The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.73: Applicant's Responses to First Written Questions

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About this Document

Purpose of this Document

This document provides National Grid Electricity Transmission plc's (the Applicant's) responses to the **Examining Authority's First Written Questions (ExQ1) [PD-017]**, received on 17 December 2025 in relation to the Sea Link Project. It includes responses to all questions directed to the Applicant. In addition, the Applicant has provided responses to certain questions not specifically addressed to it, where it considers that doing so would assist the Examining Authority's understanding of the Project or the issues raised.

Structure of the Document

This document is structured to align with the numbering used in the Examining Authority's ExQ1 **[PD-017]**. Accordingly, the chapters are numbered from '1' through to '24', covering all relevant topic areas identified by the ExA.

Within each chapter there is a response table. Within each table, four columns are provided as follows:

- As provided by the ExA, Column 1 sets out the unique reference number of each question.
- As provided by the ExA, Column 2 of the table indicates which Interested Parties (IPs) and other persons each question is directed to.
- As provided by the ExA, Column 3 provides a written description of the question to be answered by Deadline 3; and
- As provided by the Applicant, Column 4 provides the Applicant's response to the question(s) raised, as required.

For completeness, the Applicant has included all of the ExAs Written Questions, whether or not they are directed to the Applicant. In some instances, the Applicant has provided feedback to questions not directed to the Applicant where it was considered to be of potential assistance to the ExA or IPs and other persons.

In addition, the following appendices are included in **Application Document 9.73.1 Applicant's Responses to First Written Questions – Appendices**, submitted at Deadline 3, to support the Applicant's responses:

- Appendix A: 1LVIA9 Natural Beauty Indicators and their Sub-Factors
- Appendix B: 1LVIA12 - Winter Year 15 Visualisation for Viewpoint 8 (a) - Public Bridleway (Friston 260, route 2), East of Friston, Looking Northwest
- Appendix C: 1GEN11 - Comparison tables between the DCOs for East Anglia One North, East Anglia Two and Sea Link
- Appendix D: 1LVIA15 Coordination with Friston Substation Landscape Mitigation Technical Note
- Appendix E: Cultural Heritage Figures

- Appendix F: Lists of Heritage Assets Scoped Out of Assessment
- Appendix G: The Sizewell C Project Environmental Statement Chapter 9 Socio-economics
- Appendix H: Hinkley Point C Peak Construction Monitoring and Auditing Study
- Appendix I: 1ECOL6 Annotated Aerial Photograph Showing an Indicative Vegetation-free Construction Traffic Route
- Appendix J: Illustrative Lux Plots for the Proposed Substations and Converter Stations in Suffolk and Kent
- Appendix K: Detailed Unexploded Ordnance Risk Assessments
- Appendix L: HK250t Drill Rig Specification Sheet
- Appendix M: Technical Specification TS2.19 Ancillary Light Current Equipment
- Appendix N: Comparison Table for Clarification regarding plot number alterations in Suffolk and Kent
- Appendix O: Copy of the Canterbury Navigation and Sandwich Harbour Act 1825

1. General and Cross-topic Questions (GEN)

1.1 General

Table 1.1 General

Reference	Question to:	Question	Applicant's Response
1GEN1.	All Parties	**Artificial Intelligence** The Planning Inspectorate has guidance in relation to the use of artificial intelligence (AI). Have you used AI to create or alter any part of your documents, information or data? This does not include basic spell-check or grammar tools. If yes; • detail what material you have submitted which has been created using AI; • what systems or tools you used; • what the source of the information the AI based its content on was; and • what information or material the AI has been used to create or alter. In addition, if you have used AI, you should do the following: • clearly label where you have used AI in the body of the content that AI has created or altered, and clearly state that AI has been used in that content in any references to it elsewhere in your documentation • tell us whether any images or video of people, property, objects or places have been created or altered using AI • tell us whether any images or video using AI has changed, augmented, or removed parts of the original image or video, and identify which parts of the image or video has been changed (such as adding or removing buildings or infrastructure within an image) • tell us the date that you used the AI • declare your responsibility for the factual accuracy of the content • declare your use of AI is responsible and lawful • declare that you have appropriate permissions to disclose and share any personal information and that its use complies with data protection and copyright legislation If you use AI for any future submissions into this examination, ensure it is accompanied by the information as requested above.	The Applicant has not used artificial intelligence in its application documents, information and data. The only exception to this is the **Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk** submitted at Deadline 3 and **Application Document 9.41 Visitor and Tourism Assessment Technical Note – Kent** submitted at Deadline 3. The use of AI is declared in these documents, providing all of the information requested. AI had not been used in relation to any other application documents.
1GEN2.	Applicant	**Security risks** National security issues have been highlighted as a possible risk by a number of interested parties (IPs) for the Suffolk and Kent facilities. NPS EN-1 section 4.16 recognises that there may be national security implications for critical energy infrastructure. Can the applicant respond to these requirements clearly setting out the security considerations resulting	The Applicant takes into consideration the provisions of paragraph 4.16 of NPS EN-1 Section 4.16 in relation to all of its nationally significant infrastructure projects. Full security reviews are carried out by the Applicant in relation to both the physical and cyber security of its projects and the Applicant also complies with the Security and Quality of Supply Standard (SQSS) for the security requirements

Reference	Question to:	Question	Applicant's Response
		from the concentration of other UK energy infrastructure in the surrounding Suffolk area.	of the National Transmission Network, and indeed the need case for the Proposed Development is linked to the SQSS. The Department for Energy and Net Zero are consulted on each project on the physical and cyber security as required in paragraph 4.16.5 of NPS EN-1 and the appropriate protections are put in place, using Government guidance and best practices used throughout energy sector projects The overall design of the Network, including how much and where generation and demand is connected, is carried out by the National Electrical System Operator (NESO) which is also bound by its licences to comply with the SQSS. The design of each site takes into consideration the location, the connection to the network, the amount of Generation and/or demand connected to the site and the national importance of the site. This ensures that proportionate and protective security measures are designed into the Applicant infrastructure projects at an early stage on the project development, in line with paragraph 4.16.4 of NPS EN-1.
1GEN3.	Applicant	**Emergency service access** Having regard to concerns raised in the Suffolk area about limited fire service resources, can the applicant clearly explain what appropriate measures have been taken to ensure fire safety during all stages of development.	Safety is fundamental to the Applicant's operations. Fire is relatively rare in transmission substations in the UK and no instances of fire have breached the perimeter of the footprint of National Grid's assets. There is no risk of fire spreading to vegetation, crops or houses. The Applicant is confident of this because of the safety precautions and systems that will be installed, such as fire deluge systems, heat and smoke detectors, alarms and remote monitoring systems. Every site has a Fire Risk Assessment in accordance with the Regulatory Reform (Fire Safety) Order 2005 which is carried out by trained fire risk assessors as part of the detailed design. In addition, regular drills and coordination with emergency response services ensure readiness in the event of an emergency. The Applicant's design standards which have been applied to the typical layouts provided within **Application Document 2.13 Design and Layout Plans [APP-037],** will also be applied to the detailed design, these include inherent fire safety precautions within the footprint of the assets including, water storage tanks, fire barriers around and between transformers and safety zones both within and surrounding the perimeter fenceline. **Application Documents 7.12.1 Design Principles – Suffolk [APP-366] and 7.12.2 Design Principles – Kent [APP-367]** set out some of the specific design principles such as for access, where Project Level Design Principle PL6 clarifies that the converter station and substation compounds will contain circulation around each building/yard to provide clear access for servicing, maintenance, and fire tender access. Converter Station Design Principle R.3 in the same document confirms that any planting within the converter station compound will include a strategy for irrigation, to prevent drying out and dying back during dry spells and becoming a potential fire spread hazard as far as possible. From a traffic perspective during the development of the Proposed Project design, the Applicant has considered the relevant stakeholders in order to understand the Proposed Project's impacts on emergency services (e.g. Suffolk Fire and Rescue Service, East of England Ambulance Service and Suffolk Constabulary). Whilst the assessment does not explicitly consider emergency services as a separate user type, this particular receptor has inherently been considered as part of the assessments of highway safety and driver delay for all road users. There are no likely significant effects identified on emergency services as a result of the Proposed Project. Nonetheless, the construction vehicle routing has been designed to minimise impacts across the highway network, as set out within **Application Document 7.5.1.1 Outline Construction Traffic Management and**

Reference	Question to:	Question	Applicant's Response
			Travel Plan – Suffolk [APP-337]. The Applicant will continue to liaise with the emergency service providers on any issues, working collaboratively with them on issues such as road closures or the movement of Abnormal Indivisible Loads (AILs), where additional resource is required, such as the escort of AIL vehicles, the Applicant is liaising with the relevant authorities on providing financial support to increase resources.
1GEN4.	Applicant	**Community benefit** The ExA is aware of the document produced by the Government Department for Energy Security and Net Zero entitled "Community Funds for Transmission Infrastructure: Guidance". This sets out the Government's expectation for how communities that live near onshore electricity transmission infrastructure should benefit from the development of this infrastructure, with the use of community funds. This document also sets out the level of funding recommended, amongst more detail of the expected process. The Government through this document makes clear that it expects engagement with communities at an early stage. Explain any progress made by the applicant to engage with this process and current intention of how to progress with community fund/benefit in the future.	The Applicant will follow government guidance which sets expectations for how community benefit funds should be delivered for transmission infrastructure projects such as the Proposed Project. The guidance is clear that community funds are separate from, and should not be a consideration in deciding, the DCO application.. Therefore, separate to, and outside of the planning process, the Applicant will undertake engagement with local communities and stakeholders in 2026 to understand what is important to them, to inform the development of the community benefit programme for this project. Ahead of consultation, the Applicant has undertaken socio-economic analysis in both Kent and Suffolk to understand the potential needs of the respective communities. Together, this research and the forthcoming consultation will help inform the Applicant of local priorities, and guide delivery of community benefit, should the Proposed Project be granted development consent. The Applicant recently provided a high-level overview of the planned consultation to local authorities in both Kent and Suffolk as part of the regular monthly meetings with said authorities. In addition, early discussions have also taken place in 2025 with a small number of stakeholders who have expressed a desire to engage with the Applicant in relation to the delivery of community benefits.
1GEN5.	Applicant	**Need** The ExA acknowledges that there would be no requirement to apply the National Energy System Operator (NESO) energy transmission design principles to this scheme. However, if they did apply, would the proposed scheme be in accordance with them? If yes, explain how. If the proposed development is not in accordance with the NESO energy transmission design principles explain why this is considered acceptable.	During the development of the Sea Link Project, the Applicant has followed the National Grid process and procedures which follow the principles of the NESO Design Principles, and the Applicant's view is that the Proposed Project is broadly in accordance with the NESO design principles. Reviewing the NESO Strategic Principles of Technical Needs , Environment, Sustainability & Community and Economics and Regulation along with the Network Planning Principles of Route Asses, Offshore and Substations and with the Project Development Principles of Overhead Lines , Underground Cables, Offshore and Substation, National Grid has used these throughout the process; and this is covered in the **Strategic Options Report (SOR) APP-370** and the **Corridor Preliminary Routing and Substation Siting Study (CPRSS) APP-368**, along with the **Options Selection and Design Evolution Report APP-369**, checking and back checking that at each stage of the project we are developing the most appropriate solution to the need identified by the Electricity System Operators Network Options Assessment Methodology (NOA). Notwithstanding the above, National Grid has been regularly assessed by NESO and consistently recommended for progression. In recent years NESO's assessments have developed in line with its evolving design principles, aimed at delivering a Centralised Strategic Network Plan, and Sea Link has remained a key component of the plan.

Reference	Question to:	Question	Applicant's Response
1GEN6.	Applicant	**The Outline Onshore Construction Environmental Management Plan (oCEMP) Appendix A Outline Code of Construction Practice (oCoCP) [APP-341]** and **CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043]** While the two documents relate to both the onshore and offshore schemes, paragraph 1.1.4 of [CR1-043] and paragraph 1.1.8 of [APP-341] states that they are appendices to the onshore CEMP [AS-127] rather than the offshore CEMP [APP-339]. They do not appear on the contents page for either of those two documents. Provide clarification so that it is clear which document they are appended to, taking into account that the REAC includes both onshore and offshore commitments. The ExA suggests that the REAC and oCoCP should be freestanding documents rather than appendices, that can be listed and certified in relation to both the onshore and offshore schemes and the deemed marine licence (DML). The ExA therefore requests that the dDCO and all relevant articles, schedules, requirements and conditions are updated to reflect this suggestion.	The Applicant agrees to the ExA's suggestion that the REAC and oCoCP be re-created as freestanding documents and copies of these documents in their freestanding form are provided at deadline 3 as **Application Document 9.83 Outline Code of Construction Practice** submitted at Deadline 3 and **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3. The dDCO (**Application Document 3.1 (E) draft Development Consent Order [CR1-027]**) and all relevant articles, schedules, requirements and conditions will be updated to reflect these changes at deadline 4.
1GEN7.	Applicant	**Errata within the REAC** The measures listed under the heading of shipping and navigation in the REAC [CR1-043] in several cases are identified incorrectly in terms of the potential changes and effects in column (3). For example SN21 and SN22 do not relate to the Sunk. Review column (3) and provided an updated version of the REAC	The description of changes and effects for measures SN21 and SN22 have been updated in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3**.** Additionally, further Column 3 updates have been made for measures SN01 to SN05.

1.2 Design, Parameters and other Details of the Proposed Development

Table 1.2 Design, parameters and other details of the proposed development

Reference	Question to:	Question:	Applicant's Response:
1GEN8.	Applicant	**Pegwell Bay Construction Method Technical Note [REP1-108] - excavators** Paragraph 2.2.6 of the technical note states that vehicles accessing the horizontal directional drilling (HDD) exit pits via the former hoverport would include small excavators (15-20 tonnes). Appendix B summary of plant and equipment lists 40 tonne large excavators. Confirm which is correct, since this has implications for the assessment of effects.	The Applicant can confirm that 15 tonne (t) to 20 t excavators are the size of excavator that are expected to be used for the majority of works at the HDD exit pits, however larger excavators may be required for specific activities such as lifting heavier equipment onto the platforms at the coffer dam. Therefore, assessments have assumed the 40 t large excavator as the worst case using the specifications stated in Appendix B of **Application Document 9.13 (B) Pegwell Bay Construction Method Technical Note [REP2-011].**
1GEN9.	Applicant	**Pegwell Bay Construction Method Technical Note [REP1-108] – drill fluid capture** Drill fluid is proposed to be captured "where practicable" (paragraph 3.2.2). Explain the circumstances in which capture might not be practicable.	The Applicant can confirm that scenarios where it might not be possible to capture drilling fluid are: • If there is breakout of drilling fluid to the surface during pilot drilling of the final 45 m of the HDD, but prior to entering the coffer dam. This might occur if there are pre-existing fractures, or weaker than expected ground, in the Thanet Formation that overlies the chalk aquifer. It is assessed as being a low risk of occurrence. • If there is an error in the guidance system and the pilot exits outside the coffer dam. This is assessed as being extremely unlikely. In the above cases, the volume of drilling fluid in the bore that is above the exit elevation, approximately 10 $m^{3,}$ might be discharged to the surface. Estimates of losses presented in Table 4.11 in **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]** have conservatively assumed losses of 40 m^3 for four HDDs; refer to response ISH1.25 in **Application Document 9.37 Applicant's Responses to Supplementary Agenda Additional Questions for Issue Specific Hearing 1 [REP1A-033].** As set out in commitment GH10 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3, the contractor will develop a drilling fluid management plan which will be included in both the onshore and offshore Construction Environmental Management Plans (CEMPs). In the event of a breakout the contractor would quickly contain the fluid losses in accordance with the drilling fluid breakout mitigation measures included in the drilling fluid management plan. There is potential that the presence of groundwater from the chalk aquifer might make the capture of all fluid difficult. However as concluded in **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3**,** given the small volume of drilling fluid required for the Kent landfall in the first instance (up to 40 m^3), the temporary duration and single event of any drilling fluid release, the commitment to use substances that are from the OSPAR List of Substances/Preparations Used and Discharged Offshore which are considered to 'Pose Little or No Risk to the Environment' (PLONOR), and regular tidal movement in the intertidal zone, in the unlikely event that a breakout of drilling fluid occurs this

Reference	Question to:	Question:	Applicant's Response:
			would not have any adverse effects on the qualifying features of the Thanet Coast SAC Sandwich Bay SAC, or Thanet Coast & Sandwich Bay SPA as a result of changes in water quality due to use of drilling fluids.
1GEN10.	Applicant	**Pegwell Bay Construction Method Technical Note [REP1-108] – cables/ducts** The applicant's description of the proposed development in ES Part 1, Chapter 4 [REP1A-003] table 4.9 states that 4 ducts would be required, 2 for High Voltage Direct Current (HVDC) cables, 1 for fibre optic cable and a spare for repairs. In contrast, the technical note suggests that cables might be bundled within 1 or 2 ducts. Confirm which is correct.	The Applicant can confirm that the cables will be un-bundled prior to being pulled through the individual HDD ducts. The base case is as set out in Table 4.9 within **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]** which states that four ducts would be required, two for the HVDC cables (two cables, one per duct), one for a fibre optic cable and a spare for repairs. The text in **Application Document 9.13 (B) Pegwell Bay Construction Method Technical Note [REP2-011]** refers to a potential option where the fibre optic cable remains bundled to one of the HVDC cables as it is installed into the respective HDD duct. However, this is a potential option and not the basis of the worst-case scenario assessed in the ES or included in the DCO application. The correct requirement is four ducts, two for the HVDC cables (two cables, one per duct), one for a fibre optic cable and a spare for contingency in case a repair/replacement of cable is required.

1.3 Development Consent Order (DCO) ([CR1-027] unless otherwise stated)

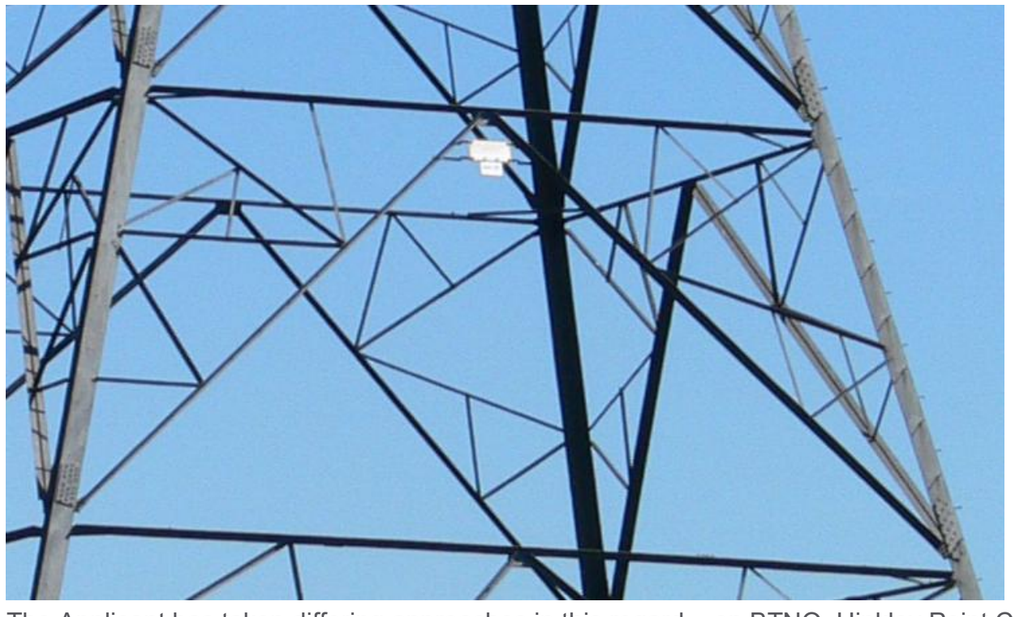
Table 1.3 Development Consent Order (DCO) ([CR1-027] unless otherwise stated)

Reference	Question to:	Question	Applicant's Response
1GEN11.	Applicant	**DCO requirements comparison for Sea Link and SPR scenarios for Friston substation** The ExA notes several differences between the requirements within the Sea Link DCO and the made order for Scottish Power Renewables (SPR) at Friston substation. Compare, in detail, in a side-by-side comparison the requirements and schedules of documents to be certified for Sea Link and the SPR made order that relate to Friston Substation. Explain any differences.	A comparison between the requirements of the Sea Link and SPR DCOs is presented in Appendix C. However, the Applicant would urge caution when considering an approach that would indicate there is a need for consistency between the applications in the way implied by this query for the reasons set out below. The draft Development Consent Order (DCO) for the Proposed Project has been drafted to provide the powers and provisions required for a large-scale transmission project, incorporating the requirements that are necessary and proportional to address the environmental effects set out in the Environmental Statement. The Explanatory Memorandum (Application Document 3.2) sets out the rationale for the provisions as drafted including explaining in paragraph 1.3 how it has been drafted to be cognisant of: • General Model Provisions in the Infrastructure Planning (Model Provisions) (England and Wales) Order 2009; • Planning Inspectorate's Advice Note 15 (July 2018, updated in March 2025): Advice Note Fifteen: drafting Development Consent Orders; and • Recent transmission DCOs, particularly National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024 (BTNO DCO) and National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 (Yorkshire Green DCO), although other DCOs are also mentioned, include SPRs. Advice Note 15 has been updated since the Scottish Power Renewables (SPR) DCOs were made so would not have applied in its entirety to those older consents; the policy context has also evolved since 2022. The BTNO DCO and Yorkshire Green DCO are considered to be more relevant to the Proposed Project draft DCO than the SPR DCOs due to also being high voltage transmission projects led by the Applicant and consented more recently than the SPR DCOs. Like the Proposed Project, BTNO is also located partially in the area of Suffolk County Council. Commitments that are necessary for SPR would not necessarily be required for the Proposed Project because the projects differ in the development proposed at Friston, as well as differing significantly outside the area where the Order limits of the three projects overlap. Requirements for Sea Link must reflect the application and Environmental Statement for that project, as opposed to requirements for another project. The Overarching National Policy Statement for Energy (EN-1), is clear on this point, stating at paragraph 4.1.17 (December 2025 version, albeit this wording was in the previous iteration) that: *'The Secretary of State should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented, enforceable, precise and reasonable in all other respects.'* These tests being met for EA1N and EA2 would not necessarily indicate the tests are met for Sea Link. It should also be noted that any developer may elect to make commitments in a DCO that are not *necessary* for a wide variety of reasons. Therefore, a commitment being included in a DCO does not mean it was necessary for it to be included; and less that it would be necessary for it to be included in a DCO for a different project. It is noted that

Reference	Question to:	Question	Applicant's Response
			paragraph 4.1.17 applies to requirements *imposed* by the Secretary of State, not any requirements that an applicant may elect to include voluntarily. The Applicant has made a number of concessions over the course of the Pre-Examination and Examination periods to increase the consistency between the Sea Link DCO and SPRs DCOs in response to queries from Interested Parties, including updating the Works Plans to reflect the style of those produced by SPR. These changes were made to provide reassurance and simplicity for Interested Parties and the Examining Authority. However, it is not necessary for this approach to be replicated throughout the DCO documents. On 18 December 2025 the Planning and Infrastructure Bill received Royal Assent, becoming the Act. This is the latest step the Government is taking to reduce costs and programme for critical infrastructure projects. It is vital in the context of these aims that requirements are not placed on projects that could increase the cost and programme for delivery of critical infrastructure projects without clear justification and a clear justification with reference to paragraph 4.1.17 in EN-1. For all the above reasons, a comparison between requirements of the different projects may not be helpful in ascertaining the requirements that are appropriate for Sea Link. Finally, whilst applications in general tend to be similarly structured, there are differences between the documents presented and where information is secured. Again, this is not an issue and means that documents that are certified for one application, do not necessarily need to be certified for another. Notwithstanding all the above, the Applicant has provided comparison tables between the requirements and documents to be certified in Appendix C.
1GEN12.	Applicant	**Article 2 order of definitions** The ExA encourages the applicant to ensure that all definitions within article 2 are in placed in alphabetical order.	The Applicant notes this comment and will ensure that the definitions are in alphabetical order.
1GEN13.	Applicant	**Article 2 (Interpretation) "authorised development/project" and "ancillary works"** Explain in more detail why you have distinguished between the development (the main works in schedule 1) and the associated development in paragraph 2 of schedule 1 and the project (the same plus the ancillary works in part 2 of schedule 1). This approach should be clearly justified. Explain any overlap between paragraph y of schedule 1 paragraph 2 (the last of the associated works) and the ancillary works listed in part 2. Explain why the definition of "ancillary works" is not limited to those in part 2 but "any other works authorised by this order" and whether this means there is an overlap between the ancillary works in part 2 and other works listed. Update the explanatory memorandum and other core documents accordingly.	The 'authorised development' comprises those parts of the 'authorised project' which are 'development' in the sense of Section 32 of the Planning Act 2008 and in turn therefore Section 55 of the Town and Country Planning Act 1990. The 'authorised development' has, as is conventional in DCOs (see for example the recent National Grid made DCOs), been separated into the principal works (which have been numbered, for convenience), and the more general list of associated development which is set out after the numbered works. The 'ancillary works' are those elements of the 'authorised project' which are not 'development' in the planning sense, as noted above. Sub-paragraph (y) of paragraph 2 (the general 'associated development') addresses those parts of the authorised development which may be necessary or expedient, whereas the 'ancillary works' are those parts of the authorised project which are not 'development' in the planning sense. The definition of 'ancillary works' includes both those items listed in part 2 of Schedule 1, but also any other works authorised by this Order. This is to recognise that the draft Order contains various powers, such as remedial and protective works (Article 21) and survey powers (Article 22), which authorise various activities and hence it is important that the definitions encapsulate all that the Order would authorise, if made. The Applicant will consider the need to update the Explanatory Memorandum as appropriate.

Reference	Question to:	Question	Applicant's Response
1GEN14.	**Applicant** Local authorities	**Article 2 (Interpretation) "construction environmental management plan" (CEMP) and all other plans listed in Schedule 3 Requirement 6** Explain whether it is the applicant's intention to produce final detailed versions of plans to be certified by the Secretary of State, as described in article 2, or to produce outline plans to be certified by the Secretary of State with the final version being approved by the relevant planning authority as implied by the wording of Requirement 6 and Schedule 19? Explain who would be the relevant planning authorities for the approval of such documents and also for the discharge of Schedule 3 requirements in all locations and how this would work in practice with multiple host local authorities. Please note, PINS Advice Note on Drafting Development Consent Orders states that "For clarity, such requirements should generally be drafted to identify the relevant planning authority by name. This could be made clear in the definitions, for example when defining 'the relevant planning authority'." As there is an onshore CEMP and an offshore CEMP, article 2 should be updated to list both.	In respect of certification of documents, Article 60 requires that, as soon as practicable after the making of the Order, the undertaker is to submit copies of the documents listed at Schedule 19 to the Secretary of State for certification that they are true copies of those documents. The effect of certification is that such documents are then admissible in any proceedings as evidence of the contents of the document. The Applicant will comply with those obligations as set out in Article 60, as soon as practicable after the making of the Order. The Applicant does not propose that there be certification of the later versions submitted to discharge requirements (e.g. Requirement 6), noting that those versions will be part of the public record of the relevant discharging authority. The Applicant will therefore reflect on the definitions in Article 2 to ensure that certification is only referred to in respect of the documents listed at Schedule 19. In respect of the relevant planning authorities, the Applicant is producing a table listing the relevant planning authorities by name and will submit this once available. Due to the nature of this DCO, covering multiple geographies, the Applicant is of the view that the definition of 'relevant planning authority' is appropriate, as being the local planning authority for the area to which the provision relates. The Applicant will consider the approach to definitions of the onshore and offshore CEMP in Article 2.
1GEN15.	Applicant	**Article 2 (Interpretation) "maintain"** The applicant's explanatory memorandum [CR1-029] states that the definition of "maintain" reflects the definition included in the Bramford to Twinstead DCO 2024 and the Yorkshire Green DCO 2024. However, the ExA notes that it does not include the wording "but not remove, reconstruct or replace the whole, of the authorised development", which is included in the wording of the two DCOs mentioned. Explain why this wording is not included. Furthermore, please explain in more detail why the use of robots/drones would be necessary and signpost to similar articles in other made DCOs. Update the explanatory memorandum and other core documents accordingly.	The Secretary of State, in the Decision Letter for the Bramford to Twinstead DCO 2024, amended the definition of 'maintain' to confirm that whilst part of the authorised development may be replaced, this definition does not cover the replacement of the whole of the development. The Applicant confirms that it does not consider that the whole of the authorised development could be reconstructed or replaced using maintenance powers. Therefore, the Applicant will include this wording in article 2. The Applicant uses Robots/Drones to inspect its network as part of routine maintenance to enable fast and efficient inspection to identify potential issues from the ground on overhead lines and from above ground on buried services. This is a safe way of inspecting the high voltage network and allow targeted maintenance where it is required. The wording is contained in the BTNO made DCO for the same reasons.
1GEN16.	Applicant	**Article 2 (Interpretation) "outline offshore overarching written scheme of investigation"** Explain the relationship between the outline offshore overarching written scheme of investigation and the marine archaeological method statement as it is not clear in the article 2 definition. Furthermore, explain why the definition of the outline offshore overarching written scheme of investigation in paragraph 1 of the deemed marine licence (DML) does not match the article 2 definition as it does not reference the marine archaeological method statement. Update the explanatory memorandum and other core documents accordingly.	The definition of an outline offshore archaeological Overarching Written Scheme of Investigation (OWSI) is provided in Section 1.3 and paragraph 1.9.40 of **Application Document 7.5.5 (B) Outline Offshore Overarching Written Scheme of Investigation [PDA-033]**. Paragraph 1.9.41 explains that Method Statements are required to enhance the scope of the outline offshore OWSI with specific detail and methodology for independent packages of work. Turning to the definitions, for consistency the Applicant is content to adjust article 2 and not refer to the method statement, by deleting the words 'or Marine Archaeological Method Statement', but would first welcome the views of the relevant marine stakeholders.
1GEN17.	Applicant	**Article 2 (Interpretation) "pre-commencement operations"** Explain any overlap with the associated development listed in schedule 1, cross-check and remove any duplication.	This definition fulfils a separate function to Schedule 1. Schedule 1 lists the entire 'authorised project', comprising the authorised development (which includes both the S.35 directed development and other 'associated development') and the ancillary works. Article 3 then grants consent for those activities.

Reference	Question to:	Question	Applicant's Response
		Update the explanatory memorandum and other core documents accordingly.	Certain provisions within the draft Order (especially certain Requirements in Schedule 3) are linked to commencement, which is defined in Article 2 (see the definition of 'commence' which refers to 'works' and 'material operations'). As explained in paragraph 4.6.12 of the Explanatory Memorandum, there is then a 'carve out' for 'pre-commencement operations'. Hence the Applicant is of the view that the above provisions and wording are correct in the context of the operation of each.
1GEN18.	Applicant	**Article 2 (Interpretation) "landfall"** The ExA notes that there is no definition of "landfall" within the dDCO, should there be? Update the explanatory memorandum and other core documents accordingly.	The Applicant has not included a definition in the draft Order as the Applicant believes that it is tolerably clear what is meant when this term is used, given the context. The Applicant can confirm that **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043]** secures the commitments to using trenchless techniques in Suffolk and Kent with a definition of these techniques for Suffolk and Kent provided within Part 2 Condition of the DML. The Applicant will review the context of the term 'landfall' within the draft Order/DML throughout the next phases of Examination as drafting progresses.
1GEN19.	Applicant	**Article 3(2)** Explain the link between article 3(2) and section 141 of the Planning Act 2008 (keeping electricity lines installed above ground). The ExA notes that there are no definitions of "install" or "high voltage electricity transmission system" in article 2, should there be? Update the explanatory memorandum and other core documents accordingly.	Article 3(2) permits the undertaker to install and keep installed the authorised project and to remove or replace any electric line including pylons and underground cables that may require removal as part of the authorised project. S141 of the Planning Act 2008 allows for an order granting development consent to authorise an electric line to be kept installed above ground. The Applicant considers that the article is compatible with s141 as the Authorised Project includes the installation of electric line above ground. In terms of further definitions, the Applicant relies upon any definitions already set out in the primary legislation of the Planning Act 2008 and/or the Electricity Act 1989 (for example the latter defines 'transmission system' at Section 64), and insofar as Parliament did not feel the need to include definitions of any of these words, the Applicant is content to follow that approach, noting that the DCO would be secondary legislation.
1GEN20.	Applicant	**Article 3(4)** Article 3(4) is subject to schedule 3, however, the ExA note that the requirements in schedule 3 are not limited to construction and installation. Review and explain. Update the explanatory memorandum and other core documents accordingly.	The entire Order is subject to other provisions of the Order, however it has become practice to expressly cross-refer. For example, Article 3(1) is subject to 'the provisions of this Order (including the Requirements)'. Article 3(5) gives effect to Schedule 3 (Requirements) generally. Any documents or controls contained within the Requirements will therefore have effect, notwithstanding if the Requirement does not relate to construction or installation. The Applicant would be happy to adjust Article 3(4) to remove the words 'and to Schedule 3 (Requirements)' if felt helpful.
1GEN21.	Applicant	**Article 4(1)** Explain where the exceptions identified in article 4(1) lie, including, but not limited to where there are contrary provisions in the order. Update the explanatory memorandum and other core documents accordingly.	This wording is well-precedented, as explained in the Explanatory Memorandum. If the undertaker enters into side agreements restricting its power to maintain, then the drafting acknowledges that. Equally any provision of the Order (for example perhaps the Deemed Marine Licence or Protective Provisions) might contain provisions which address maintenance. The wording again acknowledges that. The Applicant is of the view that this well-precedented wording should remain.
1GEN22.	Applicant	**Article 5** The applicant's explanatory memorandum sets out that article 5 allows for lateral and vertical deviation in respect of the linear and non-linear works. It goes on to explain the reasons for the vertical deviation. However, it does not provide a similar explanation for lateral deviation	The lateral flexibility is necessary to allow for delivery of the project where there might be localised ground condition considerations, or flexibility required by the contractor as it develops its detailed design. Without lateral flexibility, the Applicant would need to amend the DCO for each such issue, which would be disproportionate and inefficient. The EIA process has assessed the parameters as applied for.

Reference	Question to:	Question	Applicant's Response
		for linear elements set out in article 5(1)(a). Explain the reasons for the wording of 5(1)(a), including why the wording includes "anywhere within the Order limits" and why this differs from the Bramford to Twinstead article 5(1)(a), which includes the wording "deviate laterally from the centreline for the linear works". Update the explanatory memorandum and other core documents accordingly.	Article 5(1)(a) allows for deviation for works within Limits of Deviation (LOD) where provided, and also allows for construction activities for the authorised project anywhere within the Order Limits. This is to make clear that construction activities may occur anywhere within the Order Limits, whereas the LOD apply to the works specified. The Yorkshire GREEN made DCO also similarly used the word 'anywhere' in its article 5(1)(e). Article 5(1)(a) on the BTNO scheme (which was expressly about certain of the numbered linear electric line works) included the words 'from the centreline for the linear works' as Article 5(1) of the BTNO DCO pertained to the linear works only, which all had centre lines. For the Proposed Project, the LOD which article 5(1)(a) addresses, relate to both linear and non-linear aspects, and there are not centrelines for non-linear works.
1GEN23.	Applicant	**Article 5 upwards deviation of pylons** Article 5 sets a vertical upwards deviation of the pylons not exceeding 6 metres (m). The Explanatory Memorandum [CR1-029] states that this is the same that was consented in the Yorkshire Green DCO 2024. Explain the reasons for a 6m upwards deviation, rather than, for example, a 4m upwards deviation as set out in the Bramford to Twinstead DCO 2024. Update the explanatory memorandum and other core documents accordingly.	6 m would allow for two standard 3 m 'panels'. A panel is made up of individual steel bars to form parts of the body of the tower and will either contain sections of the main Pylon legs or connect between Pylon Legs. The panel is shown in the image below. The reason we would use one or two panels on a tower is for flexibility which is necessary to allow for delivery of the project where there might be localised ground condition considerations, or flexibility required by the contractor as it develops its detailed design.  The Applicant has taken differing approaches in this regard – on BTNO, Hinkley Point C and the Richborough DCOs, 4 m was sought and granted. On Yorkshire GREEN, 6 m was sought for that project. The approach is considered by the Applicant depending on the requirements of the project.
1GEN24.	Applicant	**Article 5(4)** Article 5(4) sets out the reasons for when the maximum limits of vertical deviation would not apply, including that "these limits would not give	The Applicant considers that whilst the wording is different, the wording used in the Proposed Project draft DCO would achieve the same outcome as the wording noted in the Bramford to Twinstead DCO 2024. The principle is the same. However, the

Reference	Question to:	Question	Applicant's Response
		rise to any materially new or materially different environmental effects **in comparison with** those reported in the environmental statement." Explain why the wording of article 5(4) differs from that used in the Bramford to Twinstead DCO 2024 which states "materially new or materially different environmental effects to those **identified** in the environmental statement."	Applicant can replicate the wording in the Bramford to Twinstead DCO 2024 for consistency in the drafting approaches.
1GEN25.	Applicant	**Article 8(1)** Provide further explanation for article 8(1) and the need to apply the Town and Country Planning Act 1990 for the proposed development. Update the explanatory memorandum and other core documents accordingly.	The Applicant refers to the rationale as set out in the Explanatory Memorandum. Where temporary works occur, at the point at which they finish and the prior use is resumed, this article provides that planning permission is not required for the resumption of the 'use' (noting the definition of 'development' in S.55 of the TCPA 1990 which includes change of use).
1GEN26.	**Applicant** Local authorities	**Article 9 Community Infrastructure Levy (CIL)** Confirm whether CIL is chargeable within the relevant local authorities and therefore whether article 9 is necessary.	Article 9 is relevant to include regardless of whether CIL is currently chargeable by the local authorities as it clarifies that, for the purposes of the Community Infrastructure Levy Regulations 2010, any buildings within the authorised project fall within the exemption under regulation 6 and will not to be considered as 'development' for the purposes of the Community Infrastructure Levy (CIL). The rationale for this disapplication is that the authorised project is, in its own right, a piece of Nationally Significant Infrastructure, and the undertaker will be obliged to provide all of the mitigatory infrastructure to mitigate its effects. Therefore, it would not be justifiable for CIL to be charged in respect of the development on top of this, for further infrastructure to mitigate impacts. Identical wording is included in the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024 and the National Grid (Bramford to Twinstead Reinforcement) Development Consent Order 2024 and the Southampton to London Pipeline Development Consent Order 2020.
1GEN27.	Applicant	**Article 10** The explanatory memorandum explains the effect but not the purpose of Article 10. Update the explanatory memorandum with project-specific justification for the inclusion of this article. Provide details of any existing Town and Country Planning Act (TCPA) or Planning Act 2008 (PA 2008) approvals and identify where these may conflict with the proposed development. Provide details of any TCPA or PA 2008 applications which may be in the pipeline (made but not determined or nearing submission) and identify where these may conflict with the proposed development.	The purpose of Article 10 is to make provision in respect of other planning permissions and development consents. It is important as a matter of principle to ensure that the interface between the DCO (if granted) and any other such consents (which may not yet exist) is provided for, to ensure clarity of the interface. Article 10(1) ensures that, where a planning permission is granted after the publication of the Order, then if the criteria are met, pursuing works or use under that permission would not cause a breach of the DCO. The Applicant is not expecting to make any applications for such permission, however if it did need to do so then this article would have effect. The two latter parts of the article stem from the *Hillside* litigation and its predecessors, pertaining to incompatibility between consents, and as a matter of principle are important to include to ensure that no such issues arise. In relation to existing planning permissions and DCOs, the Applicant has focussed here on where such consents have not yet been built out, given that those projects which have been constructed (such as the Richborough – Canterbury connection DCO project) will have been accommodated within the design of the Proposed Project. Noting the purpose of Article 10, the Applicant has below focussed its comments on those consents where the Applicant has felt the need to consider whether there is a risk of inconsistency.

Reference	Question to:	Question	Applicant's Response
			In relation to existing consents, the SPR EA1N and EA2 DCOs would interface with the proposed DCO. That interface has already been described and the interface with controls is addressed in an earlier question. In terms of other extant planning permissions or DCOs, the Applicant is also aware of the Sizewell C DCO proposals. Co-ordination with such projects is addressed elsewhere in the DCO Application, including the Co-ordination document [APP-363]. In Kent, the Applicant is aware of the Manston Airport DCO. In all cases, the Applicant is in ongoing liaison to ensure that any issues as between the projects are understood and addressed as appropriate. In relation to future consents, the Applicant is aware of the proposed NGV Lionlink project, which as above is the subject of ongoing co-ordination. In terms of existing offshore DCOs which cross the Proposed Project, this includes East Anglia One Offshore Windfarm only. Planned offshore DCOs which cross the Proposed Project are the East Anglia Three Offshore Windfarm, Five Estuaries Offshore Windfarm, North Falls Offshore Wind Farm, Tarchon Interconnector, and Nautilus Interconnector. It is further noted that the consent strategy for the Cronos Interconnector is currently unknown. The Applicant confirms that Crossing Agreements will be negotiated and executed with all relevant third-party asset owners where the proposed project crosses existing or planned assets. Engagement with third-party asset owners is ongoing and discussions are progressing to finalise the necessary agreements. This commitment is outlined in OSU01 **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 3. Whilst there are other smaller TCPA planning permissions relating to land within the Order Limits of which the Applicant is aware, the Applicant does not understand there to be issues of compatibility. In terms of future granting of such consents, the Applicant notes that it has sought in the draft DCO the safeguarding article, 56, to support with the Applicant understanding other permissions which might be granted and to enable the Applicant to make representations, including to seek to avoid inconsistencies. The Applicant submits that article 56 is therefore a protection which will assist in controlling this issue.
1GEN28.	**Applicant** Local authorities	**Article 11(2), article 15(2) and (5)(b), article 17(1)(b), article 20(3) and (4), article 22(5), article 50(2) and article 55(1)** Explain the reasons for the inclusion of the words "which consent shall not be unreasonably withheld or delayed" and define what is meant by this wording, particularly when article 11(3), article 15(9), article 17(2), article 20(9), article 22(8) and article 50(9) include a 35-day decision period. Provide justification for deemed consent in the absence of a decision. Local authorities to also provide comment.	The Applicant notes that a very similar point was raised by Suffolk County Council in its LIR. The Applicant therefore refers to Response 15.13, Table 13.1 of **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**.
1GEN29.	**Applicant** Local authorities	**Article 11, article 14, article 15 and article 17 consistency of wording** Article 11(3) states "beginning with the date on which the application was received" and article 14(5), article 15(9) and article 17(2) state	The Applicant will amend the wording in article 14(5), article 15(9) and article 17(2) to read 'beginning with the date on which the application was received' in order to ensure consistency across the draft Order. This reflects the position agreed in the National Grid (Bramford to Twinstead Reinforcement) Order 2024.

Reference	Question to:	Question	Applicant's Response
		"beginning with the date on which the application was made". Explain the inconsistency in wording and provide reasoning for why the 35 days should begin with the date on which the application was received or made. Local authorities to also provide comment. Update the explanatory memorandum and other core documents accordingly.	
1GEN30.	Applicant	**Article 13** The Explanatory Memorandum [CR1-029] sets out that similar working is included in the Bramford to Twinstead DCO 2024 for article 13. Explain the reasons for the differences in wording between the two articles. Update the explanatory memorandum and other core documents accordingly.	The differences primarily relate to minor drafting differences between the two projects. For example, differing terminology for temporary measures: the Bramford to Twinstead DCO 2024 uses "*closure, alteration or diversion*" whereas the Proposed Project draft Order text uses "*stopping up, alteration or diversion*" in paragraphs (5) and (7). The cross-references to article 15 reflect the different names of the articles in each order. The Bramford to Twinstead DCO 2024 includes section 75 (inspection fees) in article 13(6)(i) whereas this is not included in the Proposed Project drafting (and this aligns with the Yorkshire GREEN made DCO drafting at its article 12). The Applicant notes that it is in ongoing liaison with the county councils (as highway authorities) including having received detailed comments on the draft order. The Applicant further notes the application of the defined permit scheme(s), where applicable.
1GEN31.	Applicant	**Article 14** The ExA notes that the applicant recognises that this is not a model article. Explain the specific circumstances of the proposed development that would justify the need for article 14. Update the explanatory memorandum and other core documents accordingly.	This provision is well-precedented as noted in the Explanatory Memorandum, and is necessary for the Proposed Project. Having considered the nature of the highway works which are necessary to deliver the authorised project, the Applicant will need to carry out works in respect of the streets listed at Schedule 6 to the draft Order, in the manner specified in that schedule. The Applicant therefore felt it appropriate to seek the powers and provisions set out in Article 14. The specific circumstances are those listed in Schedule 6 to the draft Order, which is referred to in the Explanatory Memorandum.
1GEN32.	Applicant	**Article 15** Explain why article 15 includes permissive paths. Update the explanatory memorandum and other core documents accordingly.	Article 15 includes permissive paths due to the potential for the Proposed Project to interact with a permissive path along the old railway line that sits within the Order Limits in Suffolk (and is labelled on the Access and Public Rights of Way and Navigation Plans). Paragraph 4.19.7 of the Explanatory Memorandum addresses this. The permissive path is not a PRoW. The Project does not intend to temporarily close the permissive path but it has been included as a precautionary measure to retain flexibility.
1GEN33.	Applicant	**Article 19** The Explanatory Memorandum [CR1-029] sets out that similar working is included in the Bramford to Twinstead DCO 2024 for article 19. Explain the reasons for the differences in wording between the two articles. Update the explanatory memorandum and other core documents accordingly.	The Applicant notes that the only difference between the two articles relates to article 19(1)(c) which states 'any stopping up, alteration or diversion of a street authorised by this Order'. The equivalent wording in article 18(1)(c) of the Bramford to Twinstead DCO 2024 states 'any temporary closure, alteration or diversion of a street authorised by this Order'. The Proposed Project draft Order includes a provision for permanent stopping up of streets and public rights of way whereas the Bramford to Twinstead DCO 2024 did not require any provision for permanent stopping up of streets. Therefore, the Applicant considers that it is appropriate for the wording to deviate slightly for agreements to be entered into with street authorities with respect to any stopping up, alteration or diversion of a street authorised by this Order.

Reference	Question to:	Question	Applicant's Response
1GEN34.	Applicant	**Article 20** Explain the reasons for the inclusion of the word "decommissioning" in article 20(1), 20(5), 24, 51 and 52. Update the explanatory memorandum and other core documents accordingly.	The draft Order includes the power to maintain the authorised project, which pursuant to the definition includes decommissioning. Requirement 13 expressly acknowledges the potential for decommissioning. Hence the articles referred to also make reference not only to construction, but operation and maintenance, and decommissioning.
1GEN35.	Applicant	**Article 23** Explain the specific circumstances of the proposed development that would justify the need for article 23 (removal of human remains) and how the circumstances of the proposed development are different from those of recently made orders where similar articles have been removed by the Secretary of State. Update the explanatory memorandum and other core documents accordingly.	The Applicant notes that Suffolk County Council has made comments in respect of this article. As noted in the Explanatory Memorandum, the aim of the article is to consolidate the applicable provisions for regulating the removal of human remains into a single article in the Order to provide an alternative procedure for managing the removal of any human remains disturbed during the course of carrying out the authorised project. Insofar as the Applicant interfaces with human remains, this article will ensure that a mechanism is included in the Order itself to regulate what happens. The authorised project includes underground aspects and hence there must at least be a risk of such an interface. As was demonstrated by the relatively recent discovery of the 'enclosure' in Suffolk, it is possible that unexpected discoveries are made; and the inclusion of this provision would not prejudice any party.
1GEN36.	Applicant	**Article 24** Explain why you are seeking compulsory acquisition of land for decommissioning as well as construction, operation and maintenance. Update the explanatory memorandum and other core documents accordingly.	The Applicant refers to its answer to 1GEN34.
1GEN37.	Applicant	**Article 26** Bramford to Twinstead made order article 24 includes the same wording as the Sea Link article 26 for paragraphs (1) to (4). Explain why paragraphs (5) and (6) are not included within Sea Link article 26. Update the explanatory memorandum and other core documents accordingly.	The Applicant recalls that the extra paragraphs were added as part of the decision-making process subsequent to the examination. The Secretary of State's decision letter records (on page 36) that these paragraphs were inserted 'because compensation paragraphs were omitted'. The Applicant is of the view that that wording was not necessary, due to the primary act, being the Planning Act 2008, including provisions in respect of compensation including Section 126 which provides that an Order may not modify a compensation provision, save where needed to apply the provision, and an Order may not exclude a compensation provision. The Applicant further notes Articles 29 and 30 which address matters pertaining to compensation which the draft Order properly addresses. Notwithstanding the above, the Applicant does not object if these additional paragraphs were to be added.
1GEN38.	Applicant	**Article 27(1)** Justify why you consider it necessary and appropriate to allow temporary possession of "any other order land" and explain what steps you have taken to alert **all** landowners and occupiers within the order limits to this possibility.	As set out in paragraph 4.1 of **Application Document 4.2 (F) Statement of Reasons** submitted at Deadline 3, the Applicant seeks to acquire only such land and rights which are necessary to ensure securing the long-term placement of electricity transmission apparatus and required maintenance access. Where it is necessary to use and occupy land only during the construction and commissioning of the proposed project, then the powers sought are limited to temporary use only. Article 27 provides for the undertaker to exercise temporary use powers in respect of the land in Schedule 11 (being land where only temporary use is sought) and in respect of any other Order Land. In the latter case this is because all parts of the Order Land are necessary and hence have been included for the purposes of the authorised project.

Reference	Question to:	Question	Applicant's Response
			The Applicant has developed bespoke categories (summarised at Table 4.1 of **Application Document 4.2 (F) Statement of Reasons** submitted at Deadline 3**)** to ensure the nature and extent of powers being sought over each parcel of land was kept to the minimum required. The Applicant has sought, wherever possible, to rely on temporary possession of land rather than permanent acquisition, in order to reduce the impact on landowners. The Applicant has sought to engage with all persons with an interest in land affected with a view to reaching a voluntary agreement for the use of, or the acquisition of (or rights in respect of) the land and the payment of compensation to the landowner. The Applicant has appointed a land agency firm to assist with engagement with landowners and the issue and negotiation of the Heads of Terms. The day-to-day negotiations have been carried out by offering meetings with landowners/agents to discuss the Heads of Terms in further detail. Correspondence has been back and forth between the Applicant and third-party landowners/agents on specific individual issues. Where landowner engagement has not progressed, the Applicant has made periodic efforts to engage and offer support to try and progress negotiations by private treaty, as evidenced in **Application Document 4.2.2 (D) Statement of Reasons Appendix B Schedule of Negotiations with Land Interest** submitted at Deadline 3**.** The Applicant will continue to seek to voluntarily acquire rights over plots where there are known landowners and will continue to seek to agree Heads of Terms with those landowners that are yet to agree Heads of Terms. The Applicant will do this in parallel with the promotion of the Order, as implementing any land powers granted in the Order would be its last resort to ensure that it has acquired all the rights that it requires to deliver the Proposed Project in accordance with the project programme. Once Heads of Terms are agreed with an individual landowner an Option agreement is issued so that landowner's solicitor is able to secure the agreement in a legally binding document. The Option agreements reflect the Heads of Terms agreed with any given landowner
1GEN39.	**Applicant** Statutory undertakers	**Article 44** Explain the implications for the inclusion of paragraphs (2) to (4) and signpost to similar paragraphs within made orders. Update the explanatory memorandum and other core documents accordingly. Statutory undertakers to also provide comment.	Paragraphs (2)-(4) apply the provisions of the TCPA 1990 Ss.271-274 where apparatus are reprovided outwith the Order Limits. Those sections provide for notice to statutory undertakers and telecoms operators, and counter-notices to be issued and a process for resolution in such circumstances. In essence they provide protection for statutory undertakers and telecoms operators. The Applicant has reflected on the position and considers that the material protections provided by these notification provisions are addressed via the Protective Provisions. The Applicant has further considered the recent precedents and has updated the draft DCO to align with the most recent precedent (being the Bramford to Twinstead DCO 2024).
1GEN40.	Applicant	**Article 46** Explain the specific circumstances of the proposed development that would justify the need for article 46. Update the explanatory memorandum and other core documents accordingly.	The Applicant hopes that no persons have their supply affected by the removal of apparatus, and that the protections in place for statutory undertakers and telecoms operators will ensure that no supplies are interrupted; however in that eventuality this article would provide for a mechanism to ensure compensation for the cost of any new connections. The Applicant notes that this was one of the general DCO model provisions.

Reference	Question to:	Question	Applicant's Response
1GEN41.	Applicant	**Article 49** The Bramford to Twinstead Correction Order includes several instances where the word "relevant" was inserted into the equivalent article (45). Confirm whether article 49 should include the same amendments. The reference to the CEMP in article 49(1)(a)(ii) should be amended to the onshore CEMP.	The Applicant will amend the draft DCO to include 'relevant' in article 45(2) and (3) and notes that the reference to the CEMP should be amended to the onshore CEMP.
1GEN42.	Applicant	**Article 50** Explain the difference between the four weeks plus seven days set out in article 50(3)(a) and (b) and the 35 days set out in article 50(9) and give reasons why both are needed. Should article 50, following article 50(9), include paragraphs similar to article 22(9) and (10). If not, why not?	Article 50(3) relates to the giving of 4 weeks' prior notice to the police and traffic authority, and advertising in the way which the traffic authority may specify (and they may do so within 7 days of the above notice), in advance of exercising the TRO power. This relates to both (1) (being the TROs in Schedule 13) and (2) being any other TRO (but in the latter case this is subject to the consent of the traffic authority). Article 50(9) pertains to any application to the street authority, which is relevant to (2) where the Applicant seeks consent for any TROs not listed in Schedule 13. The Applicant will consider whether Article 50(9) should only refer to (2) and not (1). Article 22 contains provisions requiring that any application must contain a statement referring to the deeming provisions and that without that statement the deeming provisions do not apply. The Applicant felt that this was an appropriate protection in the context of Article 22 which deals with surveys etc. The Applicant is content that such a provision could be included in Article 50 if felt appropriate.
1GEN43.	Applicant	**Article 51** In light of the number of ancient and veteran trees present within the order limits that are to be retained in accordance with REAC [CR1-043] commitment A05, should article 51 include specific provision excluding these trees or a requirement for approval from the local planning authority for such works? In responding, either provide suitable alternative DCO wording to address this point or explain why such wording is not necessary, to control or prevent works to the trees.	**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** secures the commitments relating to ancient and veteran trees. Compliance with the REAC is secured by Requirement 6(2). The Applicant does not consider that any amendment to article 51 is necessary as sufficient controls already apply through the management plans and would result in duplication. This approach is well-precedented across other DCOs such as Article 47 of the National Grid (Bramford-Twinstead Reinforcement) Order 2024, Article 81(1) of the Sizewell C (Nuclear Generating Station) Order 2022, Article 35(1) of the Norfolk Boreas Offshore Wind Farm Order 2021, and Article 32(1) of the Cleve Hill Solar Park Order 2022.
1GEN44.	Applicant	**Article 56** Explain the specific circumstances of the proposed development that would justify the need for article 56. Update the explanatory memorandum and other core documents accordingly.	Article 56 relates to safeguarding the Proposed Project in respect of other planning applications. As identified in the Explanatory Memorandum, the principle of the provision is to safeguard the authorised project. Without this provision, the Applicant would be reliant on the conventional notification process, which the Applicant submits is not sufficient in the context of the importance of the project and the protection it should be afforded. The authorised project is a critical national priority and its operational integrity must be afforded protection in the context of other proposed developments within the Order Limits. The discretion of the LPA is maintained as their ultimate obligation pursuant to the article is to take into account any representations from the undertaker. In the specific circumstances of the Proposed Project, the Applicant submits that this provision is appropriate, proportionate and necessary.
1GEN45.	Applicant	**Schedule 1, part 1, work no. 1b and work no. 11** Explain the quantum and purpose of the proposed battery rooms identified in Work No. 1b and Work No. 11.	Battery Rooms are standard on the Applicant's Substations and include the Low Voltage (typically 110v) batteries that are used as back up to the Applicant's essential systems, along with the back up generator, should there be an outage on the power supply to the site from the local distribution networks. There will typically be one battery room for the Applicant's system and then battery rooms for the individual connected customers, so in the case of Friston (Kiln Lane) Substation there will be one battery room for EA1N and one battery room for EA2, therefore totalling three for the site.

Reference	Question to:	Question	Applicant's Response
			The requirements for Battery Rooms are covered in Appendix M Technical Specification TS2.19 Ancillary Light Current Equipment of **Application Document 9.73.1 Applicant's Responses to First Written Questions – Appendices** submitted at Deadline 3.
1GEN46.	Applicant	**Requirement 2 time limits** The ExA notes that the wording of requirement 2 appears to be based on requirement 2 of the Yorkshire Green made DCO, however, paragraph (2) omits the wording "or if shorter, one year". Explain why this wording is not included. Update the explanatory memorandum and other core documents accordingly.	The drafting proposed recognises that in the event of legal challenges, the commencement limit should be extended for an equivalent period to reflect the period whilst the challenges are 'live', without the limitation of a one year period (which may well be insufficient in the event of multiple challenges which are then appealed). In the circumstances of this case and following pre-application engagement with the local authorities as the drafting evolved, the Applicant is of the view that the alteration is appropriate.
1GEN47.	**Applicant**/ local authorities	**Requirement 3 converter station design** The ExA notes that the requirement does not allow the relevant planning authority to approve the design of the converter station, but restricts it to confirming that the details are in general accordance with the Key Design Principles set out in the Converter Station Design Principles. The ExA notes that this allows considerably greater flexibility than similar DCO requirements such as the ones for the Scottish Power Renewables consents for substations at Friston and in effect stops short of giving the relevant planning authorities the ability to control and approve the layout, scale and design. Explain why this approach provides sufficient control and why a similar approach to that set out in requirement 12 of the made East Anglia ONE North DCO is not required. The ExA notes that requirement 3 does not stipulate that the development must be carried out in accordance with the details submitted to the relevant planning authority. Explain whether this is an oversight or whether additional wording is required. The ExA notes that there is no requirement in the dDCO in relation to the submission and approval of the layout, scale or design of the substations in Kent and Suffolk, the River Fromus Bridge or the new pylons. Is this the applicant's intention or is it an oversight? If intentional provide justification for this approach, in the light of the identified likely significant effects of the infrastructure on landscape and visual receptors. If it is an oversight, additional requirements are necessary and the ExA would expect these to provide robust controls over the designs and the carrying out of the development in accordance with approved drawings. Provide an explanation as to why Design Principles - Suffolk [APP-366] and Design Principles - Kent [APP-367] are not included as documents to be certified in Schedule 19 pursuant to article 60 of the dDCO. Local authorities to provide comments on these matters.	**Converter station design** The layout and scale of a converter station facility (which includes a DC hall, valve hall, reactor hall, converter transformers, AC switchyard, various other buildings and equipment, car parking and other elements) must be designed to meet the functionality of the converter station in line with National Grid specifications and requirements. The equipment selection and layout will be heavily driven by engineering, safety, security, and other operational factors, as well as regulatory considerations and delivery programme considerations (e.g. product availability). This is reflected in **Application document 7.12.1 Design Principles – Suffolk [App-366]** and **Application document 7.12.2 Design Principles – Kent [App-367]**, which presents a hierarchy whereby a series of 'Critical Design Constraints' (CDCs) sit above the Design Principles that they influence. Whether or not the planning authority are afforded the ability to control layout, scale, and design, the actual ability of a planning authority to influence these elements is limited, due to the overriding engineering and operational factors captured in the CDCs summarised above. Including the ability for the planning authorities to control these elements in requirement 3 may risk creating an unrealistic expectation around design flexibility (beyond what the Key Design Principles would already deliver) and create unnecessary delays to delivery as any areas of discussion were resolved. It is not considered that introducing a procedural step which affords planning authorities the ability to control layout, scale, and design would be appropriate, or indeed productive for either the Applicant or the planning authorities in this context. The Key Design Principles, set out in **Application document 7.12.1 Design Principles – Suffolk [App-366]** and secured via Requirement 3 of **Application document 3.1 (E) draft Development Consent Order [CR1-027],** have been designed specifically to ensure that matters of design (including height, scale, massing, orientation, building arrangement, materials, colours, and textures) are considered appropriately and robustly, recognising that the manner and extent to which principles can influence the design are dependent on the engineering and operational factors above. The relevant planning authorities do have the ability to approve (or otherwise) the designs on the basis of their general accordance with the Key Design Principles. Aspects of design that could lead to significant environmental effects, such as matters related to noise and landscaping, are separately controlled through commitments and/ or through the discharge of management plans as secured via Requirement 6 of **Application document 3.1 (E) draft Development Consent Order [CR1-027].** This ensures that where controls are necessary, they are secured and approved by the relevant planning authority.

Reference	Question to:	Question	Applicant's Response
			The Design Principles documents have been developed following extensive community and stakeholder engagement, including with the relevant local planning authorities and with a Design Review Panel (DRP). The Design Principles documents also set out a series of Project Level Design Principles which (although not secured via requirement) include a commitment to maintain ongoing engagement with the relevant planning authorities and the DRP in advance of submitting material to discharge DCO Requirement 3. In this regard, while not being asked to control the design, the relevant planning authorities will be a key stakeholder as the design is developed. It is also relevant that the physical parameters are already controlled by the lines and situations on **Application document 2.5.1 (B) Works Plans – Suffolk [CR1-007]** and **Application document 2.5.2 (B) Works Plans – Kent [CR1-008]**, and the table of parameters in article 5 of **Application document 3.1 (E) draft Development Consent Order [CR1-027]**. Wording that stipulates that the authorised development must be carried out in accordance with the details submitted to the relevant planning authority has been added to Requirement 3 in **Application document 3.1 (E) draft Development Consent Order [CR1-027].** **Substations, watercourse crossings, and pylon tower design** The design of the substations is controlled by commitments in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 (the 'REAC') (e.g. GG34 and GG36), which require works to be in general accordance with the Key Design Principles relevant to the substations in **Application document 7.12.1 Design Principles – Suffolk [App-366]** and **Application document 7.12.2 Design Principles – Kent [App-367]**. Similarly, the appearance of the crossing of the River Fromus is controlled via commitments in the REAC (e.g. ID LV14). This requires that design measures are incorporated into the Fromus crossing, and that details are submitted to the relevant planning authority to demonstrate how impacts have been reduced through consideration of landscape, the use of materials, and other architectural measures. The Applicant will continue to discuss the appropriate control mechanisms related to the design and appearance of the River Fromus crossing with the relevant local authorities as discussions progress and Statements of Common Ground are developed. The Applicant is cognisant of the difference between the design of the bridge compared to the design of the converter stations/ substations in terms of the flexibility of design, site context and experience of the relevant planning and highway authorities on design. Adherence to the measures set out in the REAC is secured via Requirement 6. As with the converter station design however, the designs of the substations and the Fromus crossing must conform to the CDCs set out in the **Application document 7.12.1 Design Principles – Suffolk [App-366].** Generally, it is noted that requiring details of the scale, layout, and design of utilitarian infrastructure such as substations to be approved by the relevant planning authority is not a consistently applied requirement in energy DCOs. While recognising that this is required by the East Anglia ONE North and TWO DCOs, there is for example no equivalent requirement related to the substation element of the National Grid (Bramford to Twinstead Reinforcement) Order 2024, a recent DCO secured by the Applicant in Suffolk. Regarding pylon towers, as these are completely utilitarian in design, any requirement seeking to control their appearance would be inappropriate.

Reference	Question to:	Question	Applicant's Response
			Certification of the Design Principles documents **Application document 7.12.1 Design Principles – Suffolk [App-366]** and **Application document 7.12.2 Design Principles – Kent [App-367]** have been added to Schedule 19 of **Application document 3.1 (E) draft Development Consent Order [CR1-027].**
1GEN48.	Applicant	**Requirement 6 construction management plans to be approved** Many of the REAC [CR1-043] mitigation provisions are specifically linked to the use of HDD methods for landfall. Explain how mitigation controls would be secured by the DCO in the event that an alternative method (such as direct pipe or micro-tunnelling) were used to achieve landfall.	Mitigation measures that specifically relate to HDD methods at Landfall are commitments B59, B60, B62, and GH14 included in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)**. While the commitments specifically state HDD, they would be applied to the alternative trenchless technique (such as direct pipe or micro-tunnelling) if the landfall technique is changed. Commitment MPE06, relating to monitoring of beach profiles where rock bags are planned to be placed at the HDD exit, will also apply to any alterative trenchless technique if it requires rock bag placement at the exit. **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** will be updated for Deadline 4 to make it clear that the mitigation measures would apply to the alternative trenchless technique (such as direct pipe or micro-tunnelling) if the landfall technique is changed.
1GEN49.	Applicant	**Requirement 7 construction hours** Requirement 7 allows for onshore construction work between 07:00 and 17:00 on Saturdays, Sundays and Bank Holidays as part of the core working hours (other than the more restrictive days/hours for Work No.1A and Work No. 1B). There has been concern raised through multiple representations from both Kent and Suffolk regarding the proposed weekend and bank holiday construction working hours proposed. Suffolk County Council (SCC) [RR-5209], for example, stated that: "The potential for construction activities to take place seven days a week and on Bank Holidays would provide host communities with no respite from the impacts of the development activities associated with the Sea Link proposals, including disruption to local roads and Public Rights of Way used for recreational activity at times when they are most frequently used. In turn, this is likely to affect local tourism". This takes into account additional restrictions for onshore piling works and HGV deliveries, as set out in Requirement 7. The ExA is not currently satisfied that the extent of working hours and days as proposed is reasonable and is aware that, as an example, East Angla 1 DCO requirement 23 limits onshore construction work so that it must only take place between 07:00 hours and 19:00 hours Monday to Friday and 07:00 hours and 13:00 hours on Saturdays, with no activity on Sundays or Bank Holidays, subject to some defined exceptions and emergencies. If the working hours for this proposed development was limited to between 07:00 hours and 19:00 hours Monday to Friday, and 07:00 hours and 13:00 hours on Saturdays, other than some defined	**Context** The ability to deliver a network reinforcement that is operational by 2030 is a fundamental element of the case for the Proposed Project. Delivering the Proposed Project by 2031 is a requirement of the Applicant's transmission licence (special conditions 3.41 and 4.9), with an accelerated Earliest in Service Date (EISD) target of 2030, to meet the need for the Proposed Project. The Proposed Project is also identified in the National Electricity System Operator (NESO) Clean Power 2030 report as being critical for the achievement of the Clean Power 2030 target. This report states that of eighty transmission projects required, "*three projects have been identified as critical to delivering a network which supports the clean power pathways. At present, these three projects have delivery dates after 2030 and support is, therefore, needed to bring these projects forward for 2030 delivery*" (NESO, 2026). One of these projects is Sea Link (the other two comprising the two elements of Norwich to Tilbury). The report identifies that without the Proposed Project, consumers could face an extra £1.1bn to £1.4bn in constraints costs in 2030, £3m to £3.8m for every additional day required due to constrained working hours, added to consumers' bills. This is further evidence of the great importance of facilitating the timely delivery of the Proposed Project. The importance of programme in the delivery of network reinforcements is explicitly referenced in policy, for example the Overarching National Policy Statement (NPS) for Energy (EN-1), which states at paragraph 3.3.65, that "*there is an urgent need for new electricity network infrastructure to be brought forward at pace to meet our energy objectives*". The need to accelerate is similarly reflected in policy, for example the National Policy Statement (NPS) for Electricity Networks (EN-5), which states at paragraph 1.1.4 that

Reference	Question to:	Question	Applicant's Response
		exceptions or emergencies, what would this mean for the construction programme length and delivery overall for the proposed development?	plans for network expansion "…*must overcome barriers to deliver on time, and some vital projects need to be accelerated to delivery by 2030*". It is therefore clear that the facilitating the delivery of the Proposed Project against its required programme is paramount to the achievement of the Applicant's licence obligations, to the delivery of the NESO clean power objectives, to accord with NPS policy, and to avoid substantial constraints costs being passed to bill paying consumers. **Core working hours** The core construction working hours proposed are inherent to the Applicant's ability to meet the needs case for the Proposed Project. The Applicant requires a consent that does not unduly restrict the ability of its main works contractors to plan, programme, and deliver the works in an efficient and timely manner. This includes the ability to operate using the '12 days working, 2 days off' pattern that is conventional of a workforce on large infrastructure projects such as that proposed. The main works contractors would develop a detailed programme on this basis, reflecting a final design which will influence what activities are undertaken when. While it is not anticipated that Sunday and bank holiday working would be undertaken across the entire onshore elements of the project every weekend, the ability to utilise weekend days as required is critical to allow an effective delivery programme to be developed. It should also be noted that the ability to make efficient progress in a half day is limited. However, given the need to allow contractors to programme and phase their works without delaying time critical elements of the Proposed Project, the Applicant cannot currently be specific as to which days will be worked. This recognises that the delivery of the Proposed Project will involve multiple different main works contractors, each working on different parts of the project, in different complex and varied geographies (sometimes large distances apart), at different times. It also recognises that there are further benefits of being able to be flexible with programming of activities, including coordinating with other developers managing peaks, and reducing or carefully programming interactions with (for example) PROWs. Flexibility is therefore required to facilitate the effective planning and management of a construction project of this type. In addition to the need to accommodate and work with main works contractors in the way described above, the proposed working hours are needed to provide the necessary contingency to mitigate and manage unforeseen delays and currently uncertain constraints and otherwise keeping delivery workstreams off the critical path. It is noteworthy that recent National Grid Electricity Transmission DCO projects (Bramford to Twinstead in Suffolk, the Richborough Connection Project in Kent, as well as Yorkshire Green), were all granted weekend and bank holiday working. **Delivery programme prolongation** The Applicant has considered the scenario suggested in the ExA's question, being the loss of the flexibility to work after 13:00 on a Saturday and the loss working hours on a Sunday and Bank Holidays. The Applicant's modelling is naturally a high-level review that does not take into account the potential impact of seasonal constraints (such as restrictions on working around ecological features), unforeseen circumstances and delays, or the potential for the altered working hours to impact on critical path activities, but this modelling

Reference	Question to:	Question	Applicant's Response
			indicates that the scenario in the ExA's Question would result in a delay of between 21 and 33 weeks. Given the NESO forecast of constraint costs outlined above, if working hours were restricted as described this could mean an additional cost would be borne by British energy bill payers of between £443m and £886m. **Construction impacts** Notwithstanding the need to work full weekends and bank holidays as necessary, there are measures within the application which protect the amenity of local communities and avoid unacceptable disturbance. The Applicant notes in particular the Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127], **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)**, and **Application Document 9.83 Outline Code of Construction Practice**. The Applicant has also specifically accepted some exceptions to the general construction hours, including in relation to percussive piling works, and proposing more restrictive days/hours for Work No.1A and Work No. 1B. The Applicant has also accepted restrictions on HGV movements. It is also the case that a substantial amount of construction activity will be indoors, once the superstructures of the converter station buildings (for example the valve halls and DC halls) have been completed. The Applicant notes the local concerns set out by the Council regarding the impact of extending the construction working hours to Sundays and Bank Holidays, particularly in the tourism industry. The Applicant has undertaken a comprehensive and robust EIA, through which no residual significant effects have been identified in relation to these working hours following the application of appropriate mitigation. **Summary** The delivery of the Proposed Project in accordance with the programme set out in the Applicant's Transmission Licence, in accordance with the NESO clean power objectives, and in a way that reduces constraints costs being passed to consumers, is fundamental to the need case for the Proposed Project. The ability to programme construction activity as necessary (although unlikely to be continuously) on weekends and bank holidays is vital to facilitating this. Notwithstanding this, it is considered that the construction impacts are suitably controlled and that working on weekends and bank holidays will not result in unacceptable disturbance on communities in any case. It is therefore considered that the proposed core working hours are reasonable and indeed necessary.
1GEN50.	Applicant	**Requirement 7 construction hours** Percussive piling works are limited to 07:00 to 19:00 Monday to Friday and 07:00 to 17:00 on Saturdays and may not occur on Bank Holidays, unless otherwise approved by the relevant planning authority. As presently worded this requirement offers no restrictions on piling works on Sundays. Confirm the construction piling hours or restrictions on Sundays in requirement 7(2).	The Applicant will amend the wording of Requirement 7(2) at Schedule 3 to the Draft Development Consent Order to read: Percussive piling works are limited to 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays and may not occur on Sundays or Bank Holidays, unless otherwise approved by the relevant planning authority.

Reference	Question to:	Question	Applicant's Response
1GEN51.	Applicant	**Requirement 8 retention and protection of existing trees and hedgerows** Explain why requirement 8 paragraph (1) only notes "identifying the trees, groups of trees and hedgerows to be retained" and not those to be removed. Explain why the DCO does not contain a specific requirement for the submission and approval of replacement planting schemes.	Whilst the focus of the requirement is retention and protection of existing trees and hedgerows, Section 2 (a) of requirement 8 identifies the requirement for a schedule showing tree and hedgerow removal that must be included within the Arboricultural Method Statement. The appropriate extract from **Application Document 3.1 (E) draft DCO [CR1-027]** is as follows: *"(2) The Statement referred to in sub-paragraph (1) must include—* *(a) a schedule of all proposed tree and hedgerow removal and management;* *(b) specification for temporary physical protection including clearly defined root protection areas to prevent damage / compaction of roots by machinery; and* *(c) details of an auditable system of compliance."* Regarding replacement planting schemes, this is covered under the 'Construction Management Plans to be Approved' section of requirement 6 under para 1 (g) and (h) which requires a detailed Landscape and Ecological Management Plan (LEMPs) for Suffolk and Kent respectively to be approved by the relevant authority. The LEMPs will include all the final details regarding new planting, specifications etc. The OLEMP has references to the detailed LEMP throughout including the following: "*1.2.4 This oLEMP is a live document that will continue to be updated and refined based on ongoing discussions between National Grid, statutory bodies and relevant stakeholders. It will be updated by National Grid into a LEMP prior to the commencement of works, in accordance with the following requirements:* *unless otherwise agreed with the relevant planning authority, no stage of the Suffolk Onshore Scheme may commence until, for that stage, a detailed mitigation planting scheme for the planting of trees, groups of trees, woodlands, hedgerows and grassland has been submitted to and approved by the relevant planning authority;* *the detailed planting scheme submitted must include details of:* • *location of trees, groups of trees, woodlands, hedgerows, grassland, riparian planting including numbers, species and sizes to be planted;* • *a landscape specification; and* • *a maintenance and management plan incorporating a programme of adaptive management and monitoring measures to ensure that the planting scheme achieves optimum levels of plant growth;"* Given this will be secured by way of a control document, it was not considered necessary to also include a separate requirement.
1GEN52.	Applicant	**Requirement 9 reinstatement schemes** The ExA notes that requirement 9(2) disapplies the requirement to restore land to a condition suitable for its former use, to land above or within 10 metres of underground cables. This could have wide ranging implications for the likely significant effects, including for agricultural land and soils. Provide an explanation for the need for requirement 9(2). If it is necessary, provide an explanation of its implications for the assessment and mitigation of likely significant effects.	The presence of an underground cable affects the development and planting that can occur above and adjacent to it, within the specified 10 m area either side of the cable. In particular, trees cannot be planted above cable corridors as the roots can damage the cables or dry out the land which affects the cables, and this is not an acceptable risk for infrastructure that is part of the national transmission system. Similarly, developments such as lean-to agricultural structures or buildings can be erected without the need for planning permission and may not be appropriate to construct or reinstate over underground cables. Therefore, a blanket requirement to reinstate land suitable for its former use should not apply to land within 10 m of the cables. However, there are requirements and commitments that *do* apply to this land and Requirement 9 does not disapply these commitments.

Reference	Question to:	Question	Applicant's Response
			Examples of such requirements, as set out in **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043],** includes B13 which requires that hedgerow gaps be replanted and AS02 which commits to restoring agricultural land, with the aim being to restore to its original ALC grade. The draft DCO has also been updated at Deadline 3 to make it clear that hedgerows will be reinstated over cable corridors to ensure there is no doubt over this point. The above commitments provide confidence in the assessment of significant effects as set out in the Environmental Statement. As a result, there are no significant environmental effects that would result due to the exclusion of this land from the reinstatement commitment in Requirement 9.
1GEN53.	Applicant	**Requirement 11 removal of temporary bridges and culverts** The ExA notes that requirement 11 does not require consultation with the relevant lead local flood authority or Environment Agency in advance of seeking any approval for retention of any temporary bridges or culverts over-and-above the time period stipulated in the requirement. Explain why additional wording is not required to secure this consultation.	The Applicant considers it unlikely that any temporary bridges or culverts will be required beyond the eighteen-month period identified within Requirement 11. In the unlikely event that further time is requested the Applicant will liaise with all impacted stakeholders ahead of applying to the relevant planning authority, as it is considered that evidence of this consultation would be required by the planning authority at the time, noting that stakeholders may change over time so have not been listed in full.
1GEN54.	Applicant	**Requirement 13 decommissioning** Explain why substations are excluded from paragraph 13(1). Clarify whether requirement 13 also applies to offshore elements. Update the explanatory memorandum and other core documents accordingly.	Substations are excluded from paragraph 13(1) due to the fact that they form part of the wider Transmission Network and therefore would be required to remain in operation even if the Proposed Project were to be decommissioned. Requirement 13 does not apply to the Offshore elements of the Proposed Project as these are covered in the condition 14(4) of the draft Deemed Marine Licence at Schedule 16 to the Draft Development Consent Order – **"**14-(4) *A written decommissioning plan must be submitted to the MMO for approval no less than six months prior to when decommissioning is due to commence. Any cable protection located within marine protected areas must be removed upon decommissioning, unless a decision is made at the time that it is best to leave it in situ"* The Applicant will amend Requirement 13(1) at Schedule 3 to the Draft Development Consent Order to read as follows: *"(13 -(1) Excluding for substations and that part of the authorised development comprised in the Licensed Marine Activities authorised pursuant to Schedule 16 (deemed marine licence), in the event that, at some future date, the authorised development, or part of it, is to be decommissioned, a written scheme of decommissioning must be submitted for approval by the relevant planning authority at least six months prior to any decommissioning works."*
1GEN55.	Applicant	**Schedule 16 DML** Works no 6(b) refers to laying "electric cables and fibre optic cables". Based on the description of the proposed development in ES Part 1, Chapter 4 [REP1A-003], should this instead read "electric cables and a fibre optic cable"?	The Applicant will amend the wording to 'electric cables and a fibre optic cable'.
1GEN56.	Applicant	**Schedule 16 DML - Table 1**	The additional coordinates reflect the change in the Order Limits at the hoverport as shown within **Application Document 9.19 Sea Link DCO notification of change to**

Reference	Question to:	Question	Applicant's Response
		Ref 12 of the 'Applicant's Schedule of Changes to the Draft Development Consent Order' [CR1-050] states that 10 additional grid co-ordinates have been added to Table 1: Limits of deviation for marine cable area. Clarify which points in the table are new and if any points have been amended, and why they are needed. Provide a plan overlaying the new (and any revised points) over the original order limits.	**DCO application [AS-138]**. The Coordinates cover the additional marine environment brought into the project via this change. Figure 1GEN56-1 – Extract from **Application Document 9.19 Sea Link DCO notification of change to DCO application [AS-138]** showing order limit change at hoverport. 
1GEN57.	Applicant	**Schedule 16 DML – condition 1** Part 2 condition 1 design parameters does not include parameters relating to cable crossings. Consider whether these need to be included, and if not provide an explanation.	Maximum design parameters for cable crossings have been included in Table 2 Schedule 16 DML, Condition 1, and the text will be updated to clarify this point.
1GEN58.	Marine Management Organisation (MMO)	**Schedule 16 DML – condition 4(4)** Part 2 condition 4(4) includes provision for deemed consent where the MMO fails to give a decision within 16 weeks. In this situation, the programme, statement, plan, protocol or scheme would be deemed to be approved by the MMO. Provide your views on this provision for deemed consent.	
1GEN59.	Applicant	**Schedule 16 DML – condition 11** Consider whether Part 2 condition 11 should include provision for MMO approval to be undertaken in consultation with Natural England (NE) or the Joint Nature Conservation Committee (JNCC) as the relevant statutory nature conservation body (s) (SNCB). If not, why not?	The Applicant will amend the wording in Schedule 16, Part 2 Condition 11 to include provision for MMO approval to be undertaken in consultation with Natural England (NE) or the Joint Nature Conservation Committee (JNCC) as the relevant statutory nature conservation body(s) (SNCB).

Reference	Question to:	Question	Applicant's Response
1GEN60.	**Applicant** MMO	**Schedule 16 DML – condition 13** Provide an explanation of the purpose and effect of condition 13, including justification for the 10 year period. Update the explanatory memorandum accordingly. MMO to provide their view on condition 13.	This 10 year period aligns with other recently submitted DMLs and follows the 2020 guidance 'Outline of scour and cable protection licensing requirements during the Operation and Maintenance (O&M) phase of wind farms' provided by the MMO. Within this document, the MMO states that: *"there is a desire for longer term licences to allow consent of any additional scour and cable protection over and above the maintenance of that placed at the time of construction. The MMO also recognises that marine environments can alter significantly during the lifetime of a development, and therefore needs to balance this desire with the need to allow full transparency of cable protection proposals and manage these activities effectively, especially since it is not possible to fully assess the long term impacts of multiple instances of increasing scour and cable protection both on habitats and other legitimate users of the sea. In order to facilitate this for developers, licences lasting for 10 years in the operations and maintenance phase may be applied for in all areas not designated for benthic habitat features. The MMO considers 10 years is a reasonable time period to minimise disruption to developers while ensuring impacts to the environment, navigation and socio economic concerns are appropriately considered and consulted upon."*
1GEN61.	Applicant	**Schedule 16 DML** Part 2 Condition 4 Pre-construction plans and documentation paragraph 4.(1) requires the submission and approval of a number of documents. Where relevant, should it be specified that these documents should be substantially in accordance with the principles set out in the outline version of the document? In some cases there is no wording to require that, for example for the oOCEMP or the marine mammal mitigation plan.	The Applicant will amend the wording in Schedule 16 DML Part 2 Condition 4 Pre-Construction Plans and Documentation paragraph 4.(1) to expressly require that the pre-construction plans and documentation should be substantially in accordance with the principles set out in the outline versions of the documents.
1GEN62.	Applicant	**Schedule 16 DML** Part 2 Condition 4 pre-construction plans and documentation differs in its format from Schedule 3 Requirement 6 as 4(1) requires the submission of a cable specification and installation plan that includes the information and documents set out in in (a) to (l) inclusive. Is this the applicant's intention, or would it be clearer to require the submission of individual documents, including the cable specification and installation plan?	The Applicant will amend the wording in Schedule 16 DML Part 2 Condition 4 to clarify that the plans outlined in Schedule 16, Part 2, Condition 4 will be submitted separately as individual documents, including the Cable Specification and Installation Plan which will also be a separate document.
1GEN63.	Applicant	**Schedule 16 DML** Part 2 Condition 4(1)(i) requires the submission of the OCEMP. It appears that the REAC [CR1-043] is an appendix to the onshore CEMP [AS-127] (see 1GEN6.) and therefore would not be secured for the offshore scheme through the DML. Provide an explanation for this and make any amendments to the dDCO as necessary to ensure the REAC would be secured.	In response to this question the Applicant has separated out the REAC and oCoCP and re-created them as freestanding documents. Copies of these documents, in their freestanding form, are provided within **Application Document 9.83 Outline Code of Construction Practice** submitted at Deadline 3 and **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3. The **Application Document 3.1 (F) draft DCO** submitted at Deadline 3 and all relevant articles, schedules, requirements and conditions will be updated to reflect these changes at deadline 4.
1GEN64.	Applicant	**Schedule 17 public general legislation** Explain the extent to which the guidance in section 25 of Advice Note 15 has been followed. Good Practice Note 10 states that clear justification for the inclusion of such provisions in the "particular circumstance", should be provided.	The Applicant will review and amend the explanatory memorandum to include additional detail on these provisions. S120(5)(a) of the Planning Act 2008 confirms that an order granting development consent may apply, modify or exclude a statutory provision which relates to any matter for which provision may be made in the order. **Hedgerow Regulations 1997** Regulation 6(1) (Permitted work) of the 1997 Regulations allows for the removal of all or a part of a hedgerow in particular circumstances without first being required to notify

Reference	Question to:	Question	Applicant's Response
		Provide further justification and include within the explanatory memorandum: • the purpose of the legislation/ statutory provision • the persons/ body having the power being disapplied • an explanation as to the effect of disapplication and whether any protective provisions or requirements are required to prevent any adverse impact arising as a result of disapplying the legislative controls • (by reference to section 120 of and schedule 5 to the Planning Act 2008) how each disapplied provision constitutes a matter for which provision may be made in the DCO	and seek the consent of the local planning authority pursuant to Regulation 5. These are considered 'permitted works'. The range of permitted works under Regulation is broad and includes, at Regulation 6(1)(e), the removal of any hedgerow "....for carrying out development for which planning permission has been granted or is deemed to have been granted, except development for which permission is granted by article 3 of the Town and Country Planning General Permitted Development Order 1995 in respect of development of any of the descriptions contained in Schedule 2 to that Order other than Parts 11 (development under local or private Acts or orders) and 30 (toll road facilities);" Paragraph 1 of Schedule 17 makes clear that the removal of any hedgerow to which the 1997 Regulations apply is a 'permitted work' if it is required for the purposes set out in Article 51 of the draft DCO. The practical effect of Paragraph 1 is to ensure alignment with Regulation 6(1)(e) of the 1997 Regulations which makes clear that operational development carried out pursuant to a planning permission is a 'permitted work'. Paragraph 1 therefore seeks to apply the same principles in the context of Article 51 so as not to create an enhanced burden to the Proposed Project which is above and beyond what the 1997 Regulations contemplate for planning permissions generally. The Applicant has sought development consent for the authorised project under Article 3 of the draft DCO. As part of that application, consideration has been given to the removal of hedgerows and relevant plans are provided at Schedule 2 Part 5 of the draft DCO (Trees and hedgerows to be removed or managed plans). Article 51 makes specific provision regarding the power to remove hedgerows as part of the authorised development, including also the constraints on exercise of that power. The Environmental Statements set out the extent of environmental assessment undertaken in respect of hedgerows (including important hedgerows). Once granted, the draft DCO will itself be secondary legislation (the 1997 Regulations likewise being secondary legislation), and the Applicant believes that it would be unnecessary to require further consent to be sought under the 1997 Regulations when acting in accordance with the provisions of Article 51, as the matters would already be subject to control pursuant to the draft DCO. Hence the public policy objective, of controlling such works in respect of hedgerows, would already have been fulfilled. **Local Government (Miscellaneous Provisions) Act 1976** Section 42 (Certain future local Acts etc. to be subject to the planning enactments etc. except as otherwise provided) of the 1976 Act provides that certain future Acts will have effect subject to the listed planning enactments. The effect of Schedule 17 is that Section 42 will not apply to the draft DCO (Document 3.1(F)) to the extent that section 42 would make provisions of the draft DCO authorising the authorised development subject to other provisions. This modification is necessary to avoid any future local enactments undermining the powers and rights under the draft DCO. The Applicant has sought development consent for the authorised development under Article 3 of the draft DCO. Once granted, the draft DCO will be secondary legislation. Any public interest objectives underlying the excluded provisions should be satisfied, where appropriate, through the ongoing examination process into the grant of the development consent. Consequently, the Applicant considers that it would be inappropriate for subsequent local legislation to impose controls and consent

requirements which are not considered necessary at the point the draft DCO is made by the Secretary of State.

The Applicant notes that the modification of section 42 of the 1976 Act has been included in other recent DCOs including, for example, the Bramford to Twinstead DCO 2024, the West Midlands Rail Freight Interchange Order 2020 (see Paragraph 4 of Schedule 14) and the Sizewell C (Nuclear Generating Station) Order 2022 (see Paragraph 5 of Schedule 25).

Neighbourhood Planning Act 2017

The provisions of the 2017 Act insofar as they relate to temporary possession of land under Articles 27 (Temporary use of land for carrying out the authorised project), and 28 (Temporary use of land for maintaining the authorised project) of the draft DCO (Document 3.1(F)).

These provisions, when they come into force, will make temporary possession of land available to be sought as a statutory right, including in respect of a CPO.

The effect of Schedule 17 is that the relevant provisions of the 2017 Act will not apply when they come into force. The Applicant considers the exclusion of these temporary possession provisions under the 2017 Act necessary as they are yet to be brought into force and no subsidiary regulations have been made. Consequently, there is currently a lack of certainty around the requirements of the new temporary possession regime.

By excluding these provisions, the temporary possession regime created by Article 27 and 28 of the draft DCO will continue to be applied should the 2017 Act provisions come into force. This approach to temporary possession in a DCO and TWAO context is well-established and conventional, and this provision removes uncertainty in the future.

Building Act 1984

Part 1 of the 1984 Act deals with the power to make building regulations relating to the design and construction of buildings, the demolition of buildings and the services, fittings and equipment provided in or in connection with buildings.

The effect of Schedule 17 is that those provisions will be excluded, meaning nothing in Part 1 of the 1984 Act with respect to building regulations, and nothing in any building regulations, will apply in relation to a building used, altered or demolished, or intended for use, alteration or demolition, by the undertaker for the purposes of the authorised development before completion of construction.

The draft DCO and its associated controls already address the substantive matters which would normally be the subject of such consents and authorisations.

Further, the Applicant itself is subject to various standards and obligations, pursuant to its statutory duties under the Electricity Act 1989, its transmission licence (and conditions) from Ofgem, and other applicable obligations. Any works undertaken before completion of construction that may have fallen within the scope of Part 1 of the 1984 Act will need to be conducted in accordance with the provisions of the Order, and particularly Schedule 1 (Authorised Project), Schedule 2 (Plans) and Schedule 3 (Requirements).

The combined effect of these controls in the draft DCO will ensure the objectives underlying Part 1 of the 1984 Act are satisfied, whilst avoiding any undue interference to the implementation of the project that may be caused if Part 1 of the 1984 Act were to also apply.

Reference	Question to:	Question	Applicant's Response
			National Parks and Access to the Countryside Act 1949 Sections 51, 52 and 55 of the National Parks and Access to Countryside Act 1949 relate to general provisions for approving and varying long-distance routes. **Document 7.5.9.2 Outline Public Rights of Way Management Plan (Kent) [APP-353]** explains that although not a PROW, the King Charles III England Coast Path is a long-distance national trail which follows the English coastline within close proximity to the Order Limits in Kent and also passes through the Order Limits at two locations). The effect of Schedule 17 is that provisions to vary approved proposals or create a new long-distance route will not apply in relation to the authorised project. As noted above the interface is very limited, to two locations. This modification is necessary to avoid any new or future amendment to the long-distance route undermining the powers and rights under the draft DCO. Noting the nature of the coastal path, the Applicant is of the view that the operation of this disapplication is unlikely to need to be relied upon, however in the event of changes to the long distance route, the Applicant seeks this provision to avoid impact on delivery of the Proposed Project. This disapplication is an established approach where a long-distance trail interfaces with the Order Limits and is precedented by the Thames Tideway Tunnel DCO 2014.
1GEN65.	Applicant	**Schedule 18 amendment of local legislation** Provide further explanation in the Explanatory Memorandum about how the provisions are considered to be inconsistent with draft article 53 and the effect of the disapplication. Please provide a copy of the 1825 act and explain whether you have discussed the inclusion of this provision with the body/ies in whom those existing powers are vested.	The Applicant will review and amend the explanatory memorandum to include additional detail on these provisions. The Canterbury Navigation and Sandwich Harbour Act 1825 sets out powers to improve navigation of the River Stour from Canterbury through numerous parishes, including Minster. The River Stour runs through the Order limits and the draft DCO includes a power to temporarily close or carry out works in the relevant rivers, which includes a section of the River Stour, as highlighted on the Access, Public Rights of Way and Navigation Plans. Section CXIII (Obstructions of the navigation to be removed) states that if any person obstructs the navigation of the river, it shall be lawful to remove or prevent such obstruction to the navigation. Therefore, this piece of legislation is inconsistent with the proposed power in the DCO at Article 53 to temporarily close the public right of navigation along the Stour, as a temporary bridge is proposed to be constructed over the River Stour and the proposed new section of overhead line would cross the River Stour. In this instance, there remains a risk nonetheless that the construction of the Proposed Project could give rise to a potential conflict with powers exercisable under this piece of local legislation if navigation of the River Stour is temporarily closed during the works to construct the proposed new section of overhead line. We understand that the Sandwich Port and Haven Commissioners have the benefit of the powers under this Act and are responsible for navigation along the River Stour. We understand that there has been relatively limited interaction with the Commissioners and they did not provide any response to the Statutory Consultation. The Applicant submits that in the event that the Secretary of State grants consent for these works via the draft Order, that this local legislative protection should be overridden to the degree that it would be inconsistent with the powers and provisions necessary to deliver Proposed Project.

Reference	Question to:	Question	Applicant's Response
1GEN66.	Applicant	**Schedule 19 certified documents** Schedule 19 should include a table which lists the environmental statement documents in full. This can then be updated and any new documents added as the examination progresses. Furthermore, a full list of plans that comprise the land plans, works plans, etc. should be included. Conduct a thorough audit of the dDCO to ensure that all relevant documents are included in schedule 19.	The Applicant will review Schedule 19 as suggested, although notes that the Environmental Statement and the various plans referred to are already included. The Applicant also notes that the Environmental Statement is defined at Article 2, and hence that definition will apply. The Applicant notes that certification of a document alone does not give it status – certification is merely an evidential step. The Applicant will check the draft Order as requested.
1GEN67.	**Applicant** Natural England MMO	**Surveys and monitoring conditions** **Applicant** - It is common with DMLs as part of DCOs which have an offshore element for there to be a condition requiring details of planned pre-construction surveys and monitoring to be agreed with the MMO and NE. Notwithstanding the details within the submitted oOCEMP, is there a need for such a condition to be within the DML to secure this? Similarly, is there a need for a condition within the DML for post-construction monitoring, to include adaptive management where necessary, with details and methodology to be first agreed with MMO and NE? **NE and MMO** - If considered necessary is there wording that could be suggested.	The Environmental Assessment for the Proposed Project has concluded that no likely significant impacts post additional mitigation are anticipated for the Offshore Scheme. The Applicant can confirm that pre-commencement surveys will be undertaken to inform routing for the marine cable installation and burial. The DML will be updated at a future deadline to include wording to this effect. The Applicant will engage further with Natural England and the MMO to consider further the requirements for monitoring and an In Principle Monitoring Plan (IPMP) following the pre-commencement surveys if any habitats of principle importance are identified and there is potential for adverse effects on these habitats.
1GEN68.	Applicant	**Errata within the DCO** a) Confirm that article 2 definition of "electronic transmission" should read (a) and (b) rather than (c) and (d) b) Confirm that article 2 definition of "pre-commencement operations" should read (a), (b), (c) onwards rather than (e), (f), (g) onwards c) Confirm that article 2 definition of "traffic regulation order plans" should read "and references to a particular traffic regulation order plan are to be construed accordingly" d) Confirm that article 7(2)(1) should read "except in paragraph (3)" e) Confirm that article 7(3) should read "if those benefits or rights were exercised by the undertaker" f) Confirm that article 9 should read "(b) a building into which people go only intermittently" g) Confirm that article 12(6) should read "(restriction of works following substantial road works)" h) Confirm that article 12(7) should read "(Registers, Notices, Directions and Designations) (England) Regulations 2007(b)" i) Confirm that article 13(4) should read "(application of the permit schemes)" (in line with the Bramford to Twinstead correction order) j) Confirm that article 18(2) should read ""unless otherwise agreed with the street authority, be maintained to the same condition (including any culverts or other structures laid under that part of the highway)" (in line with the Bramford to Twinstead correction order)	The Applicant has reviewed these errata and amended the DCO as necessary. In relation to (g), no change has been made to the draft DCO as the wording correctly reflects the title of section 58A (Restriction on works following substantial street works) of the 1991 Act. In relation to (h), the footnote has been retained as (a) as it is the only footnote on the particular page. The Bramford-Twinstead DCO 2024 referred to (b) as it was the second footnote on the page.

Reference	Question to:	Question	Applicant's Response
		k) Confirm that article 20(11) should read "or approval under paragraph (4)(a)" l) Confirm that article 33(5) should read "purposes of sub-paragraph (4)(a)" m) Confirm that article 34(1)(a) should read "part of a house, building or factory" n) Confirm that article 43(1) should read "the undertaker of the Order rights will be" o) Article 44(1)(c) should end with a semi-colon p) Articles 50(2) and (6) and article 60(3) should end with a full stop q) Confirm that article 51(7) should read "if an application for consent under paragraph (4) does not include the statement required under paragraph (6), then the provisions of paragraph (5) will not apply to that application".	

1.4 Compulsory Acquisition (CA) and Temporary Possession (TP) ([CR1-003] and [CR1-005] unless otherwise stated)

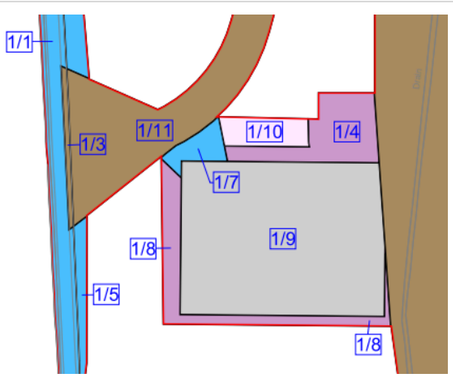
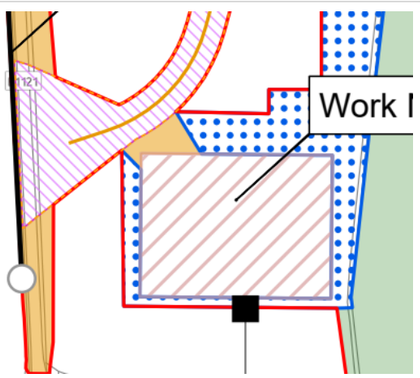
Table 1.4 Compulsory acquisition (CA) and temporary possession (TP) ([CR1-003] and [CR1-005] unless otherwise stated)

Reference	Question to:	Question	Applicant's Response
1GEN69.	Applicant	**Alternative dispute resolution** Paragraphs 27 and 28 of *Planning Act 2008 Guidance related to procedures for the compulsory acquisition of land*, September 2013, state that applicants are urged to consider offering full access to alternative dispute resolution (ADR) techniques for those with concerns about CA of their land. Have you offered full access to ADR techniques for those with concerns about the CA of their land or considered other means of involving those affected? If so, give details.	As set out in **Application Document 4.2 (F) Statement of Reasons** submitted at Deadline 3, the Applicant has considered alternatives to compulsory acquisition and has sought to acquire the necessary land rights, by agreement. The Applicant has carefully considered the use of ADR, including in the process of securing Heads of Terms by voluntary agreement and finds that in practice there is no demand for it at this stage. Whilst the Applicant remains fully open to all forms of ADR, the Applicant considers that a potential grantor will either agree to engage in voluntary negotiations or can legitimately decline to do so and those that do not wish to negotiate have no incentive to and are unlikely to wish to engage in ADR. All interested parties are encouraged to appoint a suitably qualified and experienced professional Agent to represent their interests throughout the whole process. The Applicant confirms it will meet the reasonable cost of this representation in accordance with RICS guidance. The Applicant believes that the role of the Agent largely negates the need for additional ADR procedures, albeit the Applicant remains fully open to ADR if that is sought. To date, no Interested Party or their Agent has requested ADR. Where Agents are actively engaged in negotiation it is with the intent of reaching a voluntary agreement. Others have simply declined to engage with the offers made to them. The Applicant will keep the position under review, mindful of paragraphs 27 and 28, and ADR would be made available should any Interested Party request it.
1GEN70.	Local planning authorities Local highway authorities	**Alternatives to CA or temporary possession (TP)** Are any of the Councils in their roles as the local planning authority and the highway authority aware of: • any reasonable alternatives to the CA or the TP which is sought by the applicant? • any areas of land or rights that the applicant is seeking the powers to acquire that you consider would not be needed?	
1GEN71.	Applicant	**Diligent enquiry into land interests** There are a significant number of plots in the Book of Reference (BoR) [REP1-046] that include an unknown interest in the land. We note that these unknown interests are not included in the Land Rights Tracker [REP1-126a]. Provide a list of the plots where there is an unknown interest (this can be done by adding them to the Land Rights Tracker) and detail for each plot what actions you have taken to try and identify who holds the interest and summarise what further steps will you be taking to identify these interests during the examination?	The Applicant has appointed a professional land referencing company who have undertaken due diligence following the methodology to identify all those who have rights in land affected by the project. This included both desktop and contact land referencing and the use of Land Information Questionnaires and Site Notices. The land referencing methodology is set out in **Application Document 5.1.8 Appendix G Land Referencing Methodology [APP-315]** which is appended to the **Application Document 5.1 Consultation Report [APP-301].** **Application Document 4.2 (F) Statement of Reasons** submitted at Deadline 3, sets out how land interests are identified through a land referencing methodology incorporating publicly available desktop sources (including Land Registry updates, checks of Companies House, checks of local authority information and other online data) and contact with land interests. This included correspondence using Land Interest Questionnaires to request information on land holdings and other legal interests in land, followed up with further inquiries and site visits. Where land was unregistered or interests were unknown, further investigations were done on site

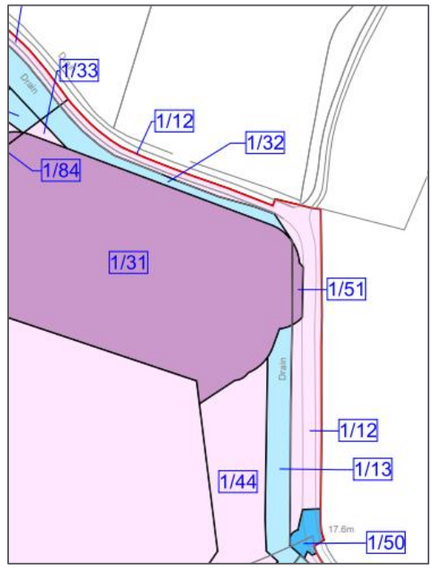
Reference	Question to:	Question	Applicant's Response
			and notices placed on the land requesting information. The notice shows the unknown land ownership boundary in question and provides details of how to contact the land referencing team with any relevant information. There are however in most projects, circumstances where detail pertaining to ownership of some land parcels is not registered or not forthcoming from enquiries and therefore the powers set out in Article 24 of **Application Document 3.1 (F) draft Development Consent Order** submitted at Deadline 3 are necessary to ensure the project can proceed and the Applicant is able to deal with the risk of any potential impediments to the projects from unknown land interests. It is standard practice to include these powers within a DCO/CPO where compulsory acquisition and temporary possession powers are sought as it also covers off any unknown 3rd party interest in land. The Applicant will add the unknown plots to the **Application Document 9.16 (C) Lands Rights Tracker** for Deadline 3 and provide details of the steps taken to identify any land interests owner and will continue to undertake its referencing and due diligence throughout the examination. The Applicant confirms that it has undertaken and land referencing data refresh ahead of the production of the updated **Application Document 4.3 (D) Book of Reference** and **Application Document 9.16 (C) Lands Rights Tracker** for Deadline 3.
1GEN72.	Applicant	**The Equality Act 2010** The Statement of Reasons [CR1-033] states that the applicant has taken into account its duties under section 149 of the Equality Act 2010. The Equalities Impact Assessment [APP-362] explains how the pre-application consultation considers those with protected characteristics. Provide further detail and clarification how regard to the Equality Act 2010 has been, and will be had, during the examination, particularly in relation to the powers sought for CA and TP? Have any affected persons been identified as having protected characteristics since the Equalities Impact Assessment was undertaken? If so, what regard has been given to them?	**Application Document 7.9 Equalities Impact Assessment [APP- 362],** concludes that, with the implementation of embedded and additional mitigation measures potential negative equality impacts arising due to the Proposed Project are not expected to be substantial in nature. The approach for undertaking the assessment is based on professional judgement, an understanding of the Equality Act 2010, particularly Section 149 regarding the PSED, and supporting technical guidance produced by the Equality and Human Rights Commission (EHRC) (Equality and Human Rights Commission, 2023). The Assessment concludes there are no landowners with protected characteristics. However, every landowner is encouraged to appoint a professional representative, normally a RICS qualified land agent to advise them during the examination and in negotiations of the voluntary agreement. The Applicant meets the reasonable cost of this professional representation. As part of the Applicant's diligence, the Applicant has continued to consider the nature of the persons with an interest in land with whom it is engaging, and has sought to implement appropriate measures (including where characteristics have been disclosed). Satellite hubs are being provided in Suffolk and Kent to allow interested parties, members of the public and those with protected characteristics to take part in the examination without needing to attend the primary venue in person or have access to their own technology.
1GEN73.	Applicant	**Funding** The funding statement, paragraph 3.2.15 [CR1-031] states that the Project Assessment (in relation to the Accelerated Strategic Transmission Investment framework) for the proposed development has been submitted to the Office of Gas and Electricity Markets (Ofgem) with a decision expected autumn 2026. Explain the consequences, on the funding for this scheme, in respect of the outcome Ofgem's decision.	The outcome of the Project Assessment does not directly impact the funding of Sea Link. Ofgem's Project Assessment Decision determines the efficient allowance to deliver the Proposed Project, which can then be recovered by National Grid through allowed revenue over 45 years.

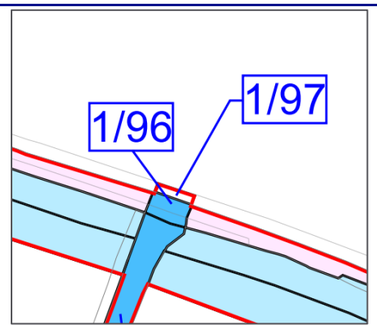
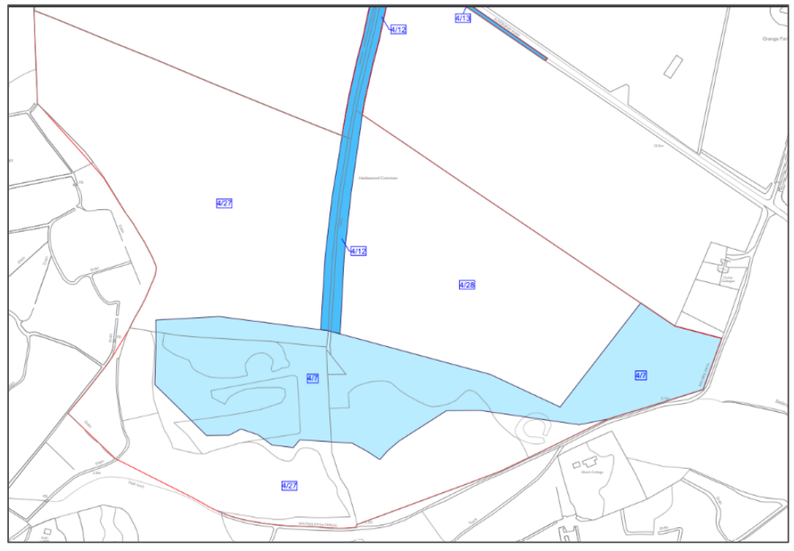
Reference	Question to:	Question	Applicant's Response
			National Grid is funding the Proposed Project as it does with all investments in network assets as part of the ordinary course of business, and funding for the Proposed Project will be available. The Applicant has a Licence Obligation (Special Conditions 3.41 and 4.9) to deliver a "New Offshore HVDC link between Suffolk and Kent", the Project Assessment outcome will not change the Licence Obligation that the Applicant must fund, construct and operate Sea Link. NGET is satisfied that the funding required to meet the estimated implementation costs will be made available for the Proposed Project within the relevant time period to meet National Grid's Licence Obligations.
1GEN74.	Applicant	**Construction compounds** The ExA's letter dated 5 August 2025 [PD-006] questioned your intention to seek CA of rights over plots identified with temporary uses. Your response [AS-084] confirmed that you intended to create a permanent right (class 4 CA of rights (construction compound)) for plots 1/9, 1/22, 1/26, 1/29, 1/30, 1/39 and 1/42 in Suffolk and plots 2/121 and 2/134 in Kent to enable the construction compounds to be reinstated in the event the asset needed to be rebuilt or substantially replaced during its lifetime. In [REP1-033] you confirmed that you would be content to seek solely temporary possession powers in respect of these compounds and that the land plans, Book of Reference, Statement of Reasons and draft DCO would be updated accordingly. The ExA has identified that in the BoR [REP1-046] plots 1/9 and 1/42 in Suffolk remain identified as class 4 Compulsory Acquisition of Rights - Construction Compound. Update the BoR to correct this error and check all other associated documents (including the Land Rights Tracker) for any other inconsistencies.	Following the ExA's earlier questions on the use of class 4, a review was undertaken which resulted in the change to the main works compounds from class 4 to class 8. The review concluded that this change would apply to Suffolk plots 1/22, 1/29, 1/42 and 1/38 as well as some ancillary plots and Kent plots 2/121 and 2/134 and some ancillary plots. A decision was taken to retain the Suffolk compound (plot 1/9) as a permanent compound right (class 4). The DCO is intended to consent the life of the project and therefore there is a need to provide a future compound for large scale maintenance works during the operational life of the converter station and decommissioning. The retained right for a permanent compound will also serve as a location for works to the permanent access road and bridge over the River Fromus, to accommodate the project needs over the lifetime of the scheme. An example of maintenance would be replacing the transformers which are transported by AIL. These need to be stored securely whilst the old ones are removed prior to transportation. As set out in **Application Document 4.2 (F) Statement of Reasons** submitted at Deadline 3, the rights sought are for the ability to reinstate the compound during the life of the project, not to leave it as a permanent feature. During the life of the project, whilst the compound is not required, the land will be made available for its current use (i.e. agriculture). The permanent right will allow the location to be used as a base for maintenance works during the operational life of the project and throughout the decommissioning period and avoid the project being ransomed for a compound location in the future. There is sufficient room within the landscaping and mitigation areas to be purchased in Kent to provide for the same scenario. Plots 2/121 and 2/134 in Kent are Temporary possession for construction purposes only. Plot 2/133 in Kent is included as Permanent Acquisition and during construction will be use as a compound to facilitate construction. Post construction the same plots will be used as mitigation. In the circumstance where a compound is required in future Plot 2/133 can be reinstated as a temporary compound wholly or in part and reinstated and any mitigation required afterwards. Plot 1/42 has been shown as Class 8 on the **Application Document 2.3 (D) Land Plans** submitted at Deadline 3 and this is reflected in **Application Document 4.3**

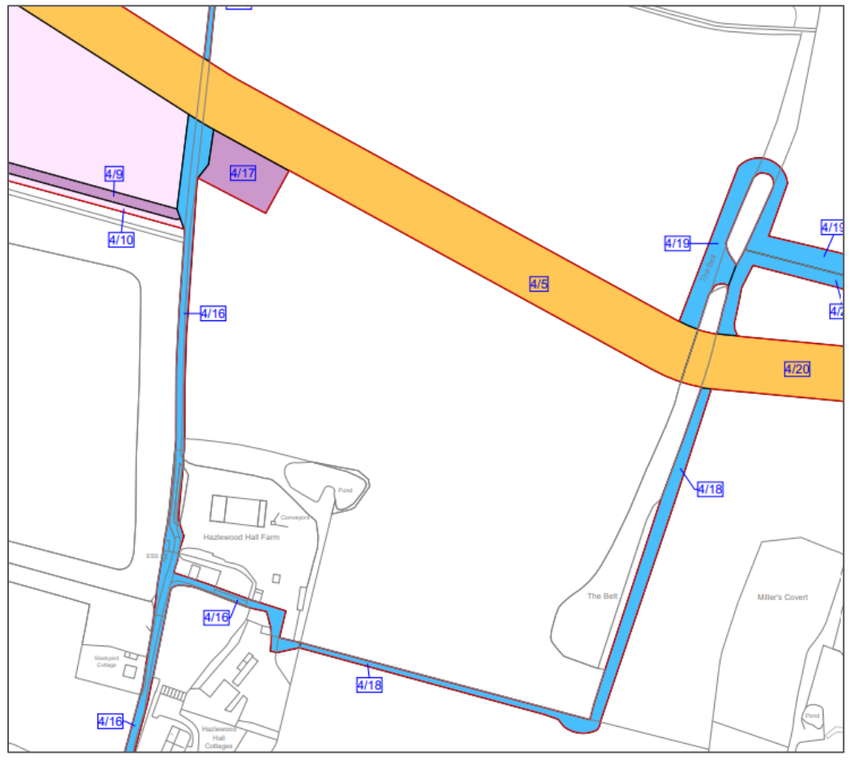
Reference	Question to:	Question	Applicant's Response
			(D) Book of Reference, **Application Document 9.16 (C) Lands Rights Tracker** and other associated documents for Deadline 3.
1GEN75.	Applicant	**Biodiversity net gain (BNG)** The Biodiversity Net Gain Feasibility Report [REP1A-025] states that the proposed development is seeking to achieve a 10% net gain in biodiversity. BNG is not currently a requirement for nationally significant infrastructure projects. Accordingly, the ExA considers the compulsory acquisition of land for the sole purpose of meeting BNG may not be justified. Provide a statement demonstrating that land to be the subject of CA for environmental mitigation is proportionate and necessary for the proposed development. Also provide detail (referring to plot numbers) to clarify which land would be considered as contributing to BNG and whether there are any CA plots which would have the sole purpose of achieving BNG.	Chapter 2 of **Application Document 4.2 (F) Statement of Reasons** submitted at Deadline 3**,** sets out the rationale for compulsory acquisition of all of the land and rights required for environmental mitigation included in the application. The Applicant can confirm that it has taken a proportionate approach towards the use of Compulsory Acquisition powers to secure that land which is the subject of CA powers for environmental mitigation in the absence of a voluntary agreement and that all of that land is necessary for the Proposed Development. The Applicant can confirm that no land is proposed to be compulsorily acquired solely to deliver BNG, and there are no land plots identified within **Application Document 6.12 (C) BNG Feasibility Report [REP1A-025]** which have the sole purpose of contributing to BNG. Any BNG required to achieve the Proposed Project's voluntary 10% commitment would be delivered without reliance on compulsory acquisition for BNG purposes. Section 5 of **REP1A-025** sets out how the Applicant will seek to deliver its 10% voluntary target. For potential BNG identified in the Proposed Project order limits this applies to land around the converter stations where there is already planting taking place to mitigate the impact of the converter stations which is unlikely to be disturbed or affected by future development. This land is however included in the order for the purpose of mitigating the impact of the converters and any BNG delivered as a result is ancillary. The Applicant does however note that the National Grid Bramford to Twinstead Reinforcement Order 2024, which was an NGET project, did include Compulsory Acquisition powers solely for the delivery of BNG. However as noted above, in respect of this Proposed Development the Applicant has not sought CA powers for plots which are solely for BNG purposes.
1GEN76.	Applicant	**Detailed responses to relevant representations (RR) of affected landowners** Explain how it was decided which RR from affected landowners would be provided with a detailed response and why detailed responses were not provided to all affected landowners. Provide a detailed response to the RRs of all affected landowners not included within '9.34.3 Applicant's Responses to Relevant Representations from Affected Landowners' [REP1-113].	The Applicant has reviewed all the Relevant Representations submitted to the ExA. An individual Relevant Representation response was provided to the Category 1 Landowners and all Statutory Undertakers. These are where the Applicant will be seeking land rights and is engaged in voluntary agreement negotiations. Responses to Category 1 Land Interests (Owners and Occupiers) are provided in **Application Document 9.34.3 (B) Applicant's Response to Relevant Representations from Affected Landowners [REP2-018].** **Application Document 9.34.2 (B) Applicant's Response to Relevant Representations from Statutory Consultees and Bodies [REP2-016]** which also deals with Representations from Statutory Undertakers who may also have an interest in land. Due to the volume of representations received, particularly from the general public, the Applicant has identified and categorised general themes of matters that have

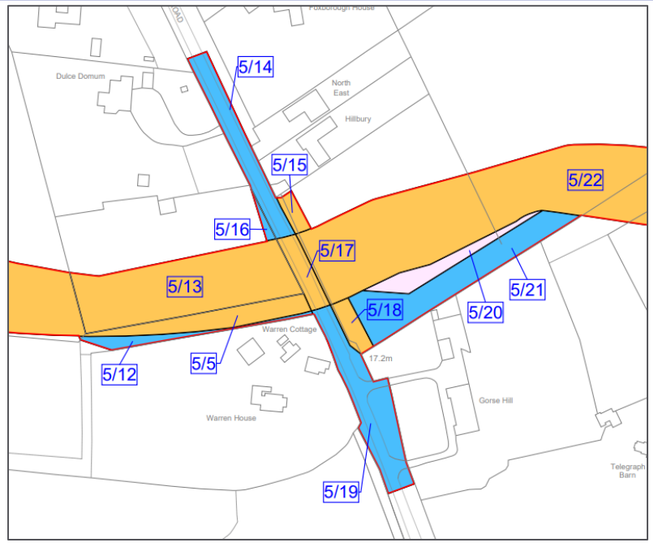
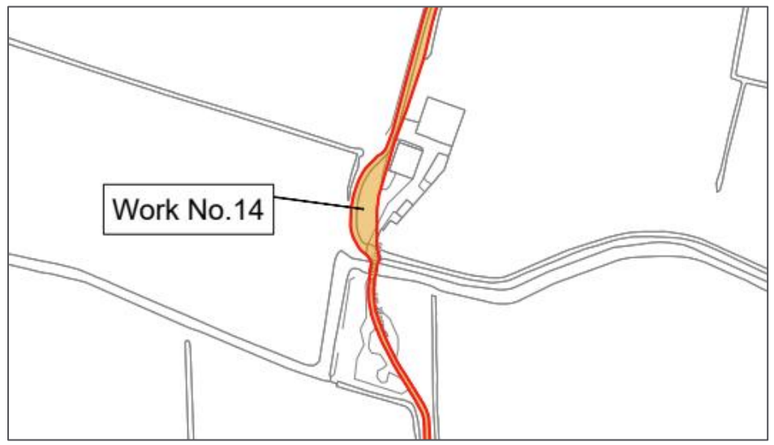
Reference	Question to:	Question	Applicant's Response
			been commonly raised including matters in respect of any perceived effect on property and compensation. The Applicant summarises these themes and provides a collective comment on the matters raised. This approach has been taken to avoid the repetition that would occur through providing a detailed response to each individual Relevant Representation. Thematic Responses were provided to Category 2 and Category 3 parties and these can be found in **Application Document 9.34.6 (B) Applicant's Thematic Responses to Relevant Representations [REP2-024]** along with selected responses of merit in **Application Document 9.34.5 Applicant's Response to Selected Relevant Representation Responses [REP2-022]**.
1GEN77.	Applicant	**Inconsistency between land plans for both Suffolk [CR1-003] and Kent [CR1-004] and the revised works plans submitted at deadline 1A for Suffolk [CR1-007] and Kent [CR1-008] and the Statement of Reasons [CR1-033]** The ExA has identified several inconsistencies between these documents, including: • Suffolk plot 2/84 is identified in the land plans as Class 5 (access) but on the works plans as work no.15 (environmental mitigation and landscaping); • Kent plots 1/7, 1/14, 1/18 and 1/19 identified on the land plans as Class 8 (temporary use for construction, mitigation, maintenance and dismantling) but on the works plans as work no.14 (proposed accesses for construction, monitoring and maintenance outside linear and non-linear limits of deviation); • sheet 2 of the Kent works plans also shades several plots as work no. 14 (proposed accesses) that do not correspond with the class on the land plans; and • Work No.14 is titled 'Principal Accesses' in the Statement of Reasons but titled differently in the works plans as 'Proposed accesses for construction, monitoring and maintenance outside linear and nonlinear limits of deviation.' All land plans and works plans, BoR, Statement of Reasons and the Land Rights Tracker to be checked for inconsistencies and all relevant associated documents to be updated accordingly.	The Applicant has reviewed the submission document and can confirm: Suffolk Plot 2/84 is required for access to the environmental mitigation proposed at Plot 2/85 and so forms part of the environmental mitigation works. The class of rights is however shown as Class 5, Access (CA) rather than Class 7, Mitigation (CA) as access is the higher right and includes mitigation as a subordinate land right. Kent plots 1/7, 1/14, 1/18 and 1/19 are required for access along the route of the existing OHL to enable a temporary haul road and drainage to be installed, this access right is temporary and falls under Class 8 rights (temporary use). As with the plots listed above, access is required under Work No. 14 to several areas where only Class 8 rights (temporary use) are being requested for construction. In terms of the Principal Accesses as summarised in paragraph 2.6.31 of the **Application Document 4.2 (F) Statement of Reasons** submitted at Deadline 3, this aligns with the phrase used in the draft Order (schedule 1) and hence is correct. The Works Plans Legend seeks to offer further commentary as to what is being shown, to assist the reader. The works packages and descriptions were recently updated. A review of all documents has been undertaken and all titles checked for consistency.
1GEN78.	Applicant	**Clarification regarding Suffolk plots 1/4 and 1/7** Suffolk plot 1/4 is identified for class 6 CA of rights (drainage) for work no. 3A access road to the converter station and Suffolk Plot 1/7 is identified for class 5 CA of rights (access) for work no 3A access road to the converter station. However, these plots both appear to relate to the temporary construction compound rather than the access road. Provide an explanation as to why these plots are required and for which work no and update any core documents as necessary.	 

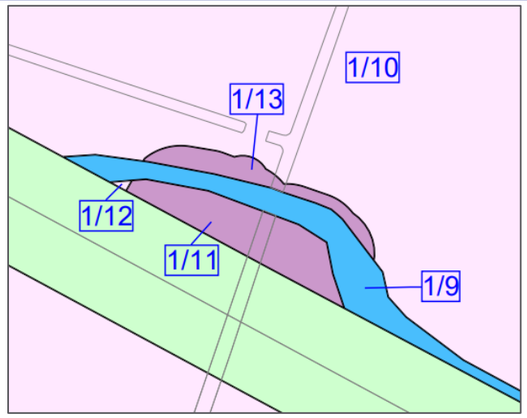
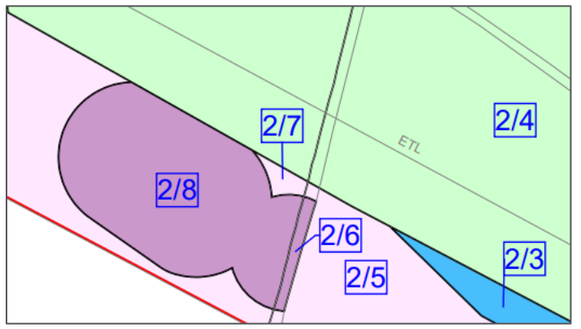
Reference	Question to:	Question	Applicant's Response
			Suffolk Plot 1/4 is shown as Class 6 for Drainage (CA) on the Land Plans and Work No.13 for drainage on the Works Plans. This reflects the drainage required around the compound. Suffolk Plot 1/7 is shown as Class 5 for Access (CA) on the Lands Plans and Work No 14 for access on the Works Plans. The is land between the permanent access to the converter station into the compound. The drainage and access shown in Plot 1/4 and Plot 1/7 respectively are for the construction compound, rights for which are being requested such that the compound can be reinstated in the future to enable maintenance or demolition works to be undertaken. A decision was taken to retain the Suffolk compound (plot 1/9) as a permanent compound right (class 4). The DCO is intended to consent the life of the project and therefore there is a need to provide a future compound for large scale maintenance works during the operational life of the converter station and decommissioning. The retained right for a permanent compound will also serve as a location for works to the permanent access road and bridge over the River Fromus, to accommodate the lifetime of the scheme. An example of maintenance would be replacing the transformers which are transported by AIL. These need to be stored securely whilst the old ones and removed prior to transportation.
1GEN79.	Applicant	**Clarification regarding Suffolk plot 1/10** Plot 1/10 is identified for class 8 temporary use for construction, mitigation and dismantling of redundant infrastructure. Explain the difference between the requirement for plot 1/10 which is required on a temporary basis compared to adjacent plots 1/4, 1/7, 1/8 and 1/9 which require permanent rights.	During the construction phase of the Proposed Project it is considered that additional construction space will be required in this location, hence the temporary nature. For future maintenance and demolition works the access road and converter station will be in-situ thus requiring a slightly smaller footprint at this location.
1GEN80.	Applicant	**Need for permanent acquisition of the entirety of Suffolk plots 1/11 and 1/11a** Your response [AS-084] to the ExA's letter dated 5 August 2025 [PD-006] sets out the reason for the extent of the area required for Suffolk plot 1/11 being considerably larger than the limits of deviation for work no 3A as the land being needed for environmental mitigation planting and screening. The detail of this is explained in Figure 3 of the Outline Landscape and Ecological Management Plan (oLEMP) – Suffolk [CR1-045]. The ExA notes that considering the planting shown on Figure 3 this would leave a considerable area of plot 1/11 with no apparent works or mitigation planting proposed. Explain the need for the permanent acquisition of the entirety of plot 1/11 including plans showing the proposed layout of any environmental mitigation planting and screening. We note that the plot identified as 1/11a in [PDA-005] is now identified as 1/11 [CR1-003]. Clarify the reason for this change. The revised works plans submitted at deadline 1A [CR1-007] indicate that plot 1/11 (previously plot 1/11a) includes the management of 12 hectares of arable land for ground nesting birds, particularly skylark. Clarify whether	The **Application Document 4.2 (F) Statement of Reasons** submitted at Deadline 3, in Section 3 sets out that part of Plot 1/11 includes an element of long-term environmental mitigation land. The mitigation works here are set out in **Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan Suffolk (Version 2, change request) [CR1-045]** but can be broadly summarised as a change in farming practice to enhance the farmed environment, to include spring cereals where these are part of a crop rotation, and though the creation of skylark plots (essentially small fallow patches of shorter vegetation) in winter crops spread across the 12 ha field at a rate of at least 4 plots per hectare. To ensure the land is properly managed to create the necessary habitat, the Applicant needs to be in control of this land to ensure the required changes in farming practices are delivered for the lifetime of the project although in practice will likely subcontract this work to the farmer. This control cannot be delivered through the acquisition of rights alone. A 12 ha area of arable land has been included within the Order Limits, south of the construction access and east of the River Fromus, to secure suitable nesting habitat for skylark for forty years (this being the lifetime of the Saxmundham Converter Station).

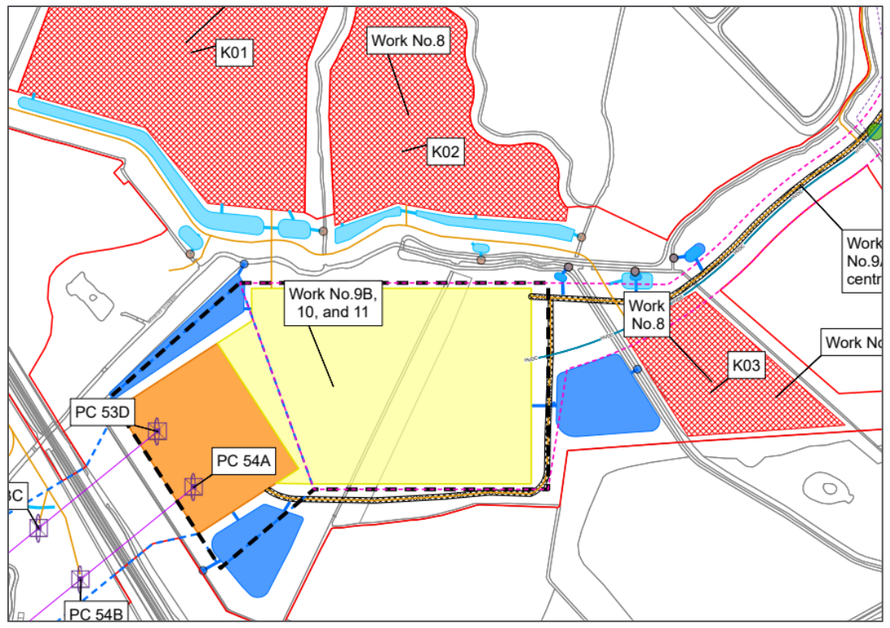
Reference	Question to:	Question	Applicant's Response
		this plot in its entirety is 12 hectares, and if it is larger, explain why the additional land is needed.	Plot 1/11 also includes the permanent access and mitigation works to the River Fromus and so in its entirety is larger than 12 ha. Plot 1/11 measures in its entirety 26.7 ha. The Applicant confirms that the land is necessary for the purposes of the Proposed Project and that the Applicant remains of the view that the powers sought are proportionate. Plot 1/11a was updated to plot 1/11 as plot 1/11a was not directly referenced in the Outline Landscape and Ecological Management Plan Suffolk (CR1-045)
1GEN81.	Applicant	**Clarification regarding Suffolk plot 1/12** The line of Suffolk plot 1/12 as shown on the Land Plans [CR1-003] includes a variable width of the B1119 highway along its length. Confirm whether this is intentional and the reasons for the extent of plot 1/12 in this location.	Plot 1/12 increases in width along the north south section of the B1119 adjacent to plot 1/13 to enable flexibility in the access, drainage and PRoW diversion works in this location due to the potential coordination with NGVs Lion Link project in this location. 
1GEN82.	Applicant	**Drainage details for Suffolk plot 1/24** Signpost to where details of the drainage proposed for the full extent of Suffolk plot 1/24 can be found.	**Application Document 2.14.1 Indicative General Arrangements Plans – Suffolk (Version 2, change request) [CR1-024]** show a drainage alignment through Plot 1/24. A section of 1/24 has been left wider in the plans to accommodate landowner feedback into the detailed design. The area is to accommodate a buried drainage outfall. The Applicant is engaging with the landowner to agree the preferred route.
1GEN83.	Applicant	**Clarification regarding Suffolk plot 1/97 (previously plot 1/55)** Explain the identification of Suffolk plot 1/97 as Class 10 land that is not subject to powers of acquisition within the Land Rights Tracker [REP1-126a].	Plot 1/97 extended to beyond the halfwidth of the road. This was identified as an errata plot as no rights are required beyond the halfwidth of the road in this location.

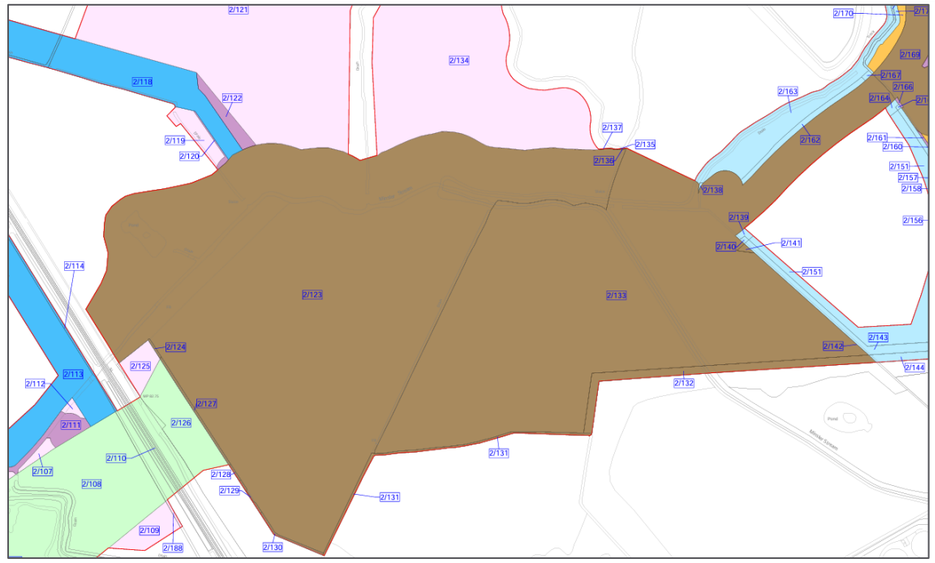
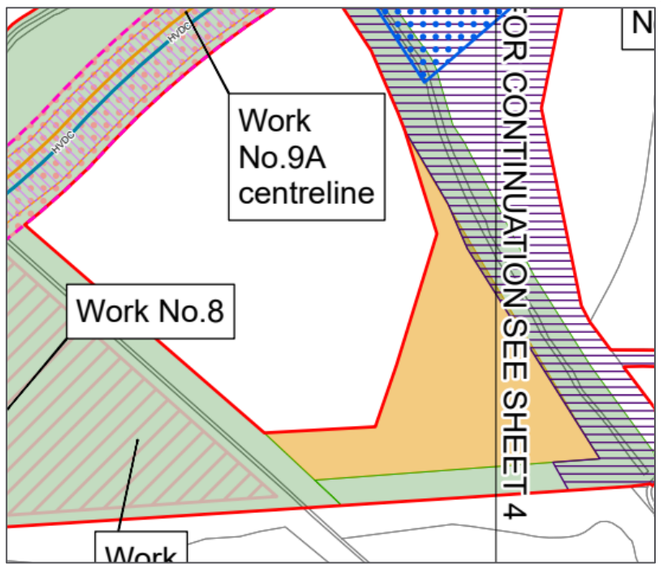
Reference	Question to:	Question	Applicant's Response
			
1GEN84.	Applicant	**Clarification regarding plot number alterations in Suffolk [CR1-004]** Provide a comparison table to explain which plot numbers have been altered and which ones are new. Include detail on the reason for the alteration and clarify if the plot size and location remain the same or have been amended.	Please see Document **9.73.1 Appendix N of Applicant's Responses to First Written Questions - Appendices** which contains the plot changes in both Kent and Suffolk between DL1 and DL1A.
1GEN85.	Applicant	**Clarification regarding Suffolk plot 4/7** The revised works plans submitted at deadline 1A [CR1-007] indicate that plot 4/7 includes the management of 6 hectares of acid grassland. Clarify whether plot 4/7 in its entirety is 6 hectares, and if it is larger, explain why the additional land is needed.	Plot number 4/7 has been updated to reflect the 6ha that is actually needed, as agreed with the landowner. The remaining plot have been re-classified as Class 10 as we are no longer seeking any land rights over the remainder. 
1GEN86.	Applicant	**Clarification regarding Suffolk plots 4/10 and 4/11** Suffolk plots 4/10 and 4/11 appear to relate to the temporary work compound identified on the work *plans [CR1-007] as work no.4.* *Explain why plots 4/10 and 4/11 are identified in the Statement of Reasons appendix A [REP1-043] as class 5 compulsory acquisition of rights - access.*	**Application Document 2.3 (D) Land Plans Part 1 of 2** submitted at Deadline 3 show plots 4/10 and 4/11 in Suffolk as Class 8 temporary use. They are shown on the **Application Document 2.5.1 (B) Works Plans - Suffolk (Version 2, change request) [CR1-007]** as Work No.4 and Work No 13 –forming part of the temporary construction compound and associated drainage. **Application Document 4.2.1 (D) SoR Appendix A Compulsory Acquisition and Temporary Possession Powers** submitted at Deadline 3 shows plots 4/10 and 4/11 **in Suffolk** are for Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure. **Application Document 4.2.1 (D) SoR Appendix A Compulsory Acquisition and Temporary Possession Powers** submitted at Deadline 3 also shows plots 4/10 and 4/11 **in Kent** are for Class 5. Compulsory Acquisition of Rights– Access.

Reference	Question to:	Question	Applicant's Response
1GEN87.	Applicant	**Clarification regarding Suffolk plots 4/16 and 4/18** Explain why two access points across plots 4/16 and 4/18 are required in this location.	**Application Document 2.3 (D) Land Plans Part 1 of 2** submitted at Deadline 3 show Plots 4/16 and 4/18 as Class 5 – Access. Multiple accesses are used for future maintenance and monitoring to enable existing field boundaries to be reinstated and to make use of existing access points through boundaries. 
1GEN88.	Applicant	**Clarification regarding Suffolk plot 5/19** Explain the reasons for requiring a wider area of land for Suffolk plot 5/19, for example, when compared to plot 5/14 which is more restricted to account for the adjacent residential properties.	In Suffolk Plot 5/19 is wider than plot 5/14 due to the location of existing utilities which may need to be accessed as part of the works. Both plots remain within the highway boundary.

Reference	Question to:	Question	Applicant's Response
			
1GEN89.	Applicant	**Clarification regarding Suffolk plot 6/4** Explain why it is necessary to include Suffolk plot 6/4.	The limit of deviation on the trenchless crossings allows for greater flexibility on the marine end of the drills and this enables the detailed design to accommodate any changes in the local environment or conditions since the preliminary design stage. The limit of deviation also allows for an additional area for alternative drills to be installed should the contractor receive a failure in one of the drills. Therefore, although it is unlikely that Plot 6/4 will be affected by the works it remains within the Limits of Deviation, within the Order Limits as part of the flexibility required for the detailed design and construction of the project.
1GEN90.	Applicant	**Clarification regarding Kent plot 1/6** Explain why the CA of rights for access widens at plot 1/6.	Plot Kent 1/6 widens for provision of a passing bay. This is identified as Work No. 14. The works packages and descriptions were recently updated. A review of all documents will be undertaken and all titles checked for consistency. 
1GEN91.	Applicant	**Clarification regarding Kent plot 1/12** Explain the reasons for TP of plot 1/12 which is 12 square metres and is enclosed on all sides by CA of rights for drainage, access and overhead lines (plots 1/8, 1/9, 1/11 and 1/13).	Kent Plot 1/12 is required for temporary use for construction and forms part of the wider temporary diversion of the OHL.

Reference	Question to:	Question	Applicant's Response
			 The proposed drainage and access works do not encroach on this area so those higher classes have not been sought ensuring the Applicant is only seeking the required land rights needed to deliver the project. **Application Document 4.2 (F) Statement of Reasons** submitted at Deadline 3 section 4 explains that National Grid seeks to acquire only such land and rights which are necessary to ensure securing the long-term placement of electricity transmission apparatus and required maintenance access. Where it is necessary to use and occupy land only during the construction and commissioning of the proposed project, then the powers sought are limited to temporary use only.
1GEN92.	Applicant	**Clarification regarding Kent plot 2/6** Kent plot 2/6 is described on the land plans as CA of rights for drainage and includes an existing track. Explain whether this would affect landowner access through the existing track.	In Kent, Plot 2/6 the feature being referred to is a drain, not an access track, hence the drainage rights sought are compatible and will not affect any landowner access.  The Applicant's appointed land agent has been liaising with all landowners in relation to Heads of Term negotiations which also included any required accommodations throughout construction and an Accommodation Works Register is being compiled and will be shared with the main works contractor.
1GEN93.	Applicant	**Clarification of works along the river Stour** Kent plots 2/60 (crown land), 2/62, 2/63, 2/64 and 2/84-2/103 are for TP along the river Stour. This area is marked for Work No.15 proposed environmental mitigation and landscaping in the revised work plans submitted at deadline 1A [CR1-008]. Explain and signpost to where further information is provided on the need for this land.	Scrapes are proposed alongside the River Stour, as shown on Figure 4 within **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]**. Such locations are indicative and are subject to change, therefore a larger area has been included within **Application Document 2.5.2 (B) Work Plans - Kent (Version 2, change request) [CR1-008]** to allow for micro-siting. This is explained within section 5.3 in **PDA-035**.

Reference	Question to:	Question	Applicant's Response
1GEN94.	Applicant	**Clarification regarding Kent plots 2/123 and 2/133** Whilst the works plans provided at deadline 1A [CR1-008] go some way to explaining the works proposed within the various plots, more detail is required to understand the specific layout of the proposed works within Kent plots 2/123 and 2/133 and to explain why the full extent of the land is required. Furthermore, Kent plot 2/133 includes a temporary construction compound which then appears in the oLEMP [PDA-035] to change to a tree planting and grassland mitigation area. Explain why you intend to CA this part of the land, when other mitigation areas have been identified only for CA of rights.	The **Application Document 2.14.2 Indicative General Arrangements Plans - Kent (Version 2, change request) [CR1-025]** show the proposed substation and converter station locations, and the **Application Document 2.13 Design and Layout Plans [APP-037]** show typical layout plans for these sites. The indicative General Arrangement plans also show that significant attenuation ponds are required which along with access utilises the majority of the fields to the south of the Minster Stream. The attenuation ponds are large and will vary in capacity as water levels rise and fall. They need to be shallow to mitigate against the high-water table. The land to the north and east of the Minster Stream is required for landscaping and environmental mitigation works. The snip below shows an extract from the general arrangement plans referenced above.  The **Application Document 4.2 (F) Statement of Reasons** submitted at Deadline 3, Section 3.2 explains that acquisition is required for Permanent Embedded Measures for Mitigation to ensure delivery and control of the mitigation. Plot 2/133 will be used as a compound for construction and then used for permanent embedded mitigation once construction is complete in an effort to minimise the land required to deliver the project.

Reference	Question to:	Question	Applicant's Response
			
1GEN95.	Applicant	**Clarification regarding Kent plots 2/149 – 2/151, 2/155 – 2/157, 2/164, 2/165, 2/171, 2/172, 2/178 and 2/179** These Kent plots are identified in the land plans for CA of rights for mitigation, however, the oLEMP [PDA-035] does not show any planting in this area. Explain in detail and signpost to where the detail is provided on the mitigation proposed for these plots.	Riparian planting is shown either side of the existing ditch for the plots identified. This is shown on Figure 1 within **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]**. For plot 2/151, there are two parts as shown on the **Application Document 2.5.2 (B) Work Plans - Kent (Version 2, change request) [CR1-008]**. Work No.14 is to facilitate access to the various elements of work in and around this location, the environmental mitigation to the east, west and south and the utilities connection and diversion works to the east. Due to the uncertain programme of works in this location, in that diversions and connections will be dependent on third parties and some elements of the mitigation may be undertaken in advance or to suit specific ecology constraints, then a degree of flexibility on the routing of access has been retained in this location. Work No. 15 is for the proposed riparian planting. 

Reference	Question to:	Question	Applicant's Response
1GEN96.	Applicant	**Clarification regarding Kent plots outside of the limit of deviation for underground cables, including Plots 2/160, 2/183, 3/7, 3/46, 3/48 – 3/51, 3/55, 3/57, 3/60, 3/62, 3/76, 3/78, 3/85, 4/14 – 4/17 and 4/29** A number of Kent plots are identified for CA of rights for the underground cabling system that appear to lie outside of the limit of deviation for underground cables. Explain what rights are being sought in relation to these plots with reasons.	**Application Document 2.3 (D) Land Plans Part 2 of 2** submitted at Deadline 3 show the plots; 2/160 – Class 3 Underground Cable rights 2/183 – Class 3 Underground Cable rights 3/7 – Class 3 Underground Cable rights 3/46 - Class 3 Underground Cable rights 3/48 - Class 3 Underground Cable rights 3/51 - Class 3 Underground Cable rights 3/55 - Class 3 Underground Cable rights 3/57 - Class 3 Underground Cable rights 3/60 - Class 3 Underground Cable rights 3/62 - Class 3 Underground Cable rights 3/76 - Class 3 Underground Cable rights 3/78 - Class 3 Underground Cable rights 3/85 - Class 3 Underground Cable rights 4/14 – Class 3 Underground Cable rights 4/17 – Class 3 Underground Cable rights 4/29 - Class 3 Underground Cable rights The identified plots are all outside the limits of deviation for the proposed project underground cables, but all of the plots are required to undertake third party diversions. The Rights are to enable the burial of the third-party utilities. **Application Document 2.14.2 Indicative General Arrangements Plans - Kent (Version 2, change request) [CR1-025]** shows the new proposed routing of the proposed utility diversions.
1GEN97.	Applicant	**Clarification regarding the arrangement of Kent plots 3/41, 3/42 and 3/45** Explain the reason for the arrangement of these plots.	**Application Document 2.3 (D) Land Plans Part 2 of 2** submitted at Deadline 3, Sheet 3 show plots 3/41, 3/42 and 3/45 as Class 8. Temporary Possession is required to enable the cable ducts to be laid out ahead of being pulled into position. The cabling methodology is described in **Description of the Proposed Project section 4.6.153- 4.6.254** (REP
1GEN98.	Applicant	**Clarification regarding Kent plot 6/1** The statement of reasons appendix A does not contain any detail for Kent plot 6/1. The revised works plans submitted at deadline 1A [CR1-008] state that this land is for 10 hectares of arable enhancement land for golden plover and skylark. Explain the reasons for the CA of the entirety of Kent plot 6/1 (particularly if plot 6/1 is in excess of 10 hectares) and update documents as appropriate.	**Application Document 4.2 (F) Statement of Reasons** submitted at Deadline 3 confirms plot 6/1 is included in the application for the delivery of off-site arable enhancement for birds (golden plover and breeding skylark) . This land is needed to offset the loss of fields at the converter station and substation site in Kent which are foraging habitats for birds and therefore 'functionally linked' to the Thanet Coast & Sandwich Bay Special Protection Area (SPA). The mitigation will be delivered through the management of farming practices on the site at plot 6/1 to ensure that an appropriate amount of time is available between autumn harvest and resowing, while taking measures to encourage soil invertebrates. This will effectively offset the loss of foraging habitat elsewhere. Plot 6/1 measures 12.7 Ha in its entirety but in practice the edges of the field are not cultivated and the landowner would not want to be left with the field margins so we have included the whole field. To ensure the land is properly managed to create the necessary habitat, the Applicant needs to be in control of this land to ensure the required changes in farming practices are delivered for the lifetime of the project although in practice

Reference	Question to:	Question	Applicant's Response
			will likely subcontract this work to the farmer. This control cannot be delivered through the acquisition of rights alone.
1GEN99.	Applicant	**Clarification regarding landowner** Clarify if Northumbrian Water Limited [RR-5598] refers to Essex and Suffolk Water Limited in the Book of Reference [REP1A-002].	Essex & Suffolk Water have confirmed they are part of Northumbrian Water Limited, which is a member of Northumbrian Water Group.
1GEN100.	Applicant	**Clarification regarding landowner** The Land Rights Tracker [REP1-126a] identifies Edward Martin Spanton as being the owner or occupier of several plots in Kents. The RR listed in the Land Rights Tracker associated with this affected person is [RR-1410]. No RR has been received from Edward Martin Spanton. [RR-1410] is the RR of Dyas Farms (1988) Ltd, submitted by Nicola Hellen Dyas. Amend the Land Rights Tracker accordingly.	RR-1410 (Dyas Farms Ltd) was submitted on behalf of Marsh Farmers (Struan Robertson, Peter Smith, Anthony Curwen, Mathew Spanton, Guy Smith, James Southorn, Nicola Dyas, Pippa Southorn). The Applicant confirms that Matthew Spanton is the son of Edward Martin Spanton and is in a farming partnership, Edward Spanton Farms, with Edward Martin Spanton for the land in question. The Applicant therefore considers RR-1410 is relevant and should remain against Edward Martin Spanton in the Land Rights Tracker.
1GEN101.	Applicant	**Land Rights Tracker** Ensure all missing details of RR or written representations (WR) are added to the Land Rights Tracker [REP1-126a]	The Applicant confirms this has been actioned.

2. Landscape and Visual

Table 2.1 Landscape and visual

Reference	Question to:	Question	Applicant's Response
1LVIA1.	**Applicant** Local authorities	**Landscape vision** Local authorities: In view of the major adverse likely significant effects, do you consider that there is a clear vision for the landscape for the whole project? If not, make suggestions for how the landscape vision should be developed. Applicant: Provide an explanation of how the recommendations of the Design Review Panel have influenced the landscape vision?	The Proposed Project Design Vision is set out in Section 2.2 of each of the Design Principles documents (**Application Document 7.12.1 Design Principles – Suffolk [APP-366]** and **Application Document 7.12.2 Design Principles - Kent [APP-367]**, and includes the overall vision that informs the wider design approach including the landscape strategy. Similarly, the Overarching Design Principles in Table 2.1 and the Project Level Design Principles in Table 2.2 of each document incorporate landscape related principles. The recommendations of the Design Review Panel (DRP) are contained in Section 4.3 of **Application Document 7.11.1(B) Design Approach Document – Suffolk [REP1A-029]** and **Application Document 7.11.2 (B) Design Approach Document – Kent [REP1A-031]** along with an explanation as to how the recommendations have informed the development of the outline landscape design (or landscape vision) presented in **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]** and **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]**. The DRP recommendations formed an important part of the iterative design process and the Applicant's commitment to achieving good design. The recommendations enabled a critical review of the landscape proposals which have been developed collaboratively with various specialists and stakeholders. Many of the key themes in Suffolk which were highlighted by the DRP were already embedded in the early landscape vision for the Proposed Project which looked to use the existing and historic landscape structure to influence the wooded nature of the landscape framework for the Saxmundham Converter Station (refer to **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [CR1-045]**). The DRP considered that the landscape interventions required a '*larger canvass than the current red line implies'*, a new woodland for Saxmundham and using the historic field pattern to inform the overall landscape approach. The historic landscape context including hedgerows and blocks of woodland are features that the landscape vision encompasses. The large areas of new woodland planting provide substantial belts of woodland which incorporate pockets of grassland habitat through which the diverted and new Public Rights of Way (PRoW) lie. The depth of planting provides a landscape framework which would ultimately provide a degree of screening and landscape integration function balanced against enabling sufficient space for co-location of LionLink infrastructure. The historic landscape features have been an early consideration in the evolution of the landscape design and the proposed hedgerow and tree planting along the B1119 reflects this. The DRP recommendations in Kent were focussed on adopting '*a softer, more layered approach*' to the landscape design as well as consideration of views from the wider network of paths and screening of views from these locations. These suggestions were incorporated into the outline landscape design which reinforced the pattern of drainage ditches, riparian planting around new attenuation ponds set within open grassland. Areas of woodland have been used to provide a degree of containment to the Minster Converter Station and Substation so that it appears visually connected to Richborough Energy Park and existing blocks of woodland rather than the wider former marsh landscape. Figure 6.4.3.1.6 Representative Viewpoint Locations in **Application Document 6.4.3.1 ES Figures Kent Landscape and Visual Part 1 of 4 [APP-240]** identifies the network of PRoW within the landscape. As part of the iterative process of design and assessment, views from this wider PRoW network have been visited and carefully considered in the development of the outline landscape mitigation measures. The various PRoW within the study area have been walked and consideration given to whether screening at specific locations would assist in mitigating effects on visual amenity. The visual assessment concluded that there were not any specific locations or sections of routes where off-site screen planting would provide effective mitigation or would be an appropriate addition to the landscape character.

Reference	Question to:	Question	Applicant's Response
			The future detailed design of the Proposed Project in Suffolk and Kent will enable these landscape objectives to evolve and be translated into a multi-functional landscape assets which is anticipated will continue to be informed by DRP oversight as set out in Section 4.2 of **Application Document 7.11.1 (B) Design Approach Document - Suffolk [REP1A-029]** and **Application Document 7.11.2 (B) Design Approach Document - Kent [REP1A-031]**.
1LVIA2.	Applicant	**Good design** In terms of good design, NPS EN-1, for example paragraphs 4.711 and 4.7.12, identifies that the wider impacts of a development, including landscape impacts, are important factors in the design process. In terms of landscape and visual effects, paragraph 5.10.28 identifies that it may be appropriate to undertake landscaping off site, for example filling in gaps in existing tree and hedge lines. Paragraph 5.10.37 states that the Secretary of State should consider whether the development has been designed carefully, to minimise harm to the landscape, including by appropriate mitigation. Provide an explanation as to whether additional landscape planting could result in the mitigation of likely significant landscape and visual effects as identified in table 1.12 of [APP-048] and table 1.13 of [APP-061]. Provide an explanation as to why opportunities for mitigation of residual effects have not been pursued. Although significant adverse cumulative effects are identified in [APP-073] and [APP-060] for landscape and visual, no additional mitigation is identified. Provide an explanation of whether additional landscape planting could result in the mitigation of significant adverse landscape and visual effects. Provide an explanation as to why opportunities for mitigation of cumulative residual effects have not been pursued.	Good design has been a consideration in the development of the Proposed Project from the outset with landscape architecture expertise shaping the early siting and routeing design of the Proposed Project. Articulating a design vision early on ensures that the embedded mitigation measures are developed within a structure which positively responds to the landscape setting and is consequently integral in reducing, and where possible avoiding, potential landscape and visual effects. The measures set out in section 1.7 of **Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP1A-031]** and **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** are essential mitigation which has been embedded into the design of the Proposed Project. Embedded landscape mitigation measures included early design input into the routeing of the HVDC and HVAC cable corridors, the location of the landfalls and siting of the converter stations. The proposals have had a strong landscape and visual influence to limit potentially significant effects from the outset. In addition, control and management measures have been specified to limit landscape and visual effects during construction, including the protection and retention of sensitive features including trees within the Order Limits. These are contained in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3, secured through Schedule 3, Requirement 6 of the draft Development Consent Order (DCO) (**Application Document 3.1 (F) draft Development Consent Order** submitted at Deadline 3). Section 6, Design Responses to Design Principles, in **Application Document 7.11.1 (B) Design Approach Document - Suffolk [REP1A-029]** and **Application Document 7.11.2 (B) Design Approach Document -Kent [REP1A-031]** shows illustrations, from the identified representative viewpoints from the Landscape and Visual Impact Assessment (LVIA) which are nearest to the converter station and most sensitive. These illustrative views, show the indicative converter station layout with a colour and texture applied to the cladding and how it could appear with summer year 15 tree growth. This gives a representation of how the building design could provide embedded mitigation for those parts of the buildings that will remain visible over the top of the tree planting. Sections 6.3 to 6.5 shows alternative building forms and cladding design options that could provide further embedded mitigation in line with the Key Design Principles in Table 3.1 of **Application Document 7.12.1 Design Principles - Suffolk [APP-366]** and **Application Document 7.12.2 Design Principles - Kent [APP-367]**,.These Project Level Design Principles have been guided by landscape and visual considerations to ensure the best landscape fit, which has in turn driven the specific Converter Station and Substation Design Principles. The building Design Principles ensure an integrated design approach which responds to the landscape setting, making use of existing tree belts for screening and reinforcing existing and historic landscape features and habitats as outlined in **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [CR1-045]** and **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan - Kent [PDA-035]**. The embedded mitigation measures are reasonable, proportionate and responsive to the landscape and visual contexts in Suffolk and Kent. Additional landscape mitigation (beyond the essential mitigation embedded in the design of the Proposed Project) was considered as part of the iterative design and assessment process, to evaluate whether further landscape planting, including off-site locations, could reduce the residual significant landscape and visual effects associated with the permanent infrastructure. Whilst planting adjacent to a receptor can be effective in screening and mitigating views, it also has the drawback of closing or restricting views of the wider landscape which are often an important aspect of the viewers' enjoyment. Additional hedgerow and tree planting along the B1119 was included within the Order Limits to allow for new vegetative layers within the landscape away from the permanent infrastructure, closer to road users and residential receptors to the north of the Saxmundham Converter Station Site. Other off-site additional landscape mitigation would not further mitigate the impression of change within the local landscape and views due to the scale of infrastructure proposed. However, it is anticipated that the embedded mitigation planting will continue to increase in height beyond year 15 and this additional screening is likely to result in reduced effects in the longer term. Therefore, it is the Applicant's view that the mitigation hierarchy has been followed throughout the design development and EIA stages, and that mitigation measures have been identified and incorporated within the Proposed Project, as far as possible, at every stage of the process. Additionally, **Application Document 7.1 (C) Planning Statement [AS-057]** in paragraph 7.2.53 notes that whilst some significant residual landscape and visual effects will remain, these would be unlikely to

Reference	Question to:	Question	Applicant's Response
			outweigh the need for critical national priority (CNP) infrastructure (such as the Proposed Project) as referenced in paragraph 4.2.15 of NPS EN-1. Regarding additional mitigation of potentially cumulative residual effects, similar reasons apply. Embedded mitigation measures have been designed into the Suffolk Onshore Scheme to enable the potential co-location of infrastructure as shown in **Application Document 7.10.1 NGV Coordination Suffolk Masterplan [APP-363]**. Furthermore Section 7.6 in **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [CR1-045]** identifies the mechanisms to support a cohesive overall design for the wider Saxmundham converter station site to embed mitigation measures into co-ordination with National Grid Ventures' LionLink project. Additional landscape planting and associated land take either close to or within the wider landscape is unlikely to result in a material reduction in the potentially significant cumulative landscape and visual effects due to the cumulative scale of the permanent infrastructure.
1LVIA3.	Applicant	**Design and landscape strategy** Provide an explanation as to how the historic maps have informed the design and landscape strategy, in the Design Approach Document – Suffolk [REP1A-029] and Design Approach Document – Kent [REP1A-031]. Provide an update to the Design Approach Documents.	The landscape mitigation planting in Suffolk (as shown on Figure 1 within **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [CR1-045]**) has been informed by historic mapping and collaboration with heritage specialists. The historic map from 1888-1913 as shown on page 28 of **Application Document 7.11.1 (B) Design Approach Document - Suffolk [REP1A-029]** shows that the current large open field was historically divided in to many smaller land parcels with suggestion of those fields likely being bound by hedgerows that have been cleared, and an area of woodland called Great Wood that has also been cleared to create more space for crops. In Section 4.3 the table of Design Review Panel Report comments and responses shows in line D.17 that the panel picked up on the historic landform and how "*this mosaic pattern could helpfully inform the overall landscape approach*". The response notes that whilst the technical requirements limit the scope for reintroducing the historic field pattern, however existing tree belts will be reinforced to improve screening. The reinstatement of woodland, hedgerow and hedgerow tree planting on and around the Saxmundham Converter Station site, including of the former Great Wood, and the replacement of the existing plantation vegetation with native planting alongside the River Fromus, offers the opportunity to reinforce historic landscape character. Such positive additions, both relating to the Saxmundham Converter Station site and River Fromus valley, are recognised in the East Suffolk Council Local Impact Report (see section 6.3.8.7 in **Application Document 9.35.2 Applicant's Comments on Local Impact Report from East Suffolk Council [REP2-027]**). With regard to the proposed hedgerow and occasional tree planting along the permanent access road off the B1121, this is located within the remnant parkland of Hurts Hall. The planting proposals have been carefully considered to reflect the historic parkland landscape whilst avoiding the creation of a tree lined avenue and also providing new habitats for wildlife. Heritage and landscape officers at East Suffolk Council and Suffolk County Council have informed these discussions. The landscape mitigation planting in Kent (as shown on Figure 1 within **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]**) has also been informed by historic mapping and collaboration with heritage specialists. The historic maps from 1888-1913 and 1955-1961 shown on page 24 of **Application Document 7.11.2 Design Approach Document - Kent [REP1A-031]** shows that the area has consistently been open farmland. The limited landscape intervention along the permanent access road off the A256, which comprises a swale either side of the road with no fencing or tree planting has been carefully considered to retain the open aspect of the former Wantsum Channel. Planting of deeper root stock has also been limited within areas where significant archaeology exists. The remaining planting around the Minster Converter Station and Substation site has been designed to provide a degree of containment to the permanent infrastructure of the Kent Onshore Scheme, ensuring that the overall sense of identity and distinctiveness of the former marshland landscape is retained. The landscape planting proposals would continue to be developed as part of the detailed Landscape and Ecological Management Plan (LEMP) with other disciplines.

Reference	Question to:	Question	Applicant's Response
			The Design Approach Document (DAD) for Suffolk (**Application Document 7.11.1 (B) Design Approach Document - Suffolk [REP1A-029]**) and Kent (**Application Document 7.11.2 (B) Design Approach Document - Kent [REP1A-031]**) have been updated to reflect ongoing discussions with stakeholders and updates to layout diagrams and renders to reflect design development. No further updates to these documents are anticipated.
1LVIA4.	Applicant	**Lighting** The ExA notes the rural and unlit context of the substations and converter stations in Suffolk and Kent and that there is very limited detail in relation to operational lighting in the application documents. Provide additional detail in terms of the height and type of any lighting installations and light contour plans. Provide a night-time assessment of the effects of operational lighting on landscape character or visual amenity. This should include the cumulative effects with other significant light sources, such as Thanet Earth and Richborough Energy Park in Kent. If the applicant considers that an assessment is not required, provide a detailed explanation of your reasoning. Has consideration been given to allowing relevant planning authorities to approve details of operational lighting schemes? If not, why not? Local authorities may also like to comment.	The operational external lighting systems at substations and converter stations in Kent and Suffolk will meet the requirements of National Grid TS 2.10.04 Issue 1- 2017. This specifies that the minimum exterior lighting requirements are as follows: • Maintained average illuminance: 6.0 lux • Maintained minimum point Illuminance: 2.5 lux The above requirement has been captured within a new commitment (GG38) in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3. The peak lux contour levels in close proximity to the proposed lighting columns and building mounted lights has been estimated at 20 lux. The external lighting will allow the safe movement of vehicles and pedestrians between any two points that they may reasonably be expected to negotiate during the hours of low light or darkness within the site perimeter. The external lighting is not intended to facilitate maintenance activities for which it is assumed that additional portable equipment will be employed. Luminaires will be Light-Emitting Diodes (LED) type fittings. Road and site lighting will be provided using Road Lanterns and Floodlights. Wherever possible, road lantern and floodlight type luminaires will be mounted upon dedicated 8 m, galvanised steel, base-hinged columns designed to be lowered for maintenance purposes. Building mounted luminaires will provide amenity lighting to footpaths throughout the site and shall be mounted at or below 8m. In terms of height the lighting is confirmed as being 8 m high within paragraph 4.2.40 of the **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]**. Appendix J includes figures providing illustrative lux plots for the proposed substations and converter stations in both Suffolk and Kent (noting Friston Scenario 2 only regarding the substation in Suffolk). The adequacy of the consideration of operational lighting within the assessment on landscape character and visual amenity has been previously discussed with stakeholders (refer to reference 6.2.12 at Table 2 and reference 82-84 at Table 6.8 within **Application Document 9.34.5 (B) Applicant's Response to Selected Relevant Representation Responses [REP2-022]**). This includes reference to the lighting assumptions at construction and operation and maintenance within the 'Assessment Assumptions' sections of the respective Landscape and Visual chapters (contained within **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** and **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**). The assessment in Kent also takes into consideration any reflective properties of bird diverters present on the section of HVAC OHL. It also refers to a design principle (N.4) for the Saxmundham Converter Station and Minster Converter Station and Substation that a dark skies strategy will be followed to minimise light spill with reference to wildlife and visual amenity (contained within **Application Document 7.12.1 Design Principles – Suffolk [APP-366]** and **Application Document 7.12.2 Design Principles – Kent [APP-367]**). The design principles are secured by Schedule 3 Requirement 3 within the draft DCO (**Application Document 3.1(F) draft Development Consent Order** submitted at Deadline 3). For Kent specifically, further responses to stakeholders (refer to reference 5.3.23 at Table 3.1 within **Application Document 9.35.4 Applicant's Comments on Local Impact Report from Thanet District Council [REP2-029]**) references the dark skies mapping within the published Thanet Landscape Character Assessment (Land Use Consultants, 2017). This shows that the Kent Onshore Scheme would be located within a relatively dark part of the Thanet District landscape but within the context of

Reference	Question to:	Question	Applicant's Response
			more lit and urbanised areas in close proximity, including the edge of Ramsgate to the north-east, Richborough Energy Park to the south and Thanet Earth further to the north-west, all of which influence the local landscape. The mapping for dark skies is at a large scale and for the site in question this would be within the context of existing infrastructure including the Weatherlees Hill Wastewater Treatment Plant, Richborough Energy Park, railway line and A256, which lessens the Proposed Project's influence on these perceptual qualities even at the local scale. The response also refers to the request in Policy SE08 (Thanet Local Plan, 2020) that an LVIA is undertaken with reference to lighting, which has been undertaken, rather than a 'full lighting assessment' as set out in the Thanet District Council Local Impact Report (which can also be referred to in **Application Document 9.35.4 Applicant's Comments on Local Impact Report from Thanet District Council REP2-029**). The two 'significant light sources' at Thanet Earth and Richborough Energy Park in Kent inform the baseline lighting context so would only be considered as part of the LVIA of the Proposed Project in terms of the existing lighting conditions rather than the cumulative assessment. The consideration of lighting within the assessment on landscape character and visual amenity in Kent largely relates to existing lighting sources in closer proximity, such as the A256, as the perception of the lighting proposals are expected to be localised. The existing lighting at Richborough Energy Park has been referred to where relevant. Whilst there is separation between Thanet Earth and the Kent Onshore Scheme due to the intervening plateau landscape, the light glow is a consideration in the context of the wider nighttime landscape. Due to the reasoning above, no further assessment on the effects of operational lighting on landscape character or visual amenity is considered to be required. **Application Document 7.12.1 Design Principles- Suffolk [APP-366]** and **Application Document 7.12.2 Design Principles- Kent [APP-367]** include design principle N.4 for the converter station lighting design. This principle sets out that the Applicant can provide a technical statement, as suggested under design principle N.4 in Table 3.1 of to demonstrate that operational lighting design for the Saxmundham Converter Station and Minster Converter Station meets the minimum operational requirement design. Consideration has been given to allowing relevant planning authorities to approve details of operational lighting schemes for the Converter Stations. Whilst approval from the relevant planning authorities is not included for in the draft DCO requirements, in discharging requirement 3 of the draft DCO (**Application Document 3.1(F) draft Development Consent** submitted at Deadline 3) details of operational lighting would be submitted to the relevant planning authority (with relevant county authorities required to be consulted) to allow them to confirm the details are in general accordance with Table 3.1 design principle N.4. It should be noted design principle N.4 does not include operational lighting design for substations.
1LVIA5.	Applicant	**Advance planting** It is not clear how advance planting would be secured and where it would be located. A more detailed explanation and commitment is required, detailing the mechanism for securing it.	The areas of potential early planting or advance planting are shown on Figure 3 within **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [CR1-045]** and Figure 3 within **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]**. It is noted on both figures respectively that '*areas of early planting to be agreed as part of the detailed LEMP with contractor and relevant stakeholders*'. The outline LEMP (oLEMP) documents for both Suffolk and Kent set out that "*where planting areas do not conflict with construction compounds and activities, advanced planting will be undertaken in the first available planting season prior to construction commencing*" and that this would be subject to contractor discussions (paragraph 5.8.1 within **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Version 2, change request) [CR1-045]** and paragraph 5.5.1 within **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]**). The oLEMP is secured through Schedule 3 Requirement 6 of the draft Development Consent Order (DCO) (**Application Document 3.1(F) draft Development Consent Order** submitted at Deadline 3) which states that no stage of the authorised development may commence until the detailed LEMP has been submitted to and approved by the relevant planning authority or other discharging authority as may be appropriate and this must be substantially in accordance with the oLEMPs.
1LVIA6.	Applicant	**Adaptive monitoring** Provide an explanation of how LV03 and LV04 of the REAC version B [CR1-043] would interact with section 7.3 of the oLEMP – Suffolk version B	LV03 and LV04 (refer to **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3) set out the commitment to reduce impacts on landscape character and visual amenity from failure of reinstatement and mitigation planting. The mitigation commitment refers to the areas of planting within Suffolk and Kent respectively that will be managed and maintained either for five-years or for the lifetime of the asset dependent on relationship with the permanent infrastructure and type of planting proposed. LV03 and LV04 are secured by the oLEMP through Schedule 3

Reference	Question to:	Question	Applicant's Response
		[AS-059] in relation to the adoption of an adaptive management monitoring programme and section 7.2 of the oLEMP – Kent version B [PDA-035].	Requirement 6 of the draft Development Consent Order (DCO) (**Application Document 3.1(F) draft Development Consent** submitted at Deadline 3) which states that no stage of the authorised development may commence until the detailed LEMP has been submitted to and approved by the relevant planning authority or other discharging authority as may be appropriate and this must be substantially in accordance with the oLEMPs. Within the respective oLEMPs at sections 7.3 and 7.2 (**Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [CR1-045]** and **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]**) the adaptive management programme is outlined. This programme will be instrumental in the commitment to reduce impacts on landscape character and visual amenity from failure of reinstatement and mitigation planting. As noted in **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [CR1-045]** and **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]**, the LEMP will define the adaptive management programme in agreement with the relevant planning authority. The adaptive management and monitoring programme applies to all mitigation planting associated with the Proposed Project.
1LVIA7.	Natural England, Suffolk & Essex Coast & Heaths National Landscape Partnership (SECHNLP), Suffolk County Council, East Suffolk District Council	**National Landscape (NL) duty** Provide your comments on Document 9.47 NL Duty Section 85 Duty Technical Note [REP1-120], including the approach to the s85 duty, the natural beauty indicators in table 3.2 and the special qualities indicators in table 3.3 and the cumulative effects on the NL in section 4 and tables 4.1 and 4.2. In your response include consideration of whether the extent and nature of the preferred area of acid grassland on plate 3.2 of [REP1-120] is sufficient and the appropriateness of the maintenance period of 10 years.	
1LVIA8.	Applicant	**Landscape mitigation for Saxmundham converter station** The landscape planting alongside the B1119 is not very clearly shown in relation to the order limits, nor is it clear the extent to which it would consist of hedgerow or trees. Provide a more detailed explanation as to whether the planting includes structural landscape planting that would be capable of integrating the converter station into the existing landscape in longer range views.	Figures 1LV1A8 –1 and 2 below shows typical cross sections through the Order Limits along the B1119 north of the proposed Saxmundham Converter Station and north of the Christmas tree fields respectively. The arrangements shows that there is sufficient space available for maintenance of the hedgerow from both sides as well as access for maintenance of the drainage ditch from the non-trafficked side. Additional width is provided within the cross section to the north of the converter station (Figure 1LVIA8 – 2) to enable flexibility in the landscaping to allow for the temporary PRoW diversion and to allow for any utility changes required for connection works.

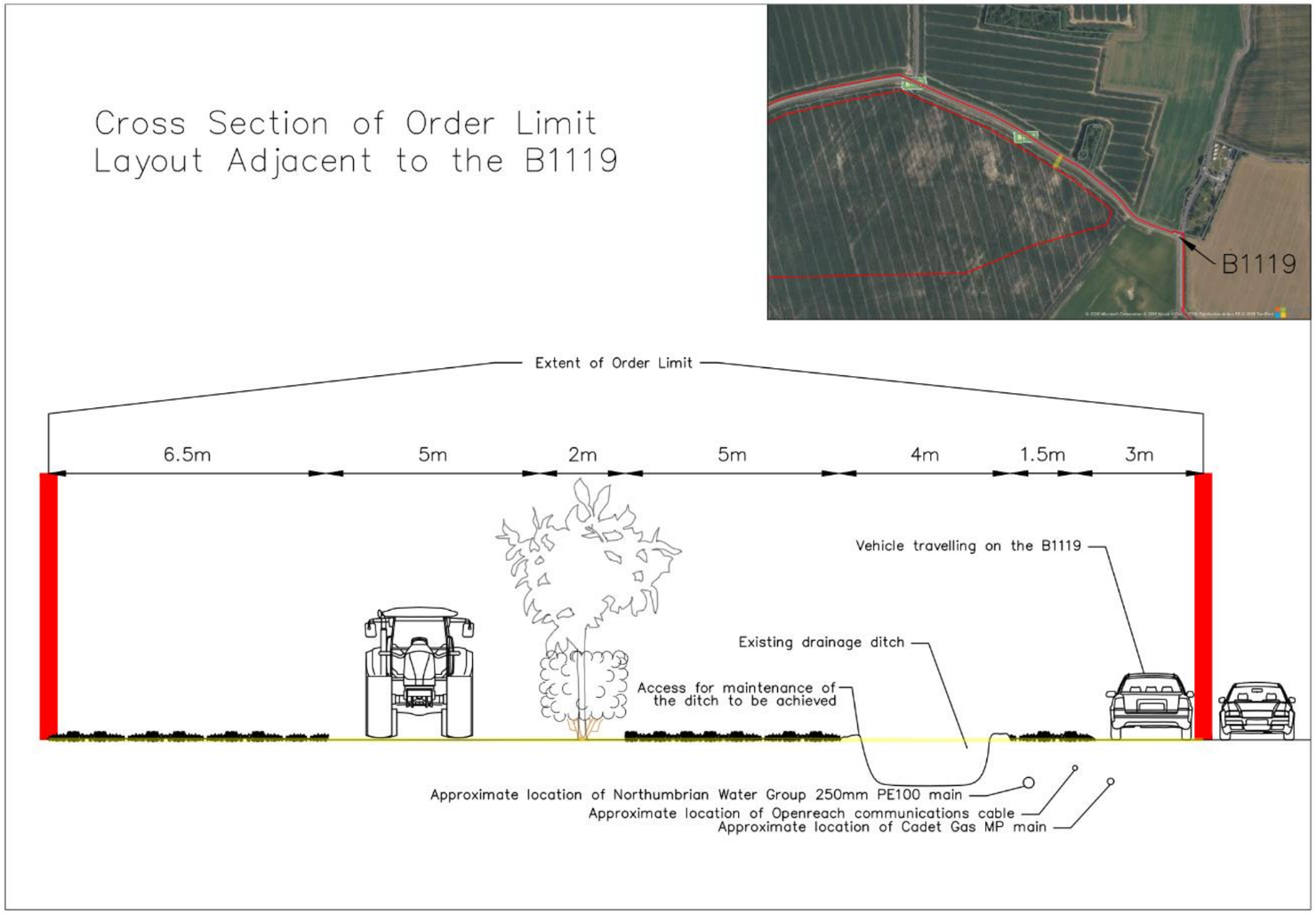


Figure 1LVIA8 – 1 Typical cross section through Order Limits along B1119

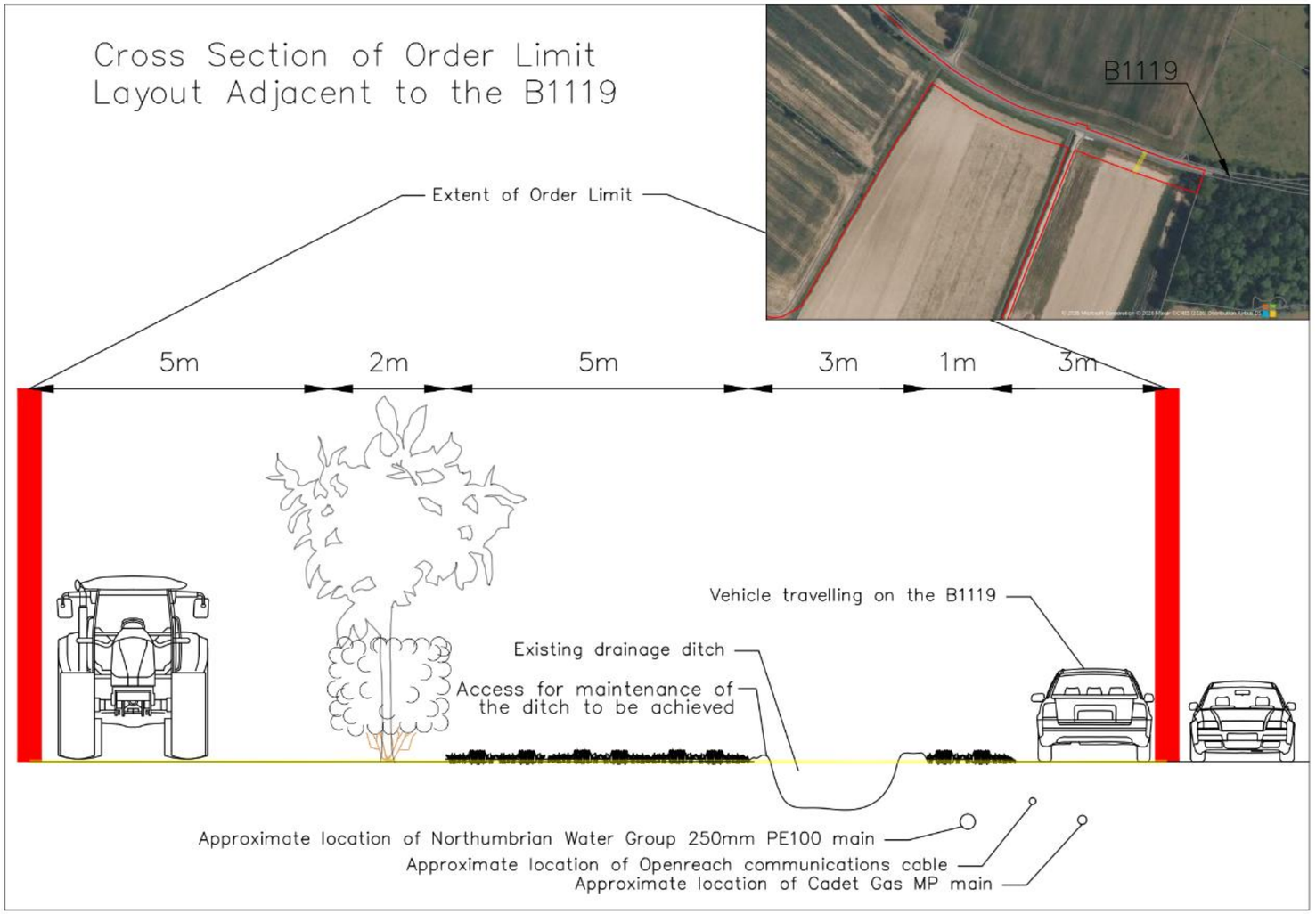


Figure 1LVIA8 – 2 Typical cross section through Order Limits along B1119

The widening of the Order Limits in this locality relating to maintenance requirements should be referred to within reference 17-18 in Table 2.2 within **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**.

The proposed planting alongside the B1119 would comprise a native double staggered hedgerow with hedgerow trees clustered along it, as set out within Section 5.1.4 in the oLEMP (**Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [CR1-045]**). The exact placement of the hedgerow trees would be further developed at the detailed design phase. The height of the hedgerow is shown at approximately 2 m and the height of the hedgerow tree at approximately 6 m, in accordance with the visualisations (contained within **Application Document 6.4.2.1.10 Representative Viewpoint Visualisations [APP-209]**) submitted within the Environmental Statement.

The proposed Saxmundham Converter Station would be clearly visible from the B1119 and there are wide-reaching views from the B1119 as far as Sizewell on the skyline, however the local landscape contains a layered vegetation network which creates

Reference	Question to:	Question	Applicant's Response
			filtered views. The proposed double staggered hedgerow and hedgerow tree planting is intended to contribute towards this network which is reflective of the historic pattern of vegetated field boundaries. It would provide some screening to the lower parts of the converter station, particularly from road users along the B1119 and residential properties in the vicinity and would provide ecological connectivity by linking areas of existing woodland and hedgerows. The clusters of trees along the hedgerow would also maintain some views of the planted edge of Saxmundham (identified in the Saxmundham Neighbourhood Plan as an important aspect of the setting and in views when approaching along the B1119 from the east as an indication that the town is nearby). In longer range views from the north and east (including Viewpoints 15, 16 and 17) (as set out in **Application Document 6.4.2.1 Representative Viewpoint Visualisations Part 4 of 7and Part 5 of 7 [APP-211 and APP-212]**), the existing layered vegetation network in the intervening landscape provides partial screening of the operational infrastructure. At these distances, the proposed planting along the B1119 and to an extent the proposed woodland planting to the north of the proposed converter station would appear as part of the landscape framework but offer minimal additional screening benefit. These views are primarily influenced by existing mature vegetation characteristic of the local landscape, which is reflected in the converter station site landscape design proposals. Increasing the depth or height of the planting along the B1119 is therefore unlikely to contribute to a reduction in effects on visual amenity from longer range views. Further to the north and east the visibility would be limited due to landform changes as shown by the Zone of Theoretical Visibility plan (**Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 1 of 7 [APP-208]**).
1LVIA9.	Applicant	**Effects of construction on defined features of the NL** Notwithstanding the information provided in [REP1-120], provide a more detailed and thorough response to the comments from SECHNLP that the landscape and visual assessment does not fully consider the impacts on all defined features, including scenic quality, relative tranquillity and relative wildness, during construction. If it is found that significant effects are likely, what mitigation measures are proposed?	The assessment on the Suffolk & Essex Coast & Heaths Area of Outstanding Natural Beauty (SECHAONB) and its setting (refer to **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**) has been based on the Natural Beauty Indicators outlined in **Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096]**. An assessment on the Special Qualities Indicators is located within Appendix F of **Application Document 7.1 (C) Planning Statement [AS-057]**. Appendix A 1LVIA9 Natural Beauty Indicators and their Sub-Factors within **Application Document 9.73.1 Applicant's Reponses to First Written Questions – Appendices** submitted at Deadline 3 provides further detail on how the sub-factors of the Natural Beauty Indicators have the potential to be affected by the Proposed Project. This is a combination of information from Table 2.1 within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]** with further clarity provided on the potential effects arising from the Suffolk Onshore Scheme for each of the sub-factors listed within the LDA Design Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators V1.8 2016 document. This demonstrates that the non-significant effects reported within Table 2.1 of **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]** at construction and operation (and maintenance) remain justified. As no significant effects are likely from the Proposed Project alone on the SECHAONB or its setting, there are no further mitigation measures proposed. The inter-project cumulative assessment for the SECHAONB and its setting has been split out into each of the Natural Beauty Indicators and Special Qualities Indicators within **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**. This concludes that there is potential for significant adverse inter-project cumulative effects, for a short and temporary period, on the Natural Beauty Indicators due to the potential simultaneous or sequential construction of the Proposed Project with other projects. As set out in **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]** the enabling works and installation works for the Suffolk Landfall would last for a duration of approximately six months. These cumulative effects are unlikely to remain once all projects are operational and the Suffolk Onshore Scheme landfall compound and HVDC cable corridors are reinstated, and the mitigation planting becomes established over time. These embedded mitigation measures are set out within the Suffolk oLEMP (**Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [CR1-045]**) and the Register of Environmental Actions and Commitments (REAC) (**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3**)**. The oLEMP is secured through Schedule 3 Requirement 6 of the draft DCO (**Application Document 3.1(F) draft Development Consent Order** submitted at Deadline 3).

Reference	Question to:	Question	Applicant's Response
			No further additional mitigation measures are considered to be appropriate due to the temporary nature of the works.
1LVIA10.	Applicant	**Acid grassland** The ExA notes that the preferred area of acid grassland enhancement shown on plate 3.2 of [REP1-120] is considerably smaller than the area shown in the order limits. Is it the applicant's intention to update the extent of area 2 on figure 4 of the oLEMP - Suffolk [CR1-045] to show the smaller area? The ExA also notes that the title of figure 4 is incorrect and needs to be revised. Provide clarification as to whether the applicant still intends to restore area 2 on figure 4 [CR1-045] and whether this would be for the lifetime of the project or some other period of time. Given that enhancement of the acid grassland is to offset damage to acid grassland caused by the proposed development, explain how it can also be considered an enhancement of the NL. Provide a response to NE's comments in [REP2-059].	The plot identified in the Order Limits is approximately 26 ha to enable flexibility over how and where the 6 ha of enhancement can be delivered in conjunction with landowner requirements. This is set out at paragraph 5.3.2 within the oLEMP (**Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [CR1-045]**). Ongoing landowner discussions have indicated that the landowner wishes to continue to farm the northern parcel of land identified as Area 1 in Figure 4 of the oLEMP. Consequently, the preferred area for acid grassland enhancement would be the parcel of land within the south of the site as shown on Plate 3.2 of **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**, which equates to 6 ha. Figure 4 within **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [CR1-045]** will be updated at Deadline 4 to show the revised area of acid grassland enhancement in line with that shown on Plate 3.2 within **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**. 'Area 2 – acid grassland enhancement' on Figure 4 of **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [CR1-045]** refers to the part of the proposed acid grassland area which is to be enhanced. As noted above, this area has been further refined in discussion with the landowner and will be updated in line with the area shown on Plate 3.2 within **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]** at Deadline 4. The acid grassland would be enhanced and subsequently maintained for a 10 year period and then returned to the landowner, further details on the timelines are detailed in Plate 3.1 of **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]** which illustrates that the Applicant will start restoring the degraded grassland before the existing grassland is lost to the Proposed Project. Refer to response 1ECOL21 for further details and justification on the proposed 10 year maintenance period. The parcel of acid grassland enhancement identified on Plate 3.2 of **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]** provides a multifunctional enhancement with landscape, ecological and biodiversity provision within the context of the SECHAONB. The Section 85 technical note **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]** provides greater detail on how the acid grassland enhancement will provide enhancement to the SECHAONB, this includes a contribution to the aspirations within the SECHAONB Management Plan 2023-28 (set out at 3.2.4), such as promoting local distinctiveness, nature recovery and increasing biodiversity. Tables 3.2 and 3.3 also set out how the acid grassland enhancement works respond to the Natural Beauty and Special Qualities Indicators, including improved habitat structure for wildlife, forming a larger area of enhanced condition of this habitat contributing towards the distinctive sense of place, resulting in a comparatively wilder and more tranquil land use within the AONB as a result of the improved land management practices, providing nesting habitat for protected species, reducing in invasive species presence and enhancing regulating ecosystem services. With regard to Natural England's landscape comments included on Tab H within **Application Document Comments on any further information/submissions-Natural England Risk Issues Log [REP2-059]**, the Applicant provided responses to Natural England at Deadline 2 within **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** and continues to engage with Natural England on the points raised within the issues log. Within **Application Document Comments on any further information/submissions-Natural England Risk Issues Log [REP2-059]**, Natural England notes that there has been no change to their RAG rating since submission of their Relevant and Written Representations pending their review of documents; therefore it is not considered that there are further responses that can be made at Deadline 3.
1LVIA11.	Applicant	**Heritage Coast** The ES Part 2, Chapter 1 Suffolk Landscape and Visual [APP-048] makes numerous references to the impacts on the Heritage Coast being assessed in appendix 2.1.C Landscape Designation and	The Suffolk Heritage Coast is defined and not designated. As set out in **Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096]**, Heritage Coasts are protected and promoted by Natural England in association with local authorities. A proportion of the Suffolk & Essex Coast & Heaths AONB is also defined as Suffolk Heritage Coast within the landscape and visual study area and the Suffolk Heritage Coast extends offshore. **Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096]** also sets out the additional objectives of the defined Heritage Coast, including "*conserving the environmental health and biodiversity of inshore waters and beaches, and to extend opportunities for*

Reference	Question to:	Question	Applicant's Response
		Landscape Character Assessment [APP-097]. There is very limited assessment of the effects on the Heritage Coast in that document, although the designation is included in tables 1.11 and 1.12 of [APP-048]. Provide an explanation of how the effects on the Heritage Coast have been assessed, including evidence base and methodology, as it is not clear how the summary has been arrived at.	*recreational, educational, sporting and tourist activities that draw on, and are consistent with, the conservation of their natural beauty and the protection of their heritage features*". The adopted approach to the separate assessment of effects where differences on the Suffolk Heritage Coast and SECHAONB was discussed in detail and agreed during pre-application thematic meetings with the Suffolk & Essex Coast & Heaths National Landscape Partnership as noted within **Application Document 9.42 Draft Statement of Common Ground Between National Grid Electricity Transmission and the Suffolk & Essex Coast & Heaths National Landscape Partnership [REP1A-034].** This approach was also agreed with Suffolk County Council and East Suffolk Council (see **Application Document 7.4.8 Draft Statement of Common Ground East Suffolk Council and Suffolk County Council [APP-329]** respectively). Albeit noting that the Suffolk Heritage Coast is not designated, it was agreed as a worst case scenario to present the effects as those associated with the SECHAONB due to the similarities in the baseline conditions between the SECHAONB and the Suffolk Heritage Coast and to identify separately where there would be differences in effect. Such differences comprise the area offshore due to direct effects at construction including from vessels. This is clearly explained within Section 2.1.2 - 2.1.4 in **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**. The rationale is provided within **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]** where the marine elements of the Proposed Project are detailed. The nearshore vessels and equipment are set out within Table 4.11. This includes consideration of effects on recreational activities and visual relationship during construction. The methodology adopted follows the approach for all other receptors in the landscape assessment (contained within **Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]**) and the evidence base is contained within paragraphs 1.1.8 to 1.1.11 within **Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096]**.
1LVIA12.	Applicant	**Visualisations** The ExA notes that type 1 and type 3 visualisations have been provided in the application documents. In view of the nature and scale of the proposed development, the sensitivity of the context and the magnitude of the effects that have been identified, provide an explanation as to why type 4 visualisations have not been provided, with reference to the guidance in the Landscape Institute Technical Guidance Note 06/19. Provide an explanation of how type 4 visualisations would differ from the type 3 visualisations that have been provided, in terms of the photographic equipment, presentation of the information, locational accuracy and whether the data used is verifiable. Summarise the purpose and use of the type 3 visualisations and the extent to which they have been supplemented	Table 2, page 11 of Landscape Institute Technical Guidance Note 06/19 (TGN 06/19) sets out the differences between the visualisation types (Type 1-4) considering three key areas: Photographic Equipment, Locational Accuracy, Data & Presentation. As identified in **Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]** and **Application Document 6.3.3.1.A ES Appendix 3.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-143]** the photography and visualisations reflect the following aspects of the guidance: **Photographic Equipment**: To meet Type 4 requirements a tripod, panoramic head and Full Frame Sensor (FFS) camera and 50 mm focal length (FL) lens must be used. As identified in **Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]** and **Application Document 6.3.3.1.A ES Appendix 3.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-143]** the photography uses a full-frame Single Lens Reflex (SLR) camera with a fixed 50 mm focal length lens mounted to a panoramic head on a tripod, therefore entirely complying with the Type 4 photographic equipment requirements. **Locational Accuracy**: Source of camera/viewpoint location data - to meet Type 4, the following is required – "*Use best available data: High resolution commercial data, LiDAR, GNSS or measured / topographic surveys*". As identified in **Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]** and **Application Document 6.3.3.1.A ES Appendix 3.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-143]** the position of the camera head is recorded using a Global Navigation Satellite System (GNSS) receiver which provides an accurate GPS position including camera elevation which complies with Type 4 camera/viewpoint location data requirements.

Reference	Question to:	Question	Applicant's Response
		by other evidence such as site visits, professional judgement in undertaking the overall assessment? Furthermore, the ExA notes that the winter year 15 visualisations at the following viewpoints do not allow a proper assessment as there are significant obstructions in the foreground due to crops. Therefore, for Suffolk viewpoint 8a provide a year 15 winter visualisation.	Survey-verified (camera position and survey features being recorded by highly accurate survey processes) – Type 4 requirements are for survey verified '*when appropriate'*. As identified in **Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]** and **Application Document 6.3.3.1.A ES Appendix 3.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-143]** the camera position and elevation have been recorded using accurate GPS position using a GNSS receiver. However, the features in the view have not been recorded by highly accurate survey processes as this was impracticable given the requirement for a surveyor to access many different private land parcels within each view to place target points to survey. Instead, detailed point cloud survey data has been used to match exact locations of fixed structures visible in each photograph. This is recognised as an acceptable approach noted in Appendix 11.4 of TGN 06/19 and is therefore in accordance with the parameters of Type 4 survey-verification set out in the guidance. **Data & Presentation**: The data and presentation of the visualisations adhere to all of the Type 4 requirements set out in Table 2 of TGN 06/19 including the requirement that the visualisations are verifiable, meaning that the photographic process and image scaling is capable of being verified by reference to the original photograph and metadata. In summary, the photography and visualisations fully adhere to the requirements in TGN 06/19 for Type 4 visualisations except for the survey data as the features in the view were not fully surveyed. This is why the Applicant has described the visualisations as Type 3. As explained above, TGN 06/19 recognises that survey-verification is required '*when appropriate*' and that the use of detailed point cloud survey data along with highly accurate recording of camera position is an accepted alternative approach, when survey data is not available. The visualisations are scale verifiable and comply with the aims of Type 4 (*photomontage/photowire/survey/ scale verifiable*) which represent scale, context, form and extent of the Proposed Project within the view. The visualisations have been used as a tool in the LVIA process, along with various site visits in different seasons, Zone of Theoretical Visibility Mapping and professional judgement and experience of similar projects. The visualisations are not the assessment in themselves but provide an accurate representation of the maximum parameters of the Proposed Project. The visualisations were taken out on site and have informed the landscape and visual assessments, particularly to understand how the vertical scale of the Proposed Project has the potential to appear in views at different distances and angles. With regard to the comment on the year 15 visualisations, it is acknowledged that for Viewpoint 8a that a hedgerow in leaf within the summer photography blocks the view towards the Friston Substation (shown on sheet 2 of 4 in **Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209]**). The summer photography was taken in 2023, and the winter photography was taken in 2024 which shows the replanted hedgerow as whips. The year 15 assessment has applied a worst-case approach and does not assume that the replanted hedgerow in the foreground would greatly filter views in the direction of the Friston Substation during winter nor fully screen views during summer. The Applicant considers that a full assessment of visual amenity for Viewpoint 8 has been carried out and is presented within **Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]**. The visualisations accompany the assessment which has been informed by extensive site work and professional judgement. A year 15 winter visualisation for Viewpoint 8a is provided at Appendix B 1LVIA12 - Winter Year 15 Visualisation for Viewpoint 8 (a) - Public Bridleway (Friston 260, route 2), East of Friston, Looking Northwest within **Application Document 9.73.1 Applicant's Reponses to First Written Questions – Appendices** submitted at Deadline 3. This shows the upper extent of proposed native woodland planting visible above the layered vegetation network in the view and demonstrates that the detailed assessment and conclusions contained within **Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]** remain unchanged (the year 1 winter and year 15 summer significance of effect are both reported to be minor adverse (not significant) for Friston Scenario 2). The mitigation planting shown is based on Figure 5 in the oLEMP (**Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [CR1-045]**). The

Reference	Question to:	Question	Applicant's Response
			mitigation planting at year 15 is not shown on bunding as the extent of this is not known and would be determined at the detailed design stage.
1LVIA13.	Applicant	**Coordination** Applicant - The ExA notes that the Coordination Document [APP-363] sets out opportunities for coordination in terms of project development and project delivery. Several opportunities for coordination in terms of landscape planting and mitigation are identified, particularly in relation to Friston substation and Saxmundham converter station and the phasing of development. The ExA notes that there are also opportunities for coordination in relation to the landfall in Suffolk, that could help to mitigate effects on the NL. Provide an updated version of [APP-363] which explains how coordination would be secured.	Coordination is either embedded into the design of the Proposed Project, or it will be delivered and realised through ongoing collaboration with third party developers in a way that builds on the opportunities presented by the embedded approach. Where coordination is embedded, for example through routing and siting of infrastructure, the incorporation of co-location opportunities, or the provision of optionality or flexibility to avoid constraining future design decisions of other developers, this is already reflected in and secured by the design itself (and the lines and situation on, for example, the Work Plans). Inherent in the approach to coordination however is the recognition that other projects with which there may be opportunities to coordinate are at different stages in their development and are being progressed by other developers whose decision making is entirely independent of the Applicant. This means that it is not feasible or desirable to seek to secure outcomes at this stage, as these are currently unknown and out of the exclusive control of the Applicant. However, as set out in **Application Document 7.10 Coordination Document [APP-363],** coordination has been considered at the strategic and detailed stages of the Project with coordination with other projects occurring over several years. This has had a profound influence on the development of the Project and resulted in coordination opportunities being considered and, where practicable, delivered as shown through consideration of the siting of the converter stations; shared cable routes; and careful siting of landfall particularly in Suffolk. There are also opportunities which are proposed to be delivered in the future as part of detailed design and delivery stages. These opportunities are being explored through ongoing dialogue with other developers. In section 4.4 and 8.2 of **Application Document 7.10 Coordination Document [APP-363]** the Applicant explains that it is committed to ongoing engagement with other project promoters to secure coordination benefits and explore further opportunities for coordination. In terms of the coordination of landscape planting and mitigation at Friston Substation and the Saxmundham converter station, the Proposed Project has taken specific measures to deliver and facilitate a coordinated approach. **Landscape planting and mitigation at Friston Substation** At Friston Substation, the Outline Landscape and Ecological Management Plan **(Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-046]** explains that the Order limits have been extended to allow future design details to be developed with Scottish Power Renewables (SPR) to ensure their planting is not subsequently removed by the Proposed Project. The wide Order Limits and cable Limits of Deviation in this area are intended to afford flexibility in the final routing of the Proposed Project's AC and DC cable routes, to allow the Proposed Project cables to be designed in a coordinated way with the landscape masterplan being developed by Scottish Power Renewables (SPR) as part of its implementation of the East Anglia 2 DCO. This recognises that while the outline design approved as part of the East Anglia 2 (and East Anglia 1) projects may be refined as a detailed landscape masterplan is developed by SPR, the flexibility afforded to the Proposed Project cable routes means that the various projects that interact in this area remain compatible. Appendix D 1LVIA15 Coordination with Friston Substation Landscape Mitigation Technical Note (within **Application Document 9.73.1 Applicant's Reponses to First Written Questions – Appendices** submitted at Deadline 3) details the latest coordination efforts with regard to landscaping mitigation at Friston Substation with SPR. **Landscape planting and mitigation at Saxmundham Converter Station** At the Saxmundham Converter Station, the Outline LEMP (**Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]**) discusses an adaptive landscape design approach at the Saxmundham Converter Station Site (whereby the landscape across the wider site would be developed out by different developers, commensurate with the number of projects and their cumulative impacts) and Section 7.6 of the Outline LEMP (**Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]**) commits to a detailed landscape and ecological design for the Saxmundham Converter Station site developed collaboratively with the National Grid Venture (NGV) project teams to ensure that the function of the outline landscape mitigation contained in this Outline LEMP is maintained; This would be demonstrated in the detailed LEMP which will need to substantially accord with the Outline LEMP as

Reference	Question to:	Question	Applicant's Response

secured by requirement 6 of the draft DCO (**Application Document 3.1 (F) draft Development Consent Order** submitted at Deadline 3).

The Saxmundham Converter Station Site has been developed alongside a site-wide coordinated masterplanning exercise, which is explained in detail at sections 6.2.40 to 6.2.44 of **Application Document 7.10 Coordination Document [APP-363].** In developing the detailed design for the Saxmundham Converter Station, design principle CO.1 in Table 3-1 of **Application Document 7.12.1 Design Principles- Suffolk [APP-366]** commits the Applicant to exploring opportunities for coordination between Sea Link and the other colocating projects to identify actions that could reduce overall impacts, make the most efficient use of resources, and deliver a coordinated landscape masterplan**.** The Applicant will demonstrate this has been explored as part of submitting details for discharging requirement 3 of the draft DCO (**Application Document 3.1(F) draft Development Consent Order** submitted at Deadline 3).

Landfall in Suffolk

Opportunities to coordinate activities at the landfall site in Suffolk would depend on whether there are other projects being developed in the vicinity, which would be dependent on routing and siting decisions made by other projects. At earlier stages of the Proposed Project, the Applicant considered the possibility of the landfall being co-located with the landfalls of other emerging projects, namely the National Grid Ventures (NGV) Nautilus and LionLink interconnectors. The landfall at Aldeburgh was identified in part due to its potential capacity to accommodate up to three sets of DC cables, and this 'co-location option' was presented at the statutory consultation stage. Since then, the NGV Nautilus project has moved away from Suffolk altogether, and the NGV LionLink project has confirmed that it has discounted a landfall at Aldeburgh and is progressing landfall options elsewhere at Southwold/Reydon and Walberswick. The Applicant considered whether the emerging LionLink landfalls would be preferable for the Proposed Project and concluded that they would not be. The reasons for this are set out in sections 6.2.25 to 6.2.30 of **Application Document 7.10 Coordination Document [APP-363].** Therefore, there is not currently anticipated to be any opportunity to coordinate with other projects at the landfall in Suffolk. Notwithstanding this, the measures taken to avoid, reduce, and mitigate impacts on the National Landscape are set out in **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]**.

Highways

The Applicant is actively coordinating with other developers such as Sizewell C, NGV, and SPR to minimise highways impacts on host communities. It is in the Applicant's interests to ensure that a coordinated approach with other schemes takes place to ensure efficiency and delivery of the construction phase logistics. For example, opportunities to share accesses and temporary construction areas and storing material on site for future projects to reduce cumulative construction vehicle trips will be explored.

Securing mechanisms

Notwithstanding that it would not be feasible or desirable to secure specific outcomes for project delivery at this stage, the Applicant proposes to secure the process by which coordination is further explored through the construction management plans. The Applicant is proposing to include commitments to explore coordination opportunities in future updates of the **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127]** (CEMP); the Outline Construction Traffic Management Plans (CTMPs) (**Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan- Suffolk [CR1-041]** and **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338])** and the Outline PRoWMPs (**Application Document 7.5.9.1 Outline PRoWMP – Suffolk [CR1-047]** and **Application Document 7.5.9.2 Outline PRoWMP – Kent [APP-353])** to be submitted at a later examination deadline. The detailed onshore CEMP, CTMPs and PRoWMPs will need to substantially accord with the outline plans as secured by requirement 6 of the draft DCO

With respect to securing the coordination process through the detailed design stage, as discussed above, this is already secured for the Saxmundham Converter Station as set out in the Outline LEMP and secured through the detailed LEMP under requirement 6 of the draft DCO (**Application Document 3.1(F) draft Development Consent Order** submitted at Deadline).and as part of demonstrating accordance with design principle CO.1 in **Application Document 7.12.1 Design Principles- Suffolk [APP-366]** which will need to be demonstrated for the discharge of requirement 3 of the draft DCO.

Reference	Question to:	Question	Applicant's Response
			Updating the Coordination Document Given the ongoing dialogue the Applicant considers that an update to the Coordination Document would not be as helpful to the Examining Authority now and therefore proposes that this document is updated at a future examination deadline once outcomes of the discussions and SoCGs with other developers are more advanced.
1LVIA14.	Applicant	**Landscape and visual effects of new access from the B1121** Provide a response to SCC comments at deadline 2 Ref A1.2 in relation to the need for a more thorough assessment of the effect of a new bell mouth construction and road from the B1121 to the proposed converter station, including the need for appropriate visibility splays along the B1121 to be provided, and the implications for the existing roadside hedge. Provide a response to SCC's comment at deadline 2 that there is a consented and constructed access further south on the B1121 in close proximity which needs to be included in the design considerations.	The Suffolk County Council **Application Document comments on any further information comments at Deadline 2 [REP2-062]** query whether the landscape and visual effects of the bell mouth construction along the B1121 and proposed permanent access road from the B1121 to the proposed River Fromus bridge have been sufficiently reflected in the assessment of effects. Those receptors to which this would be relevant would be from Viewpoints 2 and 20 and Landscape Character Areas (LCAs) B4: Fromus Valley directly and LCA O1: Benhall Estate Sandlands indirectly. The vegetation removal along the B1121 to facilitate the new bell mouth junction including associated visibility splays would include a section of hedgerow to the north and south of the existing break in vegetation which currently provides field access. The use of the existing break in hedgerow planting for the permanent access from the B1121 would limit the permanent hedgerow loss. Hedgerow planting would be reinstated to respect sight line requirements and to tie into the proposed hedgerow along the permanent access road and existing sections of hedgerow along the B1121. Regarding the permanent access road, the proposed hedgerow and occasional tree planting is shown on Figure 1 within **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [CR1-045]** and the design of which is further explained within the response to Written Question 1LVIA3 above. The construction activity associated with the permanent access road, includes consideration of the bell mouth construction including the temporary removal of hedgerow vegetation along the B1121 and has been described in the assessment of effects on the landscape and visual receptors noted above (detailed within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]** and **Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]**). This includes reference to vegetation removal to the east of the B1121, alteration to the landform associated with the construction of part of the permanent access route from the B1121 and the effects on the field pattern arising from the addition of the permanent access road. The summary of effects on users of the B1121 from sections 1.1.57 to 1.1.59 within **Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]** also sets out that views are available from this route through gaps in the intervening hedgerow vegetation. The temporary hedgerow removal along the B1121 is not shown on the visualisations from Viewpoints 2 and 20 (contained within **Application Document 6.4.2.1.10 Representative Viewpoint Visualisations [APP-209]**) as it would not be visible within the field of view. As noted above, from a short section of the B1121, this temporary vegetation removal would be apparent in views from road users and would allow direct views of the construction works associated with the Suffolk Onshore Scheme. From other locations within the PRoW network in the landscape to the west of the B1121, visibility of the temporary hedgerow removal would be dependent on the angle of the view and the relative topography. In some locations, hedgerow removal would be partially visible, though typically only the upper sections would be seen. The remainder would remain screened by existing intervening hedgerows immediately west of the B1121, which would not be affected. The exception to this would be where a small break exists in the hedgerow along the western edge of the B1121 for field access where a glimpsed view would be experienced. Since the assessments detailed in **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]** and **Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]** were authored, a section of the hedgerow vegetation along the B1121 has been removed. This is associated with Planning Application DC/24/4367/FUL for a 'Change of Use From Agricultural Land to Dog Walking and Exercising Facility and Formation of Vehicular Access'. This change of use, including a small area of parking and 2 m high safety fencing around the enclosure, will introduce development into the Fromus Valley landscape, reducing the relative tranquillity and increase movement on the approach to Saxmundham. As a result of the recent roadside vegetation removal,

Reference	Question to:	Question	Applicant's Response
			road users along an increased section of the B1121 would experience views towards the construction and operational infrastructure associated with the Suffolk Onshore Scheme. Dependent on reinstatement timescales of the B1121 hedgerow associated with the change of use application, there might be some low-level hedgerow planting in place although it is unlikely to have the same partial screening effect that the previous hedgerow provided. A review of the proposals under Planning Application DC/24/4367/FUL has shown that there is an overlap between the Proposed Project's Order Limits and the proposed dog walking facility. The proposed construction compound at this location (S01) would take on a considerable portion of the dog walking field. As noted by SCC, the proposed accesses are in close proximity to each other and therefore it is unlikely that both accesses would be able to coexist for operational and safety reasons. The Applicant has been in discussion with the landowner over this matter and it is understood that the landowner intends to set up the dog walking field during Spring of 2026. The Applicant would continue to engage with the landowner over potential compensation for the loss of use of the dog walking field (approximately eight to twelve months from starting once the bridge is complete and the main compound at Wood Farm is up and running) and then reinstate the area once the construction compound is no longer needed. It is the Applicant's intention to construct the bellmouth and access off the B1121 as shown within the application documents and provide a spur off to access the dog walking field. A gate could also be provided, once the site is operational, for dog walkers to access the field whilst keeping the converter site secure.
1LVIA15.	Applicant	**Coordination with Friston substation landscape mitigation** Provide a response to SCC's comment at deadline 2 Ref A2.1 in relation to the need for HDD to connect to the substation to avoid undermining SPR mitigation planting.	The Applicant disagrees that there is a need to HDD the HVAC and HVDC cables where they connect to the substation to avoid undermining SPR's mitigation planting. Further details on all points below are provided in Appendix D with a summary presented below. Question 1LVIA15 references a comment made by SCC in table A2 – 2.3 Landscape and Visual in **Comments on Submissions Received by Deadline 1 and 1A [REP2-062]** from Suffolk County Council**.** This comment in full reads as follows: *'Whilst SCC welcomes greater coordination between the Applicant and SPR, it does not see how this could avoid compromising the effectiveness of the landscape mitigation planting implemented by EA1N and EA2 along with the accompanying footpath around the substation. ESC explains in paragraphs 6.4.3.5 and 6.4.3.6 of its LIR [REP1-128] that the mitigation planting could not be replaced if open cut cable installation is used due to root interaction with the cables causing permanent reduction in the effectiveness of that mitigation. This concern also applies to the footpath being created by SPR around the substation site which would face closure and disruption through Sea Link's open cut connection to the Kiln Lane substation. This would likely influence the habits of users and reduce future usage due to lengthy disruption and would require reinstatement. SCC does not see how the Applicant's commitment to coordination will secure avoidance of these impacts. SCC therefore reiterates its position that HDD should be used to connect to the Kiln Lane substation where the cable route interacts with SPR's mitigation as a necessary measure to avoid impacting that mitigation as far as possible.'* In response to this comment, the Applicant's position is that: • Sea Link does not compromise the effectiveness of the landscape mitigation planting implemented by SPR because: – Sea Link does not materially affect mitigation in the SPR consents as secured in the DCOs (i.e. as detailed in the Outline Landscape and Ecological Management Strategy). – The Applicant is aware that SPR has been considering introducing additional planting at the site that is not specified in the SPR consents; and that drafts have been consulted upon, including with SCC and ESC. This additional planting includes proposing the introduction of a continuous woodland belt to the north of Friston substation that was not included in the OLEMS. However, additional planting in the area of Sea Links cables has not yet been approved and does not form part of the consents. Further, in the Applicant's view the continuous woodland belt in the location of Sea Link's cables would not comprise essential mitigation for either the SPR projects or Sea Link. – Even if the additional planting proposed by SPR were considered essential mitigation, the interaction between Sea Link and the additional planting SPR has been considering is localised and limited to requiring planting of hedgerows rather than trees where additional planting is located over underground cables. It is not considered that this would compromise the functionality of the landscape framework being prepared by SPR.

Reference	Question to:	Question	Applicant's Response
			• SCC is correct that planting trees over cables that form part of the national transmission network can be problematic due to the risks associated with high voltage cables and tree roots; and the criticality of the national grid transmission network. However, the presence of trees over high voltage cables can be problematic regardless of whether cables are installed through open cut trenching or using trenchless methods such as Horizontal Directional Drilling (HDD) as the issue is whether the cables are sufficiently below the tree roots rather than how the cables are installed. Therefore, it is incorrect to assume that this issue would be easily solved through a different installation technique. • Where it is necessary to install cables under trees (or plant trees over cables), the cables would need to be installed at a depth that ensures cables would not affect or be effected by the tree roots either through damage or drying out of the ground. Where the depths are achievable based on the geology the cables would then need to be rated, sized and spaced apart to accommodate the additional depth required. Where cables are buried deeper this has an effect on the rating due to the inability for the heat to dissipate from the cables. HDD is particularly challenging for the high voltage alternative current cables (HVAC) cables north of Friston because a shallow cable burial is required to achieve the cable rating; meaning that it is not possible to install the currently proposed cables at the depth required to pass under trees. Theoretically, it would be possible to increase the size and therefore rating of the cable, however, this would be challenging for a number of reasons, including that it would likely involve the installation of a cable design that is not currently used anywhere on the National Grid transmission network and it is unclear whether the manufacturer of the cable procured has a commercially available product suitable for use. Therefore, whilst this is a theoretical possibility, it would add technical complexity and risk and is not a solution that would be pursued unless absolutely necessary. The Applicant does not agree that this test is met. • The installation of Sea Link cables would not result in lengthy disruptions for users of the PRoW to be created and diverted by SPR. The footpath would be diverted during the open cut, with any diversion in place for approximately a week. It is not considered that this length of diversion would result in changes to the habit of users, particularly as the diversion would in place prior to the works affecting the footpath resulting in no closures. The SCC response also assumes that a HDD solution would not result in any disruption. This is incorrect because footpaths need to be closed when HDD is occurring under the routes and these routes would be closed for a short time whilst this takes place and the diversion option would not be appropriate so unlike an open cut solution, HDD would likely be a closure, albeit a very short one. It is therefore not considered that the impact of the installation technique on users of a future footpath would justify use of HDD. • It is agreed that the footpath would need to be reinstated. The temporary diversions discussed above would be managed through the Public Rights of Way Management Plan to be discharged under requirement 6. For all the above reasons, the Applicant disagrees with the contention that there is a need to HDD to avoid undermining SPR's mitigation planting.
1LVIA16.	Applicant	**Pylons** Provide clarification as to whether the pylons in Kent assessed in landscape and visual assessment and visualisations include the vertical limit of deviation of up to 6 metres. If they have not been assessed as worst case scenario provide an explanation as to why. If the visualisations have not been based on worst case scenario, provide an explanation as to whether the landscape and visual impact assessment (LVIA) is based on the maximum limits of deviation and therefore takes into account the maximum height of pylons.	The LVIA has been undertaken using the worst-case scenario parameters including those reflecting the maximum flexibility of the vertical limit of deviation (LoD) of the towers of up to 6 m (refer to Table 1.8 on page 44 of **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]**). The visualisations use a 3D model based on the tower types and heights shown in Table 4.7 of **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]**. These visualisations do not include the 6 m vertical limit of deviation as the 3D tower models use actual tower types (L8 and L12 models as identified in Table 4.7 of **Application Document 6.2.1.4 (B) Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-018]**). The vertical LoD allows for up to two, 3 m extension sections to be added if needed to allow for changes in the design alignment where greater separation between conductors at the towers is needed to meet safety clearance requirements, which would be determined at detailed design. These are more likely to be an issue at termination or tension towers if the angle of the conductors changes due to the need to move a tower slightly for other reasons such as to meet environmental constraints. It is not currently envisaged that heights beyond those modelled in the visualisations and shown in Table 4.7 of **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]** will be necessary, however, the flexibility allowed for in the vertical LoD is required for detailed design. Notwithstanding the above, visualisations are a tool used to support the professional LVIA process and are not the assessment itself. The LVIA is based on the maximum limits of deviation and therefore considers the maximum potential height of the pylons.

Reference	Question to:	Question	Applicant's Response
			Professional judgement and experience have been used to interpret what that would look like in views and is reflected in the assessment contained in the LVIA.

3. Ecology and Biodiversity

Table 3.1 Ecology and biodiversity

Reference	Question to:	Question	Applicant's Response
1ECOL01.	Applicant	**Chartered Institute of Ecological and Environmental Management Guidelines** The applicant's assessment of likely significant biodiversity effects is based on the Chartered Institute of Ecological and Environmental Management 'Guidelines for Ecological Impact Assessment in the UK and Ireland Terrestrial, Freshwater, Coastal and Marine', September 2018. An update to the guidelines was published in September 2024. Provide commentary on the implications of the updated guidelines, if any, for the assessment of likely significant effects**.**	Page 4 of the 2024 Chartered Institute of Ecological and Environmental Management (CIEEM) guidelines (CIEEM, 2024) provides a table explaining the changes made since the original 2018 version of the guidance. Most of the changes made to create the 2024 guidelines are related to semi-natural peatland habitats, which are not relevant to the Proposed Project. There has been no substantive change to the assessment methods and terminology in the guidelines since the 2018 version. This is why the 2018 version was referenced in the submitted application. There is therefore no implication for the assessment of likely significant effects.
1ECOL02.	International Union for Conservation of Nature (IUCN)	**International Union for Conservation of Nature** Paragraph 1 of the IUCN representation states that "the proposed infrastructure developments are not compatible with the UK commitments to the criteria and standards for an IUCN Category V protected area". Confirm what these commitments comprise.	
1ECOL03.	Applicant	**River Fromus Bridge – impact on macro-invertebrate passage** The ExA notes the EA's [REP2-050] revised position on the soffit height of the River Fromus bridge (now 4m above Q95 flow level but with a monitoring and contingency plan for invertebrates). Confirm whether it is intended to submit an outline monitoring and contingency plan to the examination and if not, why not.	The Applicant intends to submit an outline monitoring and contingency plan, to be prepared in consultation with the EA, at a future deadline following discussion with the EA.
1ECOL04.	Applicant	**Suffolk/Kent – HDD failure** Consistent with paragraph 2.8.229 of NPS EN-3, provide a mitigation plan to account for the possibility that HDD fails, or signpost to where this information is provided. Any alternative plan should provide justification as to why the alternative plan is the least impactful method possible.	HDD has been selected as the preferred methodology for the Kent and Suffolk Landfalls because it offers greater flexibility to adapt to ground conditions during drilling than alternative trenchless methods. HDD provides the ability to redrill on parallel or deeper alignments with no, or minimal, change required in positioning of surface equipment. In the unlikely event that repeated attempts at installation of ducts using HDD fails (and in accordance with paragraph 2.8.229 of NPS EN-3 (UK Government, 2023)), the mitigation plan is to install with alternative trenchless options. Appendix A Landfall HDD Feasibility Technical Note of **Application Document 7.3 Design Development Report [APP-321]** identifies Direct Pipe as the most feasible alternative trenchless methodology for the landfalls at Suffolk (Section 2.5.1 of **Application Document 7.3 Design Development Report [APP-321]**) and Kent (Section 3.6.1 of **Application Document 7.3 Design Development Report [APP-321]**). The document identifies Microtunnelling as an additional alternative trenchless method. The trenchless alternatives of Direct Pipe and Microtunnelling options would utilise the same entry and exit points as HDD, with the ducts passing at depth below the intertidal and coastal habitats between entry and exit. The Direct Pipe and

Reference	Question to:	Question	Applicant's Response
			Microtunnelling methods require less onshore plant and machinery and similar, or less, offshore/nearshore plant, machinery and vessels. The construction programme for Direct Pipe and Microtunnelling is shorter than for HDD because the ducts are installed in a single pass; compared to the 2 or more passes required to enlarge an HDD bore to the final diameter. Therefore, the alternative mitigation plan will not result in any greater environmental impacts than the HDD trenchless technique, satisfying the least impactful alternative requirement.
1ECOL05.	Kent Wildlife Trust Natural England Local authorities	**Biodiversity net gain measures – Kent landfall** Noting that National Grid Ventures is a separate legal entity to the applicant, can Kent Wildlife Trust (KWT) explain whether there are any measures that could be taken to reduce the residual impact of the National Grid Ventures Nemo Link works at the landfall site or to enhance this land. Local authorities to also provide comment.	
1ECOL06.	**Applicant** Kent Wildlife Trust Natural England Thanet District Council	**Former hoverport (Kent) – species surveys** The applicant's responses to selected RR responses [REP2-022] notes that terrestrial invertebrate surveys (such as for the fiery clearwing moth and Sussex Emerald) were not undertaken at the hoverport site due to lack of access agreement but the open tarmac and hardstanding areas through the site are sufficient for vehicles to access the intertidal area without vegetation clearance. No detailed botanical surveys or reptile surveys have been undertaken at the site, presumably also due to access arrangements. The site has been identified as hosting invasive, non-native (INNS) plant species and being potential reptile habitat. Can the applicant: Provide an annotated aerial photograph showing an indicative vegetation-free construction traffic route. Explain whether any works would be required to reinforce the access route. Confirm how, in the absence of surveys for reptiles, effects on reptiles can be ruled out and any special measures that might be required to avoid effects on reptiles from construction traffic. Explain whether as a mitigation or enhancement measure, INNS could be managed at the site as part of the Sea Link proposals. Explain whether NE, KWT or Thanet District Council (TDC) would be consulted on the access route. These organisations may wish to comment on the need for consultation on a route.	Annotated aerial photograph An aerial photograph with indicative vegetation free construction traffic route is provided in Appendix I (1ECOL6 Annotated aerial photograph showing an indicative vegetation-free construction traffic route) within **Application Document 9.73.1 Applicant's Reponses to First Written Questions – Appendices** submitted at Deadline 3. Ground level photos taken along this route now that access has been granted by Thanet District Council are also included in Appendix I for completeness. These show open vegetation free areas of tarmac along the identified route. Works to reinforce the route The Applicant can confirm that no works would be required to reinforce access routes through the hoverport. Confirm how impacts on reptiles can be avoided Reptiles will confine themselves to areas of suitable habitat such as scrub, rough grassland and dense ruderal vegetation. While these are abundant across the former hoverport site, reptiles will generally not be found in areas of hardstanding because a) it exposes them to predators and b) the subtle vibration from approaching vehicles or people will normally result in them seeking refuge before there is any risk of them being struck, particularly given the slow moving nature of the vehicles traversing the hoverport. Explain whether INNS could be managed Management of INNS to ensure they are not spread by construction plant is covered by **Application Document 7.5.12 (B) Outline Offshore Invasive Non-Native Species Management Plan [REP1-027]**. The Applicant intends to remediate any invasive species within the working area within the Order Limits but would not remediate invasive species beyond the working area. Explain whether NE, KWT or TDC would be consulted on the access route As landowner, Thanet District Council would be consulted on the access route. While the interest features of the hoverport fall outside the normal interests of

Reference	Question to:	Question	Applicant's Response
			Natural England the Applicant is willing to include them, and Kent Wildlife Trust, in the consultation. A new commitment (B70) has been added to **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3.
1ECOL07.	Applicant	**Azolla Fern** ES Part 3, Kent Chapter 2 Ecology and Biodiversity [REP1-049], paragraph 2.10.2 sets out mitigation for the invasive aquatic plant, the Azolla fern. Explain how the applicant would ensure that Azolla fern is not distributed by the proposed aquatic macrophyte translocation.	Macrophyte translocation may not be feasible where Azolla (or other Invasive Non-Native Species (INNS) is present. It would not be desirable to translocate such INNS to the receptor site along with the target species, as this would represent an offence under INNS legislation, i.e. causing the plant to spread in the wild. While macrophyte translocation is generally considered unfeasible where Azolla (or other INNS) is present, alternative approaches could be explored to mitigate this constraint; however, it is considered that a risk would remain of spreading INNS, thereby representing an offence under INNS legislation. The presence or absence of INNS would be confirmed by pre-works surveys by the Ecological Clerk of Works (ECoW) or suitable qualified ecologist, prior to any macrophyte translocation. This, in combination with the following best-practice biosecurity protocols, would prevent the spread of Azolla: • A Biosecurity Management Plan (BMP) should be prepared and agreed by construction contractor(s) prior to works commencing on site. • The BMP will include 'Check, Clean, Dry' protocol for contractor equipment and PPE to ensure biosecurity (see Check Clean Dry » NNSS). • Toolbox talks by the ECoW to brief Contractors of INNS risks and relevant biosecurity measures. • Pre-commencement checks/surveys for presence of INNS in works areas, including INNS known to be present through previous surveys. • Biosecurity measures adhered to according to CEMP: e.g. plant washing prior to movement, temporary silt fencing along watercourses, storage of excavated materials in allocated areas, stockpile areas inspected for presence of INNS prior to construction and monitored according to requirements of BMP. • Implementation of measures to prevent the transfer of materials off-site or to neighbouring catchments, i.e. maintenance of effective buffer strip/distance, use of temporary silt fencing. • BMP to detail appropriate timescale for regular monitoring of construction areas for occurrence of INNS. A revised wording to commitment B04 is proposed within **Application Document 9.84 CEMP Appendix B Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3, to secure the above measures, would prevent the spread of Azolla.
1ECOL08.	Applicant	**Macrophyte translocation** [REP1-049], paragraph 2.9.262 states that infilling of a 300m ditch would be mitigated by creation of new balancing ponds, scrapes and swales. It is proposed to translocate aquatic macrophytes to reduce effects to minor adverse. What is the success rate of such translocations?	An assessment would be carried out of the suitability of the receptor site (balancing ponds, scrapes and swales) for macrophytes, in order to ensure that macrophyte species being translocated would survive in the receptor site. Otherwise, alternative receptor site(s) would be found (e.g. other ditches in the area) with similar/suitable habitat conditions where these macrophyte species would thrive. Success of macrophyte translocation is dependent upon the species translocated and habitat conditions – hence the need to identify suitable habitat for

Reference	Question to:	Question	Applicant's Response
			the receptor site. Evidence suggests that survival rates are typically between 88-100% in the first season after translocation depending on the species and habitat conditions (Riis, 2009).
1ECOL09.	Applicant	**Bird collision risk modelling** The vantage point survey report and collision risk assessment [REP1A-023https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-001631-6.3.3.2.F%20(B)%20ES%20Appendix%203.2.F%20Vantage%20Point%20Survey%20Report%20(Clean).pdf] for Kent does not appear to take account of the 6 m vertical limits of deviation for the proposed pylons. Provide an updated collision risk assessment that takes into account the maximum limits of deviation, explaining any resultant differences in collision ri sk.	The Applicant notes that Table 4.7 of **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]** gives the tallest pylon tower height as 50.089 m with a Limit of Deviation of 6 m. As set out in **Application Document 6.3.3.2.F (B) Appendix 3.2.F Vantage Point Survey Report [REP1A-023]** the survey that informed the assessment of avian collision recorded flight activity in three different height bands: 0 - <15 m (below power line height), 15 – 50 m (broadly at power line height) and >50 m (above power line height). These recording bands were based on design information available at the time of survey and based on typical pylon tower height and corresponding line height between the towers. Broadly the 'risk height range' was assigned as 15-50 m, but in doing so the subsequent assessment of potential collision risk considered a number of broad criteria and assumptions to provide an exaggerated worst-case scenario (in the absence of a model for determining collision risk being available): • Collision from the pylons themselves was not considered a risk, as it is assumed that birds will visually detect and avoid these large structures. • The risk of collision zone for the suspended power lines encompassed the zone between the vertical upper and lower power line and the horizontal space between the two sets of parallel pylons. The risk height range was likely to be overly precautionary as it included areas beneath the lower cables when accounting for cable 'sag' and empty spaces between sets of power lines. This resulted in a much larger window for collision than actually exists. • All flights within a precautionary 200 m buffer around the proposed new OHL route were included within the dataset for assessment. Even with a 6 m LoD in pylon tower height, the suspended power lines are likely to be within the 15-50 m band. It is noted that the earth wire may be just out of this band when actually joining the tallest tower. However, it is likely to drop into this band in the suspended area between towers. When considered in the context of the above highly precautionary manor in which at risk flights and individuals have been determined, a 6 m LOD in pylon tower height will not materially change the assessment or the conclusions presented and as such no updated assessment is considered necessary.
1ECOL10.	Natural England Kent Wildlife Trust	**Bird diverters** Paragraph 2.10.2 [REP1-049] notes that bird diverters would not be fitted to existing overhead lines. It is not the applicant's intention to do this for existing lines. Does NE consider that there is any need for additional diverters to be fitted to other lines in the area in light of the new mixed wirescape? KWT to also provide comment.	

Reference	Question to:	Question	Applicant's Response
1ECOL11.	Applicant	**Deer** Provide an update on discussions with Sizewell C regarding their approach to management of deer. Confirm whether any project specific measures are likely to be proposed as a result of these discussions.	The Applicant has had several useful discussions with Sizewell C regarding their approach to deer management across the EDF Sizewell estate regarding new planting. EDF have undertaken extensive tree and other vegetation planting across their estate and are therefore able to advise on the degree of risk posed by deer herds (particularly though not exclusively by red deer) to new planting in East Suffolk. Their advice so far has been that it is possible to establish new areas of tree planting notwithstanding the deer populations of the area, and they have successfully established new woodlands on their estate. While understories can be damaged by deer browsing, replanting those understories where required, has generally addressed the issue. The most important phase is the 'establishment' phase when new planting is becoming established. Sizewell C advocate the use of a deer fence (with badger gates) around blocks of new woody planting, and regular checks for at least the first five years following planting to ensure deer have not entered the enclosure and to repair any fencing or replant any damaged vegetation. They also advised that ponds should be naturally lined (e.g. clay) where possible rather than using artificial liners as the latter can be damaged by deer. They have indicated that because the Applicant will not have a significant estate to manage direct deer management is unlikely to be cost effective undertaken specifically for the Proposed Project. However, they have suggested that since the main areas of planting are around Saxmundham it could be possible to take a joint approach to deer management with the Sizewell estate. This could be extended by agreement to cover the Proposed Projects core planting. The Applicant will continue to discuss this with EDF, although we do not consider this is something that needs resolving as part of the DCO determination, instead any specific action that may be required would have to reflect the situation on the ground at the time. Paragraph 6.4.2 of **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]**, does refer to use of deer fencing to protect planting. However, further details will be made at a Deadline 4 to add further details as set out above. No significant change to proposed planting management will be required.
1ECOL12.	Applicant	**Fencing** ES parts 2 and 3, Chapter 2 [REP1-047] and [REP1-049], paragraph 2.8.5 suggests that the haul road would be fenced but that this fence would not go entirely to ground level so mammals, such as badger, would be able to pass under. Explain whether this provision might reduce the efficacy of noise controls, affect site security and whether there are any areas where this might not be appropriate.	Fencing off the entirety of the works is often not required, as access into much of the land that forms the site is generally already restricted. Depending on the use of the land, works can progress in some areas unfenced or with stock fencing to prevent livestock from entering the works. Any accesses will be secured with new fencing and gates to prevent unauthorised access to the works areas or the surrounding land. This fencing can be installed with a small gap at the bottom to allow wildlife (e.g. badger) passage as is common with Heras fencing for example. Some areas will however require security or noise fencing which would require fencing to ground or near ground level. This would include at construction compounds, the converter and substation sites and around open excavations (this would also be needed at such excavations to prevent animals falling into them). For the haul road along the cable corridor only open trenches would be fully fenced and these are likely to be along isolated sections enabling wildlife to detour round any localised fencing to ground level. If gaps in noise fences are required to allow mammals, such as badgers, to pass under or around, the acoustic integrity can be maintained by a number of options, such that the significance of effect reported in the ES remains unaltered. This may include:

Reference	Question to:	Question	Applicant's Response
			• staggering fencing to prevent 'line of sight' but allowing a gap for passage around; • 'backing out' gaps under the fence with a section of fencing or equivalent to create a small section of tunnel, again to prevent 'line of sight' but allow for passage through; • small sections of culvert may be introduced, sloping down at either side, or otherwise introducing a bend, to prevent 'line of sight' but allowing passage through; and • the use of free access 'badger gates' with a solid gate section or otherwise incorporating measures above to prevent 'line of sight' but allowing access.
1ECOL13.	Applicant	**Skylark and golden plover mitigation** Paragraph 5.4.1 of the Suffolk oLEMP [CR1-045] states that a 12ha area of land for skylark mitigation "will be secured by agreement with the landowner or by compulsory acquisition powers included within the DCO". Provide an update on any voluntary agreement obtained. Similarly in Kent, provide an update on any voluntary agreement obtained in relation to the proposed area of functionally linked land.	Suffolk Skylark Mitigation - On 17 November 2025 the Applicant's appointed Land Agent met with the landowner in Suffolk along with the landowner's professional representative to discuss the Heads of Term issued for acquisition. The landowner's preferred stance is to grant a long lease of the land which cannot be mirrored in Compulsory Acquisition terms. The landowner has agreed in principle to grant a lease of the land required for the skylark mitigation with some further discussion on the legal terms to be negotiated. The discussions were positive, and an updated version of the HoTs is being prepared to reflect a long lease rather than acquisition to be issued to the landowner. Kent, Golden Plover – On 3 December 2025 the Applicant reissued Heads of Term to the Landowner's appointed agent for acquisition of the land to seek their feedback on the terms. A follow up email was issued on 18 December. The principle of the sale is agreed with commercial values to be agreed.
1ECOL14.	**Applicant** Natural England	**Dormouse surveys** Paragraph 1.5.7 of the Suffolk hazel dormouse survey report [APP-108] states that preconstruction surveys for dormouse should be undertaken in Zone D. Confirm whether the preconstruction clearance checks identified in paragraph 3.4.3 of the outline Landscape and Ecological Management Plan (oLEMP) [CR1-045] are intended to satisfy this requirement. It is noted that preconstruction surveys are currently limited to birds, bats, riparian mammals and badgers in paragraph 7.1.1 of the oLEMP. NE may wish to comment on the survey requirements.	The Applicant can confirm that the pre-construction checks referenced in paragraph 3.4.3 of **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045]** are intended to satisfy the commitment to pre-construction resurvey of Area D in Suffolk for dormice. While this paragraph does not explicitly mention dormice, the use of the phrase 'will include' prior to the list of surveys indicates that list was not intended to be comprehensive. The Applicant is content to add dormice to the list at Deadline 4 for reassurance and has confirmed as much to East Suffolk Council in **Application Document 9.35.2 Applicant's Comments on Local Impact Report from East Suffolk Council [REP2-027].** It should be noted that the risk of encountering dormice in the pre-construction survey is low given (as acknowledged by East Suffolk Council and Suffolk County Council in **Application Document Local impact reports (LIR) from any local authorities [REP1-128]** from East Suffolk Council and **Application Document Local impact reports (LIR) from any local authorities [REP1-130]** from Suffolk County Council) dormice have not previously been recorded in this part of East Suffolk despite a great deal of survey work for numerous infrastructure projects and only one dormouse tube out of almost 600 tubes (extensive survey effort) had an ambiguous record. It is therefore expected that a precautionary method of working would continue to be appropriate.

Reference	Question to:	Question	Applicant's Response
1ECOL15.	**Applicant** Kent County Council (KCC) Natural England	**Dormouse surveys** ES Part 3, Kent Chapter 2 Ecology and Biodiversity [REP1-049], paragraph 2.9.98 highlights that precautionary ways of working would be adopted on the basis that surveys identified possible dormouse nests. Paragraph 1.4.12 of the Kent hazel dormouse survey report [APP-159] states that a 'probable' rather than 'possible' nest was found in Zone C. Does this finding alter the approach, preconstruction survey requirements or assessment of effects? NE and KCC may wish to comment on the survey requirements.	In relation to dormouse there is no practical distinction between the terms 'possible' and 'probable' dormouse nest as in both instances this record denotes an ambiguous record that could not be assigned to species. The dormouse survey for the Proposed Project was also undertaken in line with guidance, and across the site as a whole far exceeded the minimum survey effort required (based on guidance (Chanin, P., & Woods, M. (2003)). English Nature Research Report No 524. Surveying dormice using nesting tubes. Results and experiences from the Southwest Dormouse Project. Peterborough: English Nature). Minimum survey effort to prove absence was 20 points, whereas the average effort for the Kent survey across the site was 31 points i.e. 50% greater). Moreover, despite the absence of confirmed dormouse records, due to landowner reports and the presence of ambiguous records within the survey area, a precautionary method of working has been introduced as a commitment (see measure B14 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3). In other words, although the survey did not confirm presence of dormice, the site will be treated as if they were present during vegetation clearance thus ensuring avoidance of killing or injury to any dormice that may be present, Furthermore, due to the planting proposals around the converter station and substation there will be a significant net increase in suitable habitat for dormice following the completion of development.
1ECOL16.	Kent County Council	**Reptile Surveys** With respect to reptile surveys explain: • What additional information is required to demonstrate that mitigation for reptiles in Area A and C is achievable. • What additional information is required to demonstrate why no reptile surveys were undertaken on the west site of the proposed converter station. • What additional information is required in relation to impacts on reptiles in Area D.	
1ECOL17.	**Applicant** Local authorities	**Tree pruning** Paragraph 1.2.11 of the Arboricultural Impact Assessment [APP-294https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-000404-6.10%20Arboricultural%20Impact%20Assessment%20Part%201%20of%202.pdf] states that clearance pruning would be required for the site access. Confirm how the deterioration of ancient and veteran trees would be avoided if substantial pruning is required? The local authorities may wish to comment on this matter.	As detailed within **Application Document 6.10 Arboricultural Impact Assessment [APP-294]** the Proposed Project will require six veteran tree root protection area (RPA) incursions to facilitate proposed construction access routes and three ancient and five veteran tree RPA incursions to facilitate proposed monitoring and maintenance access routes. In addition, two veteran tree RPA incursions are required to facilitate both proposed construction access routes and monitoring and maintenance access routes. Where construction access routes are proposed they are generally along existing access roads that are utilised predominantly by agricultural machinery so any encroaching tree canopies are considered to be currently managed to facilitate access for large vehicles. Therefore, any tree pruning requirements for veteran trees are likely to be minor. Where construction access routes do not utilise existing access routes, tree canopies either do not encroach the proposed construction access route or have a very minor encroachment, so if pruning is required it is again likely to be minor. Where monitoring and maintenance access routes are proposed, in the majority of cases the canopies of veteran and ancient trees do not encroach in their alignment. Therefore, in these cases it is unlikely that any pruning will be required.

Reference	Question to:	Question	Applicant's Response
			Where tree canopies do encroach monitoring and maintenance access routes the land is currently utilised for various purposes including a golf course, informal access routes and agricultural land which all have their own clearance requirements. Therefore, any tree pruning that may be required to facilitate access for pedestrian and all-terrain vehicles to facilitate maintenance and monitoring access is likely to be minor.
1ECOL18.	Applicant	**REAC provision B09 – impacts from potential frac out** Provision B09 of the REAC [CR1-043] sets out measures to mitigate the impact of frac out. Confirm whether provision B09 is intended to be a mitigation plan consistent with paragraph 2.8.229 of NPS EN-3. Also explain: • how impacts on designated habitats would be avoided or how extensive the impacts could be, if frac out were to arise • what discussions the applicant has had with NE or Royal Society for the Protection of Birds (RSPB) to understand the sensitivities of the flora and fauna above the route	Paragraph 2.8.229 of NPS EN-3 is interpreted as a mitigation plan for failure to complete the landfall using HDD rather than occurrence of a potential inadvertent impact of the HDD methodology. Provision B09 is considered as addressing an inadvertent impact, i.e surface frac out and is not intended to address paragraph 2.8.229 of NPS EN-3; please see the response to 1EC04 above. Provision B09 of **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 is intended to provide high level risk reduction and mitigation measures that will be used to minimise the risk of frac out during the use of trenchless techniques. During the planning, detailed design, and construction phases of the landfalls, these measures, along with any others identified by the contractor, will be developed and implemented in relation to the HDDs. The contractor will develop its drilling fluid management plan that includes drilling fluid breakout mitigation measures (secured in provision GH10 of **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3) and the plan will be shared with NE (B59 of **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 and any comments taken into consideration. Any frac out impacts, in the highly unlikely event they arose, would be expected to be localised and could therefore be contained and drilling fluids removed quickly, since the route would be continually monitored during the drill to identify any areas of frac out as soon as they arose. All areas of the complex network of habitats within the North Warren RSPB Reserve/Leiston to Alderburgh SSSI are ecologically sensitive, since it functions as a single complex unit. However, the Applicant has agreed with Natural England's request in their Relevant Representation that a pre-construction botanical survey is undertaken of the route of the drill through the RSPB Reserve to inform monitoring of the drill. This is commitment B62 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3. A site visit at the North Warren RSPB Reserve was held on 21/08/2025 with representatives of the Applicant and the RSPB present to agree methods, locations, and routes for spotters and, in the unlikely event of a frac out, vehicles, personnel and equipment for remediation. It was agreed that spotters will be on foot except where using existing access tracks, and that there will be no vehicle access to shingle habitats. Work is ongoing to formalise all the preceding points in a voluntary land agreement.
1ECOL19.	Applicant	**REAC provision B13 – impacts from the loss of hedgerows** Provision B13 of the REAC [CR1-043] column three is headed 'Impact from the loss of hedgerows' but includes discussion of ditch marginal vegetation. In column four, it is explained that marginal vegetation would	The REAC has been amended for Deadline 3 to add ditch marginal vegetation to column three for provision B13 (see **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3).

Reference	Question to:	Question	Applicant's Response
		be planted with "*mature emergent vegetation purchased from nurseries or left to recolonise naturally*". The heading in column three should be expanded to include ditch marginal vegetation and the applicant should explain what the trigger would be to decide whether to replant or leave banks to recolonise.	In point EA0002 of their Written Representation **Application Document Environment Agency Comments on any further information [REP2-050]** submitted at Deadline 2, the Environment Agency stated that "*We require the document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk (Clean) [AS-059] Section 5.2.3 to be updated to include riparian planting to mature emergent vegetation. This will ensure clarity, address previous concerns about natural recolonisation and the resulting predation risks for water voles*." The **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-050]** and **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan - Suffolk [CR1-045]** stated that '*Gaps in ditch marginal vegetation would either be planted with mature emergent vegetation purchased from nurseries or left to recolonize naturally from the adjacent ditch vegetation'* because it can be beneficial where there is adjacent marginal vegetation to simply allow it to expand rather than introduce plants that have been grown elsewhere. However, the request of the EA is noted and therefore this will be amended in the next revision of **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan- Suffolk [CR1-045]** to be submitted at Deadline 4 to specify mature emergent vegetation rather than natural colonisation. Regarding **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]** the initial preference would be to allow natural recolonisation from the adjacent mature planting, which given its extent and maturity in all ditches should be a relatively quick exercise. However, if there has not been sufficient recolonisation after 12 months following restoration (judged in terms of whether there remain blocks of bare bank in the cleared area, or vegetation that has an average height below 15 cm), then direct planting will be undertaken.
1ECOL20.	Applicant	**REAC provision B24 - disturbance of woodlark nests** Provision B59 of the REAC [CR1-043] states that crops would be cleared between October and February. The ExA considers that this wording is ambiguous as it is unclear whether this means up to the end of January or inclusive of February, which would not take account of comments that woodlark nest as early as February. The ExA notes that B27 takes into account compound set up in Sept – January. Provide alternative REAC wording for consideration.	It is understood the reference to provision B59 is a typo and instead the question relates to provision B24. Amended wording for REAC commitment B24 has been submitted at Deadline 3, changing February to 'January inclusive' (see **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3).
1ECOL21.	Applicant	**REAC provision B28 – impacts from loss of acid grassland** Provision B28 of the REAC [CR1-043] states that 6ha of acid grassland shall be managed in an enhanced manner for 10 years. The ExA understands that the applicant now proposes to only create 6ha of acid grassland and no longer proposes to enhance an additional 6ha grassland in Suffolk. The ExA therefore suggests that this provision should be amended accordingly. NPS EN-1 para 5.4.44 explains that any habitat creation or enhancement should generally be maintained be for a period of 30 years. Provide further justification for the shorter management period.	Note that the Applicant's proposal is to restore and enhance 6 ha of existing degraded acid grassland and manage it in an enhanced manner for 10 years. Therefore, the wording of provision B28 remains correct. The Applicant's interpretation of paragraph 5.4.44 of NPS EN-1, given the reference to Biodiversity Net Gain (BNG) and the statement '*or the lifetime of the project, if longer [than 30 years]*', is that the 30-year reference is with regard to planting intended to address either BNG requirements or permanent habitat losses. However, the loss of acid grassland is a temporary impact since any soil removal in areas of acid grassland will be restored within 12 months. The Applicant therefore considers that a ten-year management period is sufficient to ensure the restoration will be achieved. It should also be noted that the acid grassland

Reference	Question to:	Question	Applicant's Response
			restoration has not be included in the BNG assessment and does not contribute to the delivery of BNG units for the Proposed Project.
1ECOL22.	Applicant	**REAC provision B38 – impacts from light pollution** Provision B38 of the REAC [CR1-043] addresses the issue of light pollution and refers to compliance with published guidelines but does not state which. In the absence of this information the ExA is unclear what standards would be applied. The applicant is advised to amend the requirement to state the specific guidelines (for example 'Bats and Artificial Lighting in the UK' Guidance Note GN 08 / 23). The applicant should also confirm whether the lighting design would be delivered by a suitably qualified lighting professional.	The following wording has been added to provision B38 of the REAC after the existing text for Deadline 3 (see **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3**)**: *'Specifically, Bats and Artificial Lighting in the UK' Guidance Note GN 08 / 23). The lighting design would be delivered by a suitably qualified lighting professional'*.
1ECOL23.	**Applicant** Kent Wildlife Trust Natural England	**REAC provision B45 – impacts on breeding birds from OHL and pylon installation** Provision B45 of the REAC [CR1-043] references works above 60dB. The ExA considers that specific noise indices should be stated to make this provision clear. The ExA also notes that the provision retains the option for works to occur during two months of the breeding season. KWT and NE are requested to comment on the appropriateness of this provision and whether any particular two months during this period would be preferable.	The phrase '*above 60 dB*' in provision B45 has been amended to 'above 60dB LAmax' for Deadline 3 (see **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3**)**.
1ECOL24.	Applicant	**REAC provision B47 – impact on ecological receptors from ditch clearance** Provision B47 of the REAC [CR1-043] states that preconstruction surveys would be undertaken for nesting birds and if none are present, marginal vegetation clearance works may take place between 15 February and 15 April. As well as 15 September to 31 October (excluding water voles). Confirm who would be responsible for undertaking these surveys (for example relevant ecological specialists).	The phrase *'provided that pre-construction surveys have been undertaken*' in provision B47 has been amended to *'provided that pre-construction surveys have been undertaken by a suitably qualified ecologist*' for Deadline 3 (see **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3).
1ECOL25.	**Applicant** Kent Wildlife Trust Natural England	**REAC provision B50 – disturbance to breeding birds** Provision B50 of the REAC [CR1-043] references March to June as the breeding season. Confirm whether this should read March to September. The ExA notes that provision B65 also references March to June.	The phrase '*March to June*' is correct, as in this case (and for provision B65) as the provision is intended to apply to the core nesting season which generally ends after June. While some birds can continue nesting later in the year, the number reduces considerably.
1ECOL26.	**Applicant** Kent Wildlife Trust Natural England RSPB	**REAC provision B59 – impacts of potential frac out** Provision B59 of the REAC [CR1-043] allows for the sharing of an HDD landfall method statement and drilling fluid management plan for information with NE only. Confirm whether other parties such as RSPB and KWT should also be party to this provision. Also comment on whether, in light of the potential for impacts on sites for which NE, KWT and RSPB have responsibility, they should also approve or be consulted on these plans. The provision should be updated to explain when these plans should be made available.	The HDD landfall method statement and drilling fluid management plan will be developed by the HDD contractor during the engineering and design phase of the landfall programme, with finalisation of documentation indicatively 2-3 months prior to the mobilisation of the HDD equipment to site. The documentation will incorporate the relevant aspects of the land access agreements that are in place with the parties to ensure the works minimise any impact on their sites. The Applicant can confirm that NE, KWT and the RSPB will be consulted during the development of the HDD landfall method statement and drilling fluid management plan where applicable. Provision B59 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC**) submitted at Deadline 3 has been updated to reflect this commitment.
1ECOL27.	Applicant	**REAC – provision of outline HDD management plan and drilling fluid management plan** Can the applicant submit an outline HDD management plan and drilling fluid management plan? If not, explain why.	The Applicant confirms that an HDD Management Plan is not a common term in the industry and is assumed to refer to a HDD Risk Assessment and Method Statement (RAMS). The HDD RAMS will be specific to the methodology of the HDD Contractor and due to contractors having a range of working methodologies, an outline HDD RAMS produced at this stage of the project may not sufficiently

Reference	Question to:	Question	Applicant's Response
			represent the process to be used. For this reason, the Applicant is of the opinion that an outline HDD RAMS at this stage would not provide any more useful detail than has already been provided in Sections 2.3 and 3.3 of the HDD Feasibility Technical Note in Appendix A Landfall HDD Feasibility Technical Note of **Application Document 7.3 Design Development Report – [APP-321]**. Additionally, for the Kent Landfall, an outline of HDD Drilling and Duct Installation, including management of drilling fluids, is provided in **Application Document 9.13 Pegwell Bay Construction Method Technical Note [REP2-011].** An outline drilling management plan is expected to be more representative of the likely contents of the Contractor's working methods and documentation than an outline HDD RAMS discussed above. Therefore, the Applicant considers that this document may be of more use to the Examining Authority and interested parties in understanding the potential impact on the environmentally sensitive areas along the route affected by the Proposed Development. The Applicant will provide an outline drilling management plan for Deadline 4.
1ECOL28.	**Applicant** Natural England RSPB	**REAC provision B60 – impacts of potential frac-out** Provision B60 of the REAC [CR1-043] allows for notification of NE and RSPB in the event of a frac-out. In light of the sensitivity of the designated sites, is there a need for a more active role in this provision than currently worded for NE and RSPB? For example, to control routing of spotters and agreement of vehicle use on existing accesses.	The Applicant confirms that B60 in the REAC will be updated to '*National Grid will notify and consult with East Suffolk Council (ESC), Natural England (NE) and / or RSPB as appropriate*' (See **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3.
1ECOL29.	**Applicant** Natural England RSPB	**REAC provision B62 - impacts of HDD on Site of Special Scientific Interest (SSSI)** Provision B62 of the REAC [CR1-043] allows for preconstruction botanical surveys to support monitoring of any impact of HDD. Should this provision be to support 'monitoring and mitigation' of any impact of HDD, since the location of plants might dictate routes of access and priorities for mitigation amongst other things?	The phrase *'support monitoring*' in provision B62 has been amended to *'support monitoring and mitigation*' for Deadline 3 (see **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3**)**.
1ECOL30.	Natural England	**REAC provision B63 – impacts on shingle habitats** Provision B63 of the REAC [CR1-043] requires the applicant to inform NE about proposals to undertake additional groundwater investigation on, or adjacent to, shingle habitats. Is NE content with this provision and should an Ecological Clerk of Works (ECoW) be referenced? The ExA notes that there is a typo 'urveys'.	
1ECOL31.	**Applicant** Kent Wildlife Trust Natural England	**REAC provision B66 – impact on former hoverport ecology** Provision B66 of the REAC [CR1-043] allows for botanical survey to inform the construction access route within the hoverport and references foodplants of 'rarest vertebrates'. The ExA assumes that this should read 'invertebrates'. The ExA requests comment on whether this provision should also include reptile survey and whether the provision could be expanded to more proactively remove INNS as an improvement measure.	The word '*vertebrates*' in provision B66 has been amended to '*invertebrates*' for Deadline 3 (see **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3**)**. It is considered this provision does not need to include reptile survey. The reptiles that may be present do not have the same level of legal protection as Wildlife & Countryside Act Schedule 5 invertebrates and are not restricted to specific foodplants but will be found anywhere the vegetation provides sufficient cover. Such areas will not be traversed by the traffic using the hardstanding.
1ECOL32.	**Applicant** Kent Wildlife Trust Natural England	**REAC provision B67 – impact on saltmarshes** Provision B67 of the REAC [CR1-043] requires confirmation of an access route across the intertidal area to be defined post consent and informed by surveys. No reference is made to consent or approvals from KWT or NE,	In response to this question the Applicant has made the following update to Provision B67 of **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3:

Reference	Question to:	Question	Applicant's Response
		should it? The ExA notes that B67 seems to overlap with provision B70, can the two provisions be merged?	To ensure there will be no vehicular or pedestrian access across the saltmarsh, access and egress of vehicles to the mudflats will be via the former hoverport with a buffer between the defined access route and the seaward (distal) limit of the saltmarsh. The locations and widths of access routes across the mudflats will be confirmed post consent *in consultation with NE and KWT as appropriate* and will be informed by a pre-construction saltmarsh habitat survey to update that undertaken in August 2025. **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 has also been updated to remove Provision B70 as this is a duplication of the commitment set out in Provision B67.
1ECOL33.	**Applicant** Kent Wildlife Trust Natural England	**REAC provision B68 – Impact on Pegwell Bay** Provision B68 of the REAC [CR1-043] provides for a Pegwell Bay landfall construction method statement covering the marine cable pull in and cable burial. Should this provision include cable excavation and laying in the intertidal area too and is there a requirement for the provision to include consultation and/or approval with KWT and NE?	As set out in **Application Document 9.13 (B) Pegwell Bay Construction Method Technical Note [REP2-011]** there are five key phases of works planned at the landfall within Pegwell Bay: • Phase 1A: Establish temporary access route between the former hoverport and the HDD exit pits (located in the intertidal zone) • Phase 1B: HDD exit pit cofferdam construction and working area • Phase 2: HDD drilling and duct installation • Phase 3: Marine cable pull-in • Phase 4: Marine cable burial • Phase 5: Removal of access The Applicant has committed to preparing a HDD Landfall Method Statement (Provision B59 of the REAC which has been updated by **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3). This will cover activities associated with Phases 1A, 1B and 2. Phases 3 and 4, marine cable pull-in and marine cable burial respectively, will be covered by the Pegwell Bay landfall construction method statement included in Provision B68 of the **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3. The activities described in **Application Document 9.13 (B) Pegwell Bay Construction Method Technical Note [REP2-011]** for Phase 4 marine cable burial include specific reference to cable excavation and cable laying and lowering in the section of the intertidal area located between Mean Low Water Spring (MLWS) and the trenchless crossing exit pits which will be located between 105 m and 140 m seaward of the saltmarsh habitat. Further detail on burial of the marine cable is provided in Section 4.3 of **Application Document 9.13 (B) Pegwell Bay Construction Method Technical Note [REP2-011].** The Applicant has committed to trenchless installation of the landfall to avoid any interaction with the saltmarsh or lagoon. This commitment is included in provision W22 of the updated version of the REAC, **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3. The DCO Application does not include an option for the Applicant to install the cables using open cut trench technique to cross the saltmarsh and lagoon even as a contingency option.

Reference	Question to:	Question	Applicant's Response
			To provide further clarity the Applicant has made the following updates to Provision B68 of the **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3: Preparation of a Pegwell Bay Landfall Construction Method Statement, *in consultation with Natural England and Kent Wildlife Trust,* covering marine cable pull in, excavation and cable burial *between Mean Low Water Spring and the trenchless crossing exit pits*.
1ECOL34.	**Applicant** Kent Wildlife Trust Natural England	**REAC provision B69 – impact on saltmarshes** Provision B69 of the REAC [CR1-043] requires that trenchless exit pits would be at least 105m seaward from the edge of the saltmarsh, however temporary working areas are stated to be a minimum of 50m from the saltmarsh edge. In light of the potential for disturbance of bird species using the saltmarsh is this a sufficient offset distance?	The offsetting of exit pits away from the saltmarsh is in place to avoid the potential for any direct impacts on the saltmarsh habitat. Consideration of disturbance to birds using all parts of the intertidal area within Pegwell Bay, including where appropriate, areas of saltmarsh, has been informed by the surveys undertaken by the Applicant and existing datasets from third parties, alongside the noise modelling presented in Figures 6.4.4.5.7 and 6.4.4.5.8 in **Application Document 6.4.4.5 (B) ES Figures Marine Ornithology [REP2-007]** and described in **Application Document 6.2.4.5 (C) Environmental Statement Part 4 Marine Chapter 5 Marine Ornithology [REP2-003]**. This modelling identifies areas that may be subject to potentially disturbing levels of noise. In some instances, this will include areas of saltmarsh west of the temporary working areas. The assessment presented in **Application Document 6.2.4.5 (C) Environmental Statement Part 4 Marine Chapter 5 Marine Ornithology REP2-003]** has considered the effect of disturbance based on the worst-case predictions presented in Figures 6.4.4.5.7 and 6.4.4.5.8 in **Application Document 6.4.4.5 (B) ES Figures Marine Ornithology [REP2-007]**. This includes an assessment of disturbance from activities associated with the trenchless crossing exit pits and surrounding cofferdams as well as disturbance within the temporary working area. The exit pits and cofferdams will be located within the temporary working area to allow access to the HDD exits and cofferdams from all directions. For this reason, it will be necessary for the temporary working area to extend closer to the saltmarsh (up to a minimum distance of 50 m) than the exit pits which have a minimum separation distance of 105 m from the saltmarsh.
1ECOL35.	Applicant	**REAC pollution provisions** Explain whether the proposed construction compounds would be lined, for example with geotextile membrane having oil/chemical filtration properties beneath hard core to minimise the risk of ground water contamination? If not, should they?	Lining is not considered necessary. This is because the risk of groundwater contamination at construction compounds would be robustly managed and controlled through several commitments to good practice, included within **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3**,** Examples include GG05, GG14, GG15, GG16. W24, W20 and GH05. In combination, the measures would minimise the risks of spillages or leaks of potential pollutions and allow the isolation and rapid clean up should spills occur.
1ECOL36.	Applicant	**REAC provision A18 – access within root protection areas** Provision A18 of the REAC [CR1-043] explains that in wet conditions, access within the root protection areas of trees T612k and T614k would be by pedestrian only means. Ground protection would be used if all-terrain vehicle access is required. Explain what access would be necessary in light of the location of the trees on the edge of the site boundary and why it might be necessary to drive ATVs in this location?	All-terrain vehicles may be required to be used for maintenance and monitoring access to assist with the storage and transportation of equipment to minimise manual handling requirements. The alignment of the monitoring and maintenance access route is proposed along the edge of a fairway on the St Augustine's Golf Course.

Reference	Question to:	Question	Applicant's Response
1ECOL37.	Applicant	**Tree constraints plans – Kent onshore scheme** Explain why the key for the updated Kent tree constraints plan [CR1-058] is different from previous plans and has replaced the annotation 'tree protection fencing' with 'root protection area' and omits the construction exclusion zone (in particular along the HDD route at the landfall).	Two sets of tree related plans have been submitted for Kent including **Application Document 9.76.5.3 Change Request Appendix C Tree Constraints Plans Kent Onshore Scheme [CR1-058]** and **Application Document 9.76.5.4 Change Request Appendix D Tree Protection Plans Kent Onshore Scheme [CR1-059]**. **Application Document 9.76.5.3 Change Request Appendix C Tree Constraints Plans Kent Onshore Scheme [CR1-058]** show the principle above and below ground spatial constraints associated with trees within or immediately adjacent to the Order Limits, including 'Root Protection Areas (RPA)' as indicated in the legend. **Application Document 9.76.5.4 Change Request Appendix D Tree Protection Plans Kent Onshore Scheme [CR1-059]** show the potential direct and indirect impacts of the Proposed Project upon the existing trees including identification of those to be removed and measures for the safe retention of those proposed for retention, including 'tree protection fencing' and 'construction exclusion zone' where required. The format of both set of plans is consistent with the original Tree Constraints Plans and Tree Protection Plans submitted with the application.
1ECOL38.	Applicant	**Habitats Regulations Assessment (HRA) – noise contour plots** Explain why the extent of the 3dB change noise contour in figure 4 of the HRA [REP2-009] includes the full length of the HDD works at the landfall, when these works would be underground? Should this area be excluded from the contour plots?	The 3 dB change contour shown in Figure 4 of **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3 is intended to act as a screening contour defining the study area within which the subsequent 60 dB L_{Amax} assessment (Figure 5 of the document) is undertaken, rather than being the assessment itself. The 3 dB contour was generated by applying a buffer distance from the Order Limits, representing the maximum distance within which a change of up to 3 dB could be expected to occur. This is based on a relatively conservative assumed baseline maximum noise level of 55 dB L_{Amax} and a typical maximum sound level of 78 dB L_{Amax} at a distance of 10 m, including mitigation. There is a 3 dB increase where these values are equal, although in practice maximum sound levels are unlikely to add in such a manner unless they occur at the same time. The distance within which the maximum noise level from the construction activity may exceed 55 dB L_{Amax} is 141 m. This distance has therefore been applied as a buffer to the order limits to determine the area within which a 3 dB change may be expected. The reason for this approach was in order to simplify a relatively complicated problem in a proportionate way, whilst still provided a justifiable screening area for the subsequent assessment. The additional extensive work required to refine the assumptions (making the screening area smaller) would not be proportionate to the value of the outcome. As a result, this contour inevitably encompasses some areas where such a change would not in practice arise. For example, sections corresponding to underground HDD works, where no surface noise sources exist. Additionally, in areas where there are relatively high existing maximum sound levels (e.g. close to roads), or where construction noise is not expected to be particularly high, the distance within which a 3 dB change would occur would be much lower, potentially down to 0 m in some locations. It is therefore more accurate to interpret the contour in Figure 4 as indicating a change of up to 3 dB, rather than representing an exact 3 dB change. Areas outside the contour are not expected to experience a change greater than 3 dB. Within the contour, some locations may in practice experience less than a 3 dB change, while others may exceed 3 dB. Overall, any change greater than 3 dB is expected to be confined to within the contour.

Reference	Question to:	Question	Applicant's Response
			Crucially, the assessment itself is based on the 60 dB L_{Amax} contour in Figure 5 of the document, which is derived from actual surface construction activities. This plot, not the broader screening area in Figure 4, defines the zones within which ecological receptors were assessed. Given the purpose of the 3 dB contour map is only to determine whether a change of 3 dB will occur within designated sites, and thus whether appropriate assessment is required, and the appropriate assessment itself has been undertaken using the 60 dB LAmax contour maps, it is not considered that the 3 dB change map requires updating.
1ECOL39.	Applicant	**HRA – saltmarsh offset distance** The Pegwell Bay construction method technical note [REP2-011] explains that trenchless landfall works would be a minimum of 50m from the saltmarsh area. The HRA [REP2-009] refers to the 105m minimum offset distance of the HDD compound. Confirm that the HRA takes into account noise and vibration impacts on birds using the saltmarsh area that could arise from works at 50m distance.	As set out in the response to 1ECOL34 the offset from the saltmarsh is primarily in place to protect the habitat itself. The assessment of potential impacts to waterbirds within the intertidal area, including saltmarsh within Pegwell Bay, is based on the noise modelling presented in Figures 6.4.4.5.7 and 6.4.4.5.8 in **Application Document 6.4.4.5 (B) ES Figures Marine Ornithology [REP2-007]** and has not been based on a specific offset from the saltmarsh, although the distance of the HDD compound has been provided for context. In some instances, this will include areas of saltmarsh west of the temporary working areas. The assessment presented in **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3 has considered the effects of disturbance based on the worst-case predictions presented in Figures 6.4.4.5.7 and 6.4.4.5.8 in **Application Document 6.4.4.5 (B) ES Figures Marine Ornithology [REP2-007]**. As set out in the response to 1ECOL34 the HRA includes an assessment of disturbance from activities associated with the trenchless crossing exit pits and surrounding cofferdams as well as disturbance within the temporary working area. Therefore, the HRA does take account of activities at 50 m distance from the saltmarsh. The exit pits and cofferdams will be located within the temporary working area to allow access to the HDD exits and cofferdams from all directions. For this reason, it will be necessary for the temporary working area to extend closer to the saltmarsh (up to a minimum distance of 50 m) than the exit pits which have a minimum separation distance of 105 m from the saltmarsh.
1ECOL40.	Applicant	**HRA – groundwater impacts on Sandwich Bay Special Area of Conservation (SAC)** Further explain your position as presented in Appendix F of the HRA Report [REP2-009] regarding the screening out of dewatering as a potential impact pathway for likely significant effects to the Sandwich Bay SAC. The ExA notes that the Qualitative Groundwater Risk Assessment [APP-170] concludes it is unlikely that dewatering would be required at the HDD launch or receptor pits but proposes that further assessment would be carried out post-consent through a hydrogeological risk assessment (secured through the oCoCP, GH09 [APP-341]) if dewatering was subsequently required. In this case, additional mitigation might also be required. The ExA seeks clarification that this pathway has been properly considered in the HRA, as it appears to have been discounted on the basis that dewatering would not be required for the HDD crossing. Is it your position that, whilst dewatering is unlikely to be required, if it were needed for the HDD installation it would be carried out a minimum of 600m from the nearest dune slack habitat, and therefore in accordance with the conclusions of the ES Geology and Hydrogeology chapter 5 [APP-065]	The Applicant can confirm that dewatering is unlikely to be required and even if it was required it would be carried out a minimum of 600 m from the nearest dune slacks and in the absence of any connecting impact pathway (location of HDD entry and exit points is shown in drawing DCO/K/DE/SS/1257 within **Application Document 2.13 2.13 Design and Layout Plans [APP-037]** and also in the Pegwell Plan and Section within Appendix A Landfall HDD Feasibility Technical Note of **Application Document 7.3 Design Development Report [APP-321]**). As a result, there would be no likely significant effect on the dune slacks of Sandwich Bay SAC.

Reference	Question to:	Question	Applicant's Response
		outside of the 500m the study area beyond which construction phase dewatering was concluded to result in negligible effects?	
1ECOL41.	Applicant	**HRA – likely significant effects (LSE) on Sandwich Bay SAC** Confirm if a LSE on Sandwich Bay SAC from direct habitat loss has been identified. A LSE is not identified in paragraphs 4.4.2 to 4.4.6 of the HRA Report [REP2-009], however a LSE is identified in paragraph 6.4.1 and appendix A (e-page 174).	The Applicant notes that an error was made in paragraph 6.4.1 of the HRA referencing Sandwich Bay SAC being screened in for 'direct habitat loss'. While the cable route does traverse Sandwich Bay SAC the lack of connectivity to sand dune (or dune slack) qualifying features of that SAC means a likely significant effect will not arise. This has been corrected in the version of the HRA submitted for Deadline 3 (**Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3). With regard to Appendix A of **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3, as noted in the response to Question 1ECOLL46 below, Appendix A was intended to present 'a summary table of all European sites and qualifying features and each pathway of effect considered at each HRA Stage (screening, appropriate assessment/AEoI, and the derogations, as applicable), for each phase of the Proposed Project (construction, operation, and decommissioning, as relevant)' as per Government guidance (Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments - GOV.UK). The guidance does not ask for the outcome of the impact assessment to be reported in the summary table, so that information was not added to Appendix A, which simply listed the European sites for which the habitat loss impact pathway had been considered. The screening decision for each feature has now been added to the version of Appendix A within the **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3.
1ECOL42.	Applicant	**HRA – implications of vehicle access at the former hoverport** In the Change Request: Addendum to Volume 6 ES [CR1-055], it is explained that change 1 would not result in any change to the HRA Report [REP1-071] noting that there would be no change to number and frequency of vehicle movements as assumed in the DCO application. The applicant is requested to confirm how the use of the hoverport access for construction and operational maintenance was considered in the screening of the air quality impact pathways and explain how it is proposed to limit vehicle numbers using the access.	IAQM and EPUK guidance indicates that it is only necessary to model vehicle emissions if the change in Annual Average Daily Traffic (AADT) exceeds 100 Heavy Duty Vehicles (HDVs) (25 within an Air Quality Management Area) or 500 Light Duty Vehicles (LDVs) (100 within an Air Quality Management Area). Note that this is more stringent that the Design Manual for Roads and Bridges (DMRB) air quality screening criteria. The Pegwell Bay Construction note **Application Document 9.13 (B) Pegwell Bay Construction Method Technical Note [REP2-011]** lists numbers of vehicle movements and states *'… there may be a requirement for up to 40 movements per day at peak times of certain vehicles involved in the transportation of equipment and personnel across the mudflats'*. Note that this is the peak figure, and therefore the AADT will be well below the screening criteria. Given that this would also constitute total vehicles (since there is no baseline level of vehicle movements) and would be a temporary impact (since the total duration of the Pegwell Bay works would be approximately a year, from setup through drilling to cable pull-through), air quality effects as a result of construction vehicle emissions in this location would not be significant.
1ECOL43.	Applicant	**HRA – Stodmarsh SPA** Several of the species identified in table 3.1 of the HRA Report [REP2-009] for Stodmarsh SPA are not identified on the site citation, nor do they reflect the qualifying features identified for the site in appendix A. The applicant should review and amend the report accordingly.	For SPAs, Table 3.1 and Appendix A of **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3 has used Natural England's Designated Sites View (Designated Sites View) as the most up to date source of information for qualifying features. For Stodmarsh SPA the qualifying features of the SPA are listed as: • Bittern (*Botaurus stellaris*), Non-breeding;

Reference	Question to:	Question	Applicant's Response
			• Breeding bird assemblage, Breeding; • Gadwall (*Mareca strepera*), Breeding; • Gadwall (*Mareca strepera*), Non-breeding; • Hen harrier (*Circus cyaneus*), Non-breeding; • Shoveler (*Spatula clypeata*), Non-breeding; and • Waterbird assemblage, Non-breeding. Clicking on the 'breeding bird assemblage' then produces the following list of species: lapwing, mallard, moorhen, reed bunting, sedge warbler, common tern, coot, redshank, reed warbler, shelduck, snipe, mute swan, great crested grebe, shoveler, teal, tufted duck, water rail, bearded tit, cetti's warbler, gadwall and pochard. Clicking on the 'waterbird bird assemblage, non-breeding' produces the following list of species: gadwall, shoveler, bittern, hen harrier, tufted duck, wigeon, white-fronted geese, mallard, lapwing and snipe. These species are therefore all listed for Stodmarsh SPA in Table 3.1 of **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3**.** The same qualifying features are listed in Appendix A but rather than single out the species names in the 'breeding bird assemblage' and 'waterbird assemblage' the Applicant has stated the two assemblages. There is therefore no inconsistency between Table 3.1 and Appendix A for Stodmarsh SPA, or between **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3 and Natural England's most up to date information on qualifying features.
1ECOL44.	Applicant	**HRA – Ramsar sites and criteria** Ramsar sites have been added to the summary table in appendix A of the HRA Report [REP2-009]. However, it is unclear whether the LSEs identified are for all criterion listed. For example, for Alde-Ore Estuary SPA a LSE is identified for all criterion for all impact pathways considered. The applicant is requested to clarify the Ramsar criterion for which impact pathways are considered and for which LSEs are identified. This should accord with the conclusions drawn in the main report.	As noted in the response to Question 1ECOLL46 below, Appendix A was intended to present 'a summary table of all European sites and qualifying features and each pathway of effect considered at each HRA Stage (screening, appropriate assessment/AEoI, and the derogations, as applicable), for each phase of the Proposed Project (construction, operation, and decommissioning, as relevant)' as per Government guidance (Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments - GOV.UK). The guidance does not ask for the outcome of the impact assessment to be reported in the summary table, so that information was not added to Appendix A, which simply listed the qualifying features for all European sites. However, whether a likely significant effect is screened in or out for each interest feature is now noted in the version of Appendix A within **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3.
1ECOL45.	Applicant	**HRA – Ramsar site impact pathways** The impact pathways considered for Ramsars in appendix A of the HRA Report [REP2-009] do not reflect those considered for the equivalent SPA. For example, for the Alde-Ore Estuary and Stodmarsh sites, 4 additional impact pathways are considered for the SPAs that are not considered for the Ramsars (direct habitat loss, disturbance from onshore works, air quality and pollution). Given the geographical overlap of the SPAs and Ramsars and the similarity of features, it is unclear why this is the case.	The Applicant believes this is a misreading of Appendix A the HRA **[REP2-009]**. The Applicant can confirm that there are no impact pathways for SPAs that are not also considered for Ramsar sites in Appendix A. Direct habitat loss, air quality, pollution, and disturbance from onshore works are not identified as an impact in Appendix A of the HRA for either Alde-Ore Estuary SPA or Ramsar site due to the distance of these sites from the Proposed Project. Similarly, direct habitat loss, air quality, and disturbance from onshore works are not identified as an impact in Appendix A of the HRA for either Stodmarsh SPA or Ramsar site. Pollution during construction is identified as a potential impact for both Stodmarsh SPA and

Reference	Question to:	Question	Applicant's Response
		Can the applicant explain, or revise the report to reflect the impact pathways considered for the Ramsar sites.	Stodmarsh Ramsar site in Appendix A as the site is connected to the tidal River Stour and therefore pollution could theoretically reach the SPA and Ramsar site on a rising tide. We therefore do not consider a revision to the HRA is required.
1ECOL46.	Applicant	**HRA – confirmation of qualifying features that use Thanet Coast & Sandwich Bay SPA/Ramsar functionally linked land (FLL)** Paragraph 4.4.26 of [REP2-009] notes a LSE on Thanet Coast & Sandwich Bay SPA/Ramsar site due to loss of FLL for golden plover. Appendix A identifies a LSE for golden plover, little tern and turnstone of the SPA. Confirm which qualifying feature(s) the FLL is used by, and therefore for which qualifying feature(s) there is a LSE.	The Applicant believes this is a misreading of Appendix A of the HRA. Appendix A was intended to present 'a summary table of all European sites and qualifying features and each pathway of effect considered at each HRA Stage (screening, appropriate assessment/AEoI, and the derogations, as applicable), for each phase of the Proposed Project (construction, operation, and decommissioning, as relevant)' as per Government guidance (Nationally Significant Infrastructure Projects: Advice on Habitats Regulations Assessments - GOV.UK). The guidance does not ask for the outcome of the impact assessment to be reported in the summary table, so that information was not added to Appendix A, which simply listed the interest features for each European site. However, the screening decision has now been added to the version of Appendix A within **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3. It can be confirmed that no likely significant effect or adverse effect on integrity is expected to arise on the little tern or turnstone qualifying features of Thanet Coast & Sandwich Bay SPA/Ramsar through loss of functionally linked land.
1ECOL47.	Applicant	**HRA – management measures for FLL** The HRA Report [REP2-009] identifies a 10ha minimum parcel size of arable land to mitigate against the loss of FLL for golden plover associated with Thanet Coast & Sandwich Bay SPA. Information on the management of the mitigation land is set out within the Outline Landscape and Ecology Management Plan (oLEMP) – Kent [PDA-035]. Should specific management measures be set out, for example the enrichment of soil for invertebrates and topping as suggested by the RSPB [REP1-158]?	As noted in the question, **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]** already includes a series of specific management measures. These were requested by or agreed with Natural England. However, the Applicant would be content to add reference into **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]** to the addition of more organic matter to enrich the soil for invertebrates. Specific management measures do need to have some flexibility to work with crop rotations. However, in all years the fields will be managed to be suitable for golden plover in winter. The Applicant is also willing to add reference to consideration of topping of crops into an update of **Application Document 7.5.7.2 (B) Outline Landscape and Ecological Management Plan- Kent [PDA-035]** to be submitted at Deadline 4, but this measure must be balanced with a need to produce viable crops. Topping is generally only used on set-aside cover crops as it specifically prevents the crop from seeding.
1ECOL48.	Applicant	**HRA – loss of FLL for white-fronted goose** The loss of FLL from the project alone is not identified as a potential impact pathway for white-fronted goose associated with Minsmere-Walberswick SPA in section 4 of the HRA Report [REP2-009]. However, an in-combination LSE for loss of FLL is identified at paragraph 6.5.1. Should loss of FLL therefore be identified as in impact pathway for the project alone?	There will be no alone or in combination effect from loss of functionally-linked land for white-fronted goose for the reasons noted in Sections 4 and 5 of the HRA **[REP2-009]** i.e. '*It has been confirmed through two years of wintering bird surveys that the Suffolk Onshore Scheme Boundary does not support a significant population of non-breeding birds associated with Minsmere-Walberswick SPA or Alde-Ore Estuary SPA. Loss of functionally-linked habitat associated with either SPA will therefore not arise'.* For the version of **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3, the relevant sentence in paragraph 6.5.1 has been amended to read *'Impact pathways that may arise 'in combination' with the Proposed Project include disturbance of birds associated with Sandlings SPA, ~~loss of functionally linked habitat for white-fronted goose associated with~~ and in functionally-linked land for Minsmere-Walberswick SPA and Alde-Ore Estuary*

Reference	Question to:	Question	Applicant's Response
			SPA/Ramsar site, and disturbance of red-throated diver of Outer Thames Estuary SPA and harbour porpoise of Southern North Sea SAC.'
1ECOL49.	Applicant	**HRA – confirmation of LSE identified in-combination but not alone** Can the applicant clarify if any LSEs were identified in-combination, that were not identified as a result of the proposed development alone.	There are no impact pathways or European sites where a likely significant effect was identified 'in combination' that were not already identified as a result of the Proposed Project alone. For the Suffolk Onshore Scheme paragraph 5.2.6 of **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3 notes that '*In summary, the Suffolk Onshore Scheme is likely to result in significant effects 'in combination' with other projects for the impact pathways of construction phase loss of functionally-linked land, dust emissions, and disturbance.'* For the Kent Onshore Scheme paragraph 5.4.6 of **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3 notes that '*Therefore, in summary, the Kent Onshore Scheme is likely to result in significant effects 'in combination' with other projects for one impact pathway: operational phase loss of functionally-linked land (for which a likely significant effect alone had already been identified)'.* These are all impact pathways where a likely significant effect had already been identified alone. For the Offshore Scheme, there are no impact pathways or European sites where a likely significant effect has been identified either from the Proposed Project alone or 'in combination'.
1ECOL50.	Applicant	**HRA – confirmation of conservation status** Confirm the conservation status of the European sites assessed for AEoI in the HRA Report [REP2-009]. The ExA notes that for the SPAs and Ramsar sites, it is not stated whether the sites are in favourable or unfavourable condition.	Natural England does not publish information regarding whether terrestrial SACs or SPAs are in favourable or unfavourable condition or conservation status. They do publish such information for SSSIs but not for the terrestrial features of SAC or SPA designations. Such information is published for the marine qualifying features of SACs and SPAs where applicable. Since this information is not available for all European sites it was not included in previous versions of the HRA and Natural England have not requested its addition in their written submissions. However, **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3 (section 3) to add this information.
1ECOL51.	Applicant	**HRA – further ground investigation to inform HDD feasibility** Section 3.1.2 of appendix A to the Design Development Report [APP-321] states that no intrusive investigation has been undertaken along the eastern 400m length of the Kent landfall beneath the intertidal area but boreholes and cone penetration tests were planned in 2025. The ExA understands that this work is ongoing. Confirm the timescales for completion and submission of updated information (and assessment as needed) into examination. Provide a summary interpretation of any interim results and any implications for HDD feasibility at Kent landfall in the interim. Also provide an update on any equivalent works in Suffolk.	Intrusive investigations in the easternmost 400m length of the landfall have not yet been undertaken. As outlined in response to question D18 of **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**, the specific details and requirements for additional nearshore boreholes will be confirmed by the Contractor during their detailed design development. The Applicant currently anticipates that additional nearshore boreholes will be necessary and are provisionally planned to be undertaken later in 2026. Given that the boreholes are not due to be undertaken until later in 2026 it will not be possible to submit updated information into the examination. However, the Applicant can confirm that the HDD feasibility assessment presented in **Application Document 7.3 Design Development Report [APP-321] –** Appendix A HDD Feasibility Assessment has assessed the likely worst case in terms of ground and groundwater conditions for the length beneath the lagoon, saltmarsh and intertidal exit areas. The additional boreholes are required for detailed design not to confirm the feasibility of the HDD. For example, the boreholes will be used to confirm exact groundwater levels which are required to inform the required

Reference	Question to:	Question	Applicant's Response
			height of the cofferdams at the HDD exit. Results from the boreholes will not affect HDD feasibility. Similarly for the Suffolk Landfall, any additional ground investigation boreholes along the route, including in the nearshore area, will be used to inform detailed design and specific requirements will be determined by the Contractor. No decisions on locations or programme have been determined at this stage.
1ECOL52.	Applicant	**HRA – Thanet Coast SAC impact pathways** Update the relevant impact pathways assessed for AEoI of Thanet Coast SAC in section 7 of the HRA Report [REP2-009] to clearly demonstrate how the conservation objectives, and identified threats and pressures have been considered in reaching the conclusions of no AEoI.	Updates have been made to Section 7 of the **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3 to Inform Appropriate Assessment to relate the assessment to the particular vulnerabilities of the Thanet Coast SAC. This has covered vulnerability to disturbance and changes in species distribution from the pathway that is an increase in SSC (paragraph 7.3.7), vulnerability to changes in water quality in relation to the release of drilling fluid (paragraph 7.3.14) and vulnerability to the introduction and/or spread of INNS (paragraph 7.3.28). The conclusions of the HRA remain unchanged.
1ECOL53.	Applicant	**HRA – red-throated diver (RTD) vessel disturbance assessment for OTE SPA** Paragraph 7.3.14 (p114 as numbering has error) of the HRA Report [REP2-009] excluded AEoI to RTD of the Outer Thames Estuary (OTE) SPA from vessel disturbance. Both JNCC [REP1-210] and the RSPB [REP1-158] have challenged the applicant's position that only a small number of RTDs would be affected. The applicant [REP2-034], table 2.23 has not clearly explained why it has not followed JNCC's advice in [REP1-210] to use distribution maps within Irwin et al. (2019) and produce a vessel disturbance assessment for RTD of the OTE SPA. Provide greater detail as to why JNCC's advice has not been followed.	Most activities involved in cable installation such as pre-construction surveys, pre-sweeping, cable lay (with separate or simultaneous trenching), installation of cable protection and construction of cable crossings, post installation monitoring surveys are discrete activities involving a low number of slow-moving vessels for example a survey vessel / cable lay vessel with a couple of support / guard vessels. The operational speeds of vessels are expected to range from 0.5 km to 7 km per day, with transit speeds of 6 to 12 knots as set out in Table 4.12 of **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-002]**). Where there is an overlap in activities or certain activities are required to occur simultaneously due to the linear nature of the Proposed Project, it is likely that these activities will be distributed along the cable route therefore the maximum number of vessels operating in any specific location would remain low. The vessels will also not be present in any one location for long periods of time e.g. most activities are expected to be completed within a few weeks to a few months (for entire cable route), with maximum durations in a one specific location ranging from a few hours to several days. Given the limited duration of the works and low number of vessels likely to be present in any one location, at any point in time, the magnitude of any potential impact on red throated diver (RTD) within the Outer Thames Estuary (OTE) SPA has been assessed as low. The Applicant has also committed in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 commitment O03 and **Application Document 7.8 Red Throated Diver Protocol [APP-361]** to a seasonal restriction ((1 November to 31 March) for pre-construction activities (except geophysical surveys which the Applicant has committed to not completing between January and March) and cable lay installation activities (except pre-lay grapnel run activities). This commitment is also included **in Application Document 3.1 (E) draft Development Consent Order [CR1-027]** under Part 2 Condition 11 Red Throated Diver. Adherence to this commitment will further reduce any potential impacts on RTD. Regarding RTD densities, Natural England considers densities of between 1 and 4 individuals/km^2 as 'medium' densities, 4 to 11 individuals/km^2 as 'high', and more

Reference	Question to:	Question	Applicant's Response
			than 11 individuals/km^2 as 'very high'. As illustrated in **Application Document 6.4.4.5 (B) ES Figures Marine Ornithology [REP2-007]** and set out in **Application Document 9.79 Applicant's Comments on Written Representations [REP2-034],** the Offshore Scheme avoids the areas where RTD densities are highest (based on Natural England mapped densities densities/km from February 2018). The Irwin et al, 2019 maps are also based on survey data from February 2018 and show similar density distributions across the OTE SPA as the Natural England mapped densities/km, with increased granularity in the grading of densities across a scale from 0.01 birds/km^2 to more than 50 birds/km^2. The figures included in **Application Document 6.4.4.5 (B) ES Figures Marine Ornithology [REP2-007]** have not been reproduced using the Irwin et al, 2019 maps on the basis that prior to submission the Applicant had already committed to a seasonal restriction on works within the OTE SPA to minimise any potential impacts on RTD. Any variances in the terminology used to define RTD densities would not change the conclusions of the assessment (no significant effects) as the majority of activities will occur outside the period for which RTD densities have been mapped. Given the Applicant has already committed to a seasonal restriction it considers it to not be necessary to produce a vessel disturbance assessment for RTD of the OTE SPA using either the Natural England densities or the distribution maps in Irwin et al. (2019) for construction activities as the seasonal restriction avoids this impact. Further information on disturbance associated with PLGR and geophysical surveys (activities excluded from the seasonal restriction) is provided in response to 1ECOL54 and 1ECOL55 respectively. The Applicant is continuing to engage with JNCC, as well as NE regarding activities excluded from the seasonal restriction and the evidence base they seek to support a conclusion of no AEoI.
1ECOL54.	Applicant	**HRA – pre-lay grapnel runs in OTE SPA** The applicant has stated that pre-lay grapnel runs need to be conducted immediately prior to cable installation and that including these works in the seasonal restriction for the OTE SPA would reduce the time available for cable installation in table 2.23 of [REP2-034]. How far in advance of cable installation activities would pre-lay grapnel activities take place? Can the applicant provide an alternative construction programme that excludes all activities, including the pre-lay grapnel run from the seasonally restricted window for RTD?	Scoping opinion responses were received from both Natural England and the JNCC in 2022, with the JNCC confirming that the Sealink Offshore Scheme is entirely within the inshore (territorial limits) and deferring to Natural England regarding Nature Conservation advice (including the Southern North Sea SAC and Outer Thames Estuary SPA). Previous engagement with Natural England has been undertaken in regards to the exclusion of PGLR activities from the seasonally restricted window for RTD. The Applicants proposed approach to this was presented in a meeting 27 June 2024. PLGR is an essential activity in a sequence of route preparation works and is typically carried out a few days to a few weeks before cable installation. The construction programme is owned and prepared by the Contractor, is currently under development, and will be informed by the DCO commitments; therefore, an alternative programme cannot be provided at this stage. The Applicant's objective is to ensure that installation of the sections of cable route that pass through the OTE SPA are completed within the April to October window to avoid extending works into an additional season. As set out in **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]** marine cable installation will be completed over two years, commencing with the section between Pegwell Bay and the Sunk followed by the section between Aldeburgh and the Sunk the following year. To achieve the timescales for installation (which extend beyond 6 months for both

Reference	Question to:	Question	Applicant's Response
			sections), cable installation activities within the OTE SPA must commence promptly at the start of the unrestricted period, and PLGR must occur immediately beforehand. Including PLGR within the seasonal restriction would reduce the time available for cable installation during the non-restricted period, creating a risk for project delivery. PLGR operation involves a single, slow-moving vessel and is of limited spatial and temporal scale. Indicative durations for cable route clearance activities are up to 10 days for the entire route, five days per campaign, excluding any weather downtime, as set out in **Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339]**. Vessel movements associated with PLGR are therefore substantially less intrusive than vessel movements associated with other marine construction activities e.g. offshore wind farm construction or construction of Sizewell C and are similar to existing baseline levels of vessel number in the area. The Applicant, as set out in **Application Document 9.79 Applicant's Comments on Written Representations [REP2-034]** and concluded in **Application Document 6.2.4.5 (C) Part 4 Marine Chapter 5 Marine Ornithology [REP2-003],** therefore maintains its position that any potential impacts will be highly localised and temporary in nature and will not give rise to significant effects on RTD feature of the OTE SPA.
1ECOL55.	Applicant	**HRA – timing of offshore geophysical surveys in OTE SPA** Under what circumstances could geophysical surveys be required to take place in the OTE SPA between January and March? In the absence of a firm commitment, provide an assessment of impacts on RTD of the OTE SPA from associated vessel movements, or signpost to where this information is provided.	For UXO related survey activities please see our response to Written Representation **[REP2-034]**. UXO surveys are not included in the DCO Application. For UXO works, the Applicant is adopting the MMO-endorsed two-licence strategy: one licence for UXO identification surveys and a second for clearance, if required. Geophysical surveys are identified by the MMO as scientific research activities and are generally exempt from requiring a marine licence unless the survey is likely to significantly affect a marine protected area (Marine licensing exempted activities - GOV.UK). The MMO has also prepared specific guidance on seismic and geophysical surveys which focuses specifically on the potential effects of underwater noise on marine protected species. The guidance recommends that, when determining whether the survey would have a likely significant effect on a marine protected area particular consideration should be given to potential impacts protected sites with marine mammal features, including (but not limited to) special areas of conservation (SACs) designated for harbour porpoise for which noise management measures are in place (MMO, 2022). Regarding potential effects on the RTD feature of the OTE SPA, pre- and post-lay geophysical survey activities will involve a single vessel (and potentially a guard vessel to manage potential interactions with other vessels) moving slowly along the route of the Offshore Scheme. Any potential disturbance to RTD will be temporary and localised. The applicant maintains its position that there is no potential for any adverse effects on the RTD feature of the OTE SPA from geophysical surveys. Furthermore, this period coincides with periods of highest risk for completing offshore surveys due to an increased likelihood of weather downtime due to adverse weather. Circumstances under which geophysical surveys would be required to take place between January and March are therefore very limited as the Applicant would generally aim to complete surveys during the optimum weather window.
1ECOL56.	Applicant	**HRA – fencing to reduce noise emissions to Sandlings SPA**	The first part of measure B23 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted for Deadline 3 has

Reference	Question to:	Question	Applicant's Response
		The noise fencing around Sandlings SPA referred to in paragraph 7.2.15 of the HRA Report [REP2-009] is referenced in B23 of the REAC [CR1-043], as being 'where required to avoid significant disturbance'. It is understood from the HRA Report that such fencing is required to achieve the 10dB noise reduction. In addition, the applicant has stated that the noise fence would also act as a visual screen to mitigate impacts from lighting. Can the applicant provide a firmer commitment to ensure the quoted 10dB noise reduction would be achieved prior to construction activities taking place and to mitigate impacts from lighting?	been amended from "*Best practical means such as noise fencing or similar effective noise reduction methods around works areas where required to avoid significant disturbance and also prevent visual disturbance"* to "*Best practical means such as noise fencing or similar effective noise reduction methods will be used around works areas where required to avoid significant disturbance. At the trenchless compound, close-board fencing will be used along with other measures as a noise mitigation measure to ensure noise levels at Sandlings SPA do not exceed 60 dB LAmax, and to prevent visual disturbance".* This will ensure the required noise reduction is achieved (as the 10 dB reduction was the reduction required from mitigation to achieve the 60 dB threshold).
1ECOL57.	Applicant	**HRA – visual screening for Sandlings SPA** The applicant considers the noise fence around the Suffolk construction compound would act as a visual screen to birds in the Sandlings SPA. Can the applicant provide further details of the proposed lighting and the proposed screen to support this conclusion?	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 close-boarded fence around the HDD compound is expected to be 3 m in height. This would therefore screen the majority of activity and lighting. The use of cranes for the HDD landfall is typically limited to the initial mobilisation of HDD equipment (normally two-three days, day works only), repositioning of the drill rig between holes (one day on two occasions) and demobilisation of HDD equipment (two-three days, day works only). 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. Illumination from the small amount of lighting above the height of the fencing would be controlled through use of cowling and other appropriate measures to avoid illumination outside the compound, in line with REAC commitment B38 and GG21 in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3**.** The Ecological Clerk of Works will review lighting arrangements east of Leiston Road during construction and modify arrangements with the contractor if required by means such as the position and direction of lighting and of screening or cowling.
1ECOL58.	Applicant	**HRA - Saxmundham South Garden Neighbourhood** The Saxmundham South Garden Neighbourhood is screened in to the in-combination assessment in section 5 of the HRA Report [REP2-009], but not considered in section 8. Can the applicant confirm how the project has been taken into account?	The assessment presented in Section 8 of **Application Document 6.6 (E) Habitats Regulations Assessment Report** submitted at Deadline 3 for Saxmundham to Peasenhall Water Mains Installation was also intended to apply to Saxmundham South Garden Neighbourhood, as was the case in the screening stage (paragraphs 5.2.18 to 5.2.21). Saxmundham South Garden Neighbourhood has now been referenced in paragraphs 8.2.9 to 8.2.12 for clarity in the version of the HRA submitted at Deadline 3. The conclusions of the appropriate assessment are therefore not materially altered.
1ECOL59.	Natural England	**HRA – screening out of LSE for dune slack qualifying features of Sandwich Bay SAC** The applicant provided further justification for its decision to screen out LSE to dune slack qualifying features of the Sandwich Bay SAC from hydrological impacts in its updated HRA Report [REP2-009], based on information in a technical note at Appendix F. Confirm if this addresses your concerns about this impact pathway (as set out in B1, B9, B21, B30 to B33 [RR-3920] [REP1-154A]). If not, advise what further information you	

Reference	Question to:	Question	Applicant's Response
		consider is required from the applicant to support its position. Provide any evidence you hold that suggests that there is connectivity with the Sandwich Bay SAC.	
1ECOL60.	Natural England	**HRA – effects on Stodmarsh SAC** NE ([RR-3920], appendix B and appendix G) did not dispute the applicant's conclusions of no LSE to Stodmarsh SAC. Can NE confirm if it agrees the conclusion. If not, set out your concerns.	
1ECOL61.	Natural England	**HRA – LSE conclusions for OTE SPA** Further to the applicant's update to the HRA Report [REP2-009] in paragraphs 4.3.41 to 4.3.42, does NE agree with the applicant's conclusion that a LSE on all qualifying features of the OTE SPA can be excluded as result of impacts on their supporting habitats?	
1ECOL62.	Natural England	**HRA – emergency operation and maintenance activities in the OTE SPA** The applicant ([REP2-014], table 2.38, G10) has confirmed it could provide NE with a report on emergency operation and maintenance activities undertaken in the OTE between November and March. Does NE require such a commitment to be made within the RTD protocol?	
1ECOL63.	Natural England	**HRA – operational air quality emissions** Can NE confirm to which European site(s) its concerns regarding operational air quality emissions ([RR-3920] B24 and B37) relate? The applicant has revised the HRA Report [REP2-009] to confirm that during the operational and maintenance phase, there would be up to 4 daily car/LGV trips associated with staff members for the proposed Minster converter station, and occasional maintenance and inspection. Does NE agree that in-combination LSEs can therefore be excluded and if not, why not?	
1ECOL64.	Natural England	**HRA – operational in-combination air quality emissions** Can NE confirm to which European site(s) its concerns regarding in-combination air quality emissions ([RR-3920, B18 and B26) relate? The applicant has responded that the predicted project alone effects are too small to show in the model, so it considered there would be no in combination effect ([REP2-014], table 2.33, B26). Does NE agree that in-combination LSEs can therefore be excluded?	
1ECOL65.	Natural England	**HRA – acid grassland** NE has advised it is essential to understand soil fertility and pH for successful restoration of acid grassland at Sandlings SPA [REP1-154]. Noting that the proposed acid grassland enhancement has been removed from the proposed development, is this information still relevant to the proposed acid grassland creation and would such information be required at pre-consent stage, or can amendments be made to the oLEMP [CR1-045]?	
1ECOL66.	Natural England	**BNG metric spreadsheet and feasibility report**	

Reference	Question to:	Question	Applicant's Response
		The ExA requests that NE provide comment on the biodiversity metric spreadsheets [REP1A-040] to [REP1A-042] and on the revised BNG feasibility report [REP1A-025].	
1ECOL67.	Applicant	**Offsite BNG provision** Explain how the offsite biodiversity improvements required by the applicant to achieve 10% BNG would be secured.	Off-site biodiversity improvements are anticipated to be required to achieve the Project's minimum 10% biodiversity net gain (BNG) commitment. The **Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]** states that off-site BNG delivery would form a key component of the overall BNG strategy and that such delivery would be secured through appropriate legal agreements to ensure long-term management and monitoring of habitats (Sections 5.2.9 and 5.2.10 of **Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]**). The **Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]** sets out a range of potential off-site delivery routes, including the purchase of biodiversity units from commercial habitat providers and collaborative delivery with partner organisations, as described in Sections 5.2.1–5.2.8 and summarised in Table 5.1. The precise delivery pathway and securing mechanism for off-site BNG will be confirmed at a later stage, once detailed design and land availability are finalised. Furthermore, as detailed in Paragraph 5.2.8 in **Application Document 6.12 Biodiversity Net Gain Feasibility Report [REP1A-025]**, 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. Notwithstanding the above, any off-site biodiversity units required will be secured in accordance with the statutory BNG framework, through legally binding arrangements providing for a minimum 30-year management period, with the resulting biodiversity units recorded on the statutory biodiversity gain register. This will ensure that off-site biodiversity improvements are delivered, maintained and enforceable.
1ECOL68.	Applicant	**Local Nature Recovery Strategy** Explain whether the publication of the Kent and Medway Local Nature Recovery Strategy in November has any implications for the applicant's BNG approach and if so, whether any updates to the BNG feasibility report [REP1A-025] are required.	The publication of the Kent and Medway Local Nature Recovery Strategy (LNRS) does not require an update to the **Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]** at this stage. While the biodiversity unit values reported in the assessment may be subject to change as a result of applying the LNRS, the overall conclusions of the feasibility assessment remain unchanged. The LNRS is relevant to the Project's BNG approach because, under the Statutory Biodiversity Metric, it informs the assignment of strategic significance to habitats. Strategic significance is applied to both baseline and post-development habitats and therefore influences the calculation of biodiversity unit values. The role of the LNRS in assigning strategic significance is set out in Table 2.1 of **Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]**. **Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]** explicitly recognises that strategic significance is subject to change where new or updated information becomes available. Section 2.3.15 confirms that the BNG assessment will be updated in future to account for any changes relating to strategic significance, including those arising from the expected publication of the LNRS. Accordingly, while the publication of the LNRS is relevant to the application of the Statutory Biodiversity Metric, it does not alter the conclusions of **Application**

Reference	Question to:	Question	Applicant's Response
			Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025] or necessitate an update to that report at this stage. The BNG assessment will be updated at detailed design stage, at this point the LNRS will be used to inform the strategic significance.

4. Cultural Heritage

Table 4.1 Cultural heritage

Reference	Question to:	Question	Applicant's Response
1CH1.	Applicant	**Suffolk Bronze-Age enclosure** SCC's Local Impact Report (LIR) (Section 7 of [REP1-130]) stated that it is now believed that what was initially thought to be a Neolithic Henge is a Bronze Age enclosure, though is still a significant monument. SCC advised that further excavation would be needed, along with further mitigation. Explain in detail what further investigative archaeological works are being undertaken at this heritage asset, the timeframe for this, along with any proposed mitigation.	Additional geophysical survey was undertaken in September and October 2025 of the area associated with proposed Change 3 (Change to the Order Limits east of Friston to provide flexibility in relation to heritage feature, Suffolk) and the results have been shared with Suffolk County Council (SCC) and Historic England (HE) and submitted at Deadline 1A as part of the Change Request **Application Document 9.76.5.2 Change Request Appendix B Geophysical Survey Report [CR1-057]**. This investigation focused on the area where a possible prehistoric henge had been identified during the Phase 2b evaluation trenching. The additional geophysical survey confirmed that the feature is a G-shaped enclosure and not a henge, as explained in **Application Document 9.76.5.2 Change Request Appendix B Geophysical Survey Report [CR1-057]** and as such it is not considered to be of national importance or schedulable quality. Consultation with SCC and HE has assigned a Late Bronze Age date based on other features that were excavated as part of the Phase 2b evaluation trenching. Further evaluation trenching was undertaken in November and December 2025. The scope of the trenching (defined as 'Phase 3') was agreed with Suffolk County Council and Historic England and focused on the land to the east of the G-Shaped enclosure where the Order Limits have been extended as part of Change 3. While the full report has not yet been produced, the initial findings have confirmed that no significant archaeological remains survive in the area covered by of the Change 3. An additional impact assessment based upon the results of Phase 2a and 2b evaluation trenching in Suffolk, as well as the further Phase 3 evaluation trenching in Friston, will be submitted at Deadline 5. **Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]**) will be updated once the results of the Phase 3 trenching have been published. The updated OWSI will include any mitigation required in the area of Change 3, which will likely comprise either preservation in situ (i.e. avoidance of the G-Shaped enclosure) or detailed archaeological excavation as agreed with the Archaeological Advisor to Suffolk County Council from SCCAS.
1CH2.	Applicant	**Heritage asset assessment** A number of heritage assets, such as listed buildings, have been scoped out of the ES for further assessment. Provide a list of all heritage assets (designated and non-designated) that are within the study areas, with an explanation as to why they were individually scoped out for further assessment and what level of impacts the proposed development would have on them, if any.	A number of designated and non-designated heritage assets were scoped out of full impact assessment in the Cultural Heritage ES Chapters for the Suffolk Onshore Scheme and the Kent Onshore Scheme as there was likely to be either no impact or negligible impact to their heritage value. In response to question 1CH2 from the Examining Authority, Appendix F of **Application Document 9.73.1 Applicant's Reponses to First Written Questions – Appendices,** submitted at Deadline 3, provides a list of all designated and non-designated heritage assets within the defined Study Areas that were scoped out from the full impact assessment. As requested by the Examining Authority, a rationale for their scoping out and an assessment of impact and effect to each asset is provided, as well as an assessment of the degree of

Reference	Question to:	Question	Applicant's Response
			harm to the assets. The assessment now provided, in most cases results in 'no impact' / 'neutral effect'.
1CH3.	Historic England Kent County Council Suffolk County Council	**Inclusion of heritage assets in the ES assessment** Are there any designated or non-designated heritage assets within either county that were not considered within the ES, or that were scoped out for further assessment within the ES, which should have been assessed? Furthermore, were the study areas used sufficient to include all heritage assets which could be impacted by the proposed development?	
1CH4.	Applicant	**Geoarchaeological Assessment** In section 2 of Historic England's (HE) deadline 1 submission [REP1-199] it notes that geoarchaeology work has not been undertaken and that this was a missed opportunity to evaluate key areas of the proposed development. Explain why a programme of geoarchaeological assessment has not yet been undertaken and if this is intended to be done within the examination period.	Whilst the methods used for collating engineering data during the initial Ground Investigation (GI) works undertaken for both the Suffolk Onshore Scheme and the Kent Onshore Scheme, did not allowed for collection of geo-archaeological data/samples, a programme of archaeological monitoring and geoarchaeological assessment has subsequently been proposed as part of the additional GI works to be undertaken during 2025/2026. In Kent, geo-archaeological monitoring is being undertaken as part of the additional Ground Investigation works carried out during 2025/2026.The scope of this work was agreed with the Historic England Science Advisor and the Kent County Council Archaeological Advisor prior to works commencing. A Geoarchaeologist was involved in the scope and design of this work. Reporting on the findings of these works will be provided prior to the end of examination. In Suffolk, as stated in the response to Written Representation from Historic England (**Application Document 9.34.2 (B) Applicant's Response to Relevant Representations from Statutory Consultees and Bodies [REP2-016]**), geo-archaeological works are being proposed as part of the additional Ground Investigations works scheduled for early 2026. The results of this work will be submitted prior to the end of examination. The Historic England Science Advisor, as well as the Suffolk Archaeological Advisor, will be consulted as part of this process to agree the scope and approve the Written Scheme of Investigation.
1CH5.	**Applicant** Historic England Suffolk County Council Kent County Council	**Areas not currently assessed** SCC in section 7 of its LIR [REP1-130] states that there are areas within the order limits that have not been included in the trenched evaluations undertaken to this point, such as areas around the proposed Friston substation site, which would still need assessing. For the applicant, provide a plan to show areas that still require archaeological assessment and confirm when this will be done. Also, explain why this remaining assessment work has not yet been undertaken. For Historic England, SCC and KCC: If there are areas where further assessment work is required, should this be done before the close of examination so that the results can be considered along with any necessary mitigation? Or could this be done after any potential consent through secured commitments/requirements?	Please refer to the plan provided in Appendix E of **Application Document 9.73.1 Applicant's Reponses to First Written Questions – Appendices**, submitted at Deadline 3 which shows the following: • areas within the Suffolk Order Limits which have been subject to evaluation trenching as part of the Suffolk Onshore Scheme (based on 'as built drawings'); • areas within the Suffolk Order Limits which have been subject to evaluation trenching and/or mitigation as part of East Anglia 1 and East Anglia 2 (based on 'as built' drawings); • areas within the Suffolk Order Limits which have been subject to evaluation trenching as part of the Lion Link Scheme; and • areas within the Suffolk Order Limits that have not been subject to evaluation trenching, and the reason why they have not been trenched.
1CH6.	Applicant	**Strategy for ongoing protection of in situ remains and a historic environmental management plan**	A strategy for the preservation of archaeological remains is included in the Outline OWSI for Suffolk [APP-343] which is being updated and will be submitted prior to

Reference	Question to:	Question	Applicant's Response
		SCC in its LIR (section 7 [REP1-130]) has required a strategy for ongoing protection of any archaeology that is to remain in situ as part of a mitigation strategy, and also to provide a detailed historic environmental management plan (HEMP). Submit these strategies/plans, at least in outline form, or explain why these cannot be submitted.	the close of the Examination. The strategy in the Outline OWSI covers both construction and operation phases of the Suffolk Onshore Scheme. The Outline OWSI includes provision for a Historic Environment Management Plan (HEMP) to be prepared by the Archaeological Clerk of Works, and for the HEMP to be agreed with the Archaeological Advisor to the LPA from SCCAS. The HEMP is to be prepared post-consent and pre-construction, in line with standard practice, as it will need to respond to archaeological management measures (including preservation) that may be required following the results of detailed design and further post-consent archaeological evaluation.
1CH7.	Applicant	**Requirement 14 suggested changes** SCC [REP1-130], paragraph 7.140 provides an alternative wording for requirement 14 of the draft Development Consent Order [CR1-027]. Provide your response to the suggested amended wording, with an explanation of changes made or where they have not been amended.	The Applicant is content with the majority of the revised wording for Requirement 14 suggested by SCC and has updated the wording within **Application Document 3.1 (F) draft Development Consent Order** submitted at Deadline 3.
1CH8.	Historic England	**Wood Farmhouse** Wood Farmhouse near Saxmundham has been de-listed. Can Historic England clarify if the building now has any remaining historic value or if it is still a heritage asset?	
1CH9.	Historic England Kent County Council	**Ebbsfleet Peninsular multi-period complex archaeological site** Historic England [REP1-199] describes the Ebbsfleet Peninsular multi-period complex as being of schedulable quality and of national importance. Explain why this is a non-designated heritage asset but not a Scheduled Ancient Monument, given its high value.	
1CH10.	Applicant	**Impact to the Ebbsfleet Peninsular multi-period complex** Historic England [REP1-199] considers that the proposed development could result in major adverse impact to the multi-period complex, which would be a significant effect. Are there further mitigation options, other than those currently proposed, that could be adopted which could lessen the impact so that a significant impact could be avoided? Is so, set this out in detail in your response.	A response to comments raised by Historic England in their Written Representation regarding the potential to reduce impacts on the Ebbsfleet Peninsular multi-period complex was provided in **Application Document 9.79 Applicant's Comments on Written Representations [REP2-034]**. This cross referenced an earlier response to the Relevant Representation from HE (**Application Document 9.34.2 (B) Applicant's Responses to Relevant Representations from Statutory Consultees [REP2-016]**). This noted: *"The Applicant acknowledges that mitigation through a programme of archaeological investigation does not reduce the magnitude of impact. The reduction in the significance of effect recognises that professional excavation and recording of archaeological remains is a compensation measure, the successful completion of which would reduce the overall harm to the asset to an acceptable level. The proposed mitigation through a programme of archaeological investigation has been agreed in principle with the Kent County Council Archaeological Officer.* *Whilst acknowledging paragraph 5.9.16 of EN-1, the Applicant's position is that the successful completion of professional excavation and recording of archaeological remains would reduce the overall harm to the asset to an acceptable level. The proposed mitigation through a programme of archaeological investigation has been agreed in principle with the Kent County Council Archaeological Officer.* *The Applicant will consult further with HE and KCC to discuss feasible design mitigation options. Site compounds are an important element of the construction process allowing space for staff welfare facilities and the lay down and storage of*

Reference	Question to:	Question	Applicant's Response
			plant and materials. The Applicant has looked to relocate compounds away from areas highlighted as of increased value where possible however is unable to remove the compounds completely and still complete the works. A number of separate compounds have been proposed to enable the various elements of the works to be controlled safely and effectively, this involves three principal compounds adjacent to the Converter and Substation site, these are for the Converter Contractor, the Cable Contractor and the OHL Contractor. Segregation of these compounds is best practice from a Construction Design and Management perspective; the location of these main compounds has been chosen to reduce impacts on the archaeology of the area. The compounds either side of the A256 are necessary to enable the trenchless crossing of the road, with the western compound also acting as an enabling compound for the Converter contractor to allow for the access and main compounds to be constructed. The Applicant will work with our contractors to look to reduce the footprint of compounds where practicable during the detailed design process. The no dig option of installing compounds above top-soil without undertaking a top-soil strip has been considered. This option would however impact the quality of the top-soil which would then require remedial works to return it to its original condition. The Applicant considers that the remedial works would be just as impactful as the top-soil strip so would not provide a betterment". The Applicant also provided a response to this point raised in the Thanet Council Local Impact Report (**Application Document Local impact reports (LIR) from any local authorities [REP1-132]**) which was submitted in **Application Document 9.35.4 Applicant's Comments on Local Impact Report from Thanet District Council [REP2-029]**. This noted: "*The Applicant will continue to seek to minimise the potential for physical impacts on the Ebbsfleet Peninsula Complex as the design is developed. This includes limiting the size of compounds and the working width of the cable corridor and permanent access where practicable. This is being undertaken in consultation with the Kent County Council Archaeological Advisor*". Therefore, while the Applicant recognises that impacts to part of the multi-period complex would result in a significant effect, the Order Limits have been designed to avoid the areas defined (through consultation with KCC) as being of the greatest significance including the large Roman enclosure to the south and the Bronze Age barrow cemetery to the north. Therefore, mitigation by excavation is considered to be proportionate and adequate to the impact from the Kent Onshore Scheme. The proposed mitigation has also been discussed and agreed with the KCC Archaeological Advisor.
1CH11.	**Applicant** Local Planning Authorities Historic England	**Stakeholder involvement in the converter station design** Within its deadline 1 submission, HE [REP1-199] stated it has concern that dDCO [CR1-027] Schedule 3 requirement 3 (Converter Station Design) as drafted makes no explicit provision for stakeholder engagement on the issue of the design beyond the County Council. Given the proximity of heritage assets to the proposed large-scale converter stations, such as Richborough Roman Fort, the ExA asks the applicant to consider amending the wording so that this requirement makes it is necessary for the local planning authorities to consult also with HE on the design details of the converter stations. HE and LPAs – Are there any comments on the inclusion of HE for consultation as part of this requirement?	The Applicant is content with Historic England being added to the list of stakeholders to be consulted regarding converter station design and has updated the wording of Requirement 3 within **Application Document 3.1 (F) draft Development Consent Order** submitted at Deadline 3.

Reference	Question to:	Question	Applicant's Response
1CH12.	Kent County Council	**Geophysical surveys in Kent** Confirm whether there are any additional geophysical/archaeological surveys needed for areas of Kent that should be undertaken by the applicant.	
1CH13.	Applicant	**Additional field assessment works or submissions** Other than anything mentioned by the applicant in the responses to other heritage questions in ExQ1, is there further survey or assessment work being undertaken in Kent or Suffolk relating to archaeology or heritage assets, and are there intended to be further documents submitted in regard to heritage/archaeology during this Examination period?	As noted in the response to 1CH4 above, geo-archaeological works are being undertaken as part of the additional Ground Investigation (GI) works in Kent and will also be undertaken in Suffolk in early 2026. The results of these works will be submitted, once available, prior to the end of the Examination. As noted in 1CH1, an additional impact assessment based upon the results of Phase 2a and 2b evaluation trenching in Suffolk, as well as the further Phase 3 evaluation trenching in Friston, will be submitted at Deadline 5. **Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]** will also be updated and submitted into the Examination once the results of the Phase 3 trenching have been published.

5. Water Environment

Table 5.1 Water environment

Reference	Question to:	Question	Applicant's Response
1WE1.	Environment Agency Suffolk County Council Kent County Council	**Sequential and exception test** Provide a response with respect to the acceptability and policy compliance of the applicant's sequential and exception test as included in the Flood Risk Assessment [APP-292]? In answering, although the ExA notes that the proposed substations, converter stations and cable transition joint bays are all located in Flood Zone 1, specifically cover the manner in which the Exception Test has been applied by the applicant regarding the presence of some components of the scheme (construction routes and cables etc) being necessarily in Flood Zones 2 and 3.	
1WE2.	Applicant	**Firewater runoff – substation and converter station attenuation** The applicant's response to the Environment Agency RR set out in [REP2-014] Reference 2.4.1.F states that 'The attenuation features associated with each of the compounds will provide sufficient storage for firewater runoff in the event that an isolation chamber could not be reached safely.' Provide evidence / calculations which support this statement.	To expand upon the Applicant's response to reference 2.4.1.F in **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**, isolation of firewater at any location requires the closure of penstocks on-site to achieve the isolation. In the design of each compound, there is, at a minimum, a penstock at the outlet of the attenuation basin. However, in some compounds there may be additional on-site penstocks to isolate particular areas. The asset on-site which can store a large volume of water is the attenuation basin. In the event of firewater being required to extinguish a fire, either this will be acquired from a water main or from a water storage tank located on site as shown within the typical layouts within **Application Document 2.13 Design and Layout Plans [APP-037]**. In the unlikely event that additional water is required the attenuation basin itself could be used as a potential source, if the basin is already full of storm water. If the firewater has come from the attenuation basin, it is assumed this water can return to the basin via the drainage system as the water is just replacing itself. In the event that water cannot be pumped from the attenuation basin (and mains water or tanked water is therefore used), it is not possible to quantify how much capacity the attenuation ponds would have at any given time due to the unknown timeframe between a rainfall event and a fire. However the Applicant's standards require for 120,000 litre (120 m^3) to be available for fire suppression, within the first hour and the attenuation features have minimum storage volumes significantly in excess of this volume as identified below. • Suffolk Converter minimum attenuation volume is 5156.1 m^3 • Suffolk Substation minimum attenuation volume is 1452.4 m^3 • Kent Combined Converter and Substation minimum attenuation volume is 10114.9 m^3. It is considered that after the first hour any isolation systems could have been implemented, and additional storage would then be provided within the drainage network.

Reference	Question to:	Question	Applicant's Response
1WE3.	Applicant	**Minster Marshes – flood plain** Explain the role of Minster Marshes in acting as a flood plain now and in the future and clearly explain the impact that the proposed development would have on this? In answering, confirm the specific implications regarding any loss of storage due to providing 2m of fill which a number of RRs claim would be required to take the proposed level above the flood plain.	Minster Marshes is an area of relatively flat and low-lying land, where drainage is facilitated by the presence of a network of open drainage ditches, water level control structures and buried field drainage systems. It is not therefore a 'traditional' floodplain that is subject to routine inundation from rivers (or the sea), as the ditch network is managed by riparian land owners and the River Stour (Kent) Internal Drainage Board (IDB), who seek to maintain appropriate water levels. However, the properties of the prevailing soils and geology impede the infiltration of rainfall to ground. This can result in waterlogging of the fields, where rainwater sits in topographical depressions during periods of heavy rainfall. In the future, climate change is predicted to increase rainfall intensity, which would further encourage this waterlogging. Assessment presented in **Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065]** concludes that there would be negligible permanent operational impacts on groundwater due to the introduction of impermeable surfaces. Construction of the proposed development would change the current surface water drainage regime due to the ground improvements that are required by adding areas of impermeable surface on land that is currently greenfield and by adding below-ground foundations/piles. Without mitigation and suitable design measures, there would be a reduction in storage for rainfall that is unable to infiltrate, and an increase in rainfall runoff rates and volumes into the surrounding surface water network. To prevent these implications, runoff from the non-permeable areas of the converter station and substation sites would discharge into permanent attenuation ponds. Sufficient volumes of storage would be provided to achieve discharges to existing watercourses at rates that have been set based on discussions with the River Stour IDB. In addition, where existing buried field drainage is affected, these would be managed in agreement with the agricultural owner or manager of the agricultural land affected, to ensure drainage is maintained. These measures are secured by commitments W23 and W10 within **Application Document 9.83 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3**.**
1WE4.	Applicant	**Minster Marshes – existing pollutants** Explain how the implications of siting the construction of the convertor station on Minster Marshes has been considered, addressed and any necessary mitigations secured in order to adequately address mobilisation of existing pollutants in buried salt layers during construction.	Water arising from the proposed ground improvement works will be contained and retained in attenuation ponds within the construction site to allow any necessary treatment to be undertaken before controlled discharge to the local drainage network. This discharge would require a discharge permit to be obtained from the Environment Agency. In the highly unlikely event that pollutants were not considered to be treatable on site, the water would be removed from the site by tanker for offsite treatment.
1WE5.	**Applicant** Kent County Council Environment Agency	**Weatherlees Hill Wastewater Treatment Works** Confirm if there are any plans to extend the Weatherlees Hill wastewater treatment works, and if so how that could be affected by the proposed development.	The Applicant is aware, through its discussions with Southern Water, of proposals to expand the Weatherlees Hill Wastewater Treatment Works to construct and operate ground mounted solar photovoltaic arrays. Kent County Council granted planning permission for this expansion on 15 November 2024 under planning application reference TH/24/401 (KCC/TH/0041/2024) The Applicant has assessed the cumulative effects of this development with the Proposed Project and this is set out in **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073].**

Reference	Question to:	Question	Applicant's Response
			The Applicant has considered the interaction of the Sea Link Project with this expansion development and concludes that the construction of this development does not (based on current information) interact with the Sea Link Project, but coordination for vehicular access may be required along Jutes Lane as and when construction works for the Sea Link Project take place. **Application Document 7.10 Coordination Document [APP-363]** explains that the Applicant is committed to ongoing engagement with other project promoters to secure coordination benefits and explore further opportunities for coordination and this includes minimising highways impacts on the local communities. The Applicant will therefore continue to liaise with Southern Water regarding any potential for overlap in construction programmes at the Minster Converter Station and Substation Site.
1WE6.	**Applicant** Environment Agency	**Water Framework Directive (WFD) – River Fromus bridge** The Environment Agency RR [RR-1586] identified that a crossing over the River Fromus, with a soffit height of 4m, could have an impact on weak dispersing polarotactic invertebrates, leading to a deterioration under WFD. The ExA notes that discussions are ongoing regarding this matter and that the Environment Agency D2 submission [REP2-050] indicates that a soffit height of 4m is acceptable subject to a monitoring and contingency plan for the invertebrates. However, can both parties specifically set out their positions with respect to WFD compliance and any implications arising from an increased soffit level of +0.716m for the 4m option respectively due to the updated Q95 flow level as identified in Table 4.3 in the River Fromus Visualisations document [REP1-298].	**Application Document 6.9 Water Framework Directive Assessment [APP-293]** sets out the assessment of risks to the Water Framework Directive (WFD) status of the River Fromus through the crossing of this river. The assessment is supported by the Flying Insects Literature Review (see Annex 2.F.9 River Fromus Riverfly Literature Review within **Application Document 6.3.2.2.F Part 2 Suffolk Chapter 2 Appendix 2.2.F Aquatic Ecology Survey Report [APP-104]**) and an assessment of multiple other bridges crossing the River Fromus. The River Fromus is currently of Poor Ecological Status but Good Biological Status for invertebrates in 2019 and 2022. Invertebrates are not the driver for Poor Ecological Status; the driver being fish (Poor Status). Fish WFD Status will not be affected positively or negatively by the proposed river crossing. Reasons for the River Fromus not achieving Good status are reported as physical modifications introducing ecological discontinuity and preventing fish movement, and pollution from urban areas and transport. The Fromus has an ecological status objective of Good by 2027 (with low confidence), and a chemical status objective of Good by 2063. Data has been obtained from a range of site surveys of the Fromus waterbody, including aquatic invertebrate surveys at the proposed crossing location of the River Fromus and beyond (November 2023, May 2024 and November 2024), macrophyte surveys and fish survey (July 2024). Details are provided within **Application Document 6.3.3.2.H Appendix 3.2.H Aquatic Ecology Report [APP-104]**. Invertebrate surveys at the proposed crossing location of the River Fromus were completed on 20 November 2023, 28 May 2024 and 28 November 2024 at the locations shown in Table 3.8. Further macroinvertebrate surveys were completed at additional locations upstream and downstream of the proposed bridge location on 28 November 2024 within the autumn sampling season. The combined taxa list of all survey samples included a total of five riverfly taxa; specifically, the mayflies *Cloeon dipterum* (WBN2 only) and *Baetis rhodani/atlanticus* (WBNx1 R. Fromus only), and the caddisflies *Lype* sp. (WBN2 only), *Limnephilus lunatus* (WBN2 only) / Limnephilidae (WBN2 and WBNx2 only), and *Glyphotaelius pellucidus* (WBN2 only). All taxa are common and widespread throughout the UK where appropriate habitat is available to support their presence. A relatively diverse aquatic beetle fauna comprising ten species was also recorded, including the beetle *Anacaena bipustulata* (current CCI species

Reference	Question to:	Question	Applicant's Response
			conservation score 5 – Local, current scores provided by the EA via the EA Ecology and Fish Data Explorer) which attained the highest CCI species conservation score within the AECOM River Fromus dataset. At the US (WBNx1) R. Fromus site in autumn 2024, the riffle beetle *Elmis aenea* was recorded, the only riffle beetle recorded at any site. With the exception of the flatworm *Polycelis felina* and the Limnephilidae caddisfly larva *Glyphotaelius pellucidus* (current CCI species conservation score 3 - Frequent), all other recorded species had CCI Species conservation scores of 1 or 2, equating to Common or Very Common species. RICT analysis using environmental variables derived by the RICT Location Checker for Model 44 Input Variables (DEFRA, 2024) and in accordance with best practice WFD classification methodology (WFD-UKTAG, 2023), available on the DEFRA portal, resulted in an overall WFD invertebrate classification of Moderate (based on the combination of the modelled distributions for each of WHPT-ASPT and WHPT-NTAXA across all classes in both spring and autumn). In this case, macroinvertebrate surveys from the bridge crossing location are used to give an 'equivalent WFD classification', to support the WFD assessment alongside the EA WFD classification data, which has also been used as described elsewhere. RICT analysis of the autumn 2024 survey data provided WFD status equivalent of Moderate for the upstream (WBNx1) survey location, and Bad for the mid (WBN2) and downstream (WBNx2) survey locations. While this is indicative only, and should be treated with caution as single-season sampling, autumn data is most reliable in providing accurate single-season results (Hill, 2016). In this case the Moderate equivalent WFD status at the crossing point, and as low as Bad status elsewhere, indicates that habitat at these locations is less optimal for macroinvertebrates than elsewhere in the WFD water body, i.e., at the EA monitoring site downstream used for WFD classification. The conclusion here is not that the WFD status of the WFD water body as a whole is Moderate or otherwise, but that variations in macroinvertebrate communities present indicate a range of WFD status-equivalents that demonstrate habitat variability, i.e., macroinvertebrate communities are not uniform throughout. The Proposed Project will deliver enhancement of an approximately 500 m stretch of the riparian corridor along the River Fromus from approximate grid reference TM 38806 62412 to TM 38825 61847. Within this stretch (although not for its entire length) there will be reprofiling of selected areas of the banks of the River Fromus at specific locations (where it would not, for example, require displacement of water voles) to create an approximately 50 cm wide berm just above the typical summer water level. This berm will be planted with riparian vegetation. This will enhance the value of the River Fromus since this stretch of the river has little riparian emergent vegetation. The replanting will be focused on the new bridge partly in order to improve connectivity beneath the bridge structure. However, other stretches will also be diversified. Details are set out in Figure 1 in **Application Document 7.5.7.1.1 Saxmundham Converter Station Outline Landscape Mitigation** and the commitment will be secured via DCO Schedule 3 Requirement 6.

Reference	Question to:	Question	Applicant's Response
			From an intuitive perspective it seems unlikely that a bridge soffit height greater than a couple of metres could seriously obstruct mayfly flight, as all published observations, as detailed earlier, document mayflies routinely flying at least 0.5 m from the water surface during swarming and compensation flights. From a scientific perspective, Málnás et al. (2011) remains the only study to suggest that a bridge, devoid of electrical lighting, with ample space for underway passage, could obstruct upstream riverfly dispersal. To accept that bridges pose a significant threat to riverfly populations by acting as optical barriers requires further study and corroborating evidence from a source external to the research group that introduced this concept to the scientific community. At present, it is not possible to conclude, given the current body of scientific data, that any given bridge, or multiple bridges, could impact riverfly species found in the UK in the manner described by Málnás et al. (2011). It is therefore concluded by the Applicant that the effects of the proposed bridge crossing of the River Fromus on common and widespread dispersing invertebrate species will be negligible, and as invertebrates are currently not the driver of Poor Status for the River Fromus, such negligible effects would have no impact on the WFD Status of the River Fromus waterbody, or the ability of this waterbody to achieve its WFD objectives in the future, noting also the proposed implementation of the invertebrate monitoring and contingency plan. Refer to **Application Document 6.9 Water Framework Directive Assessment [APP-293]** and the appendices therein for further details.

6. Geology and Hydrogeology

Table 6.1 Geology and hydrogeology

Reference	Question to:	Question	Applicant's Response
1GH1.	Applicant	**Unexploded ordnance** Explain what separate terrestrial consenting process and construction safety procedures are in place to appropriately deal with any unexploded ordnance? In answering, specifically cover matters (including risk identification and mitigation) relating to: • ecology • designated sites The applicant should also supply the unexploded ordnance survey reports referenced in section 2.11 of Appendix 3.5.C Ground Investigation Report – Kent [APP-171] and section 2.10 Appendix 2.5.D Ground Investigation Report – Suffolk [APP-119].	The Detailed UXO Risk Assessment Reports prepared by Safelane Global and referenced within Section 2.11 of **Application Document Appendix 3.5.C Ground Investigation Report – Kent [APP-171]** and Section 2.10 **Application Document Appendix 2.5.D Ground Investigation Report – Suffolk [APP-119]**, are provided in Appendix K of **Application Document 9.73.1 Applicant's Reponses to First Written Questions – Appendices**. Note that these are risk assessment reports not survey reports. Within the Geotechnical Risk Register provided within Table 9.4 of **Application Document Appendix 3.5.C Ground Investigation Report – Kent [APP-171]** and Table 9.4 of **Application Document Appendix 2.5.D Ground Investigation Report – Suffolk [APP-119]**, a number of mitigations for the UXO risk are identified. Implementation of mitigation measures recommended as detailed in the Detailed UXO Risk Assessment reports provided in Appendix K of **Application Document 9.73.1 Applicant's Reponses to First Written Questions – Appendices**. adopt best practice, due skill, and care in executing ground investigation and in ground construction activities. To provide greater clarity these measures are summarised below: Table 1GH1 – 1 – Medium Risk Mitigation Measures for Kent **Risk Level** / **Planned Site Activity** / **Recommendations** **Medium** / **Shallow Intrusive Works eg. excavations** / • UXO Safety & Awareness Briefing (Toolbox Brief, TBB) • Site Specific Safety Instructions (SSSIs) Training Course • Explosive Ordnance Disposal (EOD) Engineer to support Site Investigation (SI) • Non-Intrusive (NI) Magnetometer Survey (Greenfield areas only) • Target Investigation (Required as a follow-on from NI magnetometer survey) **Deep intrusive works (eg. piling)** / • UXO Safety & Awareness Briefing (Toolbox Brief, TBB) • Site Specific Safety Instructions (SSSIs) Training Course • Intrusive Magnetometer Survey of pile/borehole positions Table 1GH1 – 2 – Medium/High Risk Mitigation Measures for Suffolk/Offshore

Risk Level	Planned Site Activity	Recommendations
Medium / High	Shallow Intrusive Works eg. excavations	• UXO Safety & Awareness Briefing (Toolbox Brief, TBB) • Site Specific Safety Instructions (SSSIs) Training Course • Non-Intrusive (NI) Magnetometer Survey (Greenfield areas only) • Target Investigation (Required as a follow-on from NI magnetometer survey) • Search & Clear • Explosive Ordnance Disposal (EOD) Engineer Watching Brief (for brownfield areas unsuitable for NI magnetometer survey) • Explosive Ordnance Disposal (EOD) Engineer to support Site Investigation Works
	Deep intrusive works (eg. piling)	• UXO Safety & Awareness Briefing (Toolbox Brief, TBB) • Site Specific Safety Instructions (SSSIs) Training Course • Intrusive Magnetometer Survey of pile/borehole positions
	Offshore works	Appropriate risk mitigation measures can be provided for any works taking place in marine (coastal or offshore) parts of the project site if necessary. These can usually include the following: • UXO Safety & Awareness Briefing (Toolbox Brief, TBB) • Client threat briefing • Authorities' engagement where required • Non-Intrusive (NI) High-Resolution Marine Survey – Area specific to each project module • Assessment and production of a Master Target List • Target Investigation (Required as a follow-on from NI Marine Survey) • ROV/Diver Investigation / Survey • Disposal if requested

The Applicant's first and foremost consideration will be the safety of the workforce and the public with respect to UXOs, and the above mitigation measures will be implemented as appropriate to achieve this in accordance with the Health and Safety at Work Act 1974 and the Construction (Design and Management) Regulations 2015. To secure commitment to this mitigation approach to UXO risk, a new commitment (GG39) has been added to **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3.

The detailed risk assessment reports presented in Appendix K of **Application Document 9.73.1 Applicant's Reponses to First Written Questions – Appendices**. identify approximate maximum penetration depths of between 8-12 m below ground

Reference	Question to:	Question	Applicant's Response
			level depending on ground conditions, so deep trenchless crossing installations of approximately 18m will be below the zone of risk. CIRIA C681 'Unexploded ordnance (UXO) – A guide for the construction industry' provides best practice for managing the risk of UXO on site. This is the process followed to date on the project. Within the guidance it states the following on disposal processes '*In the event that an item of UXO is discovered within the construction environment, discussion should be held between the interested parties regarding the disposal of the item(s). In most cases this would be between the "client", UXO specialist (if employed at the time), police and the Military Bomb Disposal Unit. As there are so many variables in such a scenario it is not practical to list all potential disposal procedures. Also, the disposal should be undertaken within the relevant legal, professional and regulatory framework. However the ultimate decision will rest with the Bomb Disposal Unit*.' Options for disposal may include controlled detonation, treatment on site to remove/neutralise the explosive material safely or removal from site to a controlled location for detonation or treatment. As identified in CIRIA C681 there are numerous variables that would need to be assessed by the experts at the time to ensure the safest, least disruptive method is identified. In respect of any terrestrial consenting required for such activities, the Applicant's experience is that, unlike in the marine environment, on land, consent such as planning permission is not typically required given the nature of the activity to deal with UXO. As referred to above, the Proposed Project's construction design, including deep trenchless crossings at landfalls, has looked to limit the potential impacts of UXOs disrupting construction activities, and therefore on ecology and designated sites, as far as practicable. Options for disposal discussed above will be risk assessed at the time of identifying the UXO and any mitigation, including for ecology and designated sites, will be considered and included as part of the UXO detailed risk assessment, produced at the time. Any consents/permits (e.g. Site of Special Scientific Interest Assent / Habitat Regulations Assessment) and associated impact assessments will also be sought/produced at that time.

7. Agriculture and Soils

Table 7.1 Agriculture and soils

Reference	Question to:	Question	Applicant's Response
1AS1	Applicant	**Agricultural land classification** Provide an update to your letter of 16 September 2025 [AS-106] in response to the ExA's section 89(3) letter dated 5 September 2025 [PD-008] with regard to the provision of agricultural land classification (ALC) and soil surveys, as well as updates to the relevant documents and mitigation measures with a timetable for the submission of the information to the ExA.	As noted in **Application Document 9.18 s89 (3) 16 September Covering Letter [AS-106]**, a commitment was given that ALC surveys would be undertaken during the examination phase. Currently the auger survey in Suffolk has been completed and 81% of the auger locations in Kent are complete (progress on completion was delayed due to land access). Soil pit surveys are being planned to complete the data required (alongside the auger data) to calculate ALC grades across the Proposed Project. It is currently envisaged that the surveys and full updates to the required documentation will be completed by early March 2026, to be submitted at Deadline 5 (noting that there is the possibility that some laboratory data may need to be submitted subsequently).
1AS2	Applicant	**Soil reinstatement** REAC commitments AS02 and AS11 indicate that soils would be restored to their previous condition and land to its pre-construction ALC. RR have raised concerns that due to the nature of soils, the recovery from works such as construction compounds, temporary access roads and the cable run would take several years. ES Part 2 Suffolk Chapter 6 Agriculture and Soils [PDA-019] and ES Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023] do not appear to give this consideration in their assessment of effects. Provide an update to [PDA-019] for Kent and Suffolk, giving an estimate of the likely success of restoration of soils and land to pre-construction condition for land required temporarily within the order limits. Where relevant, update the assessment of effects and outline the remedial measures that would be followed to minimise the loss of best and most versatile (BMV) agricultural land. Provide an explanation of any adaptive post-construction management that would be followed to ensure that BMV land is restored to its pre-construction condition and how such measures would be secured by the DCO.	The soil management and handling measures detailed in the outline Soil Management Plans (oSMP) provided in both **Application Document 7.5.10.1 Outline Soil Management Plan - Suffolk [APP-354]** and **Application Document 7.5.10.2 Outline Soil Management Plan - Kent [APP-355]** are based on published and accepted good practice, such as that contained in the Defra Construction Code of Practice for the sustainable use of soils on construction sites (Defra, 2009). The guidance used is recognised as appropriate to be able to help protect and enable successful reinstatement or re-use of the soil resources affected by construction projects. The oSMPs provide guidance on stripping, stockpiling, reconditioning, and reinstatement, as well as general guidance on wet weather working and vehicle trafficking. Adherence to this guidance will ensure that soil materials are handled appropriately and can be successfully reinstated. As such, it is expected, that by the end of the aftercare period (see below), full restoration of soils to pre-construction conditions will have been achieved. The Applicant has committed to providing an update to the oSMPs upon the completion of the Agricultural Land Classification surveys, updating the site-specific soil details where necessary. The assessment of effects and outline remedial measures within the EIA will not require update as all possibly required measures are currently included and accounted for. The current iterations of the oSMPs rely upon indicative Soil Association mapping from Cranfield University, and already account for sensitive features such as the presence of heavy clays and waterlogged soils in Kent. The oSMPs will then be further updated by the contractor(s) pre-construction, to include further details of construction approaches and planned phasing. These detailed Soil Management Plans must be submitted to and approved by the relevant planning authority under requirement 6 of the DCO (**Application Document 3.1 (F) draft Development Consent Order**, submitted at Deadline 3). The oSMPs also commit to an Aftercare Management Plan being produced by the Contractor which will detail the aftercare period, monitoring frequency and interventions which may be required depending on issues highlighted by monitoring during construction; the aftercare plans are adaptive, as the measures implemented will be based on the monitoring and assessment of recovery of the soils. A commitment to what the Aftercare Management Plan(s) will include will be submitted for Deadline 4.

Reference	Question to:	Question	Applicant's Response
1AS3	Applicant	**Depth of cable burial** REAC commitment AS02 gives a minimum depth of soil over buried cables of 0.9 metres but 1.2 metres elsewhere. Provide an explanation of why 0.9 metres is sufficient. RRs (for example [RR-2426]) have raised concerns at the depth of burial of cables across arable land, and the effect on the future use of the land. Provide a response in terms of minimising the loss or degradation of BMV land.	As detailed in **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]**, the minimum depth of burial of the cable to the top of the protective tile will be 0.9 m. This minimum burial depth is based on the Energy Networks Association guidance (the industry body for network operators in the UK) (ENA, 2012). In some instances, subject to discussion and agreement with the landowner, this may be deeper, but this will depend on cable design. Information about burial depth was provided in response to relevant representations (**Application Document 9.34.5 (B) Applicant's Response to Selected Relevant Representation Responses [REP2-022]**). Subsoil and topsoil will be reinstated above the tile in accordance with the outline Soil Management Plans provided in both **Application Document 7.5.10.1 Outline Soil Management Plan - Suffolk [APP-354]** and **Application Document 7.5.10.2 Outline Soil Management Plan - Kent [APP-355]** to ensure that the soil profile is reinstated to its pre-construction condition and so it remains suitable to support the required land use. Agricultural activities will be able to be continued following reinstatement and land hand back; any limitation (for example in relation to tree planting or land drain installation) identified once the actual depth of burial to top of tile is known will form part of the compensation agreement with the affected landowner.
1AS4	Applicant	**Grazing at North Warren** Provide a detailed response to the concerns raised by the RSPB [REP1-158] in relation to the effect of the proposed development on the grazing regime of North Warren Nature Reserve, including the following matters. The ability of third-party graziers to move animals through the North Warren Nature Reserve, communication with them, the need to ensure that grazing areas and herds are not fragmented, and the ability of grazing animals to access drinking water. Would the commitments in the REAC, in particular AS03, AS04, GG24, GG26 apply to graziers, if not why not?	The North Warren Nature Reserve will be crossed using trenchless techniques for the installation of the cables. Although the Order Limits include for an access onto the reserve, this is simply to allow for the monitoring of the trenchless techniques from above, which may include vehicle access to some areas in the unlikely event of a frac out. As such there will be no direct effects on any aspect of management of the land, including the ability for livestock to graze and access drinking water, during construction of the landfall or for the third party Graziers to move their animals around the reserve. The applicant's contractor will communicate with the RSPB and the graziers to ensure that if there is any requirement for local management of areas with electric or other fencing it will be agreed in advance. The REAC measures cited are primarily intended for use on land directly affected by construction work.

8. Traffic and Transport

Table 8.1 Traffic and transport

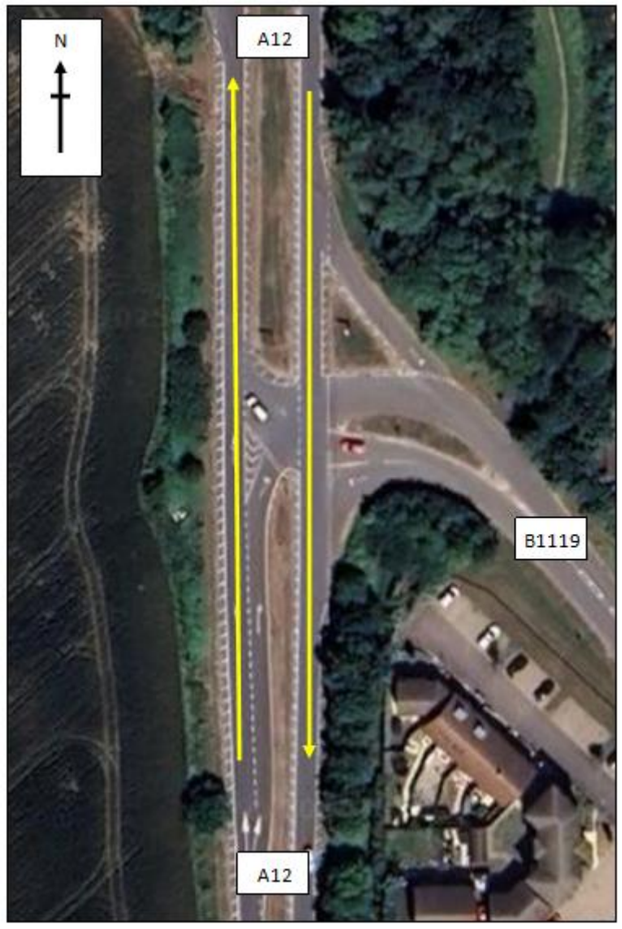
Reference	Question to:	Question	Applicant's Response
1TT1.	Applicant	**Peak construction times** Within the Suffolk Onshore Scheme Inter-Project Cumulative Effects documents [APP-060] it states that no significant cumulative effects are expected when considering construction/operational traffic associated with all committed developments combined, given that the peak construction phases for each scheme are unlikely to fully overlap. What certainty does the applicant have that the peak construction times are unlikely to overlap, given the number of variables typical in large scale construction programmes? Having identified that a full overlap is unlikely, is it therefore likely that there would be a partial overlap of peak construction times. If so, what would be the implication of this?	The peak construction phase of the Suffolk Onshore Scheme, in terms of total daily construction vehicle movements, is expected to occur for a period of approximately two months in 2028, based on Plate 7.1 Construction vehicle profile contained within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. Details relating to the anticipated construction peaks for Sizewell C, East Anglia ONE North (EA1N) and East Anglia TWO (EA2) Offshore Windfarms and LionLink Offshore Interconnector are provided within **Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]**. A review of the likelihood of peak construction phases overlapping between the Suffolk Onshore Scheme and each of these cumulative schemes is provided below: • Construction works associated with Sizewell C (early works) commenced in January 2024, which was slightly later than the original estimated start date of 2023 as set out within the Sizewell C Environmental Statement. If the construction peak for Sizewell C occurs in 2028 as identified in the Sizewell C Environmental Statement, then there will be a 1/6 (17%) chance of this either fully or partially overlapping with the construction peak of the Suffolk Onshore Scheme, on the assumption that the construction peak for Sizewell C would be similarly experienced for a period of up to two months (the Sizewell C Environmental Assessment was based on the busiest day in 2028, but does not provide details of the peak's expected duration). However, should the construction peak for Sizewell C occur later (e.g. in 2029) as a result of the associated elements of construction starting later, then it is highly unlikely that this will overlap with the construction peak of the Suffolk Onshore Scheme in 2028. There is a greater degree of certainty associated with the above forecasts given Sizewell C is already under construction. • Construction associated with EA1N / EA2 (installation of accesses) commenced in July 2025. Based on the EA1N / EA2 Environmental Statements, the construction peak for light construction vehicle movements is expected to occur in 2026 (Month 14), when there will be no chance of this overlapping with the peak construction phase of the Suffolk Onshore Scheme in 2028. The construction peak for HGV movements is expected to occur for a single month in 2028 (Month 34), when there will be a 1/6 (17%) chance of this either fully or partially overlapping with the two-month construction peak of the Suffolk Onshore Scheme. There is a greater degree of certainty associated with the above forecasts given that EA1N / EA2 is already under construction. • The construction of LionLink is currently expected to commence two years after the Suffolk Onshore Scheme commences construction. For LionLink, the construction peak is expected to occur in 2030, when there will be no chance of this overlapping with the peak construction phase of the Suffolk Onshore Scheme in 2028.

Reference	Question to:	Question	Applicant's Response
			Therefore, this shows that peak construction phases of the Suffolk Onshore Scheme and the other cumulative schemes are unlikely to fully overlap, lasting for a maximum duration of two months (Sizewell C) or one month (EA1N / EA2) if they did. Any partial overlaps (rather than full overlaps) will reduce the duration of these periods further; to a few weeks, rather than one or two months, resulting in a reduced duration for potential effects and a lesser impact. These potential effects are typically also only expected to marginally exceed Negligible levels as identified within **Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]**. The Applicant has submitted **Application Document 7.10 Coordination Document [APP-363]** which describes how the Proposed Project has approached coordination with other projects with the aim of reducing the impact on the environment and local communities. It is in the Applicant's interests to ensure that a coordinated approach with third party schemes takes place to ensure efficiency and delivery of the Proposed Project. For example, there is the opportunity to share accesses and temporary construction areas during the delivery of the substation and storing material on site for future projects to reduce cumulative construction vehicle trips.
1TT2.	Applicant	**Benhall railway bridge - minor works** The applicant's '9.76.5 Change Request: Addendum to Volume 6 Environmental Statement' [CR1-055], suggests that one of the options for crossing Benhall Railway Bridge with abnormal indivisible loads (AILs) during construction is to undertake minor works to the bridge (Option 2). It is stated that the worst-case for a temporary road closure of the B1121 is 28 days to do this work. Explain the applicant's assumptions that 28 days would be the maximum time needed to do the works necessary and what variables this would be dependent on.	The 28 day bridge closure period is considered a worst case scenario should the scale of works require exposure of the deck from the highway for repair and water proofing works to be undertaken. These works would require the removal of the pavement over the bridge deck, remedial works to the deck and applying a waterproofing layer before reinstating the pavement. These works would not take 28 days to complete, however a conservative assessment on the impact on the highway has been undertaken to allow for a scenario where works could not be undertaken outside of a track possession. It is considered more likely that remedial works would be undertaken over a period of possessions agreed with Network Rail, which may be a series of nighttime or weekend possessions. The Applicant considers that no road closure longer than 28 days will be required to complete the remedial works and that any series of road closures to align with track possessions would not total more than 28 days. The Applicant is in the process of gaining approval from the Local Highway Authority to undertake a structural survey, and has issued an approval in principle to the Local Highway Authority for review and comment. The same approval in principle has been discussed with Network Rail who are supportive of the Applicant proceeding, subject to agreed method statements and risk assessments being produced. Following the survey the scale of any remedial works will be clarified and a detailed programme of the works agreed with the Local Highway Authority and Network Rail.
1TT3.	**Applicant** Network Rail Sizewell C	**Impacts to the rail network** **Applicant -** If Benhall Railway Bridge was being fixed by the applicant under Option 2, would this mean that there would need to be a closure of the railway line under the bridge for up to 28 days? **Network Rail –** Would the railway line under the bridge need to be closed if there were works being undertaken to fix current deficiencies of Benhall railway bridge by the applicant; and if so, what impacts would this have? **Sizewell C –** If the railway line under Benhall bridge was shut for up to 28 days, could this impact on the construction of Sizewell C due to disruption of freight along this line?	The Applicant does not consider a 28-day closure of the railway line to be required for the likely remedial works and would not be seeking this from Network Rail. Remedial works would be undertaken during a series of possessions planned and agreed with Network Rail.

Reference	Question to:	Question	Applicant's Response
1TT4.	Applicant	**Use of a mini-bridge over Benhall railway bridge** With the overbridging scenario, it is stated [CR1-055] that this would mean 15 temporary road closures of the B1121 throughout the construction period for AIL use. Would it be possible to reduce the maximum number of periods when the road could be closed, such as by programming multiple AIL deliveries for each time the mini-bridge is in place? If not, please explain why this would not be feasible.	The 15 temporary road closures have been identified for assessment purposes as a worst case. The Applicant will seek to implement measures to minimise the number of closures to as few as reasonably practicable through combined deliveries, and this will include a consideration of combining multiple AIL deliveries into a single closure. Once detailed design and construction management is complete and the AIL requirements confirmed (including, for example, the ability of suppliers to ship multiple transformers), the Applicant will confirm what the minimal number will be. **Application Document 7.5.1.1 Outline Construction Traffic and Management and Travel Plan – Suffolk [CR1-041]** confirms that the Applicant will notify stakeholders of road closures at the earliest possible opportunity.
1TT5.	Applicant	**Inter-project traffic cumulative methodology** In both counties inter-project cumulative effect assessments [APP-060] [APP-073], the applicant states that "Specifically, in relation to traffic and transport in the Stage 4 assessment, where a scheme is expected to be approximately 50% built out, 50% operational trip generation has been adopted, and where the development is expected to be 75% built out, 75% operational trip generation has been assumed, and so on." Explain the basis for this assumption given that the proposed development and other development programmes appear to show peaks and troughs in construction traffic over their respective construction periods rather than a progressive decrease in traffic over time? Would it depend on the type of development?	Peak construction traffic forecasts have always been adopted for a cumulative scheme (where the information is available) when the cumulative scheme could potentially be under construction during the build-out phase of the Proposed Project. This offers a robust approach by adopting peak construction traffic forecasts in all instances and accounts for the peaks in construction traffic over the respective construction periods, rather than troughs. In terms of operational traffic forecasts for any cumulative schemes screened in on this basis, the full operational trip generation has always been adopted when the cumulative scheme is expected to be fully complete prior to (and therefore operational during) the construction phase of the Proposed Project. Adjustments have only been made when a cumulative scheme will only be partially complete/ built out during the construction phase of the Proposed Project, based on the proportion of that development that is expected to have been completed e.g. 50% of operational traffic has been adopted if a scheme is expected to be halfway through construction. This adjusted level of operational traffic has then been combined with peak construction traffic forecasts for that same scheme, to provide a robust assessment. This also avoids an over-assessment of combining peak construction traffic with full operational traffic for a given scheme, as developments cannot be both under construction and fully operational at the same time.
1TT6.	Applicant	**A14 near Ipswich** What would be the likely traffic impacts on the A14 from the proposed development, particularly the section to the south of Ipswich? Furthermore, what route would the proposed development's construction traffic need to take if the Orwell Bridge was closed to traffic?	It is acknowledged that HGVs will access the Order Limits via the A12 and that a proportion of these will also route via the A14. Construction traffic forecasts on the Strategic Road Network (SRN) including the A12 / A14 Seven Hills Interchange are set out in the **Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122]**. This shows that the peak construction phase (busiest day) of the Suffolk Onshore Scheme will result in 18 vehicle movements at this SRN junction during AM network peak (8-9am) and eight vehicle movements at this SRN junction during PM network peak (5-6pm). It was concluded that there are not expected to be any significant effects on the SRN as a result of the Proposed Project, with lower levels of forecast construction vehicle movements on the A14(T) than the levels assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** for the local highway network within the study area. Notwithstanding the above, a meeting was recently held with National Highways on 12 December 2025 to address the comments raised within **National Highways Deadline 2 Written Submission [REP2-131]**. The meeting reviewed the potential impacts of the Suffolk Onshore Scheme on the SRN in greater detail, including for the A12 / A14 Seven Hills Interchange, and the portion of the A14 south of Ipswich. National Highways subsequently agreed that the Suffolk Onshore Scheme would not be expected to have a material impact on the SRN based on the information presented. The Applicant commits to keeping National Highways updated on Sea Link planning

Reference	Question to:	Question	Applicant's Response
			going forwards, which can be recorded via a Statement of Common Ground in due course if necessary. Construction traffic to be generated by the Proposed Project and its routeing has been assessed and is not expected to result in any significant effects on the surrounding highway, following the measures identified within **Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]**. A detailed CTMTP will be developed and approved by SCC post consent Requirement 6 of Schedule 3 of **Application Document 3.1 (F) draft Development Consent Order**, submitted at Deadline 3. In a scenario where the Orwell Bridge section of the A14 route becomes closed to traffic due to high winds for example, then this would apply to all road users travelling to/from the A12 corridor to the southwest. As such, the need for a suitable diversion route would apply to all journeys, of which construction traffic associated with the Proposed Project would form an imperceptible proportion. This could include a diversion route via the A14 to the north of the A12 / A14 Copdock Roundabout (A14 Junction 55) and then the B1078, which would represent an additional journey distance of approximately four miles in each direction. This diversion would only be used by construction traffic travelling to/ from the Suffolk Onshore Scheme via the A12 to the southwest of Ipswich (circa 32 km to the southwest of the Order Limits). The potential diversion route to the north of Ipswich could accommodate construction traffic if necessary, and due to the low likelihood and temporary nature of such a scenario, it is not considered that this could result in the potential for any significant effects.
1TT7.	Applicant	**Layby facilities** SCC [REP1-130] expressed concern with a lack of laybys and other suitable parking, rest or stopover facilities on the A12 and the roads to be used by the proposed development east of the A12, such as the A1094. Noting the applicant's response in [REP2-026] to SCC's concerns regarding a lack of laybys, would there be sufficient laybys or stopover/rest facilities in the East Suffolk area for hauliers, taking into account other development and the associated HGVs that may be using these highways at the same time?	Construction traffic to be generated by the Proposed Project and its routeing has been assessed and is not expected to result in any significant effects on the surrounding highway, following the measures identified within **Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]**. A detailed CTMTP will be developed and approved by SCC post consent under Requirement 6 of Schedule 3 of **Application Document 3.1 (F) draft Development Consent Order**, submitted at Deadline 3. This will include further details of measures for HGV drivers to have appropriate breaks by utilising fully equipped service stations (rather than laybys) where appropriate. HGV drivers will also be encouraged to use welfare facilities on site rather than local facilities within East Suffolk (such as laybys or parking along the A1094) where possible. Whilst this cannot be fully prevented given that HGV drivers have a legal requirement to take a certain number of breaks/ rests as part of their journey, it is not expected that stopover/ rest facilities in the East Suffolk will be significantly impacted. It should also be emphasised that HGV drivers will not exclusively use stopover/ rest facilities on the A12 or in East Suffolk, as these locations will be determined by where HGVs ultimately travel to and from, which will include locations from much further afield. Therefore, hauliers will have the opportunity to utilise stopover/rest facilities along any part of their route and are more likely to utilise welfare/rest facilities a few hours away from site, rather than locally within East Suffolk, given that they could just continue their journey a short distance to the site construction compounds where they will have their own access to welfare facilities. Again, the detailed CTMTP will include measures to encourage HGV drivers to use welfare facilities on site, rather than parking on local roads within East Suffolk, where possible.
1TT8.	Applicant	**Safety of cyclists** The proposed traffic routes would use some more minor rural roads with narrow carriageways. What can be done to ensure the safety of cyclists	The main access routes for the Suffolk Onshore Scheme during the construction phase comprise the A12 and the B1121 Main Road for access S-BM09, as well as the A12, A1094 and the B1069 Snape Road for accesses S-BM03 and S-BM04. These routes are forecast to accommodate almost all (around 97%) of the construction

Reference	Question to:	Question	Applicant's Response
		on these routes, as they could be considered vulnerable in such circumstances where there is a notable increase in HGV traffic?	vehicle trips associated with the Suffolk Onshore Scheme. The routing strategy is designed to minimise the number of construction vehicles using less suitable routes such as the B1122 Leiston Road (through Theberton and Leiston), B1121 Saxmundham Road (through Friston), B1121 Main Road and B1119 Church Street (through Saxmundham) and Grove Road. The proposed site access (K-BM02) on the A256 for the Kent Onshore Scheme will be used as the main access during the construction programme to accommodate circa 91% of all construction vehicle trips. Therefore, the A256 access will be used to accommodate the vast majority of construction vehicles. Alternative access points will only be used where necessary to access other parts of the Order Limits, or to carry out other works that subsequently allow the A256 access to be used. This is therefore designed to reduce construction vehicle trips on parts of the local highway network (including rural roads), which will only be used to access localised works and to enable the wider works to subsequently be accessed via the main site access (K-BM02) on the A256 Richborough Road. In view of the above, there is not expected to be a notable increase in HGV traffic on minor rural roads with narrow carriageways. The potential impact of construction traffic on vulnerable road users (including cyclists) has been assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** and **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**, including in terms of severance, pedestrian delay, non-motorised user amenity, fear & intimidation and road safety. An assessment of road safety, including with respect to hazardous/ large loads, has also been carried out based on the existing collision record of the highway network and the forecast increases in HGV activity. No significant effects have been identified for the assessments relating to vulnerable road users (including cyclists), based on construction traffic forecasts during the peak construction phase. Nonetheless, **Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]** and **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]** do identify potential constraints across the highway network where mitigation (including physical measures such as carriageway widening and vegetation clearance) may be required to accommodate construction traffic. These potential requirements will be reviewed and secured as part of the CTMTPs through Requirement 6 of Schedule 3 of **Application Document 3.1 (F) draft Development Consent Order**, submitted at Deadline 3, following further consultation with the local highway authorities.
ITT9.	Applicant	**A12/B1119 junction at Saxmundham** HGV traffic is proposed to use the A12/B1119 junction at Saxmundham. SCC [REP1-130] has expressed concern with the use of this junction, even with the planned improvements. Explain in detail (using diagrams to show the junction where possible to demonstrate the points made) why the use of this junction would be acceptable in terms of capacity and safety.	The HGV Routing Plan for the Suffolk Onshore Scheme within **Application Document 6.4.2.7 ES Figures Suffolk Traffic and Transport [APP-234]** shows that whilst some HGVs will pass through (i.e. travel 'straight ahead') the A12 / B1119 junction at Saxmundham (i.e. those arriving or departing to the north), no HGVs will turn to/ from the B1119 via this junction. Any HGVs on this part of the network will travel north-south along the A12, without the need to turn or interact with other vehicles at this junction, as shown on the diagram below. The majority of HGVs (85%) are expected to travel to/ from the A12 to the south as identified in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, and will access the Suffolk Onshore Scheme via the A12 / B1121 Main Road junction or the A12 / A1094 junction to the south of Saxmundham, without passing through the A12 / B1119 junction. Therefore, the A12 / B1119 junction is not expected to be adversely affected by HGV traffic associated with the Proposed Project, given that the majority of HGVs will not pass through this junction and those that do, will not turn to/ from the B1119.

Reference	Question to:	Question	Applicant's Response
			
1TT10.	Applicant	**Visibility splays** SCC [REP1-130] has highlighted the generic accesses shown in the Design and Layout Plans [APP-037]. It states that these are not based on topographic surveys and questions, for example, the vertical alignment of the existing highway and whether this would compromise visibility. The applicant in its response [REP2-026] has stated that it has supplied preliminary designs, with this detail being appropriate for the DCO application stage. Explain how the applicant can be certain that there would not be a situation where there is a possibility that a proposed access might not be able to achieve necessary safety standards with sufficient visibility, if final details are not submitted until after any consent?	The Applicant has provided robust preliminary designs including the identification of visibility splays and where the available visibility splays are below Design Manual for Roads and Bridges (DMRB) guidance, mitigation such as reduced speed limits have been applied for within the DCO. It is expected that mitigations such as construction access warning signs will also be utilised as part of temporary traffic management. All accesses have been assessed on site by the design team for vertical and horizontal alignment including of the existing road network and available visibility splays, and independent Stage 1 Road Safety Audits have been completed and submitted to SCC.
1TT11.	Applicant	**Junction modelling** The applicant states that it has assessed driver delay at junctions as a result of the proposed development in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidelines for the Environmental Assessment of Traffic and Movement (IEMA, 2023). However, to supplement this assessment the ExA requires detailed	The Applicant has not previously carried out any junction modelling given that the proposed working hours are designed to minimise additional construction worker vehicle trips on the surrounding highway network at the busiest times (during the network peak hours) and that peak construction traffic levels will be short-term and temporary in duration. In addition, no potential for significant effects have been identified with respect to Driver Delay at junctions within **Application Document**

Reference	Question to:	Question	Applicant's Response
		junction modelling of all critical junctions, which should be identified and agreed in advance by the Local Highway Authorities (KCC and SCC), that are to be used by construction phase traffic. This junction modelling should provide key junction performance indicators (including ratio of flow to capacity (RFC)/degree of saturation and corresponding average delay per vehicle durations). This should be produced for appropriate scenarios (also agreed in advance with the Local Highway Authorities) to enable identification of specific proposed development impacts compared to a base scenario, which includes all appropriate cumulative traffic associated with approved developments. This is considered to be necessary so that proposed development traffic impacts can be clearly understood, particularly in junctions/locations which are already predicted to be operating at or above capacity, possibly due to the construction activity of Sizewell C for example, and as indicated in the transport model output tables included in the SCC LIR [REP1-130] starting at paragraph 11.106.	**6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** or **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**, based on queue length surveys carried out at these junctions during the AM and PM peak periods, and peak construction traffic forecasts. Nonetheless, this request is acknowledged by the Applicant. Discussions will be held with SCC Highways and KCC Highways to agree the requirements for, and the scope of, further junction modelling within the respective study areas, including the scenarios for assessment. Separate meetings have been arranged with SCC Highways and KCC Highways in January 2026 to inform these discussions. Where junction modelling is carried out, it is proposed that this will be limited to 'critical junctions' on key construction traffic routes (within the respective study areas) and will utilise previously collected traffic data and cumulative traffic forecasts to allow this to be completed within the timescales of Examination.
1TT12.	**Applicant** Suffolk County Council Kent County Council	**Overlapping construction programmes** **Applicant -** In the applicant's response to RR [REP2-014] (specifically responding to SCC comments) it is stated that there could be a minor/moderate cumulative effect which could persist for up to nine months in total on the B1121 Main Road to the south of Saxmundham if the programmes for the proposed development and other projects (such as Sizewell C and LionLink) overlapped precisely. A possible moderate cumulative impact would potentially be disruptive for people who live in the area, especially if it lasts for nine months. What more can the applicant provide and secure to ensure that this level of cumulative effect is avoided or further mitigated? **Councils –** What is the local highway authorities view of this potential situation?	This is acknowledged, although it should be recognised that this is based on the worst-case assumption that construction peaks of different schemes would fully overlap. As identified in the response to 1TT1 above, it is highly unlikely that the construction peak of the Suffolk Onshore Scheme would fully overlap with the construction peaks of Sizewell C and LionLink. Further clarification is provided below in respect to the B1121 Main Road to the south of Saxmundham: • As shown by Plate 3.1 in **Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]** for the B1121 Main Road to the south of Saxmundham, there could be the potential for a minor/moderate cumulative effect to arise as a result of the Suffolk Onshore Scheme combined with Sizewell C for a period of around five consecutive months in late 2028 / early 2029 if the peak construction phases overlapped precisely. There would be a very low chance of a minor/moderate cumulative effect to arise during the separate three-month period identified in 2027, given that the construction peak for Sizewell C is expected to be in 2028. • As shown by Plate 5.3 in **Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]** for the B1121 Main Road to the south of Saxmundham, there could be the potential for a minor/moderate cumulative effect to arise as a result of the Suffolk Onshore Scheme combined with LionLink for a very short period of around 11 days in late 2029. • There will be no potential for significant cumulative effects on the B1121 Main Road as a result of the Suffolk Onshore Scheme combined with EA1N / EA2. Therefore, a minor/moderate cumulative effect is more likely to persist for a much shorter period than nine months and may not arise at all if the peak construction phase of the Suffolk Onshore Scheme does not overlap with the construction peaks of other cumulative schemes, which is the most likely scenario. Nonetheless, the Applicant is committed to on-going engagement with other projects to identify potential opportunities for coordination during project delivery and to minimise potential highway impacts, and the potential for significant cumulative effects as a result of the Proposed Project and other cumulative schemes. Further details of this

Reference	Question to:	Question	Applicant's Response
			engagement and any additional mitigation to minimise the potential or duration of any potential minor/ moderate cumulative effects on the B1121 Main Road to the south of Saxmundham will be documented and secured as part of the Suffolk Construction Traffic Management and Travel Plan (CTMTP) through Requirement 6 of Schedule 3 of **Application Document 3.1 (F) draft Development Consent Order**, submitted at Deadline 3. Measures could include a daily cap on construction vehicle movements associated with the Proposed Project on this part of the network, or limiting the duration over which a certain level of daily construction vehicle movements associated with the Proposed Project can be exceeded.
1TT13.	Suffolk County Council Kent County Council	**Cumulative traffic assessment** Considering all the information submitted up to and including that received from the applicant at deadline 2, what further data or analysis (if any) would the Local Highway Authorities require from the applicant to be satisfied that the cumulative traffic assessment is sufficiently robust?	
1TT14.	Applicant	**Abnormal Indivisible Load (AIL) route assessments** SCC [REP1-130] has raised concern that there has been no assessment undertaken on the capacity of structures to carry AIL traffic from ports or the strategic road network to the site of construction. Explain why without such assessment the applicant can be sure that the identified routes are feasible and that there would not be the need for alternative routes.	As part of the AIL traffic routing assessment undertaken for the Proposed Project the Applicant used the current Electronic Service Delivery for Abnormal Loads (ESDAL) system to identify any structures of concern along the proposed routes and contacted asset owners including SCC about any known structural issues. The Applicant also liaised with other developers within the region to discuss transport issues including proposed AIL routes. The Applicant held multiple meetings with SCC to discuss construction traffic routing including AIL routes and although SCC highlighted that structures of concern not listed on ESDAL existed, they were unable to share any specifics until the recent **Local Impact Report (LIR) from the Local Authorities [REP1-130]** from Suffolk County Council was submitted. This is in part due to the changing nature of the highway network and the fact that restrictions may be imposed or remedial works completed and restrictions lifted over time. The changing nature of the road network and the detail needed to confirm loading requirements, which includes the detailed design of the transformer and transport configuration, plus the haulage vehicle specification including numbers of axles, means that detailed assessments are better undertaken closer to the time of delivery when more accurate information is available on both the road network and the proposed loadings. The constraints on AILs highlighted by SCC are acknowledged and these will be strictly managed as set out within **Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]**. The condition of the existing highway network is continually evolving, and it is normal practice for an AIL contractor to need to navigate restrictions and constraints along a network between the point of departure and arrival. The restrictions affecting the network in Suffolk do not present abnormal or unusual challenges to an AIL contractor, who have standard practices to overcome restrictions, and therefore the Applicant is confident that no alternative routes would need to be considered. Consent is required for AIL movements, with this consent being predicated on a survey of the route (as present prior to delivery) and proposals to overcome any constraints. These consents are always sought after a DCO because they need to take into account the precise source of a delivery (which cannot be determined with certainty prior to decisions on the purchase of materials), timing of deliveries and the current condition of the highway network. It is not necessary or proportional to provide these details at the application stage. The Applicant will continue to liaise with SCC (Highways) and the Police on the proposed movement of AILs through Suffolk. Information on the proposed routes has been shared with stakeholders over a number of years prior to submission at a level of

Reference	Question to:	Question	Applicant's Response
			detail appropriate to the project development. The Applicant is in discussions with the Police and SCC on the level of funding necessary to cover the costs of managing and assisting the movement of AILs including the provision of escorts where deemed necessary by the police. The Applicant welcomes the receipt of SCC's details on how it expects the assessment process to be undertaken, as received on 02/12/2025, and will look to engage with this process as the Proposed Project develops.
1TT15.	Applicant	**Alternative routes** Explain if/how it has been assessed whether there would be implications due to drivers (not associated with the proposed development) choosing to travel on minor roads instead of the more major highways to avoid traffic delays.	The potential for drivers (not associated with the Proposed Project) to re-route their journeys onto alternative roads to avoid potential traffic delays (for example) would only typically be picked up as part of a strategic transport model that can assess re-assignment. There has not been a requirement to prepare or utilise a strategic transport model to inform the Traffic and Transport assessment of the Proposed Project. The assessments within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** and **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**, do not identify the potential for any significant effects on the highway network with respect to Driver Delay, based on construction traffic forecasts during the peak construction phase. Therefore, it is not expected that road users (within the Future Baseline) will experience any significant traffic delays as a result of construction traffic associated with the Proposed Project, nor will be encouraged to utilise alternative routes such as minor roads in this instance.
1TT16.	Applicant	**Public right of way (PRoW) – mitigation/compensation** SCC [REP-130] has set out a number of enhancements to the local PRoW network, such as creating a new route across the proposed River Fromus bridge crossing which could link with the existing network. Considering the impacts that the proposed development would have to the PRoW network, the ExA requires a response to these suggested enhancements or for the applicant to set out any other enhancement works to the PRoW network it would propose as beneficial in the long-term.	The Applicant considers the committed mitigation proposed within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]** and **Application Document 9.83 Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 3, to be sufficient for mitigating the potential impacts of the Proposed Project on Public Rights of Way (PRoW), from a Traffic and Transport perspective. The Proposed Project is not expected to result in the potential for any significant effects on the PRoW network based on this mitigation, as set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. Nonetheless, the Applicant has reviewed Suffolk County Council's request for additional enhancements where this is not already proposed, to determine whether this is reasonable/necessary to help further mitigate any potentially significant effects as a result of the Proposed Project. With respect to PRoW, these initial suggestions comprise the creation of a bridleway to provide an on-road route along the B1119 for non-motorised users and a PRoW along the haul road across the river Fromus, and Sluice Cottage to the old railway line. Each of these suggested improvements involve the provision of a new route that will deliver a community benefit/ enhancement to the PRoW network during the operational phase, rather than essential mitigation to address any potentially significant effects identified in the ES. These suggested enhancements are therefore not necessary to compensate or mitigate potential impacts of the Proposed Project. PRoW enhancements that go beyond essential mitigation cannot be included as part of the Proposed Project because compulsory acquisition powers cannot be taken over land that is not essential for mitigation. Such powers are not therefore sought as part of the DCO. In line with Government guidance, published in March 2025, the Applicant will work with communities and deliver meaningful, long-term, social, and economic benefits through local and strategic investment. Community benefit funding could be used to contribute towards the PRoW infrastructure improvements identified by SCC, if these are considered to be preferential to other suggested/potential improvements in the area.

Reference	Question to:	Question	Applicant's Response
1TT17.	Applicant	**Coordination of PRoW closures and diversions** Within the REAC [CR1-043], under commitment GG32, it is stated that to reduce the potential for significant overall cumulative effects, PRoW closures/diversions would be coordinated with East Anglia ONE North Offshore Windfarm and East Anglia TWO Offshore Windfarm. However, whilst this may be the applicant's intention, explain how this could be considered as a secured commitment when it would depend on another developer.	The Applicant is committed to on-going engagement with other projects including EA1N / EA2 to identify potential opportunities for co-ordination during project delivery and to minimise potential impacts on Public Rights of Way (PRoW), and the potential for significant cumulative effects as a result of the Proposed Project and other cumulative schemes. Further details of this engagement and any additional mitigation to minimise the potential or duration of any potential significant cumulative effects on PRoW will be documented and secured as part of the Suffolk Public Rights of Way Management Plan (PRoWMP) through Requirement 6 of Schedule 3 of **Application Document 3.1 (F) draft Development Consent Order**, submitted at Deadline 3. No single party has authority over another and each DCO only controls the activities for that project. For these reasons, a firm commitment cannot be made to prepare or agree a Joint Suffolk PRoWMP with Scottish Power Renewables (SPR) for example. Therefore, it is the Applicant's intention to develop the Suffolk PRoWMP for the Proposed Project post-consent, once the Proposed Project is developed during detailed design and further details are known for EA1N / EA2 e.g. project timeframes and potential impacts/ mitigation on any shared PRoW receptors. The Applicant will consult SPR as part of this process, so that any potential cumulative impacts on PRoW can be identified and minimised such as by coordinating works to minimise the number or duration of any PRoW closures and diversions.
1TT18.	Applicant	**Junction between the A14 and the A12** In their deadline 2 submission [REP2-131] National Highways states that the A14/A12 junction is already congested and the additional traffic generated by the proposed development at construction phase could have a material impact. The ExA requires evidenced assurance from the applicant that this part of the strategic road network in this location would not be adversely impacted by construction traffic arising from the development. Furthermore, the applicant is required to assess the cumulative impact at the junction, with other planned developments in this location, such as the proposals for a significant highway improvement of the A12 (which would include amendments to this junction).	It is acknowledged by the Applicant that HGVs will access the Order Limits via the A12 and that a proportion of these will use the A14. A meeting was held with National Highways on 12 December 2025 to assure National Highways that the construction traffic associated with the Suffolk Onshore Scheme will not have an impact on the Strategic Road Network (SRN) including the A12 / A14 Seven Hills Interchange. National Highways welcomed the additional details and analysis presented during the meeting and confirmed that this provided a strong argument that the Suffolk Onshore Scheme will not be expected to have an impact on the SRN. The presentation and meeting minutes were subsequently issued to National Highways and will be shared with the ExA and incorporated within a Statement of Common Ground with National Highways in due course . The Applicant has also provided a response to National Highway's Deadline 2 Written Submission [REP2-131] following the meeting. The discussion with National Highways included a review of the potential for cumulative impacts on the SRN in this location. It was agreed that the Suffolk Onshore Scheme is expected to have a negligible effect on the SRN. A key consideration which forms the foundation to the cumulative assessment is that if the Proposed Project is expected to result in a Negligible effect for a given receptor and assessment, then there is no potential for a cumulative effect to arise when combined with other projects. This follows the principles set out in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]** and **Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]**. Therefore, no cumulative effects are expected on the SRN as a result of construction traffic associated with the Suffolk Onshore Scheme. The proposed improvement works to the A12 north of the Seven Hills Interchange, led by SCC, would offer long-term benefits to the network, increasing ability to accommodate traffic associated with other planned developments. Further consultation, including a meeting in January 2026, will be held with SCC Highways on this in terms of the timescales for these improvements.

9. Air Quality

Table 9.1 Air quality

Reference	Question to:	Question	Applicant's Response
1AQ1	Applicant	**Use of sulphur hexafluoride (SF_6) in gas insulated switchgear (GIS)** The applicant [APP-055] confirms that it intends to use GIS and that manufacturers produce GIS switchgear with minimal or no leakage and National Grid avoids the use of SF_6. Signpost to where SF_6 has been precluded from use within the application or provide an assessment of the likely environmental effects of using SF_6 as a worst case and provide an explanation of the alternatives considered consistent with the requirements of NPS EN-5.	The Applicant included measure CC03 in **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043]** which a committed to the use of SF_6-free switchgear. However, this commitment is currently being reconsidered as there may be a need to include some SF_6-insulated equipment. This is primarily driven by the availability of SF_6-free circuit breakers. Additionally, as mentioned in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]** and **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]**, SF_6 is not considered a local air quality pollutant, and the GIS manufacturers now produce switchgear that have no or minimal leakage. Therefore, the impact of SF_6 on local air quality is likely to be both minimal and short-term. An update to commitment CC03 is included in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** which now states: "*The Applicant is proposing to use both SF6-insulated and SF6-free equipment for the project. This is primarily driven by the availability of SF6-free circuit breakers. However, GIS manufacturers now produce switchgear that have no or minimal leakage*."
1AQ2	Natural England East Suffolk Council	**Air quality modelling for construction compound at Sandlings** Suffolk Energy Action Solutions Ltd (SEAS) [RR-5210] suggests that the air quality model is inaccurate and that quantification of emissions from the HDD compound adjacent to Sandlings SPA and from back-up generators is required. Provide comment on the model and explain whether you consider that further quantification is necessary and if not, why not?	
1AQ3	East Suffolk Council	**Cumulative air quality effects** ESC [RR-1420] notes specific concern with cumulative effects arising from construction traffic (including on air quality). Having reviewed the air quality assessment [APP-055] and [APP-068] and the cumulative vehicle emissions assessment [REP1-123], the council should confirm whether it has any residual concerns about specific road links/receptors in light of the limited effects identified in relation to construction traffic emissions and the relatively low background pollutant levels and if not, why not?	
1AQ4	Applicant	**Outline Code of Construction Practice provision GG12 - Euro 7 standards** Provision GG12 of the oCoCP [APP-341] sets out the proposed plant and vehicle emissions standards, including the Euro 6 standard. Explain when the Euro 7 standards would apply from and whether the Euro 7 standards and any other updated requirements should apply to the proposed development.	Provision GG12 of the Outline Code of Construction Practice (oCoCP) (**Application Document 9.83 Outline Code of Construction Practice** submitted at Deadline 3) sets out the minimum emissions standards for construction plant and vehicles associated with the Proposed Project. The Euro 7 emissions standard represents the next evolution of European vehicle emissions regulation and applies to newly manufactured vehicles placed on the market after the relevant implementation dates. At the time of preparation of the oCoCP, Euro 7 standards had not yet come into force. Current implementation timelines indicate that mandatory compliance for all new Light Duty Vehicles (LDVs) to meet Euro 7 emission

Reference	Question to:	Question	Applicant's Response
			standards will be 2026, and for new Heavy Duty Vehicles (HDVs) will be 2028 (EU, 2024). Euro 7 does not apply retrospectively to vehicles already in service. Compliance is determined by the standard in force at the time a vehicle is first registered, rather than during its operational use. The Proposed Project has committed to the following minimum emissions standards for construction plant and vehicles: • Euro 4 (NOx) for petrol cars, vans and minibuses; • Euro 6 (NOx and PM) for diesel cars, vans and minibuses; and • Euro VI (NOx and PM) for lorries, buses, coaches and Heavy Goods Vehicles (excluding specialist abnormal indivisible loads). These standards reflect current best practice for major infrastructure construction projects in the UK and are consistent with the standards widely applied through construction environmental management plans and codes of construction practice. Given that Euro 7 will only apply to new vehicles entering the market during the construction period, mandating Euro 7 compliance for all construction traffic would not be practicable or proportionate. Provision GG12 is framed to require compliance with 'relevant applicable standards for the vehicle type', which provides flexibility to accommodate future regulatory changes. As such, any vehicles newly procured during the construction phase that are required by law to meet Euro 7 standards would do so automatically; and the oCoCP does not preclude the use of cleaner vehicles or higher standards where they are available and practicable. On this basis, no amendment is proposed to explicitly mandate Euro 7 standards within GG12. The existing commitment is considered to be proportionate.
1AQ5	Applicant	**oCoCP commitment GG17** Provision GG17 of the oCoCP [APP-341] provides for wheel washing at each main construction works compound 'where required'. Can the applicant explain any circumstances in which wheel washing would not be required and therefore whether this caveat is necessary? In addition, explain what appropriate measures would be used to prevent water passing untreated into watercourses and groundwater.	Provision GG17 of the Outline Code of Construction Practice (oCoCP) (**Application Document 9.83 Outline Code of Construction Practice**) submitted at Deadline 3) provides for wheel washing at each main construction works compound 'where required'. Circumstances where wheel washing may not be necessary include when access points are on hardstanding surfaces, during dry weather conditions or when there is minimal vehicle movement. Wheel washing at main construction compound access points is only required where there is a risk of mud or debris being transferred onto public highways. The caveat 'where required' is necessary to allow for a proportionate, risk-based approach and to ensure resources are used efficiently. To prevent untreated wheel wash water from entering watercourses or groundwater, appropriate measures such as silt traps will be implemented, as set out in measure GG15 of the oCoCP.
1AQ6	East Suffolk Council, Thanet District Council, Dover District Council	**REAC commitment AQ11** Are the councils satisfied with the applicant's proposal to use stage 4 non-road mobile machinery (NRMM) as a minimum and stage 5 'where possible'.	
1AQ7	Applicant	**REAC commitment AQ11** Provision AQ11 of the REAC [CR1-043] secures specific measures relating to emissions from operational back-up generators in Kent. Explain why there is no equivalent provision for Suffolk.	Provision AQ11 of the Register of Environmental Actions and Commitments (REAC) (**Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3) relates to operational backup generators in Kent, where sensitive receptors are present within the study area. As detailed in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]**, there are no human or ecological receptors within 200 m of the

Reference	Question to:	Question	Applicant's Response
			Saxmundham Converter Station LoD or Friston Substation LoD, where the back-up generators are proposed. As such, no equivalent measure is required or proposed for Suffolk.
1AQ8	East Suffolk Council Natural England Thanet District Council, Dover District Council	**Outline air quality management plan (oAQMP)** Do the councils or NE have any comment on the proposed air quality monitoring equipment or the proposed air quality monitoring locations set out in the oAQMP [AS-129] and [APP-347]. It is noted that the applicant 'recommends' rather than 'proposes' use of zephyr monitors for dust monitoring. In Suffolk the monitoring location is noted to be south of the HDD compound which is likely to pick up effects on human receptors but not on the ecological designated sites to the north east (the prevailing wind direction).	
1AQ9	**Applicant** East Suffolk Council	**Implications of ozone pollution** Representations such as [RR-3640] referenced the potential for tropospheric ozone to be present as a pollutant within the wider area. Comment on whether it has any implications for the assessment of air quality effects.	Ozone was not directly assessed as part of the air quality assessment for the Proposed Project, as it is not emitted directly from construction vehicles or non-road mobile machinery, but is instead formed through regional atmospheric processes involving nitrogen oxides and volatile organic compounds. Current best practice guidance (such as the Environmental Protection UK and Institute of Air Quality Management Development Control Guidance (2017)) does not require direct assessment of ozone for individual construction projects; assessments focus on pollutants that are directly emitted and for which local impacts can be meaningfully predicted and mitigated. The relatively small scale and temporary nature of construction emissions means that any contribution to regional ozone formation would be indistinguishable from background levels. Therefore, the fact that ozone is not assessed does not materially affect the conclusions regarding air quality effects from the Proposed Project.

10. Noise and Vibration

Table 10.1 Noise and vibration

Reference	Question to:	Question	Applicant's Response
1NV1.	Applicant	**ISO 9613-2:2024** ES Part 2, Chapter 9 [AS-109] paragraph 9.4.28 identifies ISO9613-2:2024 as a method for predicting noise levels at sensitive receptors. Provide a copy of this reference to the examination.	Unfortunately, the Applicant cannot provide a copy of this standard as it cannot be transmitted without licence. However, a copy can be purchased through the British Standards Institute at the following link: BS ISO 9613-2:2024 | 31 Jan 2024 | BSI Knowledge.
1NV2.	Applicant	**Identification of noise sensitive receptors** Sheet 1 of the 'noise study areas, survey locations, and potential receptors - Suffolk onshore scheme' figure [AS-125] indicates that there are at least 3 'other' receptors in the grounds of Hurts Hall. During the ExA's unaccompanied site inspection, the ExA noted that these receptors appeared to be residential in nature. Can the applicant confirm why these receptors have been classified as 'other'. If the receptors should actually have been classified as residential, provide updated noise impact assessments to account for this.	The address data for the locations identified as 'other' in the vicinity of Hurts Hall have been reviewed and comprise the following: • Centre Of Pond 133 m From The Barns 157 m From Unnamed Road (Grid Reference 639152, 262461); • Centre Of Pond 83 m From The Barns 106 m From Unnamed Road (Grid Reference 639137, 262534); • Centre Of Pond 136 m From Hall House 150 m From Unnamed Road (Grid Reference 639145, 262673); and • Centre Of Pond 180 m From Church Lodge, Church Street 56 m From Unnamed Road (Grid Reference 638955, 262717). As such, the locations identified are not residential, or otherwise sensitive to noise or vibration, and no further assessment is required. These locations are included in address data as sources of water (e.g. for potential use by the fire service) but are not included in the assessment as noise sensitive receptors. However, all locations identified as residential are included in the assessment. A clearer view of the receptors in this area and their associated type is provided in the figure below.

Reference	Question to:	Question	Applicant's Response
			
1NV3.	Applicant	**Plant assumption – HK250t drill rig** Provide a copy of the HK250t drill rig specification referenced in the applicant's response to supplementary agenda question ISH1.23 [REP1A-033].	A copy of the HK250t drill rig specification, including noise levels, is provided as Appendix L in **Application Document 9.73.1 Applicant's Reponses to First Written Questions – Appendices**.
1NV4.	Applicant	**Sound source data** Explain why appendix B of the revised Pegwell Bay Construction Method Technical Note [REP2-011] omits sound power or level data for the proposed hovercraft.	Noise levels have not been provided for hovercraft as they are only required for safety purposes (not planned use) and do not form part of the schedule of construction plant and vehicles that will be used on a regular basis or for specific activities in Pegwell Bay and therefore have not been included in the noise modelling or assessment. This is consistent with the approach to noise modelling onshore which does not consider any potential for emergency vehicles needing to access the site. The availability of a hovercraft for works in Pegwell Bay is a standard health and safety requirement, being a requirement in locations where there may be a need to travel quickly across the mudflats or areas of very shallow water that are difficult for any other emergency vehicle (including offshore vessels) to access. It is considered unlikely that the hovercraft will need to be used.
1NV5.	Applicant	**Marsh Farm Road, Whitehouse Drove and Richborough Road** Confirm whether there would be any constraints placed on the number of vehicles or hours of use of Marsh Farm Road, Whitehouse Drove or Richborough Road.	Construction traffic along these parts of the highway network will be limited to activities such as vegetation clearance and survey works, as well as temporary diversion works to the Overhead Lines via Marsh Farm Road and the construction of the southern abutments (laying track way and constructing water course crossings) via Richborough Road and Whitehouse Drove. Construction vehicles on these routes will therefore be limited to less than ten Heavy Goods Vehicles (HGVs) per day at the peak of the works. Light Goods Vehicles (LGVs) will be largely vans and 4x4 vehicles for staff movements which will again be limited to a maximum of 25 per day at the peak. Any required restrictions on HGV movements (e.g. number of vehicles or hours of travel) will be secured as part of the Kent Construction Traffic Management and Travel Plan (CTMTP) through Requirement 6 of Schedule 3 of **Application Document 3.1 (E) draft Development Consent Order [CR1-027]**.

Reference	Question to:	Question	Applicant's Response
1NV6.	Applicant	**Atkins noise modelling reports** Provide copies of the Atkins noise modelling reports identified in the Design Development Report Appendix A Landfall HDD Feasibility Technical Note [APP-321].	The reference to 'noise modelling by Atkins' in section 2.4.5 of Appendix A of **Application Document 7.3 Design Development Report [APP-321]** refers to the data shown in Figure 4 and Figure 5 of **Application Document 6.6 (D) Habitats Regulations Assessment [REP2-009]**. AtkinsRéalis (formally known as Atkins) are the noise and vibration consultants for the on-shore aspects of the Proposed Project and produced the contours for the assessment of noise on ecological receptors.
1NV7.	Applicant	**Acoustic enclosures** The Design Development Report [APP-321] and the design approach documents [REP1A-029] and [REP1A-030] suggest that acoustic enclosures for transformers may be required. What level of attenuation would acoustic enclosures provide and why are they not being designed in from the outset?	Acoustic enclosures for transformers would typically be expected to provide at least 20 dB attenuation, depending on the enclosure specification and the noise source characteristics. It is very likely that some form of enclosure or housing will be required to manage operational noise, particularly where transformers are located externally. However, it is not appropriate to commit to enclosures at this stage because equivalent levels of mitigation may be achieved through alternative design approaches, such as locating transformers within a building. The developer will therefore consider a range of potential mitigation measures during detailed design, including acoustic enclosures, so that noise can be managed in the most effective and proportionate way, whilst also considering other potential design constraints. Noise mitigation is secured in **Application Document 9.84 Register of Environmental Action sand Commitments (REAC)** submitted at Deadline 3, measures NV07 and NV09 for the Suffolk and Kent Onshore Schemes, respectively.
1NV8.	Dover District Council East Suffolk Council Thanet District Council	**S61 consents** Confirm whether the current wording in section 4.4 of the Construction Noise and Vibration Management Plans [AS-131] and [AS-133] gives sufficient certainty that the applicant's contractor would make use of the s61 process and whether any additional check or approval is required by the local authorities, including in relation to provision NV01 of the REAC [CR1-043].	
1NV9.	East Suffolk Council Thanet District Council Dover District Council	**Construction noise and vibration management plan (CNVMP)** Paragraph 1.3.8 of [AS-131] and [AS-133] states that "If rapid action is required to solve a noise or vibration problem and that action may contravene something written in the CNVMP, typically it is preferable to undertake the mitigating action at the earliest opportunity. The CNVMP can then be revised in reasonable time after the event." Are the local authorities satisfied with this approach or is there a need for strict application of control measures?	
1NV10.	Applicant	**BS5228 significance criteria** Section 9.4 of the Suffolk and Kent ES Chapter 2, Noise and Vibration [AS-109] and [AS-111] refers to construction noise and vibration effects being deemed to occur where a medium or large magnitude impact occurs for a period of at least 10 days in any 15 consecutive days of 40 days in any consecutive 6 month period. This is stated to be based on BS5228-1 and DMRB guidance. Whilst it is acknowledged that BS5228 allows for "other project-specific factors, such as the number of receptors affected and the	The ABC method in Annex E.3.2 of BS 5228-1:2009+A1:2014 'Code of practice for noise and vibration control on construction and open sites' (BS 5228-1) provides noise level thresholds that indicate when construction noise *may* give rise to significant effects. Importantly, exceeding an ABC threshold does not automatically constitute a significant adverse effect. As noted in the question, BS 5228-1 explicitly states that the assessor often needs to consider: "*other project specific factors, such as the number of receptors affected and the duration and character of the impact to determine if there is a significant effect.*"

Reference	Question to:	Question	Applicant's Response
		duration and character of the impact", the time based criteria are from section E.4 of BS5228 and are the trigger criteria for provision of noise insulation. Explain why it is appropriate to use these criteria specifically, in addition to the ABC criteria, to identify likely significant effects	However, BS 5228-1 does not provide specific duration criteria for use with the ABC method when determining significance. For this reason, the assessment draws on the duration guidance provided in Design Manual for Roads and Bridges LA 111 Noise and Vibration (DMRB LA 111), which is directly aligned with and built around the ABC method thresholds.l Although the durations mirror those in BS 5228-1 Annex E.4, their use within DMRB LA 111 is specifically intended to support significance assessment when applying the ABC method. Accordingly, it is appropriate to apply these temporal criteria, taken from DMRB LA 111, alongside the ABC noise thresholds. Doing so ensures that the assessment considers both: • the magnitude of the noise change (from ABC thresholds); and • the duration over which impacts occur (from DMRB LA 111). consistent with the approach recognised in relevant industry guidance for evaluating likely significant construction noise effects.
1NV11.	Dover District Council East Suffolk Council Thanet District Council	**Change of noise indices** The ExA's s89(3) letter dated 5 September 2025 [PD-008] queried the applicant's use of $L_{Aeq10hour}$ in the applicant's construction noise assessment. The applicant reverted the assessment metrics from $L_{Aeq10hour}$ to L_{AeqT}, providing updated noise and vibration chapters [AS-109] and [AS-111]. Do the local authorities have any comments on the applicant's amended assessment?	
1NV12.	Applicant	**Construction vibration thresholds** Table 1.2 of the ES appendix 2.9b [APP-136] and [APP-189] summarises representative background sound levels for percussive piling. If another technique, such as vibropiling, was used would the predicted threshold distances still apply?	The title of Table 1.2 of **Application Document 6.3.2.9 ES Appendix 2.9.B Suffolk Construction Noise and Vibration Data [APP-136]** and **Application Document 6.3.3.9.B ES Appendix 3.9.B Kent Construction Noise and Vibration Data [APP-189]** is an error. The table title should be 'Summary of vibration threshold distances'. This will be updated at Deadline 4. In relation to the vibration thresholds, percussive piling is assumed, and this generally reflects a worst-case with regards to vibration. Vibration threshold distances for other forms of piling, such as vibropiling, would be expected to be lower.
1NV13.	Applicant	**Reversing alarms** A number of RR have highlighted the impact of noise from reversing alarms during archaeological and ground investigation works. Confirm whether a REAC commitment to only using white noise reversing alarms could be used to reduce the impact of reversing vehicles on local communities.	The use of white noise reversing alarms would be considered as part of the application of best practicable means to reduce noise impacts. This would be considered alongside other potential constraints, such as site safety.
1NV14.	Applicant	**East Suffolk Council – LIR** The applicant's response to ESC's LIR [REP2-027] does not address point 6.3.7.8. Provide a response to the suggested discrepancies in the tables.	For clarity, East Suffolk Council's comment at paragraph 6.3.7.8 of the **Local Impact Report (LIR) from East Suffolk Council [REP2-027]** states: *"Having reviewed the operational noise assessment [AS-119], ESC notes that Table 1.6 identifies noise sensitive receptor R_5764 as the worst-case receptor with a 0 to +6dB on background sound level prediction, but then states this as +4 to +10dB in Table 1.7 and 1.8, with similar discrepancies for noise ranges for all NSRs between Tables 1.6 and 1.8. ESC would like to see the reasons for this"*

Reference	Question to:	Question	Applicant's Response
			These differences do not represent discrepancies. They arise from the use of different acoustic metrics within a BS 4142:2014+A1:2019 '*Methods for rating and assessing industrial and commercial sound*' (BS 4142) assessment. Table 1.6 of **Application Document 6.3.2.9.D (B) Appendix 2.9.D Suffolk Operational Noise Assessment [AS-119]** presents the specific sound level from the operation of the Saxmundham converter station. These are the absolute modelled sound levels, with no character corrections applied. They are compared directly against the representative background sound levels to identify the receptor experiencing the highest margin above background. Table 1.7 and Table 1.8 of **[AS-119]** then apply the requirements of BS 4142, which states that the rating level must include acoustic character corrections where tonal, impulsive or other distinctive characteristics are present or may be perceptible. The application of these BS 4142 character corrections to the specific sound level increases the resulting rating level, which explains the higher ranges. This is a normal and expected step in a BS 4142 assessment, reflecting the difference between *specific level* and *rating level*. Accordingly, the values in Tables 1.6, 1.7 and 1.8 of **[AS-119]** are entirely consistent with one another. They simply represent different stages of the BS 4142 assessment process: 1. Specific sound level (Table 1.6) → raw modelled noise levels 2. Rating level (Tables 1.7 and 1.8) → specific sound level plus BS 4142 character corrections The apparent differences therefore reflect the correct application of BS 4142 methodology and are not discrepancies in the assessment.
1NV15.	Applicant	**Updated noise level figures** Updated predicted maximum noise level figures are provided in [REP2-007]. The ExA notes that these figures use the pre-change request scheme boundary, they also do not make any provision for vehicle traffic crossing the former hoverport. Provide updated figures to account for this. Provide equivalent figures showing the extent of the 3dB L_{Aeq} change contour.	Figures 6.4.4.5.7 and 6.4.4.5.8 in **Application Document 6.4.4.5 (B) ES Figures Marine Ornithology [REP2-007]** have been updated in **Application Document 6.4.4.5 (C) ES Figures Marine Ornithology** submitted at Deadline 3 to include the revised scheme boundary, and also the effects of extending indicative access corridor to include vehicles crossing the former hoverport. The 3 dB change criterion was intended to act as a screening criterion only, to determine the study area for the subsequent L_{Afmax} 60 dB. Assessment. The approach used in developing the 3 dB contours was a simplified and proportionate approach given the size of the works in this location (further detail on the approach is described in the response to 1ECO38). Given the relatively small size of the areas of interest covered in the 3D modelling used to produce the contours in Figures 6.4.4.5.7 and 6.4.4.5.8, the screening process was not necessary as it was possible to simply ensure that the 3D model extends well beyond the extents of the L_{Afmax} 60 dB contour. For this reason, 3 dB change contour figures have not been produced.
1NV16.	Applicant	**Updated noise level figures – assumptions** Footnote 7 of the updated ES Part 4, Marine Chapter 5 [REP2-003] explains that the noise model assumes that all ground is soft except for areas of water and intertidal areas at low water. The model assumes a source height of 1.5m. Explain whether: • the former hoverport area has been modelled as soft ground	The former hoverport has been modelled as soft ground. It is considered that the level of detail included in the modelling is proportionate given the size of the area being modelled, and the inclusion of small specific areas of hard (or soft) ground (such as the hoverport) is likely to have a negligible influence on the modelling results. The assumption of a source height of 1.5 m is considered realistic. This value is commonly used in construction noise assessments and is representative of the primary noise generating elements of most construction plant. Whilst there may be

Reference	Question to:	Question	Applicant's Response
		• the assumption of a source height of 1.5m is realistic in light of the types of equipment in use • the mapping presented still assumes 10dB reduction due to application of best practicable means	some variation in heights (for example the piling rig will move up and down as the piles are driven), the effect of this is considered to be negligible over the distances considered in the modelling. The mapping does not include any reduction due to best practicable means, and is based on the unmitigated source levels (L_{AFmax} at 10 m 91 dB for the piling rig and L_{AFmax} at 10 m 79 dB for vehicle passbys).
1NV17.	Thanet District Council	**Noise complaints** Confirm whether any noise complaints were handled by TDC during previous cable installation works in Pegwell Bay. If complaints were received, provide a summary of the complaints and any remedial measures that were employed.	

11. Socio-economics, Recreation and Tourism

Table 11.1 Socio-economics, recreation and tourism

Reference	Question to:	Question	Applicant's Response
1SERT1.	Applicant	The rural landscape and tranquillity are noted as attractive aspects for tourism, particularly for rural areas like East Suffolk. The change to the landscape from the proposed buildings and pylons would be long-term. What impact would this have on the long-term tourism attraction for these areas of Kent and Suffolk, especially when considered cumulatively with other planned developments?	Tranquillity is a perceptual aspect of the landscape and the extent to which this is altered forms part of the judgement on effects reported on landscape character. The Applicant acknowledges adverse effects on landscape character during construction and operation (and maintenance) as summarised in **Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** and **Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]** and detailed within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]** and **Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]**. The factors that would affect the perceptual aspects of the landscape character, including tranquillity, would be more pronounced during the construction phase of the Proposed Project, relating to construction noise and movement of plant and general construction activity. Significant adverse effects would remain on landscape character during the operational (and maintenance) phase of the Proposed Project, however the effects would be localised. In Suffolk this would be limited to an approximate 2 km area from the Saxmundham Converter Station site and in Kent would be limited to an approximate 2.4 km area from the Minster Converter and Substation. The localised effects on tranquillity are also reduced in both Kent and Suffolk due to the surrounding context, including the presence of vehicle movement on the B1119 and B1121 in Suffolk and existing infrastructure in Kent including the Weatherlees Hill Wastewater Treatment Plant, Richborough Energy Park, railway line, and A256. With regards to the Proposed Project, the Applicant does not believe the above conclusions would materially impact the tourism industry in the long-term, either alone or in combination with other NSIPs. The Applicant has undertaken a review of other Nationally Significant Infrastructure Projects (NSIPs) and their potential effects on tourism and visitor activity as detailed in **Application Document 9.40 Visitor and Tourism Assessment Technical Note - Suffolk** and **Application Document 9.41 Visitor and Tourism Assessment Technical Note – Kent**, both submitted at Deadline 3. These other NSIPs concluded that there would be no significant effects on tourism or visitor numbers. The Applicant's review of published monitoring reports of actual impacts on tourism observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified / observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-**

Reference	Question to:	Question	Applicant's Response
			economics, Recreation and Tourism [REP1A-005] and **Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism [REP1A-007]**.
1SERT2.	**Applicant** All County and District Councils	**Construction worker spending** What would be the difference between the spending locally of construction workers, staying locally in accommodation like hotels for example, compared to tourists staying the same areas?	Construction workers and tourists can be considered to have broadly similar spending habits. Both groups spend money primarily on accommodation, food and drink, supporting the same local hospitality businesses. In terms of visitor and tourist accommodation, local spending is likely to be the same whether a room is taken by a tourist or construction worker. Tourists are likely to spend proportionally more on recreational and leisure-based activities than construction workers, given tourist expenditure is typically focused on attractions, entertainment and leisure experiences. Construction workers will typically spend more on everyday convenience and necessity goods and local services than tourists. This spend supports local economic activity as construction workers generate more stable demand for goods and services due to their longer presence and more frequent expenditure than tourists. Destination Research Economic Impact of Tourism for Suffolk published in 2023 (Visit Suffolk / Destination Research (2023) indicates that the average tourist overnight spend per night was £207.14 whilst Destination Research Economic Impact of Tourism for Kent published in 2023 (Visit Kent Business, 2023) indicates that the average tourist spend per night was £197.10. As an indication of an equivalent benchmark figure for construction workers, HM Revenue & Customs (HMRC) Employment Income Manual, indicates a lodging or overnight subsistence allowance of £50.81 in 2025 (HMRC, 2025). These figures indicate that, on average, construction workers are likely to spend less per night locally than tourists, however the HMRC subsistence allowance does not capture the wider local spending of construction workers. Additionally, according to the Destination Research Economic Impact of Tourism for Suffolk and Kent, the average length of tourist trips in 2023 were 3.75 and 3.44 nights respectively, whist CITB Workforce Mobility and Skills in the UK Construction Sector for the East of England in 2022 indicates that the majority of construction workers (52%) are on one site for between one month and a year. Therefore, although the benchmark data suggests that construction workers may spend less per night than tourists, construction worker spend is likely to extend beyond £50.81 per night, and will be more frequent and for a longer duration than tourist spend. The number of construction workers (peak 327 FTE in Suffolk and 241 FTE in Kent) for the Proposed Project represents a tiny proportion when compared with the number of tourists visiting Suffolk and Kent. Destination Research Economic Impact of Tourism sets out that in 2023 there were 1,692,000 and 4,483,900 overnight tourist trips to Suffolk and Kent respectively. Given this, construction workers are not expected to displace tourists and both groups should be able to coexist within the local economy using visitor and tourist accommodation and hospitality services. Whilst construction workers are likely to have a lower average daily spend than tourists, their expenditure tends to be spread more consistently across the week throughout the year and over longer durations, providing a stable and predictable source of income for the local economy, particularly within the accommodation and food and drink sectors. Tourist spend, by contrast, tends to be more concentrated around weekends, peak seasons and leisure-based activities.

Reference	Question to:	Question	Applicant's Response
			As a result, construction worker spend can complement rather than compete with tourism spend.
1SERT3.	Applicant	**Future tourism levels** In response to the RR from Suffolk Energy Action Solutions Ltd (SEAS) [] on the matter of tourism impacts, the applicant [REP2-014] states that a review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. The ExA requests that this information/evidence is submitted into the examination with the key points highlighted.	According to Visit East of England (2024), the value of the tourist sector in Suffolk rose by 7% from 2023 to 2024, with a total value in 2024 of £2.3bn, indicating that the tourism economy is currently strong and growing. This growth provides evidence that despite the presence of multiple existing energy infrastructure developments and multiple elements of Sizewell C under construction within the area, this has not undermined the overall performance of the tourism sector. EDF Energy's The Sizewell C Project Environmental Statement Chapter 9 Socio-economics (2019) and New Nuclear Local Authorities Group Hinkley Point C Peak Construction Monitoring and Auditing Study (2024) are appended to this report as Appendix G and H respectively. As detailed in **Application Document 9.40 Visitor and Tourism Assessment Technical Note - Suffolk** and **Application Document 9.41 Visitor and Tourism Assessment Technical Note - Kent** submitted at Deadline 3, The Sizewell C Project ES Chapter 9 Socio-economics reviewed the monitored impacts on visitors and tourism of Sizewell B and Hinckley Point C. Hinkley Point C was granted development consent in March 2013. Since that time, EDF Energy and the Hinkley Point C Tourism Action Partnership have been monitoring the effects of Hinkley Point C's construction on tourism activity. The pre-peak construction Socio-economic Advisory Group Report (2019) details that the anticipated adverse impacts on tourism identified in the ES chapter had not materialised at the time of writing, with local tourism business confidence remaining high. The report further sets out that according to ONS Business Register and Employment Survey data, since development consent was granted tourist sector employment in Somerset has grown by 32% in Somerset as a whole, and 20% in the districts closest to the Hinkley Point C site. Since the Sizewell C DCO submission, another Socio-economic Advisory Group Report has been published (2024). This report considers the peak construction impacts of Hinkley Point C, corroborating the findings of the previous report. Tourist perception data surveying the impact of Hinkley Point C on Somerset tourism indicated that over 90% of tourists are not affected by construction activity. Together these two monitoring reports conclude that there is little empirical evidence that the construction of the project is leading to direct effects on the tourism economy. Sizewell B was granted planning consent in the 1980s, with construction starting in 1987 and has been fully operational since 1995. As identified by the Sizewell C ES Chapter 9 Socio-economics, there is similar evidence of trends during the construction of Sizewell B compared with Hinkley Point C and as a result no empirical evidence of a significant adverse impact on the tourist economy arising from construction activities. There was only a marginal change (<1.0%) in employment in the tourism economy relative to the total number of jobs in the local area, and fluctuations were considered to be in line with average annual variations seen throughout the time series. In real terms the number of jobs in Suffolk Coastal increased significantly over this time, as did tourism-related jobs. Between 1987 and 1995, jobs in these sectors increased by 630 jobs, equating to an increase of approximately a third.
1SERT4.	Applicant	**Local tourism sector**	According to Visit East of England, the value of the tourist sector in Suffolk rose by 7% from 2023 to 2024, equivalent to £2.3bn, indicating that the tourism economy is

Reference	Question to:	Question	Applicant's Response
		In response to the SEAS RR [RR-5210] the applicant [REP2-014] states that the local tourism sector remained confident and continued to grow during the construction period for Sizewell B and Hinckley. In this statement, confirm which local tourism sector is being referred to and provide evidence of this confidence and growth.	currently strong and growing. This growth provides evidence that the presence of multiple energy infrastructure developments and DCO projects within the area has not undermined the overall performance of the tourism sector. Additionally, the Applicant's review of published monitoring reports of actual impacts observed from Hinkley Point C found that initial concerns observed in face-to-face surveys with tourists prior to construction have not translated into measurable reductions in tourism-related employment. On the contrary, employment in the local tourism sector remained confident and continued to grow during the construction period as described in the Sizewell C Project ES assessment findings (see Appendix G). With regards to Hinkley Point C, as set out in the Sizewell C ES (Appendix G) the reference to employment growth relates to the local tourism sector which is defined in line with the Office for National Statistics (ONS) Economic value of tourism: Guidance Note 1: Definitions of tourism (Version 2, 2012). Tourism industries are defined by ONS as 'accommodation for visitors', 'food and beverage serving activities', railway passenger transport', 'road passenger transport', 'water passenger transport', 'air passenger transport', 'transport equipment rental', travel agencies & other reservation services', 'cultural activities', 'sporting &recreational activities', and 'country-specific tourism characteristic activities'. Data on employment in these tourism industries during the construction period of Hinkley Point C has shown that in the five years since development consent was granted (2013-2018), tourist sector employment in Somerset has grown by 32% according to ONS Business Register and Employment Survey data. Further supporting evidence for growth in the tourism sector is set out in Appendix G in relation to Sizewell B. As set out in Sizewell C ES (Appendix G), jobs in the tourism sector for Sizewell B were calculated and defined in line with the 1984-2018 SIC codes for 'hotels and restaurants' and 'recreation and cultural'. Between 1987 and 1995, jobs in the tourism sectors increased by around a third (630 jobs), according to ONS Annual Employment Survey data.
1SERT5.	Applicant	**Tourism industry levels** The ES concludes for both Suffolk [REP1A-005] and Kent [REP1A-007] that there would be some minor impacts on public rights of way and open space areas as a result of the proposed development, which could potentially affect the tourism industry. Whilst not more than minor impacts, does the applicant think that overall there would be any notable decline in tourism numbers and tourism industry revenue as a result of the proposed development? If not, explain why this would be the case.	The ES does not conclude for either Suffolk and Kent that minor impacts on PRoWs and open space could potentially affect the tourism industry. The Applicant considers that there is unlikely to be any notable decline in tourism numbers and tourism industry revenue as a result of the Proposed Project. Justification for this conclusion and supporting assessment is set out in response to 1SERT1 and 1SERT3. Section 10.9 of **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** and **Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism [REP1A-007]** assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment identified no significant effects on local businesses, PRoW and recreational routes, open spaces or visitor attraction receptors. Additionally, Section 10.9 sets out that the majority of effects on PRoW and open spaces identified are anticipated to be temporary and localised in nature. The Applicant acknowledges that some effects on PRoW and areas of open space would extend into the operational phase,

Reference	Question to:	Question	Applicant's Response
			however these effects are still assessed as either 'minor' or 'negligible', localised in extent and would not impact the ability of resources/receptors to provide opportunities for recreation and tourism. Amenity impacts on the users of local businesses, PRoW and recreational routes, open spaces or visitor attraction receptors are assessed in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** and **Application Document 6.2.3.11 (B) Part 3 Kent Chapter 11 Health and Wellbeing [AS-003].** No significant adverse effects are identified with regards to human health and wellbeing. The Applicant has undertaken a review of other Nationally Significant Infrastructure Projects (NSIPs) and their potential effects on tourism and visitor activity, as detailed in **Application Document 9.40 Visitor and Tourism Assessment Technical Note - Suffolk** submitted at Deadline and **Application Document 9.41 Visitor and Tourism Assessment Technical Note - Kent** submitted at Deadline 3. Sizewell C, Bramford to Twinstead, and East Anglia ONE North, each adopted methodologies comparable to those used for Sea Link, and all concluded that the developments would not result in significant effects on tourism or visitor numbers. Our review of published monitoring reports of actual impacts observed from Sizewell B and Hinkley Point C found that initial concerns observed in surveys have not translated into measurable reductions in visitor numbers or tourism-related employment. On the contrary, the local tourism sector remained confident and continued to grow during the construction period. On that basis there is limited robust evidence to suggest that negative visitor perception identified/observed in surveys prior to construction will result in material adverse effects on tourism. Therefore, the evidence suggests that there will be no significant adverse effects on visitors or tourism as a result of the Suffolk Onshore Scheme, as concluded within **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** and **Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism [REP1A-007].** As a result, there is limited potential for the construction or operation of the Proposed project to deter visitors to Kent or Suffolk, and no evidence to indicate that tourism would materially decline.
1SERT6.	Applicant	**Snape Maltings** Snape Maltings is described as a major international cultural destination and home to a world-famous Grade 2* listed Concert Hall by Britten Pears Arts (BPA) [RR-0636] and a draw for large numbers of people to the East Suffolk area. BPA is concerned that there would potentially be a loss of visitors which would result in the loss of income from box office and from retail and commercial activities which would severely impact its work in the community, the talent development programmes and the loss of at least 30 jobs. Whilst noting the applicant's comments in its submissions, including [REP2-034], explain in detail how the potential impact on Snape Maltings as a tourism and economic asset for the area as a result of the proposed development has been assessed?	The Applicant recognises that Snape Maltings is an important local tourism and economic asset within East Suffolk and has demonstrated resilience and sustained visitor appeal in a context where multiple NSIP developments, including Sizewell C and East Anglia ONE North and TWO, are under construction. **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005]** includes an assessment of tourism assets in terms of any temporary or permanent land take impacts and severance of access. As Snape Maltings Concert Hall is located approximately 3.26 km from the closest point of the Order Limits, there are not anticipated to be any land take/land use changes for the receptor arising from the Suffolk Onshore Scheme. Potential impacts on access and severance were informed by **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport**

Reference	Question to:	Question	Applicant's Response
			[APP-054], which concluded there are no significant effects in terms of severance on the roads assessed during construction, and therefore no significant severance effects between residents or visitors and tourism assets, including Snape Maltings, due to the Suffolk Onshore Scheme. Amenity impacts on the users of private, community, recreation and tourist assets within 500 m of the Order Limits are assessed in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058].** Given the distance between Snape Maltings Concert Hall and the Proposed Project, there are unlikely to be any significant adverse amenity effects on users with regards to noise, air quality or landscape and visual which would deter visitors from the tourist attraction As a result, there is no source-impact-receptor pathway identified that is likely to lead to a significant socio-economic, recreation and tourism effect on Snape Maltings**.** Taken as a whole, the Applicant's case is that visitors would not be significantly deterred from visiting this part of Suffolk, they would not be impacted on their journey to Snape Maltings, and visitors would not be impacted whilst at the venue in terms of reduced amenity. For this reason, the Applicant disagrees that there would potentially be a material impact on visitors and income.
1SERT7.	Applicant County and District Councils	**Employment and skills plan** **Applicant -** It is acknowledged that the ES for Suffolk [REP1A-005] and Kent [REP1A-007] has concluded that there would not be any likely significant adverse effects in relation to construction employment. However, NPS EN-1 at paragraph 5.13.12 states that the: "Secretary of State may wish to include a requirement that specifies the approval by the local authority of an employment and skills plan detailing arrangements to promote local employment and skills development opportunities, including apprenticeships, education, engagement with local schools and colleges and training programmes to be enacted." Considering the wording of this paragraph of the NPS, explain why the applicant considers that a Skills and Employment Plan is not necessary, especially given the scale of the proposal. **Councils –** Provide your views on the need for an employment and skills plan, and if it could be of practical benefit over and above commitments currently made by the applicant.	The Applicant has not committed to preparing and implementing a specific Employment, Skills and Education Strategy at a project level. This is not considered to be an efficient or effective approach given the number of construction workers anticipated and that the Applicant has not identified any likely significant effects in relation to construction employment. The Applicant is a regulated business and needs to demonstrate the planning case for such requirements on each of its projects. Under its licence obligations, the Applicant needs to demonstrate to Ofgem how it is being economic and efficient in the interest of bill paying consumers. It is not considered that a specific Employment, Skills and Education Strategy is required for this project and would be disproportionate to the scale of the potential effect and the Applicant's licence obligations. The number of jobs supported by the project is relatively low and short-term, when considered in isolation. When considered in the context of the Applicant's wider projects in the region, the Applicant believes there could be a more effective approach to leveraging benefits. Outside of the DCO, the Applicant is therefore committed to exploring opportunities for regional interventions in skills and employment. This supports the overriding need to consider skills at a functional economic market area scale that is representative of how construction and maintenance labour markets operate and enables better long-term planning for transferable and sustainable skills and careers in growth sectors identified by the Local Authorities. Outside of the DCO the Applicant is working to fully understand the wider, regional scale of labour and skills demand in the region in order to develop more sustainable interventions in this regard. Also, outside the DCO process, the Government published guidance on community funds for transmission infrastructure in March 2025 (UK Government, 2025). In line with this, the Applicant is set to engage with local stakeholders and

Reference	Question to:	Question	Applicant's Response
			communities in 2026 to understand their local priorities and help shape plans for delivering meaningful benefits, should the Proposed Project receive consent. This engagement will identify what matters most locally, which could include support for education, training, and skills. Beyond the Proposed Project's Community Benefit Fund, the Applicant is already running a number of programmes in the region to support employment, skills and education, including: • The Applicant attending and supporting the 2025 Suffolk Future Careers Expo, highlighting the career opportunities available within National Grid • Partnerships with both Skills for Energy and the East of England Energy Group (EEEGr) • Working with supply chain partners to identify and deliver social value activities, including education and skills development

12. Health and Wellbeing

Table 12.1 Health and wellbeing

Reference	Question to:	Question	Applicant's Response
1HW1	Applicant	**Ebbsfleet House and Martins** High Quality Lifestyles Limited (Priory Group) [RR-2021] raises concerns that the proposed development poses a significant risk to the wellbeing, safety and quality of life of its residents, who are stated to have complex needs and are highly sensitive to sensory triggers. How have the potential impacts from the proposed development been assessed to these facilities and what could be done to ensure the occupants' health and wellbeing?	The Applicant recognises the concerns raised by High Quality Lifestyles Limited (Priory Group) regarding the potential effects of the Proposed Project on the wellbeing, safety and quality of life of residents at Ebbsfleet House and Martins, who are described as having complex needs and heightened sensitivity. The facility is located approximately 100 m from the Kent Onshore Scheme Order Limits. Access to the site is via Ebbsfleet Lane which is a construction traffic route to be used for approximately 10 months during construction. Potential effects arising from the construction of the Kent Onshore Scheme that can impact on the amenity and wellbeing of residents within 500 m of the Order Limits have been comprehensively assessed in **Application Document 6.2.3.11 (B) Part 3 Kent Chapter 11 Health and Wellbeing [AS-003]**. This chapter adopts a systematic, evidence-led approach in line with best practice guidance, including the IEMA (2022) Health Impact Assessment guidance, and draws on a wide range of public health, socio-economic and environmental data, including indicators relevant to mental health and wellbeing. The assessment considers vulnerable groups, including children, older people, those receiving care, and individuals with pre-existing physical or mental health conditions, through the application of sensitivity classifications. This approach ensures that differential health outcomes and the potential for disproportionate effects on more sensitive populations are appropriately identified and assessed. The assessment considers a range of potential health and wellbeing pathways associated with construction activities, including noise disturbance, visual amenity, air quality, community severance, and physical health outcomes such as physical activity and respiratory health. Specifically, the potential effects associated with construction traffic on Ebbsfleet Lane have been assessed within **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**. This assessment identifies Ebbsfleet Lane as having negligible significance in relation to severance, pedestrian delay, non-motorised user amenity, fear and intimidation, driver delay, road safety, and hazardous loads. A number of mitigation measures have been developed by the traffic and transport topic which will help to minimise adverse effects. Section 7 of **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338]** includes construction traffic management measures that will be implemented in support of the Proposed Project, to avoid any adverse impacts during the construction phase. Monitoring and enforcement are also embedded through **Application Document 9.83 Outline Code of Construction Practice** submitted at Deadline 3, **Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan [AS-127]**, and **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3, which outlines all mitigation measures and assigns responsibility for implementation and monitoring.

Reference	Question to:	Question	Applicant's Response
			Effects on air quality have been assessed in **Application Document 6.2.3.11 Part 3 Kent Chapter 8 Air Quality [APP-068]**, which identifies Ebbsfleet House and Martins as a human receptor. The assessment concludes that effects on such human receptors would be negligible, with annual mean PM10 and PM2.5 concentrations at all assessed receptors not significant. Mitigation measures presented in **Application Document 9.83 Outline Code of Construction Practice**, **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** and **Application Document 7.5.6.2 (B) Outline Air Quality Management Plan - Kent** all submitted at Deadline 3, outline the air quality measures and the monitoring that is proposed, which will be in place for the construction phase and will be used to ensure the proposed mitigation measures are working effectively. Noise and vibration effects during construction are assessed in **Application Document 6.2.3.11 Part 3 Kent Chapter 9 Noise and Vibration [AS-111]**, which identifies Ebbsfleet House and Martins as a noise sensitive receptor. This concludes that there would be no significant residual effects on such receptors during construction. **Application Document 7.5.8.2 Outline Construction Noise and Vibration Management Plan - Kent [AS-133] and Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3 includes a requirement for the Contractor(s) to undertake detailed construction noise assessments based on their specific construction methodologies. Specifically, in the latter document, additional mitigation is proposed at noise sensitive receptors (which includes Ebbsfleet House and Martins), to apply site-specific BPM (e.g. screening) to reduce levels of noise and vibration from potentially significant construction activities. In addition, this property is unlikely to experience views of the permanent infrastructure (converter and substation) given the intervening vegetation, development and A256 road corridor. As such, these are not considered to give rise to potentially significant visual effects. In light of the topic-specific conclusions identified and mitigation in place, no significant adverse effects on human health and wellbeing are identified. This includes no significant effects arising from construction in relation to community severance, air quality, landscape & visual or noise that would materially affect health and wellbeing outcomes. The Applicant therefore considers that the conclusions presented in **Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health and Wellbeing [AS-003]** in relation to no significant effects at the Ebbsfleet House and Martins facility arising from construction in relation to noise, visual amenity, or community severance, remain valid, proportionate, and evidence-based. The Applicant has committed to maintaining ongoing dialogue with the District and County Councils through thematic meetings during the pre-construction and construction phases. This engagement will support the identification and management of any local concerns, including those relating to mental health and wellbeing, through construction planning and management measures. Furthermore, as set out in **Application Document 5.1 Consultation Report [APP-301]**, the Applicant will appoint a dedicated community relations team to provide ongoing communication and liaison during construction, ensuring that concerns can be raised and addressed in a timely manner. As such, the Applicant considers that the combination of a robust health and wellbeing assessment including consideration of vulnerable receptors, appropriate mitigation measures and ongoing engagement & communication measures

Reference	Question to:	Question	Applicant's Response
			provides appropriate assurance that any impacts on the occupants of Ebbsfleet House and Martins will be minimised.
1HW2	Great Oaks Small School	**Great Oaks Small School** The applicant has stated that [REP1A-007] the proposed works would be undertaken during the Great Oaks Small School holidays and/or at a time agreed with the school, avoiding any effects on vulnerable pupils. In terms of safeguarding the health and wellbeing of pupils at the school, do you consider this measure as sufficient? If not, what further measures would the school suggest should be adopted by the applicant?	Although this question is not directed to the Applicant, the Applicant felt it helpful to clarify that the proposed works referred to are specifically utility trenching works in the vicinity of the Great Oaks Small School, not all works relating to the Kent Onshore Scheme. The relevant text in [REP1A-007] states: "*10.9.62 Great Oaks Small School, located at the end of Jutes Lane, has the potential to be impacted by induced severance resulting from diverting the existing UKPN OHL. The works will involve the removal of the existing OHL from the woodland to the north of the school and burying of the cables along Jutes Lane. Access to Great Oaks Small School would be agreed and enabled through the trenching works which are expected to take approximately one week to complete. These works would be programmed to occur within the school holidays or as agreed with the school."* The embedded mitigation included in section 10.8 of [REP1A-007] is as follows: "*Utility trenching works to be programmed to occur in school holidays or as agreed with Great Oaks Small School to avoid impacts on users of the community facility receptor*"

13. Cumulative Effects (Intra-Project)

Table 13.1 Cumulative effects (intra-project)

Reference	Question to:	Question	Applicant's Response
1CEIntra1.	Applicant	**Significant cumulative intra-project impacts to public rights of way and transport** The submitted Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059] states that there is potential for a significant intra-project cumulative effect to occur on PRoW users (in the construction and decommissioning phase). Similarly, there is stated to be a significant cumulative effect for some transport routes for all phases of the proposed development, such as to the B1119 and the Suffolk Coastal Cycle Way. However, it is also stated that no mitigation has been confirmed at this stage. The ExA requests the applicant to submit mitigation proposals to address these significant effects, or to explain why further mitigation cannot be achieved.	The Applicant provided a general response to this point in response to Action Point AP9 in **Application Document 9.72.2 Applicant's Response to Issue Specific Hearing 1 Action Points [REP1A-037]**. The intra-project effects on PRoW users arise as a result of the combined effects of two or more of the following effects: • Visual amenity – impact on views enjoyed by users of PRoW; • Traffic and Transport (Severance, Pedestrian Delay, Non-Motorised Users, Fear and Intimidation, Diversions and Closures); • Socio-economics (in terms of quality of the PRoW route, user experience, journey lengths and times, local travel patterns and severance to local facilities); and • Health and Wellbeing (noting this already represents a form of combined assessment which takes into consideration effects reported in the traffic and transport and socio-economic assessments. Most of the contributing effects are minor when considered alone, other than impacts of visual amenity, some of which are significant alone. Significant individual residual effects have typically already been mitigated as far as reasonably practicable, as the Applicant has sought to mitigate all significant effects where possible. For these elements of intra-project effects there is often little more that can be done as any available opportunities to mitigate the individual significant effects have already been taken. Mitigation would therefore need to focus on reducing one or more of the minor effects that contribute to the combined effect. Intra-project effects have a higher level of uncertainty to them compared with the assessment of individual effects. This is partly because they are determined using professional judgement, and also because the individual effects have been assessed against a reasonable worst case for that topic, which may not apply across all of the topics considered in the intra-project cumulative effects assessment. Given that these significant effects may not even occur once the detail of proposed closures/diversions is developed, the inclusion of further restrictions on these individually minor effects at this stage could present a substantial risk to the efficient construction of the Proposed Project. It is considered that the best opportunity to address potentially significant intra-project effects on PRoW users is through the development of the detailed PRoW Management Plan, which under Requirement 6 of the DCO will need to be agreed with the relevant local planning authority. This document will be able to draw on a more detailed construction information to help identify mitigation opportunities. Opportunities may include the careful management of deliveries to lessen PRoW closures, final details of PRoW diversions including limits to durations, frequency of

Reference	Question to:	Question	Applicant's Response
			closures etc. Doing this post consent will provide greater certainty and allow the Applicant to make tailored proposals based on the circumstances of the time. The same principles apply to intra-project effects on drivers using the B1119 and cyclists using the Coastal Cycle Way.
1CEIntra1.	Suffolk County Council, Kent County Council, East Suffolk Council, Thanet District Council	**Significant intra-project cumulative impacts and mitigation (ISH1)** Can the councils comment on the applicant's response to AP8 regarding identification of significant effects [REP1-124] and AP9 with respect to the applicant's approach to mitigation of identified cumulative intra-project significant effects [REP1A-037]?	

14. Cumulative Effects (Inter-Project)

Table 14.1 Cumulative effects (inter-project)

Reference	Question to:	Question	Applicant's Response
1CEInter1.	Applicant	**Coordinated consideration of network projects** Having regard to NPS EN1, paragraph 3.3.79 and 3.3.80, can the applicant explain how all avoidable disruption, inefficiency, and visual impacts etc have been taken account in the strategic and detailed stages of the proposed development having regard to other planned and new energy projects in Suffolk? Include both spatial and temporal considerations in your answer. In answering, ensure that the response has regard to the relevant submissions from Suffolk and Essex Coast & Heaths National Landscape Partnership [REP1-270].	The Applicant notes that paragraph 3.3.79 of NPS EN-1 (UK Government, 2023) sets out the crucial role of electricity networks in connecting all kinds of electricity infrastructure and that network infrastructure is part of a "*coherent and strategically necessary system"*. This paragraph also states that given: *i) "the government's strategic ambitious levels of interconnection capacity and offshore wind generation and* *ii) the tightly interdependent infrastructure chain linking interconnection and offshore generation with onshore demand centres* *delays in the approval of associated new network development could cause significant economic waste and set back the strategically vital goals of decarbonisation and energy security".* Paragraph 3.3.80 of NPS EN-1 (UK Government, 2023) states that *"related to the above and considering the potential for unwarranted and avoidable disruption, inefficiency, and visual impacts along the onshore - offshore boundary, coordination of onshore transmission, offshore transmission, and offshore generation and interconnector developments should be considered at both the strategic and more detailed project design levels. This coordinated approach is likely to provide the highest degree of consumer, environmental, and community benefits*." The Applicant sets out its approach to coordination with other onshore and offshore energy projects, including planned and new energy projects in Suffolk, in **Application Document 7.10 Coordination Document [APP-363].** In accordance with paragraph 3.3.80 of NPS EN-1, coordination has been considered at the strategic and detailed stages of the Proposed Project with coordination with other projects occurring over several years. This has had a profound influence on the development of the Proposed Project and resulted in coordination opportunities being considered and, where practicable, delivered, or are proposed to be delivered in the future, in conjunction with other planned and consented energy projects in Suffolk to minimise disruption, inefficiency and visual impacts. At the strategic level, Section 6.3 of **Application Document 7.10 Coordination Document [APP-363]** explains how the Applicant was involved in the Offshore Coordination Support Scheme. The Applicant was part of a consortium with the promoters of RWE Five Estuaries and RWE North Falls to explore the feasibility of an offshore coordination between the two offshore wind farms and the Proposed Project. This feasibility study looked at coordination in relation to capital and constraint costs, construction and commissioning methodologies, and overall programme, associated with a coordinated solution. This confirmed that offshore coordination between the three projects is not feasible due to costs and the potential delay to the offshore wind projects. The Offshore Transmission Network

Reference	Question to:	Question	Applicant's Response
			Review (UK Government, 2023) identifies the urgent need for the Proposed Project and the RWE offshore windfarms and therefore the timeline for these projects to be delivered urgently has limited the ability of the Proposed Project to coordinate offshore. At the detailed level coordination has included: 1. Coordination in the approach to consent, which included ensuring that the consents strategy for the Proposed Project is compatible with the emerging strategies for other projects, to allow coexistence and to allow the other forms of coordination to be considered in an ongoing way. This approach has helped to inform the Proposed Project's interaction with the extant SPR DCOs for EA1N and EA2, and with the emerging approaches being adopted by the LionLink (and formerly Nautilus) interconnectors. 2. Coordination in the approach to project development, which has resulted in a number of key outcomes. These include the identification of Friston Substation as the point of network connection, adopting the principles of co-location when identifying potential converter station and cable infrastructure locations, embedding design flexibility of various forms to accommodate the potential future design evolution of other projects and the development of a site-wide coordinated masterplan at the Saxmundham converter station site. The masterplan is presented in Appendix A: NGV Coordination Suffolk Masterplan within **Application Document 7.10 Coordination Document [APP-363]**. This has resulted in a likely reduction in spatial extent of impacts from the Proposed Project in combination with these consented and planned projects. 3. Coordination in project delivery. This is a key ongoing area of coordination, facilitated by the approaches described above. There are various ways that benefits could be delivered, depending on how future projects are developed and along what timescales. This may involve elements of shared construction facilities to reduce land-take, reduce combined construction timescales, and reduce other environmental impacts. It may involve a joined-up approach to detailed landscaping and drainage design. Future coordination in project delivery may even involve co-delivery of elements of other projects' infrastructure. The extent to which these can and will be delivered depends on various factors including the design and programme of other projects, and the powers in their respective consents. The ability to deliver without reliance on the construction programme of other developers' projects is particularly important for Sea Link, given the need case and the status of Sea Link as a project of critical national priority (CNP) in accordance with NPS EN-1 paragraph 4.2.5 (UK Government, 2023) Whilst projects such as the LionLink Interconnector are behind Sea Link in terms of their programme for project delivery, there may be opportunities for projects such as LionLink to reuse construction facilities and these opportunities are being explored through ongoing dialogue with other scheme developers. An example of coordination in project delivery which is currently being explored is through the Applicant's ongoing dialogue with SPR for landscaping and cable laying at Friston Substation – see details at Appendix D 1LVIA15 Coordination with Friston Substation Landscape

Reference	Question to:	Question	Applicant's Response
			Mitigation Technical Note of **Application Document 9.73.1 Applicant's Reponses to First Written Questions**. The Applicant remains committed to continuing engagement with all projects identified, and where possible with future projects, to secure coordination benefits and to also explore further opportunities for coordination where they arise In identifying and embedding coordination opportunities, the Applicant has demonstrated the potential to co-locate the Proposed Project with other projects at the Saxmundham Converter Station Site and Suffolk landfall site. It has also considered the implications of coordination on the Proposed Project's delivery programme. The latter has focussed on avoiding significant delay to project delivery so that the delivery of the government's goals for decarbonisation and energy security, as referred to in NPS EN-1 (UK Government, 2023) paragraph 3.3.79, are not compromised. The Applicant has also identified and embedded coordination in the development of the Proposed Project to deliver on its obligations under the Electricity Act 1989 (UK Government, 1989) and its transmission licence to develop the electricity transmission network in an efficient, coordinated and economical way and one that considers the impact of new infrastructure on people and place. The cumulative effects assessment as set out in **Application document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter Project Cumulative Effects [APP-060]** has robustly assessed the Proposed Project in combination with other projects, including those which are expected to be co-located. An assessment of the Proposed Project together with other projects on the Natural Beauty Indicators and Special Qualities Indicators for the Suffolk and Essex Coast and Heaths National Landscape and its setting, as requested in the written representation for Suffolk & Essex Coast & Heaths National Landscape Partnership **[REP1-270],** is presented in Table 4.1 and Table 4.2 of **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**. This identifies that there is the potential for significant inter-project cumulative effects on the Natural Beauty indicators due to the potential simultaneous and sequential construction of the project with Sizewell C main development site and East Anglia ONE North & TWO Offshore Windfarms and the LionLink Interconnector. However, it also identifies that these are for a short and temporary period. As set out in **Application Document 7.10 Coordination Document [APP-363].** the Applicant remains committed to continuing engagement with all the projects identified to secure coordination benefits in project delivery; however, coordination with Sizewell C main development site and the East Anglia ONE North & TWO Offshore Windfarms within the National Landscape cannot be achieved due to their differing construction locations within the National Landscape and also their programmes, which are expected to be sequential. For the LionLink Interconnector Project, the Proposed Project did consider whether up to three projects could co-locate at the Suffolk Landfall and along the cable routeing within the National Landscape and the Applicant consulted on this. However, since this consultation the LionLink Interconnector project has confirmed that it is progressing landfall options elsewhere at Southwold/Reydon and Walberswick. The Applicant considered whether the emerging LionLink landfalls

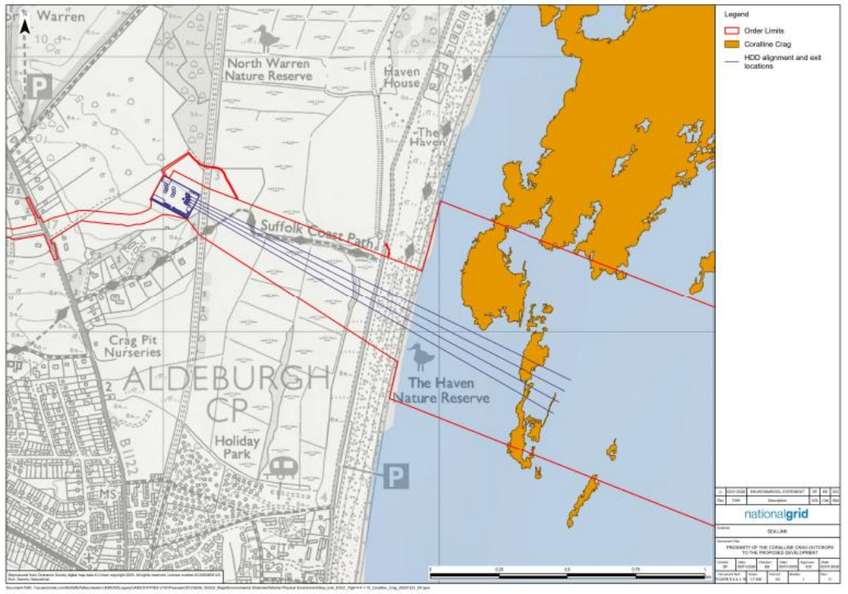
Reference	Question to:	Question	Applicant's Response
			would be preferable for the Proposed Project and concluded that they would not be. The reasons for this are set out in sections 6.2.25 to 6.2.30 of **Application Document 7.10 Coordination Document [APP-363]**. Coordination opportunities within the National Landscape are therefore unlikely to be realised with the LionLink Interconnector project due the differing construction locations. In addition, this project is yet to be consented and the delivery programmes may not align Notwithstanding this, the Sea Link landfall and DC cable design retains the possibility of being delivered as a standalone project or alongside other co-located projects within the National Landscape and measures taken to avoid, reduce, and mitigate impacts on the National Landscape are set out in **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-045].**

15. Physical Environment

Table 15.1 Physical environment

Reference	Question to:	Question	Applicant's Response
1PE1.	Applicant	**Assessment of sensitivity and significance** ES Part 4, Marine Chapter 1 [REP1-051] paragraphs 1.7.70 and 1.7.71 describe Sandwich Bay to Hacklinge Marshes Site of Special Scientific Interest (SSSI) and Sandwich and Pegwell Bay National Nature Reserve (NNR) respectively as being south of the proposed landfall. However, the proposed landfall actually crosses the sites. In addition, the descriptions in section 1.7 make no reference to the Thanet Coast and Sandwich Bay SPA or Ramsar sites. Explain whether these observations have any implications for the assessed sensitivity or significance of effect.	The location of the different designated sites relative the landfall site has been updated in **Application Document 6.2.4.1 (D) Part 4 Marine Chapter 1 Physical Environment**, submitted at Deadline 3. The Section on 'Designated sites' has been updated to include the Thanet Coast and Sandwich Bay SPA and RAMSAR sites. The impact assessment associated with morphological change to the various designated sites at the Kent landfall is presented in Section 1.9 of **Application Document 6.2.4.1 (D) Part 4 Marine Chapter 1 Physical Environment**, submitted at Deadline 3. It has been updated for further clarity, and it determines there may be a minor impact, which is not significant.
1PE2.	Kent Wildlife Trust Natural England Local authorities	**Pegwell Bay – previous cable installation works** Confirm whether any residual adverse effects from previous cable installation works within the intertidal area have been identified at Pegwell Bay (exclude reference to the saltmarsh and lagoon, which RRs have previously highlighted).	
1PE3.	MMO	**Suspended sediments and contamination** Do any of the areas of sediment bound contamination along the marine cable route identified as exceeding CEFAS Action Level 1 in section 1.7 of [REP1-051] require special working arrangements to minimise adverse effects (for example, adjacent to Goodwin Sands or within Pegwell Bay?).	
1PE4.	MMO	**Need for designated disposal area** [REP1-051] table 1.18 explains that there is no designated disposal area and that dredged sediment would be disposed within the offshore scheme boundary within the area of pre-sweeping. Confirm whether a designated dredge disposal area is required for any element of the proposed cable route.	
1PE5.	Applicant	**Pneumatic hammered casing** The applicant's comments on WR [REP2-034] suggests that there are no plans to use pneumatic casing insertion. Confirm whether pneumatic casing insertion as referenced in appendix A Landfall HDD Feasibility Technical Note [APP-321] is excluded from use by the dDCO.	As stated in **Application Document 9.79 Applicant's Comments on Written Representations [REP2-034]** there are currently no plans to use pneumatic casing as part of the trenchless technique installation method. Given that the use of pneumatic casing installation does not form part of the planned trenchless technique installation method its use has not been included in any noise modelling. Appendix A Landfall HDD Feasibility Technical Note in **Application Document 7.3 Design Development Report [APP-321]** provides additional information for a range of alternative trenchless techniques including direct pipe and micro tunnelling and includes reference to pneumatic casing installation as part of the description of alternative solutions which have previously been applied to other similar projects.

Reference	Question to:	Question	Applicant's Response
1PE6.	Applicant	**Release of drill fluid** The applicant's [REP1A-033] response to supplementary agenda question ISH1.25 explains how bentonite fluid would be discharged in the nearshore area in Suffolk. [REP1-051] paragraph 1.9.54 explains that some sediment may settle but would otherwise be redistributed in the dynamic environment. Explain what the likely distribution of this sediment would be in the context of nearshore sediment distribution patterns and whether any of this sediment could be deposited in the foreshore environment. It is also noted that the figures presented in [REP1A-033] do not appear to add up to 7,240 cubic metres discussed. Also clarify how the total volume of discharge has been determined.	Estimated quantities of sediment contained in the drilling fluid discharge are provided below for a single HDD during reaming and are based on the worst-case scenario of the HDD using pull reaming rather than forward reaming: • 112 m^3 of drilling fluid will be discharged per tidal cycle over a total of 14.5 tidal cycles. The drilling fluid is comprised of bentonite (clay) in water, so the 112 m^3 will contain 5 tonne (approx. 5 m^3) of bentonite clay that will be suspended in the seawater. • The fluid will also contain cuttings at an assumed 20% carrying capacity, the cuttings volume per tidal cycle is 18.6m3. The cuttings at Suffolk will be approximately 5% silt, 75% sand and 20% gravel based on testing of the Crag bedrock. The sand and gravel fraction will fall out of suspension close to the exit pit, most likely within a distance of 0-20 m. • 191 m^3 of drilling fluid will be released at the HDD exit during installation of the duct over a single tidal cycle. The drilling fluid is comprised of bentonite (clay) in water, so the 191 m^3 will contain 8 tonne (approx. 8 m^3) of bentonite clay. The fluid is estimated to include 2% cuttings as it flows from the bore, so the cuttings volume for this single tidal cycle is 3 m^3. The cuttings swept out at this phase at Suffolk are estimated as being 25% silt 75% sand with the sand falling out of suspension close to the exit pit, most likely within a distance of 0-20 m. The drilling fluid will initially be diluted by the seawater with this process enhanced by the stirring effect of wave action before being more widely dispersed by tidal currents. The bentonite clay particles from the drilling fluid and silt particles from the cuttings will settle in the water column at a rate of approx. 0.5 mm/s. Quiescent conditions would be required to allow the particles to settle on the foreshore or seabed. Such calm conditions are rarely experienced along this section of the Suffolk coast due to the persistent nature of swell wave activity within the North Sea. Consequently, the bentonite clay and silt particles from the cuttings will not accumulate on the foreshore but will instead be rapidly diluted and widely dispersed by tidal processes. Regarding volumes appearing to not add up: Total Volume for of 7,260 cubic metres assumes 4 No. HDD's. The breakdown of volumes provided in **ISH1.25** of **Application Document 9.38.1 Cover Letter [REP1A-033]** are for a single HDD. From the breakdown of volumes total estimated volume for a single HDD is 112 m^3 x 14.5 tidal cycles + 191 m^3 x 1 tidal cycle = 1815 m^3. Total for 4 No HDDs is 1815 x 4 = 7260 m^3. The volume calculations above assume a 450 mm OD SDR 11 PE100 duct installed in a 610mm bore for a 1500 m length HDD. Calculation of the reaming discharge volumes (112 m^3 x 14.5 tidal cycles) assume pull reaming of the bore as the worst-case scenario using parameters of final ream diameter of 610 mm, pilot diameter of 311 mm, drilling fluid carrying/flushing capacity of 20%, and a pull reaming progress rate of 100 m per 12-hour shift. Calculation of the duct installation discharge volume (191 m^3) assumes displacement drilling fluid to the HDD exit of 80% of the duct volume; the remaining 20% is assumed to be displaced to the onshore HDD entry pit, as is typically the case for HDD landfalls with relatively low entry elevations.
1PE7.	Applicant	**HDD exit location – Suffolk**	A new figure has been included in **Application Document 6.4.4.1 (C) ES Figures Marine Physical Environment**, submitted at Deadline 3, identifying the location of

Reference	Question to:	Question	Applicant's Response
		Provide a figure identifying the location of the continuous outcrop of Coralline Crag (as outlined in the applicant's [REP1A-033] response to supplementary agenda question ISH1.27) and REAC commitment GH14. To assist understanding, also overlay the order limits.	the continuous outcrop of Coralline Crag in relation to the Order Limits and the trenchless techniques (HDD) alignment and exit locations. A copy of this new figure (Figure 6.4.4.1.15) is provided below. 
1PE8.	Applicant	**Outline Code of Construction Practice measure BE04 – cable protection materials** Measure BE04 of the oCoCP [APP-341] commits that, where possible, cable protection materials would use locally sourced materials or environmentally benign sources. Is there a definition of what local and environmentally benign mean in this context? Also confirm whether local sources would also be environmentally benign.	Where cable protection is required, materials would be sourced locally where possible and practicable. In the context of the Proposed Project, reference to locally sourced material generally refers to sources from the UK, ideally south east England (but not limited to this area) with similar geological composition to the geology along the offshore cable route. Where suitable local sources do not exist (e.g. quarries), alternative sources would be identified. The priority when identifying alternative sources would be to identify a source of minimum distance from the cable route where material is of similar geological composition to the geology along the offshore cable route and environmentally benign. Ideally this would be a source in the UK but could extend further across the wider North Sea Region. All potential sources of material will be assessed to ensure they are environmentally benign in terms of having no potential for negative effects on the environment, such as, but not limited to, invasive species, leachates or contaminants. Therefore, local sources would also be environmentally benign.
1PE9.	Natural England MMO	**Microplastics arising from rock armour** In other NSIP examinations (for example for Morecambe Offshore Windfarm) the MMO and NE highlighted concerns regarding microplastics. Are MMO or NE aware of any constraints relating to the generation of microplastics from rock armour solutions for this project (for example from rock bags) and if so, are any specific control measures for microplastics required?	

16. Benthic Ecology

Table 16.1 Benthic ecology

Reference	Question to:	Question	Applicant's Response
1BE1.	Applicant	**Goodwin Sands** At point E34 of NE's RR [RR-3920] regarding benthic ecology, NE stated its concern about the potential for a benthic halo effect into the Goodwin Sands Marine Conservation Zone (MCZ) following placement of structures on the seabed near this designated site. It is noted that the proposed cable route runs alongside the Goodwin Sands MCZ boundary. Whilst the applicant's response regarding the potential for halo effects on the MCZ [REP2-014] is noted, is it possible to re-position the cable route (whilst still being within the order limits) so that there is a buffer between the cable position and the MCZ boundary to avoid any possible halo effects or any other adverse impacts to this MCZ? If not, explain why this is not achievable.	The Applicant confirms that a buffer is not considered necessary around Goodwin Sands MCZ from the Proposed Project as halo effects are not relevant for subsea cables and their associated cable protection. There will be no material placed within the MCZ. As stated in the Applicant's response to point E34 of Natural England's Relevant Representation included in **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA (Clean) [REP2-014]**, there is evidence that offshore wind turbine substructures with scour protection could result in ecological halo effects on the surrounding benthic communities but cable protection would not. The primary method of cable installation for the Proposed Project is cable burial. Where additional cable protection is required, due to the physical nature of the protection and maximum height of 1 m above the seabed (see Table 4.17 in **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [REP1A-003]**) any cable protection used by the Proposed Project would not create the environmental conditions which would cause halo effects to develop, particularly a large vertical depth gradient which would allow complex filter feeding communities to develop. The low-level elevation and small extent of the cable protection may allow some faunal colonisation to occur. However, as stated in Table 4.17 of **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [REP1A-003** given that the available surface area and depth gradient of cable protection available for colonisation by fauna is considerably smaller for cables and associated protection structures compared to substrates provided by other offshore installations such as the foundations and scour protection of platforms and wind turbines (OSPAR, 2023) the Offshore Scheme is not considered suitable for supporting the communities that can create halo effects.
1BE2.	Applicant	**Interim Subtidal Survey Report [AS-006]** Explain why there is no coverage of Area 1 within this document, other than it being shown within Figure 1-1.	The Applicant can confirm that Figure 1-1 of **Application Document 6.3.4.2.D (B) ES Appendix 4.2D Interim Subtidal Survey Report (Additional Surveys) [AS-006]** presents the 5 survey areas targeted for the 2024 geophysical and environmental survey campaign. For Area 1, Aldeburgh Nearshore, no environmental data through grab sampling was collected, as sufficient grab environmental data for this area was collected during the previous survey campaign in 2021. However, geophysical data was collected in this area in 2024 and is presented in detail in **Application Document 6.3.4.2.B ES Appendix 4.2B Geophysical Survey Interpretation (Additional Surveys) [APP-197]**. For completeness, Area 1 is also shown in **Application Document 6.3.4.2.D (B) ES Appendix 4.2D Interim Subtidal Survey Report (Additional Surveys) [AS-006]** as it still formed part of the 2024 survey campaign.
1BE3.	Applicant	**Offshore – errata**	The Applicant confirms that this sentence does relate to geophysical survey objectives and that these objectives were achieved.

Reference	Question to:	Question	Applicant's Response
		ES Part 4 Marine Chapter 2, Appendix 4.2.A, Benthic Characterisation Report section 1.3.1 geophysical objectives states that "*The following geophysical survey activities were carried out prior to the environmental survey campaign on survey vessel M/V Franklin and Mersey Discovery*" and then lists a series of what appear to be objectives. Confirm whether this sentence should relate to geophysical objectives rather than activities?	
1BE4.	Applicant	**In-Principle Monitoring Plan (IPMP)** NE [RR-3920] requests that an IPMP is developed to monitor the impacts (temporal and spatial changes) on residual concerns in relation to protected habitats and those of conservation importance. The applicant's response [REP2-014] at point C11 of its response to NE is noted. The ExA acknowledges that an IPMP is important and that an outline version is requested (with a full IPMP to be secured through the DCO), which should also include details of micro-siting and also how adaptive management would be used if the monitoring returned results which were more adverse than anticipated in the ES.	The Applicant understands the importance of an In-Principle Monitoring Plan (IPMP) for projects, such as Offshore Windfarms where significant evidence gaps or uncertainties are present alongside features which are particularly sensitive to impacts of the development. As set out in Table 2.19 of **Application Document 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology [REP1-053]**, all impacts on benthic ecology were assessed as minor and not significant without the need for additional mitigation. Also, no significant data gaps or areas of uncertainty were identified. As such, given that no likely significant effects have been identified and there are no requirements for additional mitigation or any areas of uncertainty / data gaps, no specific offshore receptors have been identified that would require further monitoring. The Applicant therefore understands that an outline IPMP is not required for the Proposed Project at this stage. The Applicant is therefore not intending to prepare an outline IPMP as there are no defined requirements for monitoring upon which an outline IPMP would be based. The Applicant can confirm that pre-commencement surveys will be undertaken to inform routing for the marine cable burial, as included within the DML, and sensitive routeing and siting of infrastructure and temporary works is also a commitment (GM04) within **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3. The Applicant will engage further with Natural England to consider further the requirements for monitoring and an IPMP following the pre-commencement surveys if any habitats of principal importance are identified and there is potential for adverse effects on these habitats.

17. Marine Mammals

Table 17.1 Marine mammals

Reference	Question to:	Question	Applicant's Response
1MM1.	Applicant	**Effects on seals at Goodwin Sands** In relation to seals, paragraph 4.9.49 of ES Part 4 Chapter 4 Marine Mammals [REP1-055] states that installation operations would only be able to take place during high tide, when the sea covers Goodwin Sands and they become completely submerged. Explain how this measure would be secured.	The Applicant can confirm that cable installation vessels can only operate in the area close to Goodwin Sands where water depth is sufficient for the cable lay and other vessels. This is therefore part of the Proposed Project design for cable installation activities which will be secured through the Cable Specification and Layout Plan (CSIP). An outline CSIP (oCSIP) will be submitted at Deadline 4.
1MM2.	Natural England	**Noise effects on seals** Provide a response to the Seals and Airborne Sound Disturbance Technical Note [REP1-122].	
1MM3.	Applicant	**Visual disturbance to seals** ES Part 4 Chapter 4 Marine Mammals [REP1-055] includes consideration of the potential visual effects of construction on seals. However, there is little recognition that there would be a range of construction activities in the intertidal area, including humans and vehicles, and that they would be visible to seals entering or leaving the River Stour. There is no assessment of the visual effects of non-vessel construction activity on seals, taking into account how effects may vary depending on the time of year, and whether seals are breeding, include young pups, or are hunting, for example. A more qualitative assessment is required and an update to [REP1-055].	Consideration of visual effects from humans and non-vessel construction vehicles on the intertidal area and during construction, to seals at their haul-out location in the River Stour, including during sensitive periods such as breeding and moulting has now been updated in paragraph 4.9.73 of **Application Document 6.2.4.4 (F) Part 4 Chapter 4 Marine Mammals**, submitted at Deadline 3.
1MM4.	Natural England Kent Wildlife Trust	**Updated information** Provide a response to the following updated documents: • ES Figures Marine Mammals [REP1-011] • ES Figures Marine Pegwell Bay Seal Survey Report [REP1-013] • Outline Marine Mammal Mitigation Plan [REP1-025] • ES Part 4 Marine Chapter 4 Marine Mammals [REP1-055]	
1MM5.	**Applicant** Natural England	**Marine mammal observer (MMob)** Provide a response to KCC's LIR [REP1-129] in relation to the need for a MMob during cable trenching/laying as well as during geophysical surveys.	The requirement for a Marine Mammal Observer (MMOb) to be onboard a vessel during geophysical activities is led by best practice measures outlined in the JNCC guidelines for minimising the risk of injury to marine mammals from geophysical surveys (JNCC, 2025) and JNCC guidelines for minimising the risk of injury to marine mammals from explosive use in the marine environment 2025. The primary role of MMObs is to ensure that no marine mammals are observed within a specified area before a noisy activity begins, thus reducing the potential for injury to negligible levels from underwater sound. The guidance is provided for those activities and sound sources known to have the potential for injury such as seismic sound sources and UXO clearance, not cable installation activities like sandwave leveling, ploughing and jetting methods for cable burial. The Applicant is following the most up to date guidance in its proposed mitigation and use of MMObs.

Reference	Question to:	Question	Applicant's Response
			Of the Proposed Project activities which occur within the hearing range of marine mammals, the highest peak pressure is expected to come from any sub bottom profiler works during pre-installation geophysical surveys. This sound source is impulsive in nature and is known to represent a higher risk of injury. For activities using sub-bottom profilers, the Applicant has committed to using the above best practice guidance in its control and management measures which includes an MMO. Adherence to appropriate JNCC guidelines for geophysical sound sources (JNCC, 2017; JNCC, 2025) will minimise injurious impacts to marine mammals. Other activities, such as cable lay and associated tasks, have a much lower sound intensity and are non-impulsive in nature. Whilst these activities do occur for longer the sound source is not stationary and so the overall sound exposure duration for mobile species is expected to be very limited. Therefore, still in adherence to the JNCC best practice guidance above, the use of a MMOb is not required for cable lay activities and associated tasks.
1MM6.	Applicant	**Port Richborough floating pontoons** Several RR, for example [RR-5843] have raised concerns at cumulative effects on seals from the Port Richborough floating pontoons increasing boat traffic. Provide a response including whether this development has been taken into consideration in cumulative inter projects effects.	The marine licence for the construction of the Port Richborough Floating Pontoons development (**MLA/2023/00236**) was granted on 24 January 2024 and expired in January 2025. It is understood that the works were completed in 2024 (noting that no works were permitted between October and February to avoid impacts on wintering birds in the vicinity of Port Richborough from piling. Based on information submitted as part of the Application for the Port Richborough Floating Pontoons development, the works were anticipated to take ten days to complete. Once operational the number of vessels using the Port Richborough Floating Pontoons was expected to increase from 2-3 vessels per week to 15 vessels per day. The application did not require an Environmental Impact Assessment under Schedules 1 or 2 of the Marine Works Regulations and did not require a Habitat Regulations Assessment (HRA). Given that the development was operational prior to submission of the application for the Proposed Project, it can be concluded that there is no potential for any cumulative effects to occur. Any increase in boat traffic resulting from the development of the floating pontoons was not considered to be significant (based on no requirement for an EIA or HRA) and therefore was not expected to affect the baseline such that this would result in any changes to the conclusions of the assessment presented in **Application Document 6.2.4.4 (F) Part 4 Marine Chapter 4 Marine Mammals**, submitted at Deadline 3.
1MM7.	Applicant	**HRA - Revised baseline** The applicant has provided a revision to the marine mammal baseline with the Winter SCANS 2025 data in ES Part 4 Marine Chapter 4 Marine Mammals [REP1-055]. Provide an explanation on the implications for the revised baseline on the assessment of effects to the harbour porpoise qualifying feature of the SNS SAC.	The revised baseline in **Application Document 6.2.4.4 (F) Part 4 Marine Chapter 4 Marine Mammals**, submitted at Deadline 3 which updated the density estimates for harbour porpoise using Winter SCANS data, was then used to determine the number of harbour porpoise in the zone of influence in the Southern North Sea SAC and the impact assessment updated in in paragraph 7.3.22 of **Application Document 6.6 (E) Habitats and Regulations Assessment Report**, submitted at Deadline 3. The revised baseline for harbour porpoise using Winter SCANS 2025 data (Ramirez-Martinez et al., 2025) did not change the overall outcomes of the assessment as the numbers estimated to be disturbed were still significantly lower than the threshold criteria for impacts to harbour porpoise SACs (JNCC, 2020).
1MM8.	Applicant	**HRA – in-combination assessment** Can the applicant provide in-combination assessment for effects on marine mammal SACs?	The applicant has updated **Application Document 6.6 (E) Habitats and Regulations Assessment Report**, submitted at Deadline 3 in Section 8. In Combination Effects to include in-combination effects to Southern North Sea SAC as a result of underwater sound from the Offshore Scheme in combination with other project activities occurring within the SAC boundary.

Reference	Question to:	Question	Applicant's Response
1MM9.	Natural England	**HRA - screening** No additional onshore European sites, or European sites designated for marine mammals were identified in ([RR-3920], Appendices A, B and F) on the applicant's HRA screening in [REP2-009]. Confirm if you agree that all relevant sites have been screened in for these receptors. If not, confirm which additional sites should be considered.	
1MM10.	Applicant	**JNCC Guidelines** Should MM01 and MM02 in the REAC [CR1-043] be updated to refer to specific JNCC guidelines (as currently it refers to just 'JNCC guidelines')?	Updated wording and referencing for MM01 and MM02 has been included in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 3.
Upda1MM11.	Applicant	**Unexploded Ordnance (UXO)** MM01 of the REAC [CR1-043] refers to UXO detonation but elsewhere it is stated that UXO detonation would be carried out under a separate marine licence. Therefore consider whether MM01 is necessary or should be removed from the REAC.	Updated wording for MM01 has been included in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 3.
1MM12.	JNCC	**HRA – Southern North Sea Special Area of Conservation (SNS SAC)** Noting paragraphs 4.3.36 to 4.3.37 of the HRA Report [REP2-009], can JNCC expand upon its concerns regarding how conservation objective 3 of the SNS SAC was considered in the applicant's LSE conclusion?	
1MM13.	JNCC	**HRA – Southern North Sea Special Area of Conservation (SNS SAC)** The applicant in [REP2-016] tables 3.8 and 3.9 and [REP2-009] has stated that less than 2% of the total SNS SAC area could be affected by noise disturbance (applying a 5 kilometre (km) effective deterrent range, which exceeds JNCC's recent guidance of 3km). It states that 581 harbour porpoise could potentially be disturbed, representing a maximum of 3% of the SNS harbour porpoise population. Can JNCC confirm if this information alleviates its concerns regarding noise disturbance to harbour porpoise of the SNS SAC and the need for a seasonal restriction. If not, can JNCC provide further justification as to why it considers a seasonal restriction necessary?	
1MM14.	CEFAS/JNCC MMO	**HRA – Conclusions regarding prey availability** NE has deferred to CEFAS on impacts associated with prey availability impacting marine mammal species. Can CEFAS confirm it agrees with the applicant's conclusion of no LSE to Annex II marine mammal European sites from indirect effects due to availability of prey species. If not, explain why.	
1MM15.	Natural England	**Comments requested on [REP2-014]** Provide a response to the applicant's response [REP2-014] to NE's RR in relation to marine mammals.	

18. Marine Ornithology

Table 18.1 Marine ornithology

Reference	Question to:	Question	Applicant's Response
1MO1.	Applicant	**Effects on bird species using the intertidal area in Pegwell Bay** Explain how the marine ornithology assessment's consideration of noise and visual disturbance in section 5.9 of ES Part 4, Marine Chapter 5 [REP2-003] has taken into account the 24 hour and night time nature of disturbance to bird species using the intertidal area.	The assessment and conclusions presented in **Application Document 6.2.4.5 (C) Environmental Statement Part 4 Marine Chapter 5 Marine Ornithology [REP2-003]** are, where necessary, set against the context of 24-hour working in the intertidal area, i.e., as noted in Sections 5.9.24 and 5.9.26. Waterbirds will be using the intertidal areas throughout the 24-hour period for both feeding and roosting and the assessment of disturbance has considered how the full tidal cycle influences bird occurrence and use. This is irrespective of when during the day the particular activities would be undertaken, and the assessment is therefore applicable to both daytime and nighttime works. The only difference in the works profile would be the use of lighting within the construction working area during the hours of darkness. Typically, any lighting will be around the perimeter of the area (e.g. coffer dam) and directed inward and downward onto working area. Movement of vehicles at night is expected to be limited to key activities such as transfer of personnel and transfer of any consumables or equipment that cannot be left until daytime operations. As a result, the area of disturbance would be no greater than that experienced from visual movements and audible cues during the day (and also present during night works). Given, that bird movements and usage of the intertidal area are driven by the tidal cycle, rather than daylight there is no cumulative effect per se, of 24-hour working, rather that there will be a continued presence of construction activity in the intertidal area during the relevant working period. This is the scenario that has been considered in **Application Document 6.2.4.5 (C) Environmental Statement Part 4 Marine Chapter 5 Marine Ornithology [REP2-003]**.
1MO2.	Applicant	**Mitigation for effects on bird species using the intertidal area in Pegwell Bay** Having provided the updated construction method technical note for Pegwell Bay [REP2-011], confirm whether any more detailed information is available regarding the best practicable means available to mitigate noise impacts from the works in Pegwell Bay.	Further detailed information on noise mitigation measures for landfall operations and the HDD cannot be provided until the principal contractor's working methodology (e.g. cofferdam versus moon pool barge) at the exit location is confirmed. Once the principal contractor has selected its methodology for the intertidal exit works, it will use best practicable means to mitigate noise impacts, complying with BS 5228 Standard for Noise and Vibration (BSI, 2014). Terrestrial based equipment (excavators/bulldozers) will be utilised for much of the operations, they will comply with BS 5228. The assessment presented in **Application Document 6.2.4.5 (C) Environmental Statement Part 4 Marine Chapter 5 Marine Ornithology [REP2-003]** and shown on Figure 6.4.4.5.7 and Figure 6.4.4.5.8 in **Application Document 6.4.4.5 (C) ES Figures Marine Ornithology**, submitted at Deadline 3, is based on a worst-case scenario that no noise reduction measures have been applied.
1MO3.	**Applicant** MMO	**Directional lighting on boats** Provision O06 of the REAC [CR1-043] suggests that artificial lighting on vessels would be directional and only used when necessary (also noting health and safety requirements). The applicant is requested to comment on the degree to which vessel lighting is directional.	The International Regulations for Preventing Collisions at Sea (COLREGs) outline specific requirements for the display of lights on vessels to ensure safe navigation and visibility at sea. These requirements ensure that vessels can be seen and understood by other vessels, reducing collisions at sea. During cable installation operations, there would be the need for use of lighting on deck and directional lighting. The directional lighting will be directed specifically

Reference	Question to:	Question	Applicant's Response
		MMO may also wish to comment.	towards cable installation activities behind the stern of the vessel. Lighting will also be directed to deployment points for subsurface equipment and surface daughter vessels, as necessary, with some reduction in the intensity of the lights / use of the lights during acceptable ambient light levels. It should be noted that the seasonal restriction on works between 1st November and 31st March will minimise potentially sensitive bird species, i.e., Red-throated Diver, being present when cable installation is being undertaken.
1MO4.	Applicant	**L_{Amax} noise level decay** Explain why an LAmax of 91dB@10m is considered to be the 'typical peak' ([REP1A-033] response to supplementary agenda question ISH1.21), when the previous assessment clearly states that noise levels from vibropiling range from 78-104dB@10m in footnote 6 of [AS-115]. Provide substitute noise level decay tables for the higher value (ie updated ES Marine Chapter 5 [REP2-003], tables 5.18 and 5.19).	The range of values is taken from the results from a programme of measurements across different operational steps of different piles being driven. The highest value measured across the programme of measurements was L_{AFmax} 104 dB, with values more typically in the low-90-dB range. The value of 91 dB used in the assessment therefore represents a reasonable and realistic worst-case scenario, based on the noise levels most likely to occur, rather than an absolute worst-case that is very unlikely to occur in practice. The modelling also takes a worst-case approach by applying the noise source level across the entire potential working area, with the results illustrated on Figure 6.4.4.5.7 and Figure 6.4.4.5.8 in **Application Document 6.4.4.5 (C) ES Figures Marine Ornithology**, submitted at Deadline 3, whereas in practice the noise source can only be located in one place at a time. Tables 5.18 and 5.19 included in the original application (**Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology [APP-078])** were based on a simple calculation of noise decay, which takes into account geometric divergence (i.e. decay with distance) only. This approach has been superseded by 3D acoustic modelling described in **Application Document 6.2.4.5 (C) Environmental Statement Part 4 Marine Chapter 5 Marine Ornithology**, submitted at deadline 3, with the results shown in Figures 6.4.4.5.7 and 6.4.4.5.8 in **Application Document 6.4.4.5 (C) ES Figures Marine Ornithology**, submitted at Deadline 3. The noise modelling, in addition to geometric divergence, takes in to account the effect of absorption by the air, ground effects, and screening (e.g. by topography). Given that these effects differ with direction based on the intervening topography, ground type, screening etc, it is not possible to give a simple table of distances. Instead, the noise contour plots in Figure 6.4.4.5.7 and Figure 6.4.4.5.8 in **Application Document 6.4.4.5 (C) ES Figures Marine Ornithology**, submitted at Deadline 3 illustrates the decay with distance in all directions.
1MO5.	Applicant	**Joint Nature Conservation Committee comments on RTD** JNCC [REP1-120] suggests that the majority of the proposed cable route passes through areas of medium RTD density. Explain what the implication of a medium density assessment would be for the assessed magnitude of effect (and therefore significance). Also provide evidence to support the assertion in your comments on WR [REP2-034] that these are areas of lower occurrence.	The Applicant has acknowledged in the Written Representation to Natural England and JNCC (**Application Document 9.79 Applicant's Comments on Written Representations [REP2-034]**) that the terminology used in **Application Document 6.2.4.5 (B) Environmental Statement Part 4 Marine Chapter 5 Marine Ornithology [REP2-004]** to describe the relative density of Red-throated Diver within the SPA does not correspond to that outlined by Natural England in their Relevant Representation in **Application Document Written representations (WR) and summaries for any that exceed 1500 words [REP1-153],** with Natural England considering densities of between 1 and 4 individuals/km^2 as 'medium' densities, 4 to 11 individuals/km^2 as 'high', and >11 individuals/km^2 'very high'. The Applicant was merely trying to show the densities, relative to the wider SPA, were at the lower end of the scale to those of a 'very high' density i.e., >11 individuals/km^2. The classification as medium densities does not change the conclusions of the assessment.
1MO6.	Applicant	**REAC provision O05 disturbance to red-throated diver**	The Final Offshore Construction Environmental Management Plan (CEMP) will provide details of all roles (including their working location either onshore or

Reference	Question to:	Question	Applicant's Response
		Provision O05 of the REAC [CR1-043] states that vessels would avoid rafting birds and areas with high densities of birds where practicable. Would vessels be accompanied by an ecological clerk of works, or similar, to ensure that this mitigation can be implemented and if so explain how would this be secured?	offshore dependent on activities taking place) relevant to environmental management post-consent. Outline roles and responsibilities are provided in Table 1.3 in **Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339]**. This document (paragraph 1.11.18) also outlies the Applicant's commitment to best practice protocols for Red Throated Diver including the avoidance of rafting birds and areas with high densities of birds where practicable. In the **Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan [APP-339]**, the Applicant has used the term Environmental Advisor instead of ecological clerk of works. The Environmental Advisor (or similar) would monitor and report progress on consents and environmental commitments within the DCO. It is however anticipated that it's also the responsibility of all staff involved with the Proposed Project to ensure the correct implementation of the CEMP and the environmental mitigation contained within.
1MO7.	Applicant	**REAC provision O07 cold weather protocol** Provision O07 of the REAC [CR1-043] allows for stopping work during freezing conditions to avoid impacts on birds 'where practicable'. What would make a stoppage not practicable?	The Applicant can confirm that 'where practicable' relates to activities which can safely be aborted once commenced. Examples of HDD works in the intertidal that would not be practicable to stop are: • Works at the coffer dam exit associated with reaming of the bore. This is due to an increased risk of drill pipe becoming stuck if it is inactive for more than 12 hours. • Pulled installation of an HDD duct if it has already been commenced. Interruption of a pulled installation significantly increases the risk of the duct becoming stuck in the bore. • Management of drilling fluid or groundwater at the coffer dam exit in the unlikely case that there is a risk of losses from the coffer dam to the intertidal area.
1MO8.	**Applicant** JNCC	**HRA - operation and maintenance effects** The applicant makes it clear in its comments on WR [REP2-034] that, although unlikely, works of between 2-6 months duration might be required to maintain the installed cable and these works might be during the overwintering period for RTD. Explain how it is possible to rule out an adverse effect on integrity on the RTD qualifying feature of the Outer Thames Estuary SPA for such works. JNCC is also requested to comment on this and to explain whether there are any potential measures available to address the impact of such works.	As set out in **Application Document 9.79 Applicant's Comments on Written Representations [REP2-034]** page 179 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. Reference to 'durations of 2-6 months' is included on page 234 of **Application Document 9.79 Applicant's Comments on Written Representations [REP2-034]** which states: *"if cable repairs are required, the timeframe of works would typically be two months but may be up to six months depending on vessel availability".* This timeframe (two to six months) is not the duration required to maintain the installed cable as is suggested. This timeframe relates only to cable repairs where there is damage to, or failure of a cable, an event which is considered highly unlikely as the cables will be designed and installed to ensure that damage or failures do not occur. Reference to a duration of two to six months is reflective of the potential time incurred waiting for a suitable vessel to become available, rather than activities happening on site (at the location of the repair) for a six-month period. Where there is a delay to commencing the repairs, a vessel will be deployed to guard the

Reference	Question to:	Question	Applicant's Response
			section of cable that has been damaged/failed (guard vessel). This vessel will hold location (be stationary) until such time that repair works can commence. Any potential disturbance to RTD during the period when a guard vessel is present will be negligible as the vessel will be stationary and not engaging in any activities. Once repairs commence these could take up to two months to complete. However, the number of vessels involved in cable repairs will be limited e.g. cable repair vessel and guard vessel/support vessel. These vessels will be stationary/slow moving (if installing a new section of cable). Once the cable is repaired/new section of cable installed, there may be a requirement for a post repair burial/survey vessel to move slowly along the repaired section to ensure all works are complete. Any potential disturbance to RTD will be limited due to the low number of vessels involved in the works, the stationary/slow moving nature of the vessels and that all operations will be localised to the section of cable that is damaged or has failed. There may also be a requirement for the use of crew transfer vessels (CTVs). However, these would be occasional movements and all CTVs, as well as all other vessels in cable repair operations, would be required to comply with the measures set out in **Application Document 7.8 Red Throated Diver Protocol [APP-361]**. This includes a commitment to prepare a Vessel Management Plan (VMP) post consent to mitigate potential impacts on Red Throated Diver from vessel movements. The Applicant has also committed to using existing shipping lanes for vessel transit routes (see commitment O04 in **Application Document 9.83 Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 3) and ensuring vessel operators are made aware of the importance and sensitivity of the species to disturbance and avoiding rafting birds and areas with high densities of birds, where practicable (see commitment O05 in **Application Document 9.83 Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 3). Given the low number of stationary/slow moving vessels, the high localised nature of repair operations and limited duration (up to two months subject to vessel availability) the Applicant maintains that there is no potential for any adverse effect on integrity on the RTD qualifying feature of the Outer Thames Estuary SPA. Compliance with **Application Document 7.8 Red Throated Diver Protocol [APP-361]** and commitments included in **Application Document 9.83 Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 3will further ensure that there is no potential for any adverse effect on integrity on the RTD qualifying feature of the Outer Thames Estuary SPA.

19. Marine Archaeology

Table 19.1 Marine archaeology

Reference	Question to:	Question	Applicant's Response
1MA1.	Applicant	**Kent Landfall Geophysical Surveys** ES Chapter 6 Marine Archaeology, [REP1-057] section 6.4.60 identifies that the Offshore Scheme has been widened at the Kent landfall and additional geophysical survey data has not been obtained in this wider area. Explain when the additional geophysical surveys will be completed and what the implications are for the conclusions of the ES in the absence of these additional surveys?	The boundary of the Order Limits associated with the Offshore Scheme were initially widened at the Kent Landfall immediately prior to submission. The main reason for the change (March 2025) was to allow for the inclusion of a wider area adjacent to the Limits of Deviation for vessel anchoring. The extended Order Limit boundary also includes part of the intertidal area identified for use as construction access from the former Hoverport. No changes were made to the Limits of Deviation within the intertidal area in Pegwell Bay (see Sheet 5 of 6 in **Application Document 2.5.2 (B) Work Plans – Kent [CR1-008]**) within which all infrastructure will be located, and all construction activities occur. A further change to the Order Limit boundary in Pegwell Bay was made as part of the Change Request submitted at Deadline 1A. This minor change extends the boundary slightly in the area immediately adjacent to the former Hoverport to allow for construction plant and vehicles to access the intertidal mudflats from the front edge of the former Hoverport to avoid an area of saltmarsh that has encroached along the southern edge of the former Hoverport. No changes to the Limits of Deviation were included in the Change Request. The area included in the Limits of Deviation were covered by geophysical surveys and the data from these surveys have been used to inform the assessment of impacts on marine archaeology presented in **Application Document 6.2.4.6 (C) Part 4 Marine Chapter 6 Marine Archaeology [REP2-005]**. The data gap relates specifically to the extended Order Limit boundary (outside of the Limits of Deviation) and use of this area for vessel anchoring and for construction traffic access from the former Hoverport. Due to the timing of the initial change, it was not possible to complete an additional geophysical survey for the widened boundary prior to submission of the application. Stage 1 UXO Identification (Geophysical Surveys) are currently scheduled for Q2 / Q3 2026 with Stage 2 UXO Target Investigation scheduled for Q2 / Q3 2027. A Marine Licence Exemption for Stage 1 surveys will be submitted Q1 2026. UXO Clearence activities are currently scheduled for 2027 / 2028. The Stage 1 UXO Survey will include the collection of geophysical survey data covering the data gap at the Kent landfall at Pegwell Bay. The marine survey data will include multibeam bathymetry, backscatter, sidescan sonar and magnetometry and it is anticipated that magnetometer, Lidar and Photogrammetry data will be acquired terrestrially. The survey data will be archaeologically processed and assessed for evidence of anomalies of archaeological potential, and the results will be compiled into a standalone report. The survey will be undertaken in accordance with **Application Document 7.5.5 (B) Outline Offshore Overarching Written Scheme of Investigation [PDA-033]**. This process has been undertaken in consultation with Historic England. The area forming the data gap has been assessed for archaeological potential using available archival and documentary sources, results of archaeological

Reference	Question to:	Question	Applicant's Response
			walkover surveys and supplemented by aerial images. The implications of the data gap have also been included in the assessment of impacts and likely significant effects within **Application Document 6.2.4.6 (C) Part 4 Marine Chapter 6 Marine Archaeology [REP2-005]**. In summary, there is potentially increased risk of impact on currently unknown sub-seabed archaeological receptors within the area forming the data gap, however the commitment to undertake the geophysical survey assessment to cover this gap has been incorporated into additional mitigation measure MA09 and is due to take place in 2026 (part of the UXO surveys).
1MA2.	Applicant	**Marine Archaeology Study Area** Can the applicant explain why the study area used in the Marine Archaeological Technical Report [REP1-005] (section 6.1.9) appears to be different from that described in section 6.6 of the ES Chapter 6 Marine Archaeology [REP1-057]? Confirm what the implications are for the findings presented in ES Chapter 6 if the alternative study area is considered?	**Application Document 6.3.4.6.A (C) Environmental Statement Appendix 4.6.A Marine Archaeological Technical Report [REP1-005]** uses a standard 100 m buffer of the Order Limits to form the study area for this assessment. The buffered area performs two functions: • It identifies further recorded sites and/or geophysical anomalies of archaeological potential that could be impacted by the Proposed Development, for inclusion in **Application Document 6.2.4.6 (C) Part 4 Marine Chapter 6 Marine Archaeology [REP2-005]**. This is described in paragraph 6.6.2 of **Application Document 6.2.4.6 (C) Part 4 Marine Chapter 6 Marine Archaeology [REP2-005]**. • It also allows greater understanding and characterisation of the wider marine archaeological baseline. It is unlikely that there would be any implications to the significance of residual effects presented in **Application Document 6.2.4.6 (C) Part 4 Marine Chapter 6 Marine Archaeology [REP2-005]** if the alternative study area from **Application Document 6.3.4.6.A (C) Environmental Statement Appendix 4.6.A Marine Archaeological Technical Report [REP1-005]** is used. The EIA conclusions will not change as a result; however, the wider study area will mean additional recorded sites and geophysical anomalies that would not be impacted by the Proposed Development would be included in the EIA assessment, which has the potential to be disproportionate to the overall aim of assessing potential impact. For instance, a discrete receptor such as magnetic anomaly 7425, located just under 60 m from the Order Limits, would be discussed in the Marine Archaeological Technical Report (see **Application Document 6.3.4.6.A (C) Environmental Statement Appendix 4.6.A Marine Archaeological Technical Report [REP1-005]**) as it is located within the 100 m study area for this assessment. However, due to its distance from the Order Limits, the anomaly would not be impacted by the Proposed Development and therefore would not need to be included in **Application Document 6.2.4.6 (C) Part 4 Marine Chapter 6 Marine Archaeology [REP2-005]**.
1MA3.	Historic England	**Geoarchaeological Assessment** Historic England in [RR-2032] notes that additional geotechnical work undertaken in October 2024 is still in progress and has not been included within the documents submitted at that time. The ExA notes that an updated supplementary Stage 1 and 2 Marine Geoarchaeological Assessment [REP1-005] was provided at deadline A. Can Historic England provide an update on their position with respect to the suitability of the geoarchaeological assessment including identifying any outstanding information?	

20. Shipping and Navigation

Table 20.1 Shipping and navigation

Reference	Question to:	Question	Applicant's Response
1SN1.	Applicant	**Baseline depths** Provide the relevant Admiralty chart extracts at a resolution that shows baseline depths.	The Applicant will produce plates as requested and submit them at Deadline 4.
1SN2.	Applicant	**Depth of lowering (DoL) in the Sunk** Provide a timescale for the assessment of the engineering implications of the additional cable DoL set out in [REP1A-038] paragraph 2.3.9 that may be required in the areas of the Sunk Pilot Boarding area that are already shallower than the 22m safeguard level, including the submission of updated documents.	The Applicant can confirm that the assessment set out in paragraph 2.3.9 of **Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]** is ongoing, and an update on the outcome will be provided at Deadline 4. Further work may be required beyond Deadline 4 for the Applicant to reach a final position, which will be informed by the final Areas of Interest and the associated requirements agreed with all relevant stakeholders.
1SN3.	**Applicant** and relevant stakeholders	**Depth of lowering** Provide an update on reaching an agreement with the relevant stakeholders on safeguarding current and future navigable water depths. In responding, explain how DoL commitments can most effectively be secured in order to secure existing and reasonable future under keel clearance requirements. If this is to be through protective provisions, provide suggested wording for how this can be appropriately secured. Also explain any alterations or additions to the REAC, for example MPE02.	The Applicant is in ongoing discussion with the Port of London (PLA), London Gateway Port (LGPL), Harwich Haven Authority (HHA) and the Maritime and Coastguard Agency (MCA). These discussions are currently being undertaken through individual stakeholder meetings where requested, and through a shipping and navigation monthly working group online call where Port Authorities, MCA and Coastguard representatives are invitees. A summary of stakeholder engagement on under-keel clearance and the requirements for the Areas of Safeguarded Water Depths ("Sunk Pilot Boarding area", "Long Sand Head Two-Way Route Crossing area", and "North East Spit area") is provided in **Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]**. The Applicant agrees in principle with the need to safeguard water depths to ensure sufficient under-keel clearance within the Areas of Safeguarded Water Depth identified by the port authorities, and as described below is working to reach a final position. In respect of the Areas of Safeguarded Water Depth already agreed with PLA, HHA, Port of Tilbury and LGPL, the Applicant confirms that it they are currently assessing the engineering implications of these requirements, specifically the additional cable Depth of Lowering (DoL) that may be necessary in parts of the "Sunk Pilot Boarding Area" where depths are already shallower than the 22 m CD safeguard level. An update on the outcome of this assessment will be provided at Deadline 4. Further work may be required beyond Deadline 4 for the Applicant to reach a final position, which will be informed by the final Areas of Safeguarded Water Depth and associated requirements agreed with all relevant stakeholders. The Applicant agrees with the port stakeholders that the aim is to secure these commitments through appropriate mechanisms, such as Protective Provisions (PPs) and DCO provisions as necessary, and is working collaboratively with the port stakeholders to agree both the mechanism and the wording. The Applicant is currently agreeing the wording on commitments in Protective Provisions with all relevant stakeholders. While the wording in the PPs is comprehensive in scope and is subject to the ongoing discussions between the parties, an example of draft

Reference	Question to:	Question	Applicant's Response
			wording in the PLA Protective Provisions in relation to securing existing and reasonable future under keel clearance requirements is as follows: *"10. The cable specification and installation plan referred to in paragraph 3 must be informed by a cable burial risk assessment, and set out for Work No.6, in so far as it applies to the Areas of Interest:* *(1) That any part of Work No.6, including any associated development or ancillary works, located within the Areas of Interest must be installed at a level which would not impede the dredging of those parts of the Areas of Interest to the following depths:* *(a) Labelled "Sunk Pilot Boarding area", to a level of 22 metres below Chart Datum;* *(b) Labelled "Long Sand Head Two-Way Route crossing", to a level of 12.5 metres below Chart Datum; and* *(c) Labelled " North East Spit area" to a level of 12.5 metres below Chart Datum; and* *(d) and in all cases (a) to (c) makes allowance for an 'over-dredge' tolerance of 0.5 metres in addition to the stated depths attributable to standard dredging methodology."* Further comments on the three Areas of Safeguarded Depth outlined in **Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]** were received from the MCA on the 18 December 2025 via email and are currently under review by the Applicant. An additional meeting took place on the 19 December 2025 to further understand the MCA's position. The Applicant has scheduled a meeting with the MCA on the 16 January 2026 to refine the MCA's requirements and agree appropriate wording for their Protective Provisions and/or DML. Further commentary on this ongoing discussion will be provided in the MCA SoCG. Updates to the REAC will be undertaken once Applicant and the MCA have further discussed and agreed their requirements.
1SN4.	Applicant	**National Policy Statement for Ports (January 2012)** Consider whether the National Policy Statement for Ports (January 2012) (Ports NPS) is an important and relevant matter in relation to the proposed development. If so, provide a summary of which aspects of the Ports NPS are important and relevant and a summary assessment of the proposed development in relation to those aspects as an update to the Planning Statement [AS-057].	The National Policy Statement for Ports (Ports NPS) (January 2012), as indicated in its paragraph 1.2.1, provides "*the framework for decisions on proposals for new port development*" and associated development Paragraph 1.2.4 makes it clear that the Ports NPS "*provides the framework for decisions on proposals for new port development".* Therefore, the Ports NPS does not apply directly to the Proposed Project. However, the Ports NPS can be considered to be an important and relevant matter in so far as it highlights, in its Section 3.1, the essential role of ports in the UK economy, and in its Section 3.3, the Government's support for: "*sustainable port development to cater for long-term forecast growth in volumes of imports and exports by sea with a competitive and efficient port industry capable of meeting the needs of importers and exporters cost effectively and in a timely manner* (paragraph 3.3.1)." The Government has decided to update the Ports NPS and has published a draft revised NPS in June 2025, which reiterates the above points in Sections 2.1 (the essential role of ports in the UK economy) and 2.2 (Government policy for ports)Discussions with London Gateway Port Ltd and Port of London Authority (the Ports) with regard to the impact of the Proposed Project on navigable depths and vessels' access to the London Gateway Port,(and by the same token, on its ability to cater for the long-term forecast growth in volumes of imports and exports by

Reference	Question to:	Question	Applicant's Response
			sea) are ongoing. The outcome of these discussions will be reflected in a further update to **Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [REP1-059]** and **Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment [REP1-063]** to be issued at Deadline 4. Following the update to this chapter (setting out the conclusions in relation to any impacts on the long-term forecast growth in volumes of imports and exports by sea as a result of the navigable depths and vessels' access to the Ports as caused by the Proposed Project) and the outcome of the discussions with the Ports, the Applicant will confirm whether any update to the Planning Statement is required.
1SN5.	Applicant	**East Inshore and East Offshore Marine Plan** Respond to LGP's assessment [REP1-142] that the proposed development is in conflict with policies PS1, PS3, DD1 of the East Inshore and East Offshore Marine Plan. Provide an explanation of how the conflict, if any, can be overcome.	**Policy PS1** Policy PS1 of the East Inshore and East Offshore Marine Plan makes it clear that proposals requiring static sea surface infrastructure or that significantly reduce under-keel clearance (UKC) should not be authorised in International Maritime Organization designated routes. **Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]** provides a summary of engagement and collaboration undertaken to date with port and harbour authorities on the topic of UKC within the Sunk region. The Applicant agrees in principle with the need to safeguard water depths to ensure sufficient under-keel clearance for future deep draught vessels in key areas, such as the Sunk region. The Applicant is able to confirm in-principle that agreement can be reached on the three Areas of Safeguarded Depth outlined in detail in **Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]** by the port authorities for safeguarding future water depths. Internal discussions are ongoing on the best approach to securing this commitment, whether it is within the DCO, DML or Protective Provisions. **Policy PS3** Policy PS3 requires proposals to demonstrate that they will not interfere with current activity and future opportunity for expansion of ports and harbours, and if they will interfere, how they will minimise this. The Offshore Scheme does not involve the installation of any permanent static sea surface infrastructure that would interfere with current and future port activities Matters concerning UKC for future deep draught vessels, which may interfere with future opportunity for expansion of ports and harbours, are discussed above. The Applicant is in ongoing discussion with the Port of London, London Gateway Port, Harwich Haven Authority and the Maritime and Coastguard Agency to agree wording on commitments surrounding safeguarding water depths. An update to **Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [REP1-059]** and **Application Document 6.3.4.7.A Appendix 4.7.A Navigational Risk Assessment [REP1-063]** will be issued at Deadline 4. **Policy DD1** Policy DD1 requires proposals within or adjacent to licensed dredging and disposal areas to demonstrate that they will not adversely impact dredging and disposal activities, and if they are, how they will minimise these impacts. **Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]** outlines in its Section 4.2 how

Reference	Question to:	Question	Applicant's Response
			the Applicant's proposed marine works (Work No 6) will safeguard water depth and ensure that dredging in the relevant parts of the Sunk Pilot Boarding area can be proceed to a depth of 22 m below CD (Chart Datum). As stated above, the Applicant is in ongoing discussion with the Port of London, London Gateway Port, Harwich Haven Authority and the Maritime and Coastguard Agency to agree wording on commitments surrounding safeguarding water depths.
1SN6	Applicant	**Consultation with the Coastguard** Can the applicant provide assurance that His Majesty's Coastguard will be engaged in discussions which impact their jurisdiction in relation to the delivery of the Sunk Vessel Traffic Services, which has been raised by the Maritime and Coastguard Agency (MCA) [REP2-063].	The Applicant and MCA attended a call on the 11 December 2025 where a review of the invitee list was undertaken for the monthly Shipping and Navigational Stakeholder Meeting hosted online by the Applicant. This invite has now been shared with the relevant individuals.
1SN7.	Relevant stakeholders including London Gateway Port Ltd (LGP), Maritime and Coastguard Agency (MCA), Port of London Authority (PLA), Harwich Haven Authority (HHA)	**Cable burial risk assessment (CBRA)** Provide comments on the submitted CBRA [PDA-039].	
1SN8.	Applicant	**Pre and post construction surveys and activities** Provide a detailed response to PLA's suggested restrictions in relation to pre and post construction surveys and activities in paragraph 7.1 of [REP1-155].	The Applicant can confirm that activities relating to UXO are not considered within this DCO application and will be submitted separately though a Marine Licence. The restrictions outlined by the PLA in **Written Representations (WR) and summaries for any that exceed 1500 words [REP1-155]** from Port of London Authority will be considered within this application. The Applicant can confirm that re-routing around boulders and archaeological finds is the Proposed Project's primary solution when installing the cable. If re-routing around boulders is not practicable, these features will be repositioned within the Order Limits in consultation with PLA prior to commencing pre-clearance activities, and considering Areas of Safeguarded Water Depth. Furthermore, the Applicant is also preparing an outline Cable Specification and Installation Plan (oCSIP) which will be provided at Deadline 4. This document will incorporate an outline Sediment Disposal Management Plan (oSDMP). The status and proposed structure of the oCSIP is provided in **Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]**. The Applicant can confirm that location of planned wet storage areas will also not occur within three Areas of Safeguarded Depth, as defined by the Port of London Authority as being the "Sunk Pilot Boarding area", "Long Sand Head Two-Way Route crossing area" and "Northeast Spit area".
1SN9.	Applicant	**Wet storage** In its deadline 2 comments on submissions received at deadline 1 and deadline1A, PLA raised consistency with the ES Part 4, Chapter 6 Marine Archaeology [REP2-005] in relation to wet storage. Where relevant update or amend as necessary to ensure consistency.	**Application Document 6.2.4.6 (C) Part 4 Marine Chapter 6 Marine Archaeology [REP2-005]** will be updated and submitted at Deadline 4 to include the following text: *"The location of planned wet storage areas will be confirmed in advance to prevent impact to archaeological remains and will also not occur within three Areas of Safeguarded Depth, as defined by the Port of London Authority as being the "Sunk Pilot Boarding area", "Long Sand Head Two-Way Route crossing area" and "North East Spit area."*

Reference	Question to:	Question	Applicant's Response
1SN10.	Applicant	**Sediment disposal management plan (SDMP)** There is reference in the draft Statement of Common Ground between National Gride Electricity Transmission (NGET) and the PLA [REP1-082] to the submission of a sediment disposal management plan. Provide confirmation that relevant stakeholders will be engaged, including the PLA. Provide an explanation as to whether it should be secured by the dDCO as a certified document.	The Applicant is preparing an outline Cable Specification and Installation Plan (oCSIP) which will be provided at Deadline 4. This document is expected to incorporate an outline Sediment Disposal Management Plan (oSDMP). The status and proposed structure of the oCSIP is provided in **Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]** with relevant stakeholders, including the PLA to be consulted as appropriate. The Applicant can confirm that the CSIP will be included as a Certified Document in the draft DCO.
1SN11.	Applicant	**Cable joints in the areas of interest** REAC commitments SN19 and SN20 indicate that cable joints in the Sunk would be avoided where possible and where practicable. Provide a response to the request from the PLA that there would be no planned cable joints within the Areas of Interest due to the disruption to heavily trafficked routes.	The Applicant can confirm that there are no planned cable joints within the three Areas of Safeguarded Depth excluding the need for any unforeseen repairs during installation and/or the operational lifetime. The Applicant is currently assessing the engineering and operational implications of a cable joint in the Areas of Safeguarded Depth due to unforeseen repairs during installation and/or the operational lifetime. An update on the outcome of this assessment will be provided at Deadline 4. Further work may be required beyond Deadline 4 for the Applicant to reach a final position, which will be informed by the final Areas of Safeguarded Water Depth and associated requirements agreed with all relevant stakeholders.
1SN12.	Sizewell C Harbour Authority	**Engagement with Sizewell C Harbour Authority** Provide comments on the updated Navigational Risk Assessment (NRA) [REP1-063] received at deadline 1.	
1SN13.	Harwich Haven Authority and London Gateway Port Ltd	**Safety zones** Provide comments as to whether REAC commitment SN29 meets your requirements.	
1SN14.	**Applicant** Harwich Haven Authority, London Gateway Port Ltd, Maritime and Coastguard Agency, Port of London Authority	**Exclusion zones** The applicant has stated in section 7.3 of ES Part 4, Chapter 7 Shipping and Navigation [REP1-059] that exclusion zones will not be required. Does this need to be added to the REAC to be secured?	The Applicant can confirm that exclusion zones are not required, in line with standard industry practise, as the Offshore Scheme is a permanent subsea structure with no offshore surface infrastructure, and therefore there is not a need to secure this within the REAC. The Applicant commits to instituting a rolling 500 m Recommended Restricted Zone (RRZ) around the installation vessel during cable lay as is standard practise, and this is secured as SN29 in **Application Document 9.83 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3.
1SN15.	**Applicant** Maritime and Coastguard Agency	**Magnetic compass deviation** In the draft Statement of Common Ground with the MCA [REP1-081], the applicant states that a full update to the Electromagnetic Field report will be carried out once a full analysis update has been carried out pre-construction and will be shared with the consultee at the earliest opportunity. Can the applicant clarify whether this will be submitted to the examination or whether it intends for this to be post consent. Can the MCA comment as to whether it is necessary for this information to be made available prior to the decision being made on the DCO.	Once a finalised pre-construction design is available, a desk-based assessment will be completed by The Applicant and submitted to MCA post-consent. This data can then be verified with as-built drawings if required in consultation with the MCA.
1SN16.	**Applicant** MCA	**Consultation with MCA**	Consideration on the requirements and conditions of the DML are ongoing and will be subject to change upon further engagement with stakeholders. This text is being updated to include provision for the MCA to be consulted on the discharge of

Reference	Question to:	Question	Applicant's Response
		Provide confirmation that there would be provision for the MCA to be consulted on the discharge of relevant shipping and navigation related conditions in the DML.	relevant shipping and navigation related conditions in the DML. An updated draft DML will be provided at Deadline 3.
1SN17.	**Applicant** and relevant stakeholders	**Vessel management plan (VMP)** Several stakeholders have requested a VMP. Can the applicant confirm that their proposal is that this takes the form of a navigation and installation plan (NIP), for which an outline version has been submitted [AS-104]? Taking into account that section 1.2 of [AS-104] states that project activities outside of the three defined areas of interest are not covered by the NIP, can the applicant confirm that it does not consider that there is a need for a VMP with a wider geographical scope. Can the stakeholders provide comment as to whether they are satisfied that a separate VMP is not required.	The Applicant can confirm that the requested Vessel Management Plan takes the form of a Navigation and Installation Plan (NIP), for which an Outline NIP has been submitted. The Applicant will provide an updated version of **Application Document 9.12 Outline Navigation and Installation Plan [AS-104]** at Deadline 4, taking into account stakeholder comments from Written Representations. The Applicant can confirm that it does not consider that there is a need for the NIP to cover a wider scope than the three areas identified. These areas have been selected based on density of traffic and shallow water depths, where vessel management and enhanced communication protocols are important for control of risk as identified by the **Application Document 6.3.4.7.A (B) ES Appendix 4.7.A Navigational Risk Assessment [REP1-063].**
1SN18.	UK Chamber of Shipping	**Reputational risk** The draft Statement of Common Ground [REP1-084] raises concerns about reputational risk. The applicant has updated the NRA [REP1-063] to deal with the commercial risk of a collision. Provide comments as to whether this is sufficient to overcome these concerns.	
1SN19.	**Applicant** Port of Ramsgate	**Navigational Risk Assessment** Port of Ramsgate to provide comments on the NRA [REP1-064] including in relation to potential future impacts on commercial ferries. Applicant to engage with the MCA in relation to their suggested additional risk mitigation measures [REP1-162] in relation to ensuring that the risk to shipping and safe navigation is As Low As Reasonably Practicable (ALARP).	The Applicant can confirm that a meeting with the MCA took place on 11 December 2025, and the matter of the MCA's suggested additional mitigation measures was raised. The MCA confirmed that there were no further mitigation measures beyond securing commitments in the DCO that they would suggest at this time.

21. Commercial Fisheries

Table 21.1 Commercial fisheries

Reference	Question to:	Question	Applicant's Response
1CF1.	Relevant fisheries stakeholders	**Mitigation and compensation** Provide comments on the revised section 8.10 of ES Part 4, Chapter 8 Commercial Fisheries [REP1A-009] which sets out additional mitigation for the identified likely significant effects. In your comments include consideration of whether the proposed provisions for securing mitigation and/or compensation are adequate. Provide comments on whether there is adequate consideration of inter project cumulative effects in table 11.24 of [REP1A-011] ES Part 4, Chapter 11 Inter-Project Cumulative Effects and the need for further mitigation.	
1CF2.	Applicant	**Fisheries liaison and co-existence plan (FLCP)** Section 8.10 of [REP1A-009] sets out that a FLCP will be prepared and this is required by condition 4(1)(j) of the DML. Provide an outline FLCP and update the dDCO to require that the FLCP is substantially in accordance with the principles contained within it.	The Applicant confirms that **Application Document 9.85 Outline Fisheries Liaison and Co-existence Plan (FLCP)** will be submitted at Deadline 4. The wording has also been updated in **Application Document 3.1 (F) draft Development Consent Order** submitted at Deadline 3 to require that the FLCP is substantially in accordance with the principles contained within it.

22. Other Sea Users

Table 22.1 Other sea users

Reference	Question to:	Question	Applicant's Response
1OSU1.	**Applicant** Relevant Stakeholders	**Cable crossings** **Applicant -** It is stated in the responses to the Supplementary Agenda Additional Questions [REP1A-033] ISH1.03 that the expectation is that there are no areas where the Sea Link cables cannot be buried, and that surveys indicate that existing in-service cables are buried, so that there would not be a scenario where Sea Link cables would cross over unburied cables. Each individual crossing location would be surveyed in detail and would be agreed with each crossing agreement with the third-party asset owner. Provide an explanation of how this will be secured in the dDCO. **Applicant -** Stakeholders such as London Gateway Port Ltd (LGP) and Port of London Authority (PLA) require that there are no cable crossings at all in the Sunk, Long Sand or North East Spit. Would it be appropriate to include a requirement or DML condition that prohibits cable crossings in these areas? **Applicant and relevant stakeholders** - Cable crossing agreements with third-party asset owners have not been included in table 2.1 of the Consents and Agreements Position Statement [APP-010]. Give consideration as to whether they should be added.	The Applicant can confirm that Crossing Agreements will be created for any third party assets being crossed by the Proposed Project. Meetings with third party asset owners are now underway. This commitment is outlined in OSU01 **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)**, submitted at Deadline 3. The Applicant can confirm that the relevance of cables crossings within the three Areas of Safeguarding Water Depth for ports is in regards to under-keel clearance and future safeguarding. The Applicant can confirm that there are no planned crossings within the "Sunk Pilot Boarding area" and "Long Sand Head Two-Way Route Crossing area". Clarification was sought with the Port of London Authority (PLA) and London Gateway Port (LGP) during the monthly virtual meeting on the 19 December 2025 regarding the requirement for no crossings at all to be located in North East Spit Area. All parties agreed that this statement is incorrect, and planned crossings within this Area of Safeguarded Water Depth are permitted providing they do not exceed the 12.5 m below Chart Datum (and 0.5m over dredge) which is preserved for future safeguarding. A Statement of Common Ground (SOCG) is being drafted for LGP which will be submitted to LGP for comment prior to submission to the Examining Authority at Deadline 5 at the latest. The updated SOCG for the PLA will be submitted at Deadline 3. The Applicant agrees in principle with the need to safeguard water depths to ensure sufficient under-keel clearance within the Areas of Safeguarded Water Depth identified by the port authorities and described in **Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]**. The Applicant is currently assessing the engineering implications of these requirements, specifically the additional cable Depth of Lowering (DoL) that may be necessary in parts of the "Sunk Pilot Boarding Area" where depths are already less than the 22 m CD safeguard level. The Applicant confirms that the assessment outlined in paragraph 2.3.9 of **Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]** is ongoing, and an update on the outcome will be provided at Deadline 4. Further work may be required beyond Deadline 4 for the Applicant to reach a final position, which will be informed by the final Areas of Safeguarded Water Depth and associated requirements agreed with all relevant stakeholders. The Applicant agrees with the port stakeholders that the aim is to secure these commitments through appropriate mechanisms, such as Protective Provisions and DCO provisions as necessary, and is working collaboratively with the port stakeholders to agree both the mechanism and the wording. Terrestrial and marine crossing agreements have not been individually listed out within Table 2.1 of **Application Document 3.5 Consents and Agreements Position Statement [APP-010]** but have instead been discussed within Section

Reference	Question to:	Question	Applicant's Response
			1.5 of **Application Document 3.5 Consents and Agreements Position Statement [APP-010]**.
1OSU2.	Applicant	**Cable crossings with third party assets** Provide a full response to PLA's concerns expressed in [REP1-155] about GridLink (KP 101.27) and Q&E North (KP 100.151) in paragraph 6.3.	The Applicant agrees in principle with the need to safeguard water depths to ensure sufficient under-keel clearance within the Areas of Safeguarded Water Depth identified by the port authorities and described in **Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]**. The Applicant is currently assessing the engineering implications of these requirements, specifically the additional cable Depth of Lowering (DoL) that may be necessary in parts of the "Sunk Pilot Boarding Area" where depths are already less than the 22 m CD safeguard level. The Applicant confirms that the assessment outlined in paragraph 2.3.9 of **Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]** is ongoing, and an update on the outcome will be provided at Deadline 4. Further work may be required beyond Deadline 4 for the Applicant to reach a final position, which will be informed by the final Areas of Safeguarded Water Depth and associated requirements agreed with all relevant stakeholders. The Applicant agrees with the port stakeholders that the aim is to secure these commitments through appropriate mechanisms, such as Protective Provisions and DCO provisions as necessary, and is working collaboratively with the port stakeholders to agree both the mechanism and the wording. The Applicant is satisfied that it has a solution to ensure that the 12.5 m depth is preserved even at the GridLink location, by moving the planned Proposed Project cable route at this point into deeper waters to the east (while still within the Order Limits) ensuring sufficient water depth above the expected crossing location. The Applicant had kept the Order Limits wide here to enable such solutions to be possible (**Application Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]**). An updated SOCG for the PLA will be submitted at Deadline 3.

23. Climate Change

Table 23.1 Climate change

Reference	Question to:	Question	Applicant's Response
1CC1.	**Applicant**, Suffolk County Council, Kent County Council, East Suffolk Council, Thanet District Council	**R (on the application of Finch on behalf of the Weald Action Group) v Surrey County Council judgment** **Applicant -** The Climate Change assessment [APP-085] states that it is not possible to calculate the likely upstream and downstream direct or indirect effects and any resultant increases or decreases in greenhouse gases. Can the applicant justify their position and provide specific examples of other NSIP which have taken this approach? **Councils** – Do you agree with the applicant's position and approach? If not, why not?	The methodology for the greenhouse gas (GHG) assessment for the Proposed Project is consistent with the Supreme Court ruling in the Finch Case. The Supreme Court ruled that downstream impacts of a development must be included in an Environmental Impact Assessment (EIA) where they are a likely, and especially where they are an inevitable, consequence of the project. The Finch case itself referred to a fossil fuel extraction project, where the downstream impacts of fuel combustion were ruled to be an inevitable consequence of the project, and therefore could not be excluded from the scope of the EIA. In the case of the Proposed Project, the GHG assessment included within its scope a range of up- and downstream impacts from the Proposed Project, as set out in Table 1.11 of **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change [APP-085]** and described in more detail in Table 5.1 of **Application Document 7.5.13 Greenhouse Gas Reduction Strategy [APP-358]**. These impacts cover Before Use stage (products and construction) and the Use stage (maintenance, repair and operational energy use). Impacts during the End of Life stage were scoped out of the ES due to the high level of uncertainty around activities so far into the future. Further explanation of how the Finch case has been considered in the preparation of the EIA is found in paragraphs 1.3.8 - 1.3.11 of **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change [APP-085]** and 5.2.15 to 5.2.17 of **Application Document 6.2.1.5 Part 1 Introduction Chapter 5 EIA Approach and Methodology [APP-046]**. With regard to the consideration of downstream and upstream effects it is noted that consideration was given to the position where an increase in the capacity of the electricity network and in the potential for additional activities requiring electricity are treated as direct or indirect effects arising from the Proposed Project. For the Proposed Project it is not possible to calculate the likely upstream or downstream direct or indirect effects. While in theory, more electricity can be transported and used, increasing the potential for additional activities requiring electricity, it is impossible to quantify the amount of either the increase, or more likely decrease, in greenhouse gases that could result from the generation and use of that additional electricity capacity. While the Applicant operates the transmission network, within England and Wales, they do not control which generators are generating electricity at any one time nor does it control which demand is connected to the system. As such, the Applicant has no way of assessing where or how the power is generated or where the power is going (i.e. the end user and how it will be used) and consequently, any related emissions arising from, or more likely being reduced, as a result of such use.

Reference	Question to:	Question	Applicant's Response
			As such the GHG assessment therefore explicitly scoped out any indirect downstream effects from the generation or consumption of additional generation that may or may not be facilitated by the Proposed Project. Further rationale for this exclusion is set out in paragraphs 1.3.9 – 1.3.11 of **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change [APP-085]** but can be summarised as follows: • Indirect emissions are only classed as an inevitable consequence where the project itself guarantees that these emissions will occur. • In this instance, downstream impacts such as generation and consumption emissions are indirect, contingent and non-inevitable. • Transmission infrastructure such as the Proposed Development is technology-neutral and serves multiple generators. • The future connection of generators to the grid depends on market forces, policy decisions, operator behaviour and availability of different generator types – none of these is within the control or influence of the Applicant. • The future consumption of electricity will depend on consumer behaviour, market forces, energy efficiency and substitution effects. Again, none of these is within the control or influence of the Applicant. • Not only can any downstream effects from the generation or consumption of electricity not be classified as an inevitable, or even likely, consequence of the Proposed Development, there is no meaningful methodology that could be applied to quantify or estimate such emissions. The GHG assessment applied in the case of the Proposed Project is consistent with current EIA regulations and the 2024 Supreme Court ruling in the Finch Case. It applies the same approach to the scope of assessment as other EIAs conducted on comparable NSIPs. While there is not yet another directly comparable NSIP project in terms of an energy transmission project that has considered Finch, other NSIPs have considered the implications of Finch on upstream and downstream emissions in projects.
1CC2.	Applicant	**Climate Change impacts – Flood Risk** Can the applicant explain specifically if the flood risk assessments for Kent and Suffolk and findings contained therein have been cognisant of any rising sea levels associated with climate change and summarise their approach? In answering confirm if either the Suffolk and Kent assessment areas are particularly vulnerable to sea level increases due to climate change covering the relevant points made in [REP1-168].	Yes – the Applicant confirms that the assessment findings reported in **Application Document 6.8 Flood Risk Assessment [APP-292]** are fully cognisant of predicted sea level rise in relation to climate change. **Written representations (WR) and summaries for any that exceed 1500 words [REP1-168]** from Alan George Jones provides a series of articles and publications that present information regarding climate change and its impacts on sea level rise. Section 4.3 of **Application Document 6.8 Flood Risk Assessment [APP-292]** addresses flood risk to the Proposed Project from the sea, describing that there is land within the Order Limits that is vulnerable to flooding from this source at the Suffolk and Kent landfalls and in the vicinity of the River Stour, which is tidally influenced.

Reference	Question to:	Question	Applicant's Response
			At the Kent and Suffolk landfalls, the potential impacts of climate change have been factored into defining future baseline conditions and assessing impacts on the Proposed Project, using modelling, detailed in **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [REP1-051].** For sea level rise, UK Climate Projections (UKCP)18 (Met Office, 2019), provides the most up-to-date assessment for the period up to 2100. Data relevant to a high emissions scenario (Representative Concentration Pathway 8.5) in the 95th percentile have been applied in the modelling. Projections of future wind and wave conditions, have also been accounted for, drawn from guidance published by the Environment Agency (Environment Agency, 2022). The final engineered HDD solutions at the landfalls will be informed by the modelling assessments, ensuring that the cable depth is such that neither it, nor the landfall infrastructure, becomes exposed, and that neither the infrastructure of the Proposed Project nor existing flood risk are adversely affected. Future flood risk in other areas of the Proposed Project has been appraised using the National Flood Risk Assessment 2 (NaFRA2) dataset published by the Environment Agency in January 2025. The data include climate change scenarios based on the latest UKCP18 projections, using the high emissions scenario for the period up to 2069. The data show that no above ground operational assets forming part of the Suffolk Onshore Scheme are particularly vulnerable to sea level rise. In Kent, land within the Order Limits in proximity to the River Stour is more vulnerable to flooding due to sea level rise. However, only overhead line works are proposed in this location, with the overhead line towers and overhead cables being resilient to flooding. Floodwaters being able to move through and around the proposed pylons unimpeded, would therefore not increase flood risk. At the proposed Minster Converter and Substation site, the mapping for the future climate change scenario described defines future flood risk as low, with predicted depths of flooding of up to 0.2 m, in a flood event with an annual chance of between 0.1% and 1%.
1CC3.	Applicant	**Climate Change Assessment - Embodied Carbon** Regarding embodied carbon, does the assessment provide a reasonable worst-case with respect to quantities of used construction material including extraction and delivery processes? Provide an answer which relates to construction activity in both Suffolk and Kent, including both converter stations.	In line with EIA requirements, the assessment of embodied carbon presented in **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change [APP-085]** has taken a reasonable worst-case approach in terms construction material used, including extraction and delivery processes. Carbon emissions have been based on a bill of material quantities appropriate for the design stage of the project. The bill of quantities provided a breakdown of materials by asset and activity for the Proposed Project including the converter and substations in Suffolk and Kent (including all equipment, buildings, materials for hardstanding), overhead line cabling, pylon towers, marine and terrestrial cabling (including cable, ducts, joint bays, rock berms), enabling works (including construction of access routes, construction compounds, new junctions, a temporary bridge, haul roads, and utility diversions) and earthworks. The contingency that this is a reasonable worst case is not necessarily in relation to the quantities of materials, which are the quantities envisaged to be needed, but it is in relation to the embedded carbon in the materials. This is because the assessment has assumed that none of the materials used, including steel and concrete, are low carbon types. However, the Applicant will seek to use low carbon

Reference	Question to:	Question	Applicant's Response
			material in line with their work to reduce carbon in line with National Grid policy. National Grid is looking to be carbon neutral in construction by 2026 and support Net Zero by 2050. Emissions factors for calculating the embodied carbon in materials were taken from the Inventory of Carbon and Energy (ICE) version 3, the current version at the time of undertaking the assessment. The emissions factors in the ICE database account for cradle to gate emissions i.e. they reflect impacts of producing and supplying the products including material extraction, processing, transport and fabrication. As the exact location for the source of the construction materials was not known at the time of the assessment, emissions from the transportation of materials to the site are based on an estimation method provided by the Royal Institute of Chartered Surveyors Guidance on Whole Life Carbon Assessment for the built environment. Estimates for volumes of waste during construction are also based on this guidance. Emissions from plant and vehicles use during construction was based on estimated fuel consumption from each anticipated plant or vehicle type and their running hours during construction. DESNZ, Greenhouse Gas Reporting Conversion Factors (2023) for fuel types were applied to the volume of fuel consumed to estimate the carbon emissions. Construction activities relating to excavation and filling activities have been calculated from volumes of excavated and filled and materials provided in the RFI from the design team, using factors from the Civil Engineering Standard Method of Measurement (CESMM4) (CESMM4, 2013).
1CC4.	Applicant	**Climate Change Assessments - Minster Marshes and other carbon sinks** The ExA notes the applicant's position that the climate change assessments follow Institute of Environmental Management and Assessment good practice guidance for climate change risk assessments in environmental impact assessment. However, can the applicant confirm specifically how the assessment has addressed the function of Minster Marshes and other local carbon sinks regarding their role in capturing and storing carbon etc?	In answering this question, it is important to note that despite the name of this area, the site of the proposed converter station is not a functional coastal or floodplain grazing marsh, the two recognised marsh habitats in the UK. True floodplain grazing marsh consists of grassland which is, as the name suggest, used for grazing livestock, though the sward is sometimes cut for hay or silage in the summer. The Applicant recognises the value of the land for foraging birds such as golden plover; however, this alone does not mean it is marsh habitat. Instead, the proposed converter station and substation are primarily located within drained and cultivated arable land that is in active use. While the arable land can retain standing water at times of heavy rainfall, the cropping use limits its biodiversity importance, consisting, as it does, of monoculture commercial planting (comprising, when surveyed, corn, beans, and cabbage). There are various other habitat types within and around the converter station and substation site, including drains with marsh habitat (which has been avoided where possible) but the majority of the site (and indeed the land in the wider 'Minster Marshes' area) comprises disturbed and cultivated arable land. The majority of this area is not a functional grazing marsh habitat. Given the above, it is not considered that the land that would be permanently lost as a result of the Minster Converter Station and Substation has any greater role in capturing and storing carbon than other areas of arable land.

Reference	Question to:	Question	Applicant's Response
			Carbon emissions and sinks associated with land use have been calculated in line with the EU Commission's Guidelines for Land Carbon Stocks (EU Commission, 2010). Carbon emissions associated with land use based on hectares and habitat types lost and gained over the life of the Proposed Project. As presented in **Application Document 6.2.5.1 Part 5 Combined Chapter 1 Climate Change [APP-085],** current land use within the boundary of the Proposed Project consists of predominantly arable land, managed hedgerows and trees**.** Over the 40-year carbon assessment period the remaining land within the boundary of the project will sequester approximately 5,595 tCO2e. Landscape planting around the site will also sequester carbon.

24. Other

Table 24.1 Other

Reference	Question to:	Question	Applicant's Response
1O1.	Applicant	**Waste and Materials** Schedule 3, requirement 6(1)(n) requires a Material and Waste Management Plan (MWMP) to be submitted and approved. Provide a detailed explanation as to why an outline MWMP is not required, taking into account the quantity of material that would need to be imported to carry out the development and the need to sustainably manage waste. Article 2 of the dDCO [CR1-027] describes the MWMP as a document to be certified under article 60 but it is not listed in schedule 19 as a document to be certified. Amend the dDCO to include a MWMP.	The general approach of the Applicant has been to submit outline management plans only where the mitigation measures within those plans are relied on to mitigate potentially significant effects from the Proposed Development. That allows the proposed content of the plan to be scrutinised through the Examination. The Applicant has not submitted outlines of plans where the mitigation is not specifically required to address potentially significant effects. The detail of these plans would be submitted to the planning authority for approval post-consent. The Applicant considers that this is a standard approach for projects of this nature. The need for a Material and Waste Management Plan is secured by requirement 6(1)(n) and is already included in the draft DCO.

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