Estuary SPA, and Woodlark is a feature of the Sandlings SPA, not the SAC. For the 2024 Lapwing and Redshank figures, methods and limitations should be discussed and it should be acknowledged that the territory distribution maps may not accurately reflect the real locations of favoured areas.	Since the overall importance of North Warren Reserve has been acknowledged as correct, the matters raised do not ultimately affect the assessment of significance. The Applicant considers 'national importance' is still an overall appropriate valuation for the reserve east of Leiston Road. Less bird survey was undertaken within the RSPB Reserve to avoid damaging habitat by going off track, at RSPBs request, and since detailed bird survey data for the Reserve east of Leiston Road was not required for the Applicant's assessment. It is not necessary for the assessment and judgment of significance of effects (since the Reserve boundary was treated as the nationally important receptor and no surface works are proposed) to undertake	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
			Maps used to show the abundance and distribution of wintering birds recorded during 2022/23 in APP-216 should clearly indicate that the wet grasslands were not formally surveyed on the dates shown in the legend. Annex 2.B.2 (p63, ep67) of PDA-025 ES Appendix 2.2.B Suffolk Wintering Bird Report is a compendium of WeBS data from Kent and not Suffolk and requires correction.	detailed species-specific surveys for marsh harrier, bittern or other species within the reserve.	
3.2.5	**Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3 **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3	Other Ecological Surveys	Given the decision not to survey the vegetation across the SSSI, any impacts on the vegetation, including due to proposed access routes or potential incidents such as frac-out need to be carefully considered. It should be recognised that Water Voles are present at RSPB North Warren.	There were no proposals for vegetation surveys because no surface works, or HDD failure, effect on surface water levels, or frac out is expected. This is discussed in the submitted **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3 and **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**. Natural England has requested pre-construction botanical survey of the RSPB Reserve route of the HDD to inform post-construction monitoring, and this has been proposed as a new REAC measure (B62) (**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3). Presence of water voles and other non-avian features in the RSPB Reserve are not mentioned because the submission documents only discuss areas where impacts from works are likely to arise. The RSPB Reserve has been treated as an important feature in itself and that includes all wildlife within it.	Under discussion

Table 3.3 Suffolk Onshore Scheme - Landfall at North Warren

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.3.1	**Appendix A Landfall HDD Feasibility Technical Note** of **Application Document 7.3 Design Development Report [APP-321]** **Application Document 9.72.2 Applicant's Response to Issue Specific Hearing 1 Action Points [REP1A-037]** **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3. **Application Document 3.1 (E) draft Development Consent Order [CR1-027]**	Risk of open trenching within the SSSI	The RSPB seek reassurance that open-trenching across the SSSI would not be pursued in any circumstances (including via subsequent Change Applications or other applications to facilitate open-trenching). For clarity, we also request that the Draft DCO at Schedule 16, Part 2, Para. 10 (3) is updated to specify the 'seaward' HDD exit.	The ground conditions are assessed as being suitable for HDD methods, as stated in Appendix A Landfall HDD Feasibility Technical Note of **Application Document 7.3 Design Development Report [APP-321]**. Evidence of the low failure rate of HDDs (1 in 120 of projects in which the trenchless expert was on site and 0 in 260 from consulting work) was provided during ISH1 hearings. Please see AP16 of **Application Document 9.72.2 Applicant's Response to Issue Specific Hearing 1 Action Points [REP1A-037]**, noting that while the response is addressing the Kent landfall, the failure rate discussed is across a wide range of projects in a wide range of ground conditions. The project is committed to a trenchless installation beneath the SSSI as stated in Measure LV08 and Measure W12 of **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3. The project has committed to the HDD exits being beyond the continuous coralline crag outcrops, and the exits are therefore more than 600 m seaward of MLWS. Please see Measure GH14 **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3. It is therefore not considered necessary to amend the wording of the draft DCO (**Application Document 3.1 (E) draft Development Consent Order [CR1-027]** as requested.	Under discussion
3.3.2	**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3	Commitment to use of trenchless technique at landfall	We welcome the statement in para. 4.2.51 (p15, ep19) of AS-093 Part 1 Introduction Chapter 4 Description of the Proposed Project that: *"… there is a commitment to make landfall using a trenchless crossing technique beneath designated sites, the location of the transition joint bay would be located outside of the coastal designated sites of Leiston Aldeburgh Site of SSSI and North Warren RSPB Reserve"* We also note that this commitment has been included in APP-342 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) as measure B21.	Please note that in addition to Measure B21, Measure LV08 and Measure W12 also commit the landfall to trenchless techniques for crossing the SSSI (**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3).	Under discussion
3.3.3	**Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description**	Clarity regarding construction swathe	The RSPB request confirmation that the list of additional activities and infrastructure required as part of the construction swathe and listed in para. 4.6.138 (p50, ep54) of AS-093 Part 1 Introduction	The HDD compound, access road and fencing will be located to the west (outside) of the SSSI. In the unlikely event of a surface frac out within the SSSI, limited plant and equipment may be temporarily operating within the SSSI (e.g. tractor and	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
	of the Proposed Project [REP1A-003]		Chapter 4 Description of the Proposed Project does not apply to the trenchless crossing of RSPB North Warren/Leiston-Aldeburgh SSSI.	bowser, hand carried pumps and hoses) to recover the drilling fluid and remediate the frac out location.	
3.3.4	**Application Document 7.3 Design Development Report [APP-321]**	HDD feasibility and methodology	We query the confidence around the statement that HDD feasibility is not likely to be affected by the presence of gravel as well as the potential impacts of any changes to drilling methodology. We also seek reassurance that the available onshore borehole data is sufficient to give confidence in the conclusions that the HDD within the RSPB Reserve and SSSI will remain above the London Clay layer.	With regards the potential risk from gravel accumulation in the bore, we stand by the statements in **Application Document 7.3 Design Development Report [APP-321]** that, if gravel, a minor constituent in the Crag, accumulates in the bore, it is expected to affect methodology not feasibility. The borehole photographs and descriptions indicate that the described gravel component is weakly consolidated shell fragments that are most likely to be broken up by the bit and rotating drill pipes and should not accumulate. However, if they do accumulate, the potential has been clearly identified as a risk and the HDD contractor monitor drilling forces and will undertake proactive cleaning of the bore, including swabbing and trips out of the hole to ensure the bore is clear. With regards the surface of the London Clay. A series of boreholes in the onshore and offshore area 2.5 km to the north indicate the gently easterly dipping upper surface of the London Clay has a variability of +/- 2 m over a 1500 m length. The elevation of the top of the London Clay at the location 2.5 km north is within 3 m of the elevations at the Sea Link landfall, so this gives confidence that the upper surface of the London Clay should be consistent. BGS borehole TM45NE7, 1.2 km to the south of the HDD entry location, encountered the top of the London Clay at approximately -12.2 m ODN, while the project borehole RedP-BH-4 near the landfall entry point recorded London Clay at -15.8 m ODN. This also indicates consistency in the top of the London Clay over a long distance. While variations in the London Clay due to palaeochannels are known to occur regionally, the scale of the variation in surface of the London Clay is expected to be a few metres vertically over 100 or more metres. The HDD can adjust course to remain above the London Clay if necessary, while ensuring sufficient depth to mitigate the risk of drilling fluid frac out. In the unlikely event of extreme changes in the London Clay are present, the HDD may need to drill through the London Clay for several hundred metres. However, the London Clay is drilled on a weekly basis in the UK and the contractor will be able to adapt their drilling fluid and methodology (e.g. additional swabbing trips through the zone) to ensure the bore is clean and in gauge through the zone.	Under discussion
3.3.5	**Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology**	HDD feasibility and methodology	The RSPB request that additional information is provided to explain the freeing process should the drill head become stuck, any additional impacts on the RSPB reserve and SSSI (including from	Paragraph 2.9.8 of **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** includes further text explaining what would happen in the unlikely event of stuck drilling equipment.	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
	and Biodiversity [REP1-047] **Application Document 3.1 (E) draft Development Consent Order [CR1-027]**		extending the construction duration and subsequent noise effects) and how these can be mitigated. We request that provision (B22) in APP-342 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) regarding measures to avoid the trenchless drilling equipment getting stuck is updated to include details of mitigation measures.	Durations required to free strings depend on the length of string that is stuck, but typically require between 1 and 7 additional shifts, so they have a small impact on the overall programme for the landfalls. The Applicant has committed to the use of trenchless techniques at the landfall to avoid the saltmarsh and lagoon. There are no proposals in the DCO (**Application Document 3.1 (E) draft Development Consent Order [CR1-027]**) to allow open cut trenching to cross the saltmarsh and lagoon, even as a fall- back position. If trenchless techniques were for any reason identified as not feasible, any proposals for alternative methods would require a formal amendment to the DCO, with a new supporting environmental assessment.	
3.3.6	**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3	Drilling fluid frac-out	A report detailing the outcomes of hydrofracture modelling should be a required Obligation to be discharged before construction commences. Measure GH10 (drilling fluid breakout plan) in APP-342 REAC should include provisions that Natural England and ourselves are consulted with regard appropriate procedures (including access) within RSPB North Warren/Leiston-Aldeburgh SSSI; also that these procedures should include notification of both NE and ourselves of any incidents at the earliest opportunity.	Regarding **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3, in addition to the mitigation measures being implemented to minimise and address the risk of surface frac out or break out contained in Measure B09, Measure GH10 provides for a drilling fluid management plan, that includes drilling fluid breakout mitigation measures, and Measure B59 commits to sharing the plan with Natural England. Site visits with Sea Link and RSPB representatives have already been undertaken at the RSPB North Warren/Leiston-Aldeburgh SSSI to understand the works and RSPB requirements. The results of the visit, along with ongoing discussions, are informing the development of land access agreements between the parties.	Under discussion
3.3.7	**Application Document 6.3.3.5.B ES Appendix 3.5.B Qualitative Groundwater Risk Assessment [APP-117]** **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3	Hydrology and water quality	We request clarity regarding the likelihood of dewatering at launch pits being required and mitigation to be proposed to ensure that any dewatering does not affect water levels within RSPB North Warren/Leiston-Aldeburgh SSSI.	As described in **Application Document 6.3.3.5.B ES Appendix 3.5.B Qualitative Groundwater Risk Assessment [APP-117]** during the site specific preliminary ground investigation, groundwater was not encountered within the exploratory holes drilled within the area of the proposed HDD landfall, therefore groundwater is unlikely to be intercepted by the launch pits and dewatering is not anticipated to be required in this location. In addition, Commitment GH09, included within **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3, secures the requirement for a hydrogeological risk assessment to be undertaken if dewatering is found to be required following detailed design including further ground investigation (Commitment GH01).	Under discussion
3.3.8	**Application Document 6.3.2.5.A**	Hydrology and water quality	Due to concerns about the risk of the trenchless crossing mobilising existing contamination in	The Applicant notes the summarised position of the Consultee and will provide a full response in due course.	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
	Appendix 2.5.A Preliminary Contamination Risk Assessment [APP-116] **Application Document 6.3.3.5.B ES Appendix 3.5.B Qualitative Groundwater Risk Assessment [APP-117]** **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3		groundwater, the hydrogeological risk assessment referred to in GH10 of APP-342 REAC should be available to inform the assessment of impacts on the RSPB reserve and SSSI during the Examination.		
3.3.9	**Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**	Commissioning/Operational cable faults and duct failure	Information should be provided in order to understand the likelihood of occurrence (or multiple occurrences) of cable faults along with an assessment of the likely impacts of additional duct installation itself or the impacts of cable fault remedial action (including additional cable pulling). Further information about the risks and subsequent remedial procedures in the event of the empty cable duct collapsing or becoming unsuitable for use should be provided.	The cable system will have an initial design life of 40 years this will include the cables and ducting. Typically, High-Density Polyethylene (HDPE) or PVC ducts will have a longer design life of approximately 50 years with an expected service life that is longer. Once the ducts are installed it is not considered likely that they will deform by any significant value over the life of the duct. The only likely causes of damage to ducts requiring maintenance or replacement are when they are damaged by 3rd parties undertaking excavation works. Given the depth of the installation under the RSPB reserve and the nature of the reserve this is not considered a significant risk for this proposed installation. Industry analysis from a survey carried out by Cigre between 2006 and 2015 (Report reference 815, September 2020) shows the failure rate of HVDC terrestrial circuits is too low to calculate as only two failures have been reported within the 10-year period over the 1045 km of installed circuits covered within the survey. So, the likelihood of a failure under the RSPB reserve is considered to be very low. However, given the significance of the RSPB reserve the installation of a spare duct will be undertaken so that a new cable can be installed in the unlikely event of a failure in the circuit. The works to install a replacement cable would require excavation at the joint bay	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
				location to the west of the RSPB reserve and exposure of the spare duct, the set-up of a working area for cable winches, laydown and welfare adjacent to the joint bay. The replacement cable would be brought to site on a cable vessel, the spare duct would be exposed on the seabed and the cable pulled into the duct from the shore.	
3.3.10	**Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3 **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**	Disturbance thresholds	We recommend that it is clarified that noise thresholds proposed within the HRA refer to impulsive noise, represented by dB LAmax	The 3 dB change used for HRA screening, and the 60 dB threshold used for appropriate assessment, both as agreed with Natural England, would apply to either LAmax or LAeq, as the 60dB threshold is a noise level without reference to how often that level is breached. The assessment presented in **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3 and **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** then uses LAmax as a precaution and effectively treats it as if it was the typical noise levels to which the SSSI/SPA would be exposed. This is because for a given activity LAmax is always higher than LAeq. Therefore, if the LAmax can be brought below the 60 dB disturbance threshold (irrespective of how often the LAmax is experienced) the LAeq will also be below the 60 dB threshold, as LAeq is typically 5-15 dB below the LAmax.	Under discussion
3.3.11	**Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3	Mapping of noise contours	The meaning of the mapped 'average LAmax' contour should be clarified. We also seek reassurance that the map 'for the project as a whole' represents the worst-case scenario for impulsive noise and not an average level for the duration of the whole project. As contours have been calculated for all phases of the work, these should be made available to the Examination. It would be helpful for mapping to be supplemented by larger scale maps of the noise contours where they overlap designated sites, to aid identification of areas and species which may potentially be impacted.	Figure 3 of Appendix E of **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3 presents a blended LAmax contour for the project, based on the worst-case phase of the work in each case. For example, while Figure 3 shows the 60 dB LAmax contour straying into Sandlings SPA, the HRA explains this is driven by the compound setup, with the relevant contour for the actual HDD operation falling outside the SPA. The blended contour maps were provided for ease of reference and intelligibility, rather than a larger number of maps covering each phase of work.	Under discussion
3.3.12	**Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3	Chronic Noise	The RSPB recommend that consideration is given to chronic noise levels, represented by dB LAeq, as this has been shown to affect densities and distribution of breeding birds.	The Applicant had lengthy pre-application discussions about noise impacts with Natural England and a 'no reaction' threshold of 55 dB was agreed. This applies to either LAmax or LAeq. We note RSPBs reference to some available research suggesting reactions at lower noise levels, but we also note that RSPB acknowledges the limited number of studies available and the lack of evidence regarding species of interest for the Proposed Project. The Applicant and Natural England agreed a precautionary 60 dB threshold for significant disturbance (i.e. that which could affect population survival and persistence). RSPB also agreed to this threshold in a meeting and as noted in **Application**	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
				Document 6.6 (E) Habitat Regulations Assessment Report submitted at Deadline 3. This threshold can also be applied to either LAeq or LAmax. Since LAmax is always 5-15 dB higher than LAeq for a given activity LAmax was used as a worst-case, effectively treating it as if it would be the typical noise exposure. This was on the basis that if the LAmax of a given activity in a given area falls below 60 dB (and will therefore not cause significant disturbance) this will be true of the LAeq to an even greater extent.	
3.3.13	**Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3	Modelling of mitigation measures	It would be helpful to specify the noise modelling guidance used in the assumption of a 10 dB noise reduction due to best practice and to comment on the safety of the assumption, including any circumstances where this could be difficult to achieve.	Guidance in this matter is provided in Annex B of BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites – Part 1: Noise', which provides examples of mitigation options for various activities, together with their likely efficacy. The 10 dB mitigation assumption is reasonable at this stage and takes account of the relatively worst-case assumptions in the assessments, together with the likely attenuation from a range of mitigation options that may be combined. The stakeholder is correct that certain situations, such as work at height, can limit the options available. However, that does not mean that there are no mitigation options available. Additionally, the full 10 dB mitigation is not required in all situations to avoid significant effects, and a lower level of attenuation may be sufficient in some situations (not-withstanding that best practicable means to reduce noise levels would be implemented). Conversely, attenuation far exceeding 10 dB can likely be achievable in some situations with a combination of mitigation options. Further detailed assessments will be undertaken by the Contractor based on their specific construction methodologies and specific mitigation measures will be identified and implanted.	Under discussion
3.3.14	**Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3 **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**	Availability of noise modelling report	We request that the noise modelling carried out by Atkins is made available to be considered as part of the Examination documents.	The noise modelling presented for the terrestrial environment and presented in map form in the **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3 and **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** was produced specifically for those chapters and consists of maps and data rather than a technical note.	Under discussion
3.3.15	**Application Document 6.2.2.2 (C) Part 2 Suffolk**	Construction programme and working hours	Given the broad timespan for reinstatement activities and the potential for these to cause disturbance, we query both when any reinstatement	The Applicant can confirm that Table 4.10 is an indicative construction programme only and that the landfall compound set up will be undertaken outside of the nesting season	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
	Chapter 2 Ecology and Biodiversity [REP1-047] **Application Document 6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise and Vibration [AS-109]** **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3		needed in the vicinity of RSPB North Warren/Leiston-Aldeburgh SSSI would be completed and the nature of any such works. We recommend that the potential for increased sensitivity of birds to disturbance at dawn, dusk and during the night during winter should be considered in the assessment of noise impacts.	(February to August) as committed to within the REAC (**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3) under provision B27. Noting that there is also a commitment under O03 that landfall cable installation activities would not occur between the reduced seasonal restriction period between January and March. The noise assessment for these works can be found within **Application Document 6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise and Vibration [AS-109]**. This document confirms that the Applicant has committed to employ BPM (NV01) (secure via **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3) to reduce the adverse effects of construction noise. Additional temporary noise mitigation measures will be put in place to reduce noise levels from construction plant and machinery at specific locations including the landfall, unless a detailed assessment is undertaken that demonstrates that no significant noise impacts would occur to nearby NSR. With regard to noise, Paragraph 2.9.45 of the **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**. discusses noise disturbance on the SSSI. While a small part of Leiston-Aldeburgh SSSI east of the former railway line would be subject to noise above 60 dB during compound set up/demobilsation and HDD works between the former railway and Leiston Road (total duration c. 6 months), it has been agreed with Natural England that this would not constitute a significant effect due to the very small area affected. The 60 dB threshold agreed with Natural England would apply whenever the works were undertaken and is not restricted to particular times of day. With regard to lighting, the ES has assumed lighting would be used at the HDD compound during the HDD operation. Lighting impacts have been considered in the **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** and the **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3. Paragraph 2.9.42 of the Ecology chapter states that '*A noise fence [proposed around the HDD compound] would also act as a visual screen, thus protecting birds in the SPA from visual disturbance'.* Paragraph 2.9.85 on ornithology states that '*Lighting for construction should only be needed around construction compounds and the trenchless compound (S10). This would be targeted directional lighting with cowling and other lighting controls to manage (and in the case of the trenchless compound avoid) incidental illumination (B38)'.* REAC measure B38 states '*Around construction compounds*	

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				and the converter station and substation works areas, direct illumination of boundary features would be avoided. Lighting would be designed to comply with published guidelines'. Paragraph 4.2.25 of the **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3 also discusses lighting and the presence of a screen from the SPA.	
3.3.16	**Application Document 7.3 Design Development Report [APP-321]**	Ground works including piling	It should be made clear whether any piling activities could be required at the compound close to RSPB North Warren/Leiston-Aldeburgh SSSI and whether the current modelling and proposed mitigation take account of this.	All preparation works prior to the HDD have been modelled as part of compound set up. There is no piling planned for the compound east of Leiston Road.	Under discussion
3.3.17	**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3	Ground works including piling	Given our concerns about the adequacy of the noise modelling information presented, we request that further consideration is given to the potential for disturbance of White-fronted Goose, Eurasian Curlew and other wetland birds on the basis of the additional information requested.	The affected area is extremely small compared to the size of the RSPB Reserve (a patch just the opposite side of the former railway) and the contour shown is LAmax. The LAeq 60 dB line will not extend into the reserve.	Under discussion
3.3.18	**N/A**	Ground works including piling	We query whether the possible requirement for use of a pneumatic casing hammer at the seaward end of the HDD drill has been considered in the noise modelling and assessment of impacts on designated sites.	The Applicant can confirm that, following evolution of the landfall design, there are no plans to use a pneumatic hammered casing for the trenchless ducts.	Under discussion
3.3.19	**Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]**	Noise during trenchless installation	We recommend that average (chronic) noise levels affecting the Sandlings SPA, Leiston-Aldeburgh SSSI (and Minsmere-Walberswick SPA/Ramsar and Alde-Ore Estuary SPA/Ramsar through functional linkage) during the HDD drilling process are quantified to aid the assessment of impacts on breeding birds. The assessment of noise from continuous working during the HDD drilling process (which is planned during the bird breeding season) should consider potential impacts of work during hours of low light and darkness, when birds may be more sensitive to noise while they are roosting or through increased vulnerability to predation.	The 60 dB LAmax contour for the HDD does not extend into the RSPB Reserve. Therefore, since LAeq is 5-15 dB below LAmax the 60 dB LAeq contour for the HDD also does not stray into the RSPB reserve.	Under discussion
3.3.20	**Application Document 6.6 (E) Habitat Regulations Assessment Report**	Noise during trenchless installation	The HRA should consider potential noise impacts on breeding birds during the drilling process, particularly Marsh Harrier .	See above responses.	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
	submitted at Deadline 3				
3.3.21	**N/A**	Noise during trenchless installation	We request that specific mapping of the noise contours for the drilling phase is provided including a range of noise contour levels. Also to include a map based on average sound level (dB LAeq) as well as a separate map showing impulsive noise levels (using dB LAmax).	See above responses.	Under discussion
3.3.22	**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3	Mitigation measures	It is crucial that the mitigation required by measure B23 (such as acoustic fencing) is constructed at the beginning of the construction period, especially as the enabling works could have the highest noise impacts on designated sites. We also recommend that B23 should include identification of further mitigation should noise modelling indicate that thresholds have been exceeded.	The Applicant agrees that mitigation needs to be in place before activities commence east of Leiston Road. With regard to more specific noise measures, the wording of B23 was left open (rather than committing to specific noise reduction methods) precisely so that the measures can be tailored on the ground, including in response to noise monitoring during works.	Under discussion
3.3.23	**N/A**	Mitigation measures	Given the potential reduction of impact afforded by an acoustic shed enclosing the HDD equipment, we suggest this should measure be included in the proposed mitigation. We recommend that bird distribution should be monitored during construction to indicate whether any changes are occurring and again, help to inform any need for further mitigation.	See responses above. The Applicant is willing to consider monitoring of bird distribution during construction to inform any need for further mitigation.	Under discussion
3.3.24	**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3	Visual Disturbance and Lighting During Construction	Where GG10 (lighting) is applied to designated conservation sites, the phrase "where practicable" should be removed to comply with the mitigation hierarchy and GG21 (lighting) should explicitly include designated conservation sites.	Comments are noted. The request to amend the wording of measures GG10 and GG21 in the REAC (**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 is being considered by the Applicant and a response will be provided in due course.	Under discussion
3.3.25	**N/A**	Visual Disturbance and Lighting During Construction	Further information regarding lighting and work at height is required to adequately inform the assessment of visual disturbance, as fencing will not screen or reduce light spill from any activities taking place at height.	For the works east of Leiston Road including the HDD, the primary source of potential visual disturbance would be the construction workers themselves and associated lit areas which would be at or close to ground level. The use of cranes for the HDD landfall is typically limited to the initial mobilisation of HDD equipment (normally 2-3 days, day works only), repositioning of the drill rig between holes (1 day on 2 occasions) and demobilisation of HDD equipment (2-3 days, day works only).	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
				Equipment that may be visible above site fencing or screening is normally the top of the HDD rig (5 m above ground level), Top of the recycling system (4.8 m above ground level) and the top knuckle of an excavator boom (typically working at 5 m but potentially 7 m above ground level). One to two excavators will be working on the HDD site for most of the duration of the works. Lighting on the booms is directed at the working area (ground) in front of the excavator.	
3.3.26	**N/A**	Visual Disturbance and Lighting During Construction	We recommend that mapping of areas affected by visual disturbance is provided using a suitable threshold based on visibility of lighting, people and mobile infrastructure and the sensitivity of ecological receptors.	Given the existence of a treeline and the former railway embankment separating the SPA and SSSI from the HDD compound, and the commitment to visually screening these works, the Applicant doesn't consider that actual mapping of visual impacts is necessary.	Under discussion
3.3.27	**N/A**	Operational noise and visual disturbance during maintenance activities	We recommend the inclusion of measures in the REAC to carry out noisy and/or disturbing maintenance activities in August and September where this is practicable, to avoid disturbing breeding or wintering birds.	Given the depth of the cable through the RSPB reserve it is very unlikely any noisy or disturbing maintenance activities would take place within the Reserve.	Under discussion
3.3.28	**Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]** **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005]**	Clarity regarding access required	The exact nature of access routes at RSPB North Warren, along with any works required to facilitate it, should be made clear, and potential impacts require proper assessment and mitigation. Surfacing of access routes in particular could result in significant damage to and loss of SSSI habitat, and we would object to this should it form part of the proposals.	The access track is only for use during the construction of the Proposed Project not during operation. All routes in the submission drawings are linked to the cable corridor. Routes are for access by a 4 x 4 or a quad bike for monitoring during construction so will not require any surfacing unless agreed in advance that it is required by the RSPB. Monitoring as stated above will be by 4 x 4 or quad bike or by foot; there will be no requirement to leave any equipment within the North Warren Nature Reserve. In the event of a fault, the Applicant will look to remove the cable from the duct it is in and replace the section of cable. Therefore, the Applicant will not require access to the cable from the surface. The Applicant will only require access during the construction phase of the Proposed Project.	Under discussion
3.3.29	**Application Document 2.12 Trees and Important Hedgerows to be Removed or Managed Plans [CR1-023]**	Vegetation management	We request clarity on the exact scope of vegetation management proposed within the RSPB reserve and SSSI and note that suitable mitigation would be required to protect Schedule 1 species.	The groups identified to be managed correlate with tree features H1099S and G82S. These tree features line an existing access route. These have been marked as 'managed' to ensure that the canopies and lateral growth can be kept back from the existing access route to facilitate monitoring and maintenance works, as is currently undertaken by RSPB in those locations.	Under discussion
3.3.30	**Application Document 6.2.2.2 (C)**	Habitat loss during construction	The section on construction phase habitat loss in Chapter 2 Ecology and Biodiversity should include	See above responses (3.3.28 and 3.3.29) on access within the RSPB reserve. There will not be any habitat loss.	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
	Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]		implications of regular and emergency access and vegetation management. We query whether reinstatement of any vegetation managed to facilitate access would be possible given the proposal for a permanent access route across the site. We consider that the impacts of any permanent loss of scrub habitat should be properly assessed. It should be clarified that no surfacing of access routes is proposed within RSPB North Warren/Leiston-Aldeburgh SSSI.		
3.3.31	**N/A**	Emergency Access	We request clarification of the circumstances which might require emergency access and the methods and equipment required, also of how the Applicant proposes to be able to reach all parts of the cable route in the event of a fault, and what effect this could have on habitats within the RSPB reserve and SSSI?	Access would be required along the alignment of the trenchless crossings which will be installed within the cable limit of deviation provided. Access would be via light vehicle where viable and on foot where light vehicles cannot access. The purpose of the access is to monitor the progress of the drill and to undertake any remedial works in the unlikely event of a frac out of drilling fluid occurring. The works associated with remediating a frac out would include the following steps: • Terminate drilling activity upon frac-out detection by the monitoring equipment. Fluid pressure would then decrease stopping additional drilling escaping. • Identify frac-out location and ensure a safe working area. The above ground monitoring would assist in this process making it quicker which is an additional benefit to monitoring access. • Contain the frac out fluid using straw bales and/or silt fencing. Typical surface frac-outs are small and are usually several or tens of litres which can be easily dealt with by a small team. All of the drilling mud at surface level can then be removed back to the drilling compound. This may be by temporarily installing small hand carried pumps with hoses to pump fluid back to a tractor towed bowser, and/or by using spades, buckets and wheelbarrows/trailers.	Under discussion
3.3.32	**Application Document 2.13 Design and Layout Plans [APP-037]**	Layout	We request that more detail is provided of the locations of any noise/visual mitigation screening at the construction compound is provided, so that impacts on the Sandlings SPA and Leiston-Aldeburgh SSSI (including RSPB North Warren) can be more fully understood.	The precise positioning of plant and equipment has not been determined as this is a detailed design matter. However, they will be located within the Order Limits between the HDD compound and the SPA/SSSI. Therefore, the Order Limits around the HDD compound can be taken to be the location of the fence as the worst-case scenario.	Under discussion
3.3.33	**Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology**	Location of transition joint bay (TJB)	Due to the potential for disturbance impacts during the construction period (particularly from cable drilling), the location of the transition joint bay needs	This is not required. The transition joint bay will be outside designated sites and a worst-case noise assessment of impacts on designated sites has already been presented in	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
	and Biodiversity [REP1-047]		to be confirmed in order to adequately inform the assessment of impacts.	**Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**.	
3.3.34	**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3	Drainage at construction compounds	Measures GG14, GG15, GG16, GH05 in APP-342 REAC around control of contamination from runoff, wash down, storage areas etc should include explicit requirements to protect wetland habitats.	Comment is noted. The request to amend the wording of REAC commitments to include specific reference to wetland habitat is being considered by the Applicant.	Under discussion
3.3.35	**Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**	Exclusion of deer	Potential impacts of increased deer pressure arising from exclusions or restrictions to deer movement should be assessed and any required mitigation should be proposed. Impacts on the reinstatement and enhancement of habitats should be considered along with any necessary protection.	Any deer present in this field will already be part of a herd using Sandlings SPA and Leiston-Aldeburgh RSPB reserve. Paragraph 2.9.93 of the **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** notes that 'Being large animals they [red deer] have a large home range (typically a minimum of 200 ha and often much larger) such that this field is likely to be a small part of a much larger area used by the deer.' The works areas will be fenced for the duration of the works in this specific location, following completion of the works the site will be returned to its existing condition. If additional protection is required around saplings or hedgerows then this will be provided and monitored as part of the reinstatement. Access around the works site will be retained as there will be no need to fence off the trenchless installation area so north south movement of the deer within the field network will be retained throughout, limiting any reduction in grazing area.	Under discussion
3.3.36	**Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]**	Air quality	The statement that air quality impacts from generators on Leiston-Aldeburgh SSSI lasting up to 3 years are considered a temporary impact requires further justification and supporting evidence to be provided.	Up to three years is a reference to the overall construction programme. The compound east of Leiston Road would not be present for the entire construction programme but for approximately six months as noted in the **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**, the indicative construction programme and **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]**.	Under discussion
3.3.37	**Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics,**	Public access and recreational impacts	Should any changes to public access or parking be required, potential impacts of changes in visitor use, including on designated sites, should be included in the assessment.	Recognising that PRoW and recreational trails are valued by both locals and tourists. Section 10.9 of **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005]** assesses the potential effects of the Proposed Project on disruption to the use of PRoW and recreational routes. Appropriate route	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
	Recreation and Tourism [REP1A-005] **Application Document 2.7(B) Access, Rights of Way and Public Navigation Plans – Suffolk [AS-011]**			diversions, closures and management measures are proposed as embedded mitigation and outlined in Section 10.8. The criteria for determining the sensitivity of users of PRoW and recreational trails and the magnitude of impact of disruption is outlined in Section 10.4. For example, recreational routes' sensitivity criteria considered several factors, including: • the quality of user experience; • quality of the route; • purpose of usage; and • potential for substitution. Footpath 103/006/0 is identified as a recreational footpath that runs across the RSPB North Warren. The HVDC cable will be installed via trenchless technique limiting impact on this PRoW which is to remain open throughout the Proposed Project. Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated. As set out on **Application Document 2.7(B) Access, Rights of Way and Public Navigation Plans – Suffolk [AS-011]**, there is potential for the Proposed Project to interact with vehicular access on Leiston Road and access to Footpath 103/006/0 in this area, but no significant effects are expected with the mitigation to be secured as part of **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [APP-352]**, and noting that Footpath 103/006/0 will remain open regardless of any road closure of Leiston Road. Additionally, the Applicant recognises the importance of local amenity and access to PRoW. In response to this concern, **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** assesses the likely significant effects on amenity of PRoW users, drawing on assessment from of **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** and **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]**. The cumulative impact is also assessed in **Application Document 6.2.12 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. No significant adverse effects are identified with regards to human health and wellbeing.	
3.3.38	**Application Document 6.3.2.5.E ES Appendix 2.5.E Generic Quantitative**	Unexploded Ordnance (UXO)	Assessment is required of potential presence of UXO and any need for excavations within RSPB reserve/SSSI. This should include assessment of potential damage to habitats and disturbance to the	The Applicant has undertaken a detailed UXO risk assessment for the Proposed Project including at the RSPB North Warren reserve. The risk assessment notes that a maximum penetration depth of between 10-12 m can be taken for WWII	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
	Risk Assessment – Suffolk [APP-120]		SSSI and the nearby Sandlings SPA from any detonations required.	bombs at the site. With the trenchless crossing anticipated to be approximately 16-18 m below the RSPB reserve it is considered very unlikely that a UXO will be encountered by the drill. Consequently, the risk of encountering a UXO in the RSPB reserve may be considered reduced to As Low as Reasonably Practicable (ALARP), and therefore no excavations within the RSPB reserve/SSSI are anticipated. The Applicant is planning to reduce the UXO risk for working areas and the complete length of the landfall route to ALARP by the appointment of a UXO Consultant and additional pre-construction UXO survey works. This approach was undertaken during the intrusive ground investigation works completed previously by the Applicant and will be used for future surveys and construction works. Where required, pre-construction surveys, such as UXO surveys (including relocation / removal where required) and additional landfall ground investigations, will be consented separately and are therefore not covered or assessed in the ES and/or the HRA. This is standard practice for some pre-construction preparatory surveys. If UXO clearance is necessary, the activity would be undertaken in accordance with approved industry practices for removal and disposal/waste management of ordnance, particularly the use of low deflagration methods during clearance. These considerations will also be included in any consents/permits (e.g. SSSI Assent / HRA) and associated impact assessments.	
3.3.39	**N/A**	The RSPB's land management	We request clarity as to whether any restrictions will be imposed on our land management activities during the construction (e.g. during cable installation) or operational periods which could limit our ability to manage and maintain habitats within RSPB North Warren/Leiston-Aldeburgh SSSI	The trenchless installation of cables under the North Warren reserve will not require significant changes to the management or use of the reserve. Access to the reserve is required to monitor the progress of the drill, therefore the Applicant will need to work with the RSPB to ensure safe access for the Contractor during the drilling process. This could include the isolation of the works area from grazing animals if those animals are considered to be hazardous, or from other activities if deemed hazardous to the workforce. Drilling is a relatively slow process, and only isolated locations would be required for access on any given day, therefore it is not considered that the proposed monitoring works would impact on the ability of the RSPB to undertake necessary habitat management works. The Applicant looks to work with the RSPB to plan and agree a safe method of access that is suitable for all parties.	Under discussion

Table 3.4 Suffolk Onshore Scheme - Cable Corridor Impacts

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.4.1	**Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [AS-059]**	Avoidance of disturbance to breeding Woodlark and other species	For the restored/enhanced acid grassland, we would encourage a mostly short sward with some bare ground retained if possible (around 5-10%), and provision of some areas with a sward of less than 3cm will optimise foraging for Woodlark. Arisings from mowing should be placed around the perimeter of the site. Provision B24 in the REAC (clearance of vegetation to deter nesting birds) is not guaranteed to be effective in our view and surveys and mitigation before construction takes place will still be required to avoid damage or disturbance to nests. Measure B35 (commence work during winter to deter nesting birds) also may not be successful and monitoring will be necessary to inform the construction programme, particularly as construction noise levels and types may vary.	The Applicant agrees that pre-construction monitoring (and bird surveys every year) will be needed to ensure steps can be taken to keep areas within the Order Limits clear of nesting Schedule 1 Birds. Section 7.1 of the **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [AS-059]** identifies the need for such surveys. We note the RSPBs recommendations regarding acid grassland management and will consider their inclusion in the LEMP.	Under discussion
3.4.2	**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3	Potentially conflicting mitigation measures	Measures B05 (clearance of vegetation to deter reptiles) and B02 (avoidance of vegetation clearance during the bird breeding season) may conflict in some locations – in this instance the reptile dispersal window could be reduced to September-October to avoid conflict.	The Applicant is aware that different species have different clearance seasons. It will be for the Ecological Clerk of Works for the Proposed Project to provide specific advice to the contractor as to the suitable period for clearance. To avoid conflict between reptiles and nesting birds this will generally be in September/October.	Under discussion
3.4.3	**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3	Impacts on Stone-curlew	Surveys of bare ground during construction will be required to check for presence of Stone-curlews and, should nesting occur, suitable measures (which may need to include cessation of works in the area) would need to be put in place to avoid disturbing nesting birds.	Comment is noted. This will be factored into the pre-construction and annual bird surveys and the duties of the Ecological Clerk of Works (see response above).	Under discussion
3.4.4	**Application Document 6.2.2.2 (B) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**	Impacts on Turtle Dove	Impacts on key habitats for Turtle Dove and Nightingale (including scrub and mature hedgerows) should be avoided and minimised as far as possible and mitigation proposed for loss of habitat during time taken for re-establishment. To benefit Turtle Dove and Nightingale, we recommend that newly planted hedges be maintained at a height of 3 m or more and allowed to grow at least 4 m wide with brambles and other thorny climbers encouraged/retained.	Impacts on scrub and mature hedgerows have been minimised as much as possible and the Proposed Project will result in a considerable net increase in woody planting (woodland, scrub and hedgerows) particularly in the vicinity of the Converter Station and Substation. The maintenance recommendations regarding hedgerows are noted by the Applicant and will be considered for inclusion in an update to the oLEMP.	Under discussion

Table 3.5 Suffolk Onshore Scheme - Cumulative/In combination Effects with other Projects

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.5.1	**Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3 **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**	Co-location	Whilst the RSPB is supportive of the principle of trying to reduce impacts through project co-ordination, we are extremely concerned that co-location in this instance could have significant additional impacts on the proposed landfall area. The Co-ordination Document and HRA should acknowledge the need to robustly assess impacts of potential co-location on designated sites including repeated disturbance, additional infrastructure, potentially increased width of cable corridor and the increased risk associated with any failure/faults.	The Applicant is ultimately only responsible for its impacts and cannot control other projects. Each project must ensure that it can address its impacts in terms of noise and visual disturbance and other impact pathways. If the Applicant has ensured that their disturbance and other impacts are not-significant (see other responses regarding noise and visual disturbance in this document) that is all that can reasonably be required of the Applicant. If the Applicant's impacts are not significant and subsequent developers can also mitigate their impacts such that they are also not-significant then ultimately no significant impact will arise even if projects are undertaken sequentially. In addition to consideration of in-combination effects within the HRA (**Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3), an assessment of the likely significant effects of the Proposed Project with other development in the area is provided in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**.	Under discussion
3.5.2	**N/A**	White-fronted Geese	The assessment of cumulative impacts from Sea Link and Sizewell C on White-fronted Geese of the Minsmere-Walberswick SPA should consider combined disturbance to commuting flights in winter.	See previous comments on noise disturbance.	Under discussion
3.5.3	**Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3	Disturbance to Sandlings SPA	The HRA should consider the impacts of multiple projects disturbing multiple areas of the Sandlings SPA as this could result in a significant reduction in nesting and foraging habitat being available for Woodlark and Nightjar.	The Applicant is addressing the Proposed Project's contribution to cumulative and 'in combination' effects as set out in **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3, by ensuring noise levels within the SPA do not exceed the 60 dB LAmax threshold agreed with Natural England. Impacts may arise on other locations from other developments unrelated to the Proposed Project. However, since the Applicant is reducing the Proposed Project's impact on the SPA to 'not-disturbing', the cumulative 'in combination' effect will remain not significant.	Under discussion
3.5.4	**Application Document 7.10 Coordination Document [APP-363]**	Deer pressure	The Applicant should liaise with Sizewell C and with site managers around potential impacts on the movement of deer around the landscape and potential effects of increased deer pressure on designated sites during the construction periods for these projects.	See previous comments on deer. Ultimately the Applicant only has control over the impacts of the Proposed Project. However, the Applicant has been in discussion with Sizewell C about their approach to deer management. The Applicant is aware of the importance of coordination with other projects and has set out its approach to	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
				coordination within **Application Document 7.10 Coordination Document [APP-363]**. This document provides an overview of the various coordination approaches that have been considered and, where practicable, implemented by the Proposed Project.	

Table 3.6 Suffolk Onshore Scheme - Monitoring and Additional Mitigation

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.6.1	**Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [AS-059]**	Suffolk Onshore Scheme – Monitoring and Additional Mitigation	A programme of monitoring of project impacts on designated sites and important species populations is required to provide assurance that agreed thresholds are not being exceeded or that inadvertent impacts are not occurring and to enable additional mitigation to be put in place should unforeseen impacts occur. We recommend that oversight of the outputs of such monitoring and any requirement for additional mitigation should sit with an Ecology Working Group.	The comment is noted. Section 7 of **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [AS-059]** specifically discusses monitoring pre and post-construction, including that '*A post-construction monitoring programme and reporting procedures will be formalised, agreed with the relevant planning authority and included within the detailed LEMP, prior to construction works commencing*'.	Under discussion

Table 3.7 Suffolk Onshore Scheme - Habitat Enhancements and Biodiversity Net Gain

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.7.1	**Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]**	Details of BNG proposals	We request that plans for ambitious BNG which contributes to landscape-scale conservation of important habitats and species within Suffolk are submitted as part of the Examination.	The applicant can confirm its commitment to deliver 10% BNG. Habitat creation and enhancement measures are included within **Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]** for the land surrounding the converter station as this is land within the ownership of the applicant. This is because the Proposed Project presents an opportunity to deliver more ambitious BNG that contributes to landscape-scale conservation and restoration as you have also identified. The Applicant will continue to explore a range of options to deliver BNG for the Proposed Project which provide the best choices and outcomes for nature and wider environmental and societal benefits, and provide value for money for consumers. These outcomes will be secured and in place prior to the Proposed Project being operated as part of the high voltage electricity transmission network.	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.7.2	**Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [AS-059]**.	Habitat enhancements for farmland birds	We recommend that habitat enhancements consider planting targeted at providing nesting, foraging and watering habitat for farmland birds (particularly Turtle Dove), where appropriate. We also recommend that the Applicant liaises with local communities about opportunities to improve biodiversity along the cable route, in ways that benefit both wildlife and communities.	Comment is noted. Proposals for habitat creation and enhancement are set out in **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** and **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [AS-059]**.	Under discussion

Table 3.8 Suffolk Onshore Scheme – The RSPB's Landownership

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.8.1	**Application Document 4.2 Statement of Reasons [CR1-032]** **Application Document 2.12 Trees and Hedgerows to be removed or managed plans – Suffolk [CR1-022]**	Compulsory Purchase Powers (CPO)	CPO powers must be restricted to only those necessary. Article 20 Discharge of water and Article 51 Felling or lopping are not appropriate for a designated site.	The Applicants have sought to minimise all areas of Compulsory Acquisition and as such have only applied for the land rights necessary to construct, operate and maintain the Sea Link project. The Applicant also, as stated, prefers to seek, secure and rely on voluntary agreements with affected parties and will honour those agreements where they are secured and in place. There are no drainage works proposed for the North Warren reserve, and in terms of vegetation management reference should be made to the **Application Document 2.12 Trees and Hedgerows to be removed or managed plans – Suffolk [CR1-022]** for details on the hedgerows within the reserve that have been identified for potential management to keep the PRoW clear for access. There are no trees or hedgerows to be removed within the reserve.	Under discussion
3.8.2	**Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**	Horizontal Directional Drilling	Contingency plans must be in place for any potential HDD failures which avoid any future need for open trenching at RSPB North Warren; without an adequate contingency plan, our concerns remain as an objection.	Please see response to comment 3.3.4 above regarding the risk of needing to open trench through the RSPB reserve. Mitigation measures for equipment stuck in an HDD is addressed in Paragraph 2.9.8 of **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**. The recovery of the stuck equipment is all undertaken from the HDD entry site, with no need for trenching in the RSPB Reserve.	Under discussion
3.8.3	**Application Document 4.2 (B) Statement of Reasons [CR1-032]**	Designated Site	PDA-009 Statement of Reasons should recognise that part of the RSPB Reserve within the red line boundary is designated as part of a SSSI, National Landscape and local nature reserve.	See above responses and those below. The Statement of Reasons deals with compulsory acquisition and land rights not the wider impact on designation which are covered elsewhere as stated in the application.	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.8.4	**N/A**	Grazing	There should be no restriction on the ability of graziers, and their animals, to freely move about the RSPB Reserve. There must be no severance of herds or grazing areas and there must always be the ability for grazing animals to access drinking water.	The Applicant acknowledges these concerns and will collaborate with the landowner to minimise disturbance to grazing activities wherever practicable.	Under discussion
3.8.5	**N/A**	Fencing	Any requirement for fencing should be clarified and any installation should take account of the designated site and its management as grazing marsh.	There will be no fencing required within the RSPB Reserve, unless agreed with the RSPB as a requirement for livestock management, see response to 2.2.10 above.	Under discussion
3.8.6	**Application Document 2.12 Trees and Important Hedgerows to be Removed or Managed Plans [CR1-032]**	Vegetation Management	The Application should recognise that, even with vegetation management, the proposed access routes would still not be suitable for vehicles, even quad bikes due to ground conditions. Vegetation management must be carefully controlled and minimised. Reinstatement must be agreed with the RSPB and preferably adopt a natural regeneration methodology. If new planting is required, it must be with native species agreed with Natural England and the RSPB.	See above vegetation management comments. Any management would simply be a continuation of the RSPB's existing management to keep paths open.	Under discussion
3.8.7	**N/A**	Water Control	The drainage management plan should be developed in consultation with RSPB as landowner and Natural England. Works should avoid impacting the sluice and drainage channel along the northern boundary of the DCO area at the landfall.	There are no drainage works proposed on the RSPB site.	Under discussion
3.8.8	**N/A**	RSPB Visitors	Clarity is required regarding whether the parking bay on Thorpe Road near access point S-AP-1 will be closed during construction of the scheme. Mitigation of visitor impacts may be required.	S-AP-1 is at the parking bay on Thorpe Road and is required for monitoring access to the foreshore during the drilling works. Although an element of the car park will need to remain clear for access it is not considered likely that the entirety of the car park will need to be closed. The use of this access will only be for a short period whilst drilling progresses under the foreshore and Thorpe Road.	Under discussion
3.8.9	**N/A**	Schedule of condition	The photographic schedule of condition must be compiled with the ability to locate individual photographic points.	The comment is noted, and the Applicant will provide a response in due course.	Under discussion
3.8.10	**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3	Intrusive Surveys and ongoing monitoring	Any further intrusive surveys require consultation with the RSPB and Natural England and assessment of impacts on the designated sites, Schedule 1 breeding birds and any interaction with our grazing operation. We request that ongoing monitoring of the scheme is undertaken including soil testing, ground level monitoring and hydrological impacts as a minimum.	The Applicant is committed to working with the RSPB on agreeing any access required for ongoing survey works. As was the case for the preliminary ground investigation and numerous ecology surveys within the reserve, the Applicant would look to agree the scope, location and timing of any survey works with the RSPB prior to those works being undertaken. The comment on ongoing monitoring of the scheme is noted, and the Applicant will provide a response in due course.	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.8.11	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]**	Access Requirements	Clarity is required regarding the nature, surfacing, purpose and proposed level of usage of the proposed access tracks in and around the RSPB Reserve (one track being from the compound located to the west of the RSPB Reserve, and a second track located not far from Sluice Cottage on the eastern edge of the RSPB site).	Details relating to the access point to the east of Thorpe Road (Bellmouth S-BM13) and the access point to the west of B1122 Leiston Road (Bellmouth S-BM02) are provided within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** and **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]**.	Under discussion
3.8.12	**Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk. [CR1-041]**	Access Requirements - vehicles	Clarity is required as to whether HGV access is only required to the west of the compound or whether access for HGVs is also proposed to the east of the compound and crossing onto the RSPB Reserve. The RSPB would strongly object to access across a designated site by such vehicles. Monitoring access during HDD drilling operations across the reserve should be on foot rather than vehicle due to access difficulties and potential impacts.	The forecast levels of construction traffic (including HGVs) associated with the access point to the east of Thorpe Road (Bellmouth S-BM13) and the access point to the west of B1122 Leiston Road (Bellmouth S-BM02) are provided within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** and **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]**.	Under discussion
3.8.13	**N/A**	Access Requirements – ditch crossings	Any ditch crossing points need to be agreed with the RSPB to ensure minimal impact on SSSI management and the hydrology of the site. Any monitoring should be on foot only.	No new crossing structures will be installed within the RSPB Reserve, Access is only required for monitoring either on foot or by 4x4 vehicle (e.g. quad bike). Existing crossings will be used.	Under discussion
3.8.14	**N/A**	Access Requirements – wetland constraints	There is no consideration that the RSPB Reserve is a wetland site, and not all areas of the property are accessible. The proposed method of access to monitor the progress of the HDD is by quad bike. However, even with surfacing, and vegetation clearance, parts of the route are not accessible and access should be on foot only. The RSPB are keen to avoid clearance and surfacing operations taking place which will ultimately not lead to the destination required.	Noted, access will be taken on foot where it is not possible to gain access by quad bike.	Under discussion
3.8.15	**Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]**	Access Requirements – path crossing	With regard crossing reference S/FO/0011.2), it would be more favourable to install a controlled crossing to allow users of the footpath to cross safely over the access track. We seek confirmation that the PRoW will not be utilised as a route for vehicles.	This footpath is a permissive path (not a Public Rights of Way) and will only by temporarily diverted for a short period if required, to safely manage users of the footpath, in the unlikely event that investigation or protection works are required to utility assets within the permissive path. The location at which the access for monitoring crosses the permissive path is already a crossing point, however this will be controlled when used by the Applicant. Details relating to the management of Public Rights of Way (PRoW) are set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]**. The only PRoW in this area is PRoW E-103/006/0, where a trenchless HVDC crossing will be carried out to avoid any temporary closures or diversions to this PRoW. Access along the HVDC alignment will be carried by	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
				foot or quad bike for monitoring purposes during construction and operation. Vehicles will only be taken to suitable locations, access beyond these points will be on foot.	
3.8.16	**N/A**	Incidents and Emergencies	The Emergency/Incident Response Plan relevant to works on or adjacent to RSPB land should be approved by Natural England and the RSPB and should include provision for the RSPB to be notified immediately should an unplanned event occur along with agreement of access routes and methods. It should also include consideration of impacts on and contact with graziers.	Site visits with the Proposed Project and RSPB representatives have already been undertaken at the RSPB North Warren/Leiston-Aldeburgh SSSI to understand the works and RSPB requirements. The results of the visit, along with ongoing discussions, are informing the development of voluntary land agreements between the parties. The Applicant's land agents are organising meetings with landowners to discuss agri-environmental schemes and compensation provisions. They are also compiling a list of Accommodation requirements which will be shared directly with the Main Works Contractor. This Accommodation Works requirement will also include an Incident Response Plan. The comment is noted, and the Applicant will provide a response in due course.	Under discussion
3.8.17	**N/A**	UXO	A full assessment of the potential presence of UXO is required, with suitable mitigation proposed.	The comment is noted, and the Applicant will provide a response in due course.	Under discussion

3.3 Kent Onshore Scheme

Table 3.9 Kent Onshore Scheme – Landfall

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.9.1	**Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]** **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3	Description of baseline	Need to recognise within PDA-021 Part 3 Kent Chapter 2 Ecology and Biodiversity impacts on Thanet Coast & Sandwich Bay SPA/Ramsar, Sandwich Bay SAC and Sandwich Bay Hacklinge Marshes SSSI There is need for clarity and transparency within the AS-007 Habitats Regulations Assessment Report regarding impacts, discussion of designations which are closest and are directly impacted first and clearly state which designation e.g. SPA, conclusions are referring to.	The impact of the Proposed Project on ecology and biodiversity in Kent has been considered in detail and with accuracy in **Application Document 6.3.2.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [APP-049]**, and **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3.	Under discussion
3.9.2	**Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3	Stodmarsh SPA	Further assessment required to justify screening out of impacts to Stodmarsh SPA given Hen Harrier record(s) and, if appropriate, consideration of mitigation.	As per paragraph 4.4.17 of the **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3, given the 6.9 km distance between Stodmarsh and the Order Limits, and the fact that hen harriers are not purely found in SPAs, there is low likelihood that these are birds from Stodmarsh. Natural England has not identified any concern about impacts on Stodmarsh in their Relevant Representation.	Under discussion

Table 3.10 Kent Onshore Scheme - Landfall

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.10.1	**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 **Application Document 3.1 (E) draft Development Consent Order [CR1-027]** **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3 **Application Document 6.2.4.4 (F) Part 4 Marine**	Risks associated with trenchless techniques HDD feasibility and methodology	We seek reassurance that open-trenching across the Sandwich Bay SPA/Ramsar/SAC/SSSI site area and functionally linked land would not be pursued under any circumstances (including within the intertidal zone, and via subsequent Change Applications or other applications to facilitate open-trenching).	Measure W22 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 commits to a trenchless solution passing at depth beneath the saltmarsh and wetlands so as to avoid adverse impacts on these areas. There is no provision in the DCO (**Application Document 3.1 (E) draft Development Consent Order [CR1-027]**) for trenched options to be used. Technical issues associated with trenchless techniques such as risk of frac-out or stuck drilling rigs, and noise disturbance have been considered in the following DCO Application Documents: • **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3;	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
	Chapter 4 Marine Mammals submitted at Deadline 3 **Application Document 6.2.4.5 (C) Environmental Statement Part 4 Marine Chapter 5 Marine Ornithology [REP2-003]**			• **Application Document 6.2.4.4 (F) Part 4 Marine Chapter 4 Marine Mammals** submitted at Deadline 3**;** • **Application Document 6.2.4.5 (C) Environmental Statement Part 4 Marine Chapter 5 Marine Ornithology [REP2-003];** and • **Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]**. In the Habitats Regulations Assessment, the use of trenchless techniques is considered as mitigation to avoid impacts on saltmarsh habitat.	
3.10.2	**Application Document 9.13 Pegwell Bay Construction Method Technical Note [REP1-108]** **Application Document 6.2.4.4 (F) Part 4 Marine Chapter 4 Marine Mammals** submitted at Deadline 3 **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3 **Application Document 6.2.4.5 (C) Environmental Statement Part 4 Marine Chapter 5 Marine Ornithology [REP2-003]** **Application Document - 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology [REP1-053]**	Risks associated with trenchless techniques HDD feasibility and methodology	We also seek clarification that trenching will not take place within the intertidal zone on the mudflats at Pegwell Bay and seek reassurance from the Applicant that open trenching across the SPA would not be pursued in any circumstances. We also request more detail on how, if trenchless techniques are to be used across the intertidal zone, the installation would avoid or mitigate disturbance to the nationally significant waterbird assemblage around the Stour Estuary.	By necessity, at Pegwell Bay the marine cables must be buried through the section of the intertidal area between the HDD exit (which will be located in the intertidal area between 105 m and 140 m seaward of the edge of the saltmarsh habitat) and Mean Low Water Springs (MLWS); therefore this section of the intertidal mudflats will be a trenched installation. Further detail on working methods at the HDD exits and cable installation through the intertidal mudflats are provided in **Application Document 9.13 Pegwell Bay Construction Method Technical Note [REP1-108]**. Impacts associated with installation of the marine cables using a trenched installation between MLWS and the HDD exit have been assessed in the following DCO Application Documents: • **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3; • **Application Document 6.2.4.4 (F) Part 4 Marine Chapter 4 Marine Mammals** submitted at Deadline 3; • **Application Document 6.2.4.5 (C) Environmental Statement Part 4 Marine Chapter 5 Marine Ornithology [REP2-003];** and • **Application Document - 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology [REP1-053]**. The project has examined extending the length of the trenchless landfall at Pegwell Bay to exit east of MLWS, however it would require a 2.5 km length landfall. The longest cable landfall in the UK to date is 1.6 km length. The 2.5 km length would represent a very significant (non-linear) increase in risk, programme and cost with complex HDD or full sized tunnelling being the only potential options. When all impacts are considered a 2.5 km landfall is not a practical solution. Additionally, a 2.5 km cable pull in through a duct is expected to be at the limit of the allowable cable pulling tension.	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.10.3	**Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]**	Risks associated with trenchless techniques HDD feasibility and methodology	We request further clarification is required regarding the potential impacts should drill equipment become stuck – freeing process, any additional impacts on the designated area and mitigation requirements. We request additional information to be provided to explain the freeing process should the drill head become stuck, any additional impacts on the Sandwich Bay SPA/Ramsar/SAC/SSSI (including from extending the construction duration and subsequent noise effects) and how these can be mitigated and remedied.	Paragraph 2.9.8 of **Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]** includes further text explaining what would happen in the unlikely event of stuck drilling equipment. Durations required to free strings depend on the length of string that is stuck, but typically require between 1 and 7 additional shifts, so they have a small impact on the overall programme for the landfalls.	Under discussion
3.10.4	**Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]**	HVDC Cable – risk of habitat loss	Further information about the risks and subsequent remedial procedures in the event of the empty cable duct collapsing or becoming unsuitable for use should be provided.	The duct specifications will be designed with wall thickness that is more than sufficient to resist both short-term and long-term soil and groundwater pressures, therefore it will not collapse. The duct will be sealed at both ends and buried so that it cannot become blocked. In the unlikely event that a cable installation is later required in the spare duct, the onshore entry point and offshore exit point will be excavated to expose the ends of the ducts. The sealing ends will be removed from the duct, the cable installed, and the duct ends sealed and buried, as per the initial landfall cable installation procedure for the Proposed Project. In the unlikely event that these repair/emergency works for cable installation are required in the future, then the impacts to ecological features would be similar to those assessed during construction in the ES, but noting that the duration would be greatly reduced from the assessed construction case because only cable installation for a single duct would be involved, and there would be no HDD installation works, that form the majority of the durations for the planned works during construction.	Under discussion
3.10.5	**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3	Pollution	Further detail is needed on how any frac out event is to be managed.	Commitments to mitigation measures being implemented to minimise and address the risk of surface frac out or break out are contained in Measure B09, Measure B59, and Measure B61 of **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3. In particular, Measure B59 commits to preparing an HDD landfall Method Statement and Drilling Fluid Management Plan to be shared with Natural England.	Under discussion

Table 3.11 Kent Onshore Scheme – Cable Route, Converter Station and Substation

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.11.1	**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3	Noise and machinery disturbance	There is need to consider overwintering interest in noise mitigation timings of works to reduce disturbance to Sandwich Bay to Hacklinge Marshes SSSI. There must be inclusion of construction noise and vibration monitoring at the closest sensitive receptors at Minister Marshes and the designations, in order to assess accuracy of the modelling and confirm effectiveness of the mitigation, and/or inform additional mitigation requirements.	Natural England have confirmed that the affected part of Sandwich Bay to Hacklinge Marshes SSSI (Weather Lees Hill) is designated for its breeding bird interest. Therefore, this has driven the seasonal restriction on works. An amended REAC measure at Natural England's request has been introduced (see measure B45 of **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 to ensure works exceeding 60dB LAmax at Weather Lees Hill do not take place during the core breeding season. Therefore, noise monitoring will be undertaken.	Under discussion
3.11.2	**Application Document 9.34.5 (B) Applicant's Responses to Selected Relevant Representation Responses [REP2-022]** **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3	Mitigation for loss of functionally linked habitat	There is need to consider the appropriateness of the converter station site, given the large quantity of fill and cut required to render it suitable, and the attendant risk of pollution. Robust consideration must be given to mitigation for any pollution impacts.	The comments regarding site selection are addressed in Table 6.13 of **Application Document 9.34.5 (B) Applicant's Responses to Selected Relevant Representation Responses [REP2-022]**. Pollution mitigation is secured through a range of commitments set out in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3.	Under discussion
3.11.3	**N/A**	Mitigation for loss of functionally linked habitat	We request additional survey data to support assessment of the value of functionally linked land for Golden Plover or a more precautionary approach.	Two years survey is standard for assessing functionally-linked land and Natural England have been content with the survey effort. Arable land as an acceptable alternative habitat was proposed by Natural England, on the basis that the habitat being lost is arable land (not wet grassland).	Under discussion
3.11.4	**Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations [REP2-014]**	Mitigation for loss of functionally linked habitat	Use of the peak count for Golden Plover reference in the PEIR is needed in calculations around carrying capacity. The maximum number of birds that occur must be used rather than an average.	See line 2.8.4 of Applicant's Response to Kent Wildlife Trust in **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations [REP2-014]** where it has been explained that the reference to 700 birds was an error at PEIR that was subsequently corrected within the ES. See line 2.8.13 of Applicant's Response to Kent Wildlife Trust in **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations [REP2-014]** regarding the suitability of the identified mitigation land for golden plover.	Under discussion
3.11.5	**Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3	Mitigation for loss of functionally linked habitat	Further detail is needed as to why the mitigation site was chosen and how it would function appropriately. This must include sufficient monitoring of its current use by Golden Plover; if it is currently functionally linked land it cannot be used as mitigation.	The area proposed and its location were discussed and agreed with Natural England. Management is based on initial prescriptions from Natural England based on measures to address functionally linked land that have been implemented elsewhere. As with other mitigation, the amount of habitat required to address loss of functionally-	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
	Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035] **Application Document 9.28 Wintering Bird Survey of Golden Plover Mitigation Land (Kent) [REP2-013]**		Consideration of a larger area of mitigation land is required to address concerns about indirect impacts and adequacy of the site. Clarification is required regarding how success of the mitigation land will be monitored, what success looks like and if not successful what would be the alternative. Further consideration is required regarding the long-term suitability of this site and its management, including variations in land use and whether it is appropriate to mitigate wet grassland with dry arable habitat, rather than like-for-like replacement.	linked land has been quantified based upon calculations presented in the ES chapter and **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3. Regarding monitoring and enforcement, Sections 7.1 to 7.3 of **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]** set out the process involved in monitoring and, if necessary, rectifying any mitigation. A wintering bird survey report for the Enhancement Area will be submitted at Deadline 2 (see **Application Document 9.28 Wintering Bird Survey of Golden Plover Mitigation Land (Kent) [REP2-013]**. It confirms golden plovers are present in the area but are not using the enhancement area as currently farmed.	
3.11.6	**Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3	Functionally linked land – Pylons and powerlines in the Minster Marshes area	Caution should be applied to conclusions drawn from only one year's vantage point survey and four months' bird corpse surveys re collision risk and displacement.	With regard to bird survey effort, a single season of observations for recording flight activity is sufficient and proportionate for the short section of new overhead powerline, given that multiple seasons of wintering and breeding bird surveys have been undertaken, a wealth of existing data is available from other sources and birds are already interacting with existing overhead powerlines in the landscape around Minister Marshes. Natural England have accepted the **Application Document 6.6 (E) Habitat Regulations Assessment Report** submitted at Deadline 3 as it relates to bird-strike and impact on golden plover through loss of functionally-linked land. The carcase search of the existing overhead line was used to provide contextual information.	Under discussion
3.11.7	**N/A**	Habitat creation plans	Caution should be applied re conclusions of increase in ecological value of habitats in the long-term as the baseline value may be underestimated. Consideration is needed of wider species use of any created habitats to maximise their value.	See above responses on 3.11.2 and 3.11.3 on golden plover numbers at Minster Marshes. The Proposed Project will result in a substantial net increase in woodland, scrub, grassland and wetlands other than ditches. While these habitats are all currently present in smaller numbers, the landscape is primarily arable.	Under discussion
3.11.8	**Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]**	Habitat Creation Plans	We request clarity of where new habitats are proposed to be created to better assess their long-term value.	Refer to **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]** where these habitats are discussed and maps showing their location are included.	Under discussion
3.11.9	**Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]**	Impacts on Turtle Doves	The area of the proposed converter site is also known to support breeding Turtle Doves (a pair was recorded in 2024). It is noted however that the breeding surveys of the study area failed to identify Turtle Dove as a breeding bird in 2024. Impacts on key habitats for Turtle Dove and Nightingale (including scrub and mature hedgerows) should be avoided and minimised as far as possible and mitigation proposed for loss of habitat during time taken for re-establishment.	The purpose of the surveys for the ES is to enable an overall evaluation of the ornithological importance of the area, rather than undertake a detailed census of individual species. The Proposed Project will result in a considerable net increase in woody planting (woodland, scrub and hedgerows) and wetlands, particularly in the vicinity of the Converter Station and Substation. These will be well connected to the existing scrub and woodland along the rail corridor and at Weather Lees Hill. **Application Document**	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
			To benefit Turtle Dove and Nightingale, we recommend that newly planted hedges be maintained at a height of 3m or more and allowed to grow at least 4m wide with brambles and other thorny climbers encouraged/retained, creation of new ponds and creation of foraging habitat.	**6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]** recognises that it will take time for the woodland to mature (10 years) and therefore recognises a significant moderate adverse habitat loss effect on ornithology in the short-medium term.	

Table 3.12 Kent Onshore Scheme - Habitat Enhancements and Biodiversity Net Gain

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.12.1	**Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]**	Biodiversity Net Gain Calculations	We request that plans for ambitious BNG which contributes to landscape-scale conservation of important habitats and species within Kent are submitted as part of the Examination.	The applicant has committed to delivering 10% BNG in both Suffolk and Kent. Tables Ex 1.3 and 4.3 of **Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]** present the combined result for both areas for information only. Habitat creation and enhancement measures were included within the BNG assessments for the location surrounding converter station as this is land within the ownership of the applicant. This is because the Proposed Project presents an opportunity to deliver more ambitious BNG that contributes to landscape-scale conservation and restoration as you have also identified. The Applicant will continue to explore a range of options to deliver BNG for the Proposed Project which provide the best choices and outcomes for nature and wider environmental and societal benefits, and provide value for money for consumers. These outcomes will be secured and in place prior to the Proposed Project being operated as part of the high voltage electricity transmission network.	Under discussion
3.12.2	**Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]** **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]**	Habitat enhancements for farmland birds	We recommend that habitat enhancements consider planting targeted at providing nesting, foraging and watering habitat for farmland birds (particularly Turtle Dove), where appropriate. We urge that habitats that take time to establish such as scrub and hedgerows, if being delivered off-site as part of BNG, are created as soon as possible. We recommend that the Applicant liaises with local communities about opportunities to improve biodiversity along the cable route, in ways that benefit both wildlife and communities whilst considering any potential recreational disturbance implications on sensitive habitats.	Comment is noted. Proposals for habitat creation and enhancement are set out in **Application Document 6.2.3.2 (D) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP1-049]** and **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]**.	Under discussion

Table 3.13 Kent Onshore Scheme - Risks of Further Problems in the Future

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.13.1	**Application Document 7.10 Coordination Document [APP-363]**	Co-location	The Co-ordination Document and HRA should acknowledge the need to robustly assess impacts of potential co-location on designated sites including repeated disturbance, additional infrastructure, potentially increased width of cable corridor and the increased risk associated with any failure/faults.	The Applicant as part of its submission has produced a report on coordination which covers how it approached coordination with other projects with the aim to reducing the impact on the environment and local communities. Further details are set out in **Application Document 7.10 Coordination Document [APP-363]**.	Under discussion

3.4 Marine

Table 3.14 Marine

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
3.14.1	**Application Document 6.2.4.5 (C) Part 4 Marine Chapter 5 Marine Ornithology [REP2-003]**	Sensitivity of Red-throated Diver to disturbance	We consider that the assessment should be based on the application of a 5km buffer around the vessel routes and their related activity. Given the acknowledged "high sensitivity" of non-breeding Red-throated Diver to anthropogenic sources of disturbance, including shipping traffic and offshore windfarms and that if a vessel passes through or close to a group, it has the potential to disturb and displace many individuals at once, we do not agree with the conclusion that "the displacement of red-throated diver during construction of the offshore scheme alone … will only result in a minor adverse effect that is not significant".	The Applicant maintains that the profile of vessel movements is different to that associated with offshore wind farms as there are no repeat movements backwards and forwards along a particular route. Similarly, this is not comparable to the reduction in Red-throated Diver densities along shipping routes where the displacement distance is driven by the frequent movements of vessels through a particular area and therefore, repeated potential disturbance to individuals. The installation of the cable will require a low number of vessels (e.g. a cable lay vessel and a couple of support/guard vessels) moving slowly along the route of the Offshore Scheme. Furthermore, the Applicant has already committed to a seasonal restriction for cable installation between 1 November and 31 March to avoid the potential for any impacts to RTD during the overwintering period. Given the low number of vessels, slow speeds and highly localised nature of vessel movements (focused along the cable route), and that cable installation will be completed outside the overwintering period, a 2 km displacement zone is considered to be suitably precautionary.	Under discussion
3.14.2	**Application Document 6.2.4.5 (C) Part 4 Marine Chapter 5 Marine Ornithology [REP2-003]**	Distribution of Red-throated Diver	The Red-throated Diver distribution data only shows Divers recorded in February 2018, which does not give a sound basis for conclusions about longer term distribution patterns.	It is acknowledged that there are limitations to the data available on Red-throated Diver distributions within the Outer Thames Estuary SPA. However, the data is considered suitably robust to designate the boundaries of the SPA. Within which the distribution of Red-throated Diver is already heavily influenced by existing shipping lanes and renewable energy schemes. The available data would suggest that areas of higher Red-throated Diver densities within the SPA are outside the Order limits.	Under discussion
3.14.3	**Application Document 7.8 Red-Throated Diver Protocol [APP-361]**	Seasonal restriction	Project-related vessel movements and cable installation, maintenance or decommissioning activities during the Red-throated Diver overwintering period, from October to May, should be avoided. In case of any, even occasional, need for project-related vessel movements within that period, they should also be subject to clearly detailed and practical bird avoidance measures to be set out in a detailed Vessel Management Plan.	Whilst Red-throated Diver may be present in the Outer Thames Estuary SPA in months outside November-March, this is the core period when numbers are greatest and environmental conditions are tougher on birds, therefore, disturbance is likely to have a greater effect on individuals. However, the profile of vessel movements, alongside reduced densities of birds present, mean that a restriction between November-March is proportionate and maintains the conservation objectives of the Outer Thames Estuary SPA. As set out in **Application Document 7.8 Red-Throated Diver Protocol [APP-361],** the Applicant has included a commitment to develop a Vessel Management Plan (VMP) post consent.	Under discussion

Ref	Relevant Application Documents	Description of Matter	Consultee's Current Position	The Applicant Current Position	Status
				This will be prepared in consultation with Natural England in accordance with requirements of the dML.	
3.14.4	**N/A**	Red-Throated Diver Protocol and Outline Vessel Management Plan	The RSPB would like to see a more detailed Red-Throated Diver Protocol to include comprehensive measures throughout not only the construction phase, but also operation, maintenance and decommissioning of the project. Either additionally or as part of the Red-Throated Diver Protocol, a detailed Outline Vessel Management Plan covering construction, operation, maintenance and decommissioning should be presented to the Examination.	The total number of vessels, number of vessel movements and duration of activities associated with the Sea Link project during all phases (construction, operation and maintenance, and decommissioning) will be substantially lower than those required during the construction, operation and maintenance and decommissioning of offshore wind farms and Sizewell C which involve repeat movements back and forth along a particular route for extended periods of time (several years). For example, most activities are expected to involve an operational vessel (e.g. a cable lay vessel) and a couple of support / guard vessels. There may also be a requirement for occasional CTV movements for crew transfer and safety purposes. The Applicant has also committed to a full seasonal restriction between 1 November – 31 March for offshore cable burial activities (excluding pre-lay grapnel run activities) in the Outer Thames Estuary SPA. Maintenance requirements are expected to be minimal. Other than post-installation surveys at 12 and 24 months, no regular maintenance works are planned for the Offshore Scheme. There is potential that cable repairs may be required during operation (either due to damage or cable fault). However, the location of any repairs or remedial works, and therefore routes used to access the location of the repair or remedial works, will not be known until the fault / damage occurs. As set out in the Red-Throated Diver Protocol, the Applicant has included a commitment to develop a Vessel Management Plan (VMP) post consent. This will be prepared in consultation with Natural England in accordance with requirements of the dML. This approach reflects the key points noted above and is considered appropriate and proportionate for a subsea cable project.	Under discussion

4. Approvals

Signed	

On Behalf of	Royal Society for the Protection of Birds
Name	
Position	[senior consents officer/lead project manager/ lead project director]
Date	

Signed	

On Behalf of	NGET
Name	
Position	[senior consents officer/lead project manager/ lead project director]
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

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