The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.36: Applicant's Comments on Other Submissions Received at Deadline 2

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1. About this Document

1.1 Purpose of this Document

1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) comments on other submissions made by Interested Parties at Deadline 2 on 9 December 2025, in response to the application for development consent for the Sea Link Project (the Proposed Project).

1.1.2 All Interested Parties responses received at Deadline 2 have been reviewed and considered in full. The purpose of this document is to provide the Applicant's comments on new matters or matters which have been expanded upon within Interested Parties submissions at Deadline 2.

1.1.3 To avoid duplication, where matters raised by Interested Parties have been responded to previously through the Applicant's Responses to Relevant Representations **[REP2-014 to REP2-025 and REP1-117]**, the Applicant's Written Responses to Open Floor Hearings 1 and 2 **[REP2-032 and REP2-032]** and the Applicant's Comments on Written Representations **[REP1-034]**, the Applicant has not commented further in this document.

1.1.4 Some submissions are not responded to at all because it is the Applicant's view that all matters raised have been responded to previously. The exception to this is Category 1 affected parties, where responses are provided in full, irrespective of whether the Applicant considers that the points have been previously responded to.

1.2 Structure of the Report

1.2.1 Table 1.1 below outlines the structure of this document. The Applicant's comments are provided in response to paragraph numbers used in the original submissions, with paragraphs grouped where appropriate for clarity. Where paragraph numbers are missing, this indicates that the point is considered to have been responded to previously.

Table 1.1 Structure of the Report

Chapter	Interested Parties	Relevant Submission at Deadline 2
2	Bridget Youell	[REP2-070]
3	The Coal Authority	[REP2-132]
4	East Suffolk Communities Energy Partnership	[REP2-047]
5	East Suffolk Council	[REP2-048]

Chapter	Interested Parties	Relevant Submission at Deadline 2
6	East Suffolk Water Management Board	[REP2-049]
7	Historic England	[REP2-052]
8	Kent County Council	[REP2-053]
9	Kent Wildlife Trust	[REP2-054]
10	London Gateway Port Limited	[REP2-055]
11	Marine Management Organisation	[REP2-056]
12	Maritime and Coastguard Agency	[REP2-063]
13	Marlesford Parish Council	[REP2-093]
14	National Highways	[REP2-131]
15	Natural England	[REP2-058]
16	Paul Smith	[REP2-098]
17	Pauline Trudy Klauber	[REP2-099]
18	Piers Sturridge	[REP2-100]
19	Pippa Southorn	[REP2-101]
20	Port of London Authority	[REP2-060]
21	Save Minster Marshes	[REP2-103]
22	Saxmundham Against Needless Destruction	[REP2-104]
23	Scottish Power Renewables (UK), East Anglia ONE North Limited & East Anglia TWO Limited	[REP2-046]
24	Snape Parish Council	[REP2-106]
25	Suffolk & Essex & Heaths National Landscape Partnership	[REP2-038]
26	Suffolk County Council	[REP2-062]
27	Suffolk Energy Action Solutions (SEAS)	[REP2-114]
28	Suffolk Energy Action Solutions (SEAS)	[REP2-116]

Chapter	Interested Parties	Relevant Submission at Deadline 2
29	Suffolk Energy Action Solutions (SEAS)	[REP2-119]
30	Suffolk Energy Action Solutions (SEAS)	[REP2-120]
31	Suffolk Energy Action Solutions (SEAS)	[REP2-121]
32	Suffolk Energy Action Solutions (SEAS)	[REP2-125]

2. Applicant's Comments on the Submission from Bridget Youell [REP2-070]

Table 2.1 Applicant's Comments on Bridget Youell Deadline 2 Submission [REP2-070]

Reference	Matter	Point Raised	Applicant's Comments
WR-REP2-070.01		I have read the Thematic Responses document and feel that my concerns (as a resident with property which will be directly affected by drilling and trenching on the route from Aldeburgh beach to the Leiston Road) have not been adequately addressed. Concerns about noise, air quality, and road congestion are glossed over, as are the wider concerns about adverse effects on the local economy. This area depends on tourism, and tourists are already saying they will not visit again…and that is because of the appalling disruption caused by Sizewell C. This level of disruption is nothing compared what is currently proposed for Sea link. The option of cabling offshore has still not been adequately addressed. Nor is there proper concern about the cumulative impact of a number of schemes coming together….or failing to come together!	The Applicant would draw attention to documents; **6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise & Vibration [AS-109]** which details the Suffolk Construction Noise and Vibration Assessment, **6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]** details the Air Quality Assessments, **6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** documents the Traffic and Transport assessment, and **6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio- Economics, Recreation and Tourism [REP1A-005]** which considers Socio Economics, Recreation and Tourism. Sea Link is primarily an offshore project, however that does not negate the need to connect into the transmission network onshore. Cumulative impacts have been considered and are detailed in APP-059. Links to all of these documents can be found on the Sea Link examination web page via the examination library. These documents provide detailed assessments in relation to the environmental issues raised by the Interested Party.

3. Applicant's Comments on the Submission from The Coal Authority [REP2-132]

Table 3.1 Applicant’s Comments on The Coal Authority Planning Team on behalf of The Coal Authority Deadline 2 Submission [REP2-132]

Reference	Matter	Point Raised	Applicant’s Comments
WR- REP2-132.01		Thank you for your notification of 5 December 2025 seeking the views of the Coal Authority on the above. The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.	The Applicant acknowledges the Coal Authority’s written representation.
WR. REP2-132.02		We have reviewed the site location plan provided and can confirm that the site falls within the Coal Authority’s defined Development Low Risk Area. On this basis we have no specific comments to make. However, in the interest of public safety, it is requested that the Coal Authority’s Standing Advice note is drawn to the applicant’s attention, where relevant	The Applicant acknowledges the Coal Authority’s land interest in plots (Kent): • 5/13 - Class 3. Compulsory Acquisition of Rights - Underground Cable System • 5/18 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure • 5/10 - Class 8. Temporary Use for Construction, Mitigation, Maintenance, and Dismantling of Redundant Infrastructure The Applicant thanks the Coal Authority for confirmation the proposed project falls within the low-risk area.

4. Applicant's Comments on the Submission from East Suffolk Communities Energy Partnership [REP2-047]

Table 4.1 Applicant's Comments on the East Suffolk Communities Energy Partnership Deadline 2 Submission [REP2-047]

Reference	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 1			
Section A – Traffic and Transport		"*ESCEP reiterates the points made in its Relevant Representation and its broad view that the Applicant's DCO Chapter 7 (APP-054) is a deeply unsatisfactory document around traffic and transport issues – principally that it does not reflect the detailed research, analysis and suggested mitigation that ESCEP members had expected from meetings, feedback and submissions made over a number of years. ESCEP has reviewed the Applicant's Thematic Response to the Relevant Representations (REP1-116) and regrettably find that if offers no substantive reactions/responses to the multitude of traffic and transport concerns raised by ESCEP and the individual Town and Parish Councils in their Relevant Representations and oral presentations; it offers little more than provided in the DCO and we accordingly offer no comment to them here. Consequently, this section of ESCEP's Deadline 2 submission will focus on Suffolk County Council's Principal Areas of Disagreement Summary Statement (AS-083) (PADSS) and the Traffic and Transport chapter of its Local Impact Report (REP1-130) (LIR).*"	It is acknowledged that the comments raised largely relate to the Suffolk County Council (SCC) Local Impact Report and SCC PADSS rather than an Applicant submission. As such, we refer the ESCEP to **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**. The matters raised are discussed accordingly.
Section B – Local Road Pressures Snape		"*Snape PC noted in its RR and OFH1 WR (REP 1A-179) that the Applicant (NGET) were making a completely unrealistic claim that its project will have so little impact on traffic and transport issues that they do not even need to prepare a Transport Assessment The Applicant's error was at least partly due to their using a study area that excludes from consideration local roads south of the A1094 that are already bearing the pressures of diversionary tactics by drivers trying to avoid traffic pressures from SZC and to an extent SPR construction. This situation allows ESCEP and Snape PC to make very accurate predictions about where the further pressures that Sea Link will be adding will be felt*."	The Applicant has provided a response to these comments raised by Snape Parish Council, as well as additional comments raised by Snape Parish Council within **Applicant's Comments on the Snape Parish Council Deadline 2 Submission [REP2-106]**.
Section C - B1121 Benhall Rail Bridge and A12/B1121 junction		"*In our Deadline 1A submission of our oral presentation at the OFH (REP1A-045) we commented upon the above bridge and junction. Please note this representation was prepared in collaboration our Chair, Councillor Sanders of Woodbridge Town Council, a Chartered Engineer with over 40 years civil engineering design consultancy experience of major infrastructure works. This representation document was also prepared before full examination of the Applicant's 26 November Change Request Application document recently issued on the Planning Inspectorate Sealink Project Information web portal. Additional comments may*	It is noted that the comments raised largely relate to the Change Request, namely Change 4: Benhall railway bridge, Suffolk. As such, we refer the Parish Council to **Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]**. The matters raised are reviewed and assessed with Section 3.5 accordingly, which includes the potential traffic and transport impacts of the temporary road closure (Benhall Bridge) on various users including road users.

Reference	Matter	Point Raised	Applicant's Comments
		well arise from examination of that document and will be made as requested on or before 19 January 2026."	

5. Applicant's Comments on the Submission from East Suffolk Council [REP2-048]

Table 5.1 Applicant's Comments on the East Suffolk Council Deadline 2 Submission [REP2-048]

Reference	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 1 and Deadline 1A			
2.1 to 2.5	ESC's comments on **Application Document 9.44: St John's Church Grade II* Listed Building [REP1-118]**	ESC welcomes the Applicant's submission of a technical note providing an assessment of the effects on the Grade II* Listed Church of St John the Baptist as an individual heritage asset. Whilst this differs to the assessment ESC provided in its Local Impact Report (LIR), having reviewed the submitted information, ESC agrees with the Applicant's assessment of the residual effects of the proposed Saxmundham Converter Station and River Fromus bridge on the Grade II* Church of St John the Baptist. ESC requests that Chapter 3 (Cultural Heritage) of the ES should be amended to include this further assessment.	The Applicant welcomes ESC's agreement on the assessment of the residual effects on Grade II* Church of St John the Baptist. The Applicant does not propose to update Chapter 3 itself, as that already contains an appropriate assessment of the asset as within Saxmundham Conservation Area. Assessing the church as part of the Conservation Area is deemed to be a robust and proportionate approach to assessing the asset based on its spatial relationship with the Conservation Area and their shared setting to the south. **Application Document 9.44: St John's Church Grade II* Listed Building [REP1-118]** sought only to provide clarification of the impact assessment provided in Chapter 3.
4.3	ESC's comments on **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology ad Biodiversity [REP1-047]**	The Applicant considers that there would be a moderate beneficial long-term (significant) impact on dormice due to habitat creation provided by the proposed landscape planting around the Saxmundham Converter Station and Friston Substation, despite the very same paragraph (Paragraph 2.9.192) acknowledging that "there is no evidence of dormouse within the operational footprint of the Suffolk Onshore Scheme". ESC queries this finding and considers that the proposed landscape planting cannot be of benefit to a species which is claimed to be absent. ESC considers that this benefit should be downgraded to 'negligible' (i.e. 'not significant') if the project maintains that the species is absent from these sites. The corresponding row of Table 2.11 should also be updated to reflect this.	Whilst dormice are considered to be likely absent within the footprint of the Suffolk Onshore Scheme, it is noted that others have suggested that dormice may be present. **Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** is noting that even if dormice are present, the Proposed Project is delivering a net increase in habitat.
5.2	ESC's comments on **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]**	ESC requests that mitigation measures B60 and B63 in Table 1.2 of the updated REAC include East Suffolk Council in the list of organisations to be notified.	East Suffolk Council have been added to the list of organisations to be notified for mitigation measures B60 and B63 within the REAC. See **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3.
7.2	ESC's comments on **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [REP1-051]**	Paragraph 1.7.2 states that the Aldeburgh defence wall 'is situated at the back of the beach and at the time of inspection was largely buried by shingle (Royal Haskoning, 2010).' ESC considers that this statement, based on an inspection carried out 15 years ago, is out of date as the Aldeburgh seawall is exposed in places, which has caused some concern locally. ESC therefore suggests that this statement is removed or amended based on a more recent inspection of the frontage. ESC wishes to reiterate that such inspections should already be being conducted by the Applicant to	Text associated with the old inspection has been removed. While no site-visits were undertaken, the ACMP dataset was used to analyse recent local erosion extents and rates at the landfall site. For the purposes of the baseline assessment, the spatial and temporal resolution of the ACMP data is considered adequate to define baseline erosional/accretional patterns; particularly as one of the transects is coincident with the landfall.

Reference	Matter	Point Raised	Applicant's Comments
		ensure that it understands the coastal processes in the area and any erosion issues.	A new commitment (MPE08) has been added to **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3. This states that further analysis will be undertaken to consider the potential for coastal erosion over the lifetime of the Proposed Project in line with the final Offshore Construction and Environmental Management Plan. This information will be used to inform the detailed design of the Proposed Project, to ensure that the risk of future exposure of the offshore burial cables is reduced as far as practicable.
7.3	ESC's comments on **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [REP1-051]**	ESC is very concerned by the Applicant's assertion in Paragraph 1.7.6 that 'towards Thorpeness and at Thorpeness Haven which includes the location of the landfall site, the policy is for no active intervention, allowing the natural development of the frontage.' The current Shoreline Management Plan policy for both Unit ALB 14.1 Thorpeness Haven Properties 1 and Unit ALB 14.2 Thorpeness Haven Beach2 is 'Managed Realignment', not 'No Active Intervention'. A possible explanation for this inaccuracy is that the Applicant appears to be referencing the Shoreline Management Plan dated 2010, but a 2015 revision to Policy ALB 14.1 (Thorpeness Haven Properties) introduced a change in approach from 'No Active Intervention' to 'Managed Realignment' in this area3 . ESC requests that the Applicant urgently addresses this inaccuracy to ensure that the ES is informed by the most up-to-date Shoreline Management Plan policies.	Text has been updated to include the latest update to the Shoreline Management Plan (SMP) policy for the landfall site.
7.4	ESC's comments on **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [REP1-051]**	Paragraph 1.7.19 states that 'generally speaking, the northern Suffolk coastline may be considered erosive, while the southern Suffolk coastline shows long term accretional trends (Reeve, Horrillo-Caraballo, Karunarathna, & Pan, 2019; Mott MacDonald, 2014; BEEMS Technical Report TR311).' ESC wishes to note that it is currently working on some acute erosion issues on the southern Suffolk coastline. ESC therefore considers this statement to be an unhelpful, over-simplified generalisation of the Suffolk Coastline, and that it should be removed from the ES chapter	The text has been retained as describing/understanding the wider/large scale coastal change patterns is a relevant part of the baseline, however the text has been amended to clarify that this does not account for localised areas of erosion/coastal change which is assessed in more detail in the coastal erosion section for the Suffolk landfall.
7.5	ESC's comments on **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [REP1-051]**	Paragraph 1.7.42 notes that as a result of a missing figure in the 'Suffolk (SMP 7) Coastal Trends Report' from the Anglian Coastal Monitoring Programme ('ACMP'), published in 2022 by the Environment Agency, the Applicant's 'assessment relies upon the reported results to describe the erosional trends.' ESC obtained this missing figure from the ACMP and sent this via email to the Applicant on 14 May 2025. The Applicant subsequently advised that the ES chapter would be updated accordingly. ESC is therefore disappointed to see that this has not been actioned, and requests that the necessary updates are made at Deadline 3. The figure in question, although also sent directly to the Applicant as previously noted, is provided in Figure 1 of this document	Thank you for alerting us to the missing figure. This has now been added to the chapter. See **Application Document 6.2.4.1 (D) Part 4 Marine Chapter 1 Physical Environment** submitted at Deadline 3.
7.6	ESC's comments on **Application Document 6.2.4.1 Part 4 Marine**	Paragraph 1.7.144 states that 'due to the lack of site-specific erosion data for the landfall site, the assessment makes high-level estimates of erosion distance and erosion rates using adjacent estimates as a proxy.' ESC considers that the Applicant could have analysed the	The quoted phrase has been removed from the chapter for better clarification as we have used ACMP data to analyse local erosion extents and rates at the landfall site. NCERM data has also been

Reference	Matter	Point Raised	Applicant's Comments
	Chapter 1 Physical Environment [REP1-051]	open source ACMP topographic dataset referenced earlier in Section 1.7 of the Chapter. This dataset is also utilised by ABPmer for its beach profile analysis, as noted in Paragraph 1.7.44. ESC considers that the Applicant's efforts to collect and analyse primary coastal geomorphology data have been inadequate, resulting in no baseline dataset with which to compare any future change.	used to present the predicted future erosion for both landfalls for the high emissions scenario.
7.7	ESC's comments on **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [REP1-051]**	Table 1.18 states that 'the beach landfall sites and joint bays that run beneath the beach, may be excavated' during decommissioning. ESC wishes to note that it would not support the use of heavy plant on the beach for this excavation and removal of cable infrastructure due to the negative impacts this would have on the beach geomorphology and the surrounding Leiston-Aldeburgh Site of Special Scientific Interest ('SSSI'). ESC considers that the more pragmatic approach to decommissioning detailed in Paragraph 1.9.79 (that is, to review possible solutions at the time of decommissioning, and possibly leave the infrastructure in-situ with stabilisation if this is considered to be less damaging than excavation and removal) is more appropriate. Therefore, ESC suggests that the wording in Table 1.18 is removed or amended to reflect Paragraph 1.9.79.	Text has been revised to reflect the decommissioning approach outlined in Paragraph 1.9.79. See **Application Document 6.2.4.1 (D) Part 4 Marine Chapter 1 Physical Environment** submitted at Deadline 3.
7.8	ESC's comments on **Application Document 6.2.4.1 Part 4 Marine Chapter 1 Physical Environment [REP1-051]**	ESC welcomes the commitment to monitoring of the beach profile and erosion rates through additional mitigation measure MPE06 detailed in Paragraph 1.10.1. However, the wording is vague and ESC requests it is amended to detail a more systematic monitoring approach	A new commitment (MPE08) has been added to **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** submitted at Deadline 3. This states that further analysis will be undertaken to consider the potential for coastal erosion over the lifetime of the Proposed Project in line with the final Offshore Construction and Environmental Management Plan. This information will be used to inform the detailed design of the Proposed Project, to ensure that the risk of future exposure of the offshore burial cables is reduced as far as practicable. As a follow-up action to this analysis, the monitoring approach can be developed to focus on the beach profile and erosion processes and rates, with an appropriate monitoring schedule for the lifetime of the Proposed Project.

6. Applicant's Comments on the Submission from East Suffolk Water Management Board [REP2-049]

Table 6.1 Applicant's Comments on the East Suffolk Water Management Board Deadline 2 Submission [REP2-049]

Reference	Matter	Point Raised	Applicant's Comments
WR-REP2-049.01		1.1 This submission is made on behalf of East Suffolk Water Management Board.	The Applicant thanks East Suffolk Water Management Board for its written representation.
WR-REP2-049.02		1.2 East Suffolk Water Management Board (the Board) is an Internal Drainage Board as defined by the Land Drainage Act 1991. The Board's internal drainage district covers several river catchments in East Suffolk. This district overlaps with a very small part of the proposed Sea Link development at two locations: the landfall area near Thorpeness, and the River Fromus area south of Saxmundham.	Noted, Thank you for the clarification.
WR-REP2-049.03		1.3 East Suffolk Water Management Board is the potential regulator for certain elements of Sea Link's proposed works – specifically those works within the Board's Internal Drainage District and which require consent as per the Land Drainage Act 1991, and under the Board's Byelaws. These works could include the discharge of water into a watercourse within the internal drainage district, and the alteration of a watercourse within the internal drainage district. The Board is an interested party because of the potential impact of the project on the Board's ability to carry out its statutory functions relating to land drainage and reducing flood risk.	Noted, Thank you.
WR-REP2-049.04		1.4 The Board had highlighted several matters within its relevant representation (June 2025) and written representation (November 2025). These included a request for clarification on watercourse crossing locations and methods; a need for drainage to be attenuated to greenfield runoff rate; concerns relating to the wording of Article 20 within the draft DCO; and comments about protective provisions for drainage authorities. We note that the applicant has provided a response to the Board's comments in REP1-112 Document 9.43.2: Applicant's Responses to Relevant Representations from Statutory Consultees and Bodies (Version A; November 2025). The applicant has directed the Board to relevant information on watercourse crossings and drainage rates. The applicant has welcomed ongoing engagement with the Board in relation to the wording of Article 20 and to discuss protective provisions.	The Applicant will arrange a meeting to discuss further.
WR-REP2-049.05		1.5 The Board welcomes further direct engagement with the applicant to discuss these matters.	The Applicant would be pleased to discuss the proposed project drainage with ESWMB and will arrange a call in January.

7. Applicant's Comments on the Submission from Historic England [REP2-052]

Table 7.1 Applicant's Comments on the Historic England Deadline 2 Submission [REP2-052]

Reference	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 1			
N/A	Comments on draft Development Consent Order (Clean) – Applicants document reference: 3.1(E); PINs Examination Reference: REP1-036	We continue to have some concern surrounding the design commitments presented in the Draft DCO Schedule 3 Requirements '3 Converter Station Design' and '14 Archaeology' as drafted, as they make no explicit provision for stakeholder engagement on the heritage issues beyond the local County Council. We recommend that an appropriate wording is added to the draft DCO to enable engagement with Historic England on the heritage issues. This is important to ensure post consent works are appropriate.	The Applicant agrees to include HE being consulted as part of Requirement 3 and 14 and has updated the wording of these two requirements within Application Document 3.1 (F) draft Development Consent Order submitted at Deadline 3. The Applicant will include the two documents within the list of certified documents in Schedule 19 of **Application Document 3.1(F) draft Development Consent Order** submitted at Deadline 3.
N/A		Additionally, we note that the document 'Outline Offshore Overarching Written Scheme of Investigation (PINs Examination Reference: PDA-033) is referenced within Part 1, Article 1(1) of the DCO as a certified document, but it is not included within the list of certified documents in Schedule 19. Similarly, the 'Outline Onshore Overarching Written Scheme of Investigation' for Kent (PINs Examination Reference: REP1-104) and Suffolk (PINs Examination Reference: APP-343) are both referenced within Part 1, Article 1(1) of the DCO as a certified documents, but are not included within the list of certified documents in Schedule 19. We recommend that omitted documents should be added to the list	
N/A	Comments on Part 4 Marine Chapter 6 Marine Archaeology – Applicants document reference: 6.2.4.6 (B); PINs Examination Reference: REP1-057	We note the updated document sets out further details regarding further survey work required for Pegwell Bay (paragraphs 6.4.21-22) and future UXO surveys (paragraph 6.4.60). We welcome inclusion of the details of these surveys and agree that they are sufficient to address identified baseline data gaps.	This is noted by the Applicant.
N/A	Comments on CEMP Appendix B Register of Environmental Actions and Commitments (REAC) (Clean) – Applicants document reference: 7.5.3.2 (B); PINs Examination Reference: REP1-102	The commitment referenced in Marine archaeology section (MA09) to secure further surveys only refers the archaeological assessment and interpretation of 'further surveys' and not marine surveys identified in Part 4 Marine Chapter 6 Marine Archaeology: 6.2.4.6 (B) (PINs Examination Reference: REP1-057) specifically.	The Applicant can confirm that pre-commencement surveys will be undertaken to inform the routing for marine cable installation and burial. The dML will be updated to include wording to this effect.

Reference	Matter	Point Raised	Applicant's Comments
		Given there is no condition with the draft Development Consent Order (DCO) deemed marine licence (dML) for pre-construction surveys, we would like to understand how these surveys will be secured. We recommend the appropriate mechanism for securing of these surveys should be included in the draft Development Consent Order (DCO) and a revised wording shared with Historic England prior to the end of the examination.	
		We remain of the view that there is some harm to the significance of Richborough Roman Fort caused by the proposed development within its setting. In order to ensure that this harm is kept to a level which would be considered 'not significant', we request that a commitment to further consultation with Historic England on the detailed design of the Minster Converter Station and Substation is secured through the REAC. In order to address this, we propose the inclusion of a further heritage commitment to the REAC Landscape and Visual section, as follows: *To minimise the change to the setting of heritage assets, the Minster Converter Station and Substation is to be designed in consideration of limiting intrusion into Heritage key views and in consultation with Historic England.* We recommend the revised wording of the REAC is shared with Historic England prior to the end of the examination and confirmed with the examining authority.	The Applicant notes the request for Historic England to be a consultee on Requirement 3 (as noted above) and the related request for an additional commitment to be added to the REAC on the design of Minster Substation and Converter Station. As per response above, the Applicant has agreed to include HE as a consultee on Requirement 3. Requirement 3 ensures that the design of the Minster Converter Station is in general accordance with the Key Design Principles set out in Table 3.1 of **Application Document 7.12.2 Design Principles - Kent [APP-367]**. This includes consideration of heritage key views as part of principle CO.2. Inclusion of HE within Requirement 3 of the draft DCO (**Application Document 3.1 (F) draft Development Consent Order** submitted at Deadline 3) is considered to be the most effective way to secure this request and therefore, the Applicant does not consider a further REAC commitment is necessary.
N/A	Comments on Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Kent (Clean) – Applicants document reference: 7.5.4.2 (B); PINs Examination Reference: REP1-104	Historic England welcomes submission of the amended Outline Onshore Overarching Written Scheme of Investigation (OWSI) for Kent. However, we note that some of the comments which have been previously provided directly to the applicant have not been implemented in the current version of the document. We reiterate these comments for clarity: • Section 4 should refer to HE guidance for Environmental Remains (2011, update soon to be published), Geoarchaeology (2015) and Animal Bones and Archaeology (2019). • Paragraph 4.2.19 – please add to the last sentence: 'and analysis of palaeoenvironmental indicators'. • Paragraph 4.3.18, 3rd bullet point – undertaking micromorphology on floors/activity surfaces is highly recommended. It is an underused but very effective and informative technique. • Paragraph 7.1.4 – research aims should also make reference to any previous evaluation results. • a point should be added for details of re-burial, following recent HE guidance, in case preservation in	Please see the Applicant's response to comments 17.1-17.11 in Written Representation from Historic England as provided in **Application Document 9.79 Applicant's Response on Written Representations [REP2-034]**,

Reference	Matter	Point Raised	Applicant's Comments
		situ is warranted. Historic England 2024 Preserving archaeological remains. Appendix 5 – The Reburial of archaeological sites. HEAG100f v2. Historic England. https://historicengland.org.uk/images-books/publications/preservingarchaeological-remains • Figure 1 - please include more detailed figures of zoned areas with geophysical survey results included.	
		Separately, we note that (Applicant's Responses to Relevant Representations from Statutory Consultees and Bodies Doc 9.34.2; PINs Examination Reference: REP1-112) states under paragraph 3.7.32 that the geoarchaeological works to assess potential hydrogeological impacts of the scheme to buried archaeology will be secured in the Outline Onshore OWSI. Similarly, paragraph 3.7.33 states that mitigation for ecological impacts from landscaping and BNG designs to buried archaeology will be developed in the relevant OWSI. However, the latest version of the OWSI document does not consider addressing these impacts and mitigation We recommend that the additional sections dealing with hydrogeological impacts, and ecological impacts from landscaping and BNG designs, and securing appropriate mitigation are included in the OWSI. Revised wording of the OWSI should be shared with Historic England prior to the end of the examination	The Applicant acknowledges the comments from Historic England and will continue to engage with Historic England and other relevant stakeholders as the OWSI is updated. Further responses to comments made by Historic England relating to the OWSI in their Written Representations can be found in **Application Document 9.79 Applicant's Response on Written Representations [REP2-034]**. Responses particularly pertinent to the OWSI include responses to Comments 1.9 to 1.13, 16.1 to 16.16 and 17.1 to 17.11, and 23.9-23.10.
N/A	Comments on Applicant's Responses to Relevant Representations from Statutory Consultees and Bodies – Applicants document reference: 9.34.2; PINs Examination Reference: REP1-112	We welcome commitment by the applicant to providing updated cultural heritage impact assessment of the Suffolk onshore part of the project based on the full results of additional archaeological surveys (paragraphs 3.7.8-3.7.11). We fully support this approach. We welcome commitment by the applicant (outlined in paragraph 3.7.23) to consult further with Historic England and other stakeholders regarding impacts on the multi-period complex archaeological site on the 'Ebbsfleet Peninsula'. We have highlighted significance of this non-designated archaeological site in our Written Representation. We noted that a number of measures have been already implemented by the project to either avoid or mitigate direct impacts. Despite this, some direct impacts on the Ebbsfleet Peninsula complex are likely to remain, and, due to the permanent nature of this harm, it must be considered to be of at least medium magnitude, resulting in a major adverse significance of effect (i.e.	The Applicant acknowledges the comments from Historic England. Regarding the Ebbsfleet Peninsula complex. Further feedback has been provided in response to Comment 1.11 and Comments 3.6-3.9 in the Historic England Written Representations (see **Application Document 9.79 Applicant's Response on Written Representations [REP2-034]**).

Reference	Matter	Point Raised	Applicant's Comments
		one that is Significant). We agree with this part of the assessment presented in the application documents However, we continue to disagree that the ability to mitigate the effect through a programme of archaeological works would reduce the significance of the effect to 'Minor'. In our opinion, the assessed level of effect after archaeological mitigation does not present a full and accurate picture of the potential harm caused by the works. This is in line with para 5.9.16 of EN-1 which recognises that the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted. Therefore, if there are any options for further reducing harm by removing site compounds or utilising non-dig options, these would likely be preferred. However, we understand that no-dig options may often result in the need for top-soil remedial works, which may then be as harmful as the proposed top-soil stripping for compound locations. Potential options for reducing harm in sensitive locations will therefore need to be discussed further.	
		The paragraph 3.7.29 states that the applicant understands that Historic England's advice in relation to geoarchaeological assessments and deposit models only applies to Kent Onshore part of the scheme. We have provided detailed comments on the geoarchaeological assessments in Suffolk in our Written Representation. We have identified that there are certain gaps in the understanding and knowledge of the project area. We recommended that these gaps in the understanding are addressed through a programme of geoarchaeology and deposit modelling.	Further responses to comments made by Historic England relating to the geo-archaeological works in their Written Representations can be found in **Application Document 9.79 Applicant's Response on Written Representations [REP2-034]**. Responses particularly pertinent to the geo-archaeology include responses to Comments 2.12 to 2.15, as well comments 4, 8, 9, 12, 13, and 14 which examine related subjects such as Ground Investigation works and geology/ground conditions.
		Paragraph 3.7.33 notes that the applicant assumed that there would be no physical impact within the areas of grassland proposed as part of ecological mitigation measures. This has informed approach to proposed mitigation. We would recommend that for the sake of clarity the assumption of no change within these areas is confirmed by the applicant.	The Applicant notes the comment. This will be addressed in the next iteration of the OWSI.
N/A	Comments on Suffolk and Kent Illustrative Visualisations Part 2 of 2 – Applicants document reference: 9.14; PINs Examination Reference: REP1-297	We have previously highlighted significance of the scheduled monument known as 'A Saxon Shore fort, Roman port and associated remains at Richborough' in our Written Representation. The proposed development is located within the setting of this nationally important Roman site. We are pleased to see that a key illustrative visualisation, i.e. from on top of the Claudian Gate at Richborough Fort, have now been supplied. However, we note though that the use of the 'Rochdale Envelope' has not been employed, which means that the visualisation presented in the document is something of a 'best case' scenario.	Further responses to comments made by Historic England relating to the Richborough Fort in their Written Representations can be found in **Application Document 9.79 Applicant's Response on Written Representations [REP2-034]**. Responses particularly pertinent to the Richborough Fort include responses to comments 1.12 and 3.10 to 3.18. Illustrative visualisations (**Application Document 9.14 Suffolk and Kent Illustrative Visualisations Part 2 of 2 [REP1-297**]) have been produced which further demonstrate the limited potential for impacts on the setting of the Fort (see response to comment 1.12

Reference	Matter	Point Raised	Applicant's Comments
		The additional visualisations clearly demonstrate that the converter station will intrude views from the amphitheatre towards the fort, and in and around the fort itself. This would have an effect on the legibility of the surrounding landscape and peoples' ability to appreciate the forts historic setting. The setting of the fort contributes highly towards our understanding of the monument and its original topographic context. Therefore, we continue to maintain that there is a higher level of harm to Richborough Roman Fort than has been assessed by the applicant. As we previously highlighted in our Written Representation the applicant has assessed the magnitude of harm to the significance of the fort caused by development within its setting (during operation and maintenance) to be 'Negligible' with a resultant 'Minor Adverse' significance of effect (Table 3.14, pg. 65, Doc. 6.2.3.3, Environmental Statement, Part 3 Kent, Chapter 3 Cultural Heritage, **PINs Examination Reference: APP-063**). On the assumption that appropriate design mitigation will be implemented, utilising the least intrusive of the design principles put forward (as described in Doc 7.11.2 Design Approach Document – Kent, PINs Examination Reference: APP-365 and Doc 7.12.2 Design Principles – Kent, PINs Examination Reference: APP-367), Historic England assess the magnitude of harm to be 'Small' (as per Table 3.10, pg. 31, Doc. 6.2.3.3, **PINs Examination Reference: APP-063**). According to the methodology used by the applicant (as per plate 5.2, pg. 14, Doc 6.2.1.5, PINs Examination Reference: APP-046), this may then result in a 'Moderate' or 'Minor' significance of effect. We consider that a 'Minor' significance of effect is appropriate and that the harm is therefore 'Not Significant'. Despite our disagreement regarding the specific magnitude of harm, the resultant significance of the effect does therefore broadly align with the applicant's assessment. This is subject however to ensuring that the detailed design of the converter station truly meets the aims set out within the design parameters as currently set out. It should be noted however that if a design is chosen that increases the intrusion of this structure within the landscape, then the harm may be considered 'Moderate' which would then be 'Significant'.	above in **Application Document 9.79 Applicant's Response on Written Representations [REP2-034]**). Furthermore, it should be noted that a 'Rochdale Envelope' approach was used in the assessment (**Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]**), and that the illustrative visualisations have been submitted to provide a more realistic depiction (**Application Document 9.14 Suffolk and Kent Illustrative Visualisations Part 2 of 2 [REP1-297]**). As noted above, the Applicant has now agreed to include HE as a consultee on Requirement 3 of the draft DCO (**Application Document 3.1 (F) draft Development Consent Order** submitted at Deadline 3).
	Conclusions	Historic England welcomes submission of additional and revised documents in support of the Sea Link project DCO application. We have provided comments on this additional information and broadly agree with the applicant's approach to assessment and	The Applicant agrees with these points and the approach suggested.

Reference	Matter	Point Raised	Applicant's Comments
		further mitigation. We have identified areas where further discussions and changes to the submitted documents are needed. We recommend that the amendments to the draft DCO and Outline Overarching Written Schemes of Investigation should be agreed with stakeholders prior to the finalisation/certification of these documents.	

8. Applicant's Comments on the Submission from Kent County Council [REP2-053]

Table 8.1 Applicant's Comments on the Kent County Council Deadline 2 Submission [REP2-053]

Reference	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 1			
Submission ID: SE3045E35	Transport – Request for supporting evidence of flows	"It was our understanding from the Draft Statement of Common Ground (SoCG) that the Transport Assessment Note (TAN) would be accompanied by the relevant supporting evidence of construction traffic flows within the agreed study area, which appears to have informed the cumulative effects assessment. Neither has there been any discussion in the applicant's submission around any capacity assessment at key junctions, simply the assessment carried out in accordance with IEMA guidelines. We anticipated that these matters would be addressed within the further Transport and Traffic addendum for Kent in time for Deadline 1, as specifically requested under point 15 of the Action Points arising from ISH1. This does not appear to have been provided for the Kent onshore scheme, nor has any reason been given to date for this omission, despite us making this enquiry since the 24th November. KCC Highways therefore are of the view that the Transport Assessment has not yet been fully carried out to our satisfaction, in discharge of 3.10.8 of the draft SoCG".	The Transport Assessment Note (**Application Document 6.3.3.7.A ES Appendix 3.7.A Transport Assessment Note [APP-175]**) is informed by traffic flow diagrams showing construction traffic flows within the agreed study area for the Kent Onshore Scheme as set out within **Application Document 6.3.3.7.G ES Appendix 3.7.G Traffic Flow Diagrams [APP-181]**. These construction traffic flows have informed the cumulative effects assessment which is reported in **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]**. This was supported by **Application Document 6.3.3.13.B ES Appendix 3.13.B Preliminary Cumulative Highway Impact Assessment [APP-194]** which provides total cumulative traffic flows within the agreed study area. Therefore, the information requested by KCC has already been provided. In terms of junction capacity and performance, the proposed working hours are designed to minimise additional construction worker vehicle trips on the surrounding highway network during the network peak hours. Therefore, junctions are not expected to be impacted by the Proposed Project at these peak times. In addition, the assessment is based on peak construction traffic levels which are forecast to be temporary in duration (considering levels on the busiest day and month of the construction programme). Therefore, no junction capacity modelling has been carried out given that construction traffic will largely avoid the network peak hours and that peak (assessed) levels will only be experienced for a short duration, with no significant effects expected with respect to driver delay in any case. Nonetheless, a meeting has been arranged with KCC Highways in January 2026 to agree the requirements for, and the scope of, any further junction modelling within the study area, including the scenarios for assessment. Where any 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. In terms of point 15 of the Action Points arising from ISH1, the Examining Authority has since confirmed by email on 3 December 2025 that the Applicant will not be required to submit an additional cumulative traffic document (*Transport and Traffic addendum for Kent)* at this stage. This is because no significant effects were identified for Traffic and Transport when the traffic volumes associated with the peak construction phase of the Kent Onshore

Reference	Matter	Point Raised	Applicant's Comments
			Scheme were initially reviewed against the traffic flows of each of the cumulative projects individually, as reported in **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]**. This is different from the situation in Suffolk, where the initial stage of reviewing the peak construction traffic numbers arising from the Suffolk Onshore Scheme against the traffic flows of each of the cumulative projects individually indicated the potential for significant effects, which then led to the next stage where the Applicant considered the residual effects reported by the other developments, following the application of their committed mitigation. It was this additional assessment stage that Suffolk County Council requested additional details of, and which resulted in the preparation of **Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]**. In view of the above, we continue to refer KCC to **Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]**. The Applicant would also be happy to discuss this matter further with KCC Highways during the meeting arranged in January 2026.

9. Applicant's Comments on the Submission from Kent Wildlife Trust [REP2-054]

Table 9.1 Applicant's Comments on the Kent Wildlife Trust Deadline 2 Submission [REP2-054]

Reference	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 1			
1) Misrepresentation of the Mitigation Hierarchy, Alternative Assessment and Cumulative Effects *Responding to sections 2.8.1 – 2.8.4*	Alternative Assessment	This demonstrates that landfall options were not evaluated on a like-for-like basis at the same decision-making stage. Instead, terrestrial routing constraints were introduced only after Pegwell Bay had already emerged as the preferred option, resulting in a retroactive justification rather than a genuine application of the mitigation hierarchy.	The suggestion that the terrestrial appraisal was undertaken at a later date is incorrect. As set out in Figure 5-2 of **Application Document 8.1 Corridor and Preliminary Routeing and Siting Study [APP-368]** the marine and terrestrial appraisals were undertaken concurrently and then brought together to identify an 'on balance' preferred end-to-end solution.
1) Misrepresentation of the Mitigation Hierarchy, Alternative Assessment and Cumulative Effects *Responding to sections 2.8.1 – 2.8.4*	Cumulative assessment	Within response to paragraph 2.8.3 the Applicant states that the proposed solar farm (RBL2) which is proposed immediately adjacent to the golden plover mitigation site "cannot be meaningfully assessed" and downplays foreseeable cumulative impacts. As mentioned within KWT's Written Representation: Both the EIA Regulations and the Habitats Regulations impose a clear and mandatory duty to assess cumulative impacts comprehensively. Schedule 4(5)(e) of the EIA Regulations explicitly requires an Environmental Statement ("ES") prepared under Regulation 14(2) to include: "A description of the likely significant effects of the development on the environment resulting from, inter alia: […] (e) the cumulation of effects with other existing and/or approved projects..." This requirement is not optional or qualified. It compels the Applicant to assess all existing, approved, and reasonably foreseeable projects whose effects could combine with the proposed development.	As the guidance published by the Planning Inspectorate makes clear, the reference to certainty is not about the certainty that a project will happen; rather it refers to certainty about the information available for the other project. The guidance states: *"The availability of information needed to conduct a CEA will depend on the status of the other existing and, or approved developments. Any assumptions or limitations in the collated data should be clearly stated by the applicant. A level of certainty, based on the available information, should be attributed to each development and recorded.."* So, although RBL2 may be reasonably foreseeable, it is the lack of any project information that renders its certainty to the lowest level i.e. Tier 3. The guidance also states the following: *"The applicant is expected to compile detailed information to inform the Stage 4 assessment. The information should include but not be limited to:* • *proposed design and location information* • *proposed programme of construction, operation and decommissioning* • *environmental assessments that set out baseline data and effects arising from the other existing and, or approved development "* Of this information, only the location is available to the Applicant. There is no design information, no construction programme and no environmental assessment available. As such, there is practically no information for the Applicant to consider cumulatively with the proposed development. However, assessments undertaken by the developer of RBL2 will have a substantial amount of information about the Proposed Project with which to undertake its assessment of inter-project cumulative effects.
2) Saltmarsh and Intertidal Impacts, Trenchless Techniques, and	Permanent effects on saltmarsh and mudflat habitat	2. The Applicant admitted during Issue Specific Hearing 1 ("ISPH1") that it has no insight into NGV's decision-making, meaning it cannot reasonably rely on NGV's evidence or assert that identical geological settings now guarantee HDD success.	The Applicant is not relying on NGV's evidence regarding the geological setting. The Applicant has undertaken its own investigations into the feasibility of using trenchless techniques and has concluded that the use of such techniques is feasible. Irrespective, commitments are made to not encroach on any saltmarsh habitat which would become legally binding should the DCO be made.

Reference	Matter	Point Raised	Applicant's Comments
the Nemo Precedent *Responding to sections 2.8.5*			
3) Incomplete and Insufficient Ecological Baseline *Responding to sections 2.8.9 – 2.8.11*	Marine mammal assessment	The Applicant's marine mammal assessment remains incomplete. The Applicant's response again focuses solely on potential disturbance to seals at haul-out sites in the River Stour. The following issues remain unaddressed: • No assessment of disturbance to seals in transit, foraging/hunting, breeding, or moving between haul-out sites. • No assessment of impacts to prey availability, despite intertidal disturbance and sediment mobilisation. • No assessment of breeding season sensitivity, despite known pupping activity in the wider estuarine system. • Underwater noise modelling is crude and fails to consider cumulative behavioural disturbance. • The Applicant relies heavily on habituation to vessel traffic in the River Stour, which is irrelevant to the novel, high-intensity, multi-month construction activities proposed at landfall. Furthermore, the Applicant claims seals will be "screened" by saltmarsh from sound disturbance during low tide. This assertion is unsupported and contradicts their own acknowledgement that airborne sound modelling is being recalculated.	The Applicant disagrees that the marine mammal assessment is incomplete. Each point provided by KWT is addressed in order below. Consideration of disturbance to seals when in transit, foraging, hunting and moving around is provided in **Application Document 6.2.4.4 (F) Part 4 Chapter 4 Marine Mammals** submitted at Deadline 3. The baseline includes consideration of seal tracking data (Carter et al., 2022) which demonstrates strong connectivity and movement between Pegwell Bay and the Greater Thames Estuary for harbour seal (see paragraph 4.7.43 of **Application Document 6.2.4.4 (F) Part 4 Chapter 4 Marine Mammals** submitted at Deadline 3). Acknowledgement is also given to connectivity with Margate Sands, Swale Estuary and Dengie Flats. The maximum foraging distances for harbour seal and grey seal provided by Carter et al. (2022) have also been considered throughout the assessment. Potential for indirect effects through impacts to prey species are considered in paragraph 4.9.33 onwards of **Application Document 6.2.4.4 (F) Part 4 Chapter 4 Marine Mammals**, submitted at Deadline 3, which states that any habitat loss and disturbance associated with Proposed Project will be localised and small in extent. The assessment of this pathway concludes that impacts on prey species for harbour seal and grey seal, including sandeel and other benthic fish, are negligible. The assessment provided in **Application Document 6.2.4.4 (F) Part 4 Marine Chapter 4 Marine Mammals**, submitted at Deadline 3, also considers sensitive periods for seals including the consideration of potential breeding activity in the River Stour. Project-specific seal location surveys were completed in September to November 2024 which coincided with the end of the moulting season (considered to be the most sensitive period for seals) when numbers of hauled-out seals are considered to be at their highest. An additional survey was completed in August 2025 as requested by Natural England (see **Application Document 6.3.4.4.A (B) Appendix 4.4.A Pegwell Bay Seal Survey Report [REP1-003]**). This also allowed the presence of any new seal pups to be easily recorded. Low numbers of seal pups are recorded annually at the Pegwell Bay haul-out site, with only 12 pups recorded in the 2024 pupping season based on anecdotal data (see paragraph 4.7.45 in **Application Document 6.2.4.4 (F) Part 4 Chapter 4 Marine Mammals** submitted at Deadline 3. The seal population in the River Stour which includes adults and small numbers of pups, was considered as a whole in the assessment, as they are located on the same area of haul-out where modelling predicted sound related effects considered to be negligible for all individuals. The worst-case haul-out locations (i.e. closest to the mouth of the estuary and therefore to construction activity in Pegwell Bay) identified during the surveys were incorporated into the airborne noise modelling provided in **Application Document 9.49 (B) Seals and Airborne Sound Disturbance Technical Note [REP1-122]**. With the exception of unexploded ordnance (UXO, which will be considered in a separate marine licence application), underwater sound (UWS) activities of relevance to cable-laying projects generate low intensity sound (i.e. the sounds produced are largely non-impulsive and low amplitude) and due to the transitory nature of these activities, are very short-term. Therefore, UWS production in any given location along the cable route is short-term and not cumulative. There are no quantitative thresholds for behaviour and therefore behavioural effects have been assessed qualitatively in paragraph 4.9.27

Reference	Matter	Point Raised	Applicant's Comments
			onwards of **Application Document 6.2.4.4 (F) Part 4 Marine Chapter 4 Marine** Mammals, submitted at Deadline 3, and found to be minor. Updated airborne sound modelling was submitted in **Application Document 9.49 (B) Seals and Airborne Sound Disturbance Technical Note [REP1-122]**. At the haul-out site in the River Stour, which is considered to be a minimum of 670 m from the closest construction activity occurring on Pegwell Bay intertidal area, auditory injury or TTS will not occur and disturbance is unlikely. Construction activities will not produce high intensity sound and are short-term (see **Application Document 9.49 (B) Seals and Airborne Sound Disturbance Technical Note [REP1-122]**. The airborne noise modelling indicates that seals hauled-out in the river are generally sheltered from visual disturbance and therefore construction activities are not likely to cause seals to move away. Furthermore, seals hauled-out in the River Stour are considered to have some habituation to noise especially when considering other noisy activities which occur in the River Stour such as regular passage of vessel traffic and seal watching vessel tours which come within 30 – 50 m away from seals.
4) Hoverport – Habitat Loss Mischaracterised (Responding to comments made within the Applicant's Thematic Responses to Relevant Representations)	Hoverport	The Applicant states that: "*There will be no habitat loss at the former hoverport*." This statement is not credible.	Updated information regarding the hoverport and the availability of access routes that avoid the need for habitat removal are covered in response 1ECOL6 in **Application Document 9.73 Applicant's Responses to First Written Questions** submitted at Deadline 3.
5) Absence of a Statement of Common Ground ("SoCG") with Kent Wildlife Trust		Serious concerns that, despite being a landowner and the long-term land manager of Sandwich and Pegwell Bay National Nature Reserve ("NNR"), the Applicant has not engaged with KWT to prepare a SoCG.	The Applicant has not pursued an SOCG with KWT. The Applicant acknowledges that KWT are both a landowner and a long-term land manager and where land issues have been raised by landowners, SOCGs have been produced. The Applicant has also entered into SOCGs with statutory stakeholders and statutory undertakers and these are produced to enable areas of agreement and disagreement to be captured and progressed. The Applicant has consistently taken the position that these are the appropriate parties with whom to enter into SoCGs in relation to other relevant DCO matters, including environmental issues. In any event, the Applicant has engaged with KWT consistently since early development of the Sea Link project to discuss environmental issues but also to progress land negotiations. The Applicant is willing to continue this engagement throughout the course of the examination and to document it to assist the ExA and the examination more generally.

10. Applicant's Comments on the Submission from London Gateway Port Limited [REP2-055]

Table 10.1 Applicant's Comments on the London Gateway Port Limited's Deadline 2 Submission [REP2-055]

Reference	Matter	LGPL Comment / Response	Applicant's Comments
2.1.1 Comments on Table 2.1 of the Applicant's Response to ISH1 (11 Nov 2025) [REP1-124]			
AP10	*Technical note regarding protection of under keel clearance including in relation to cable crossings on bedrock where external protection or backfilling will be required above seabed level.*	*Our comments on the technical note provided by the Applicant at Deadline 1 A [**REP1A-038**] are set out in the table titled LGPL Comments on Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note below.* *In particular, as set out below, LPGL does not see how a TDOL approach alone guarantees the possibility of a future dredge of -22m CD (with necessary tolerances).*	This is noted by the Applicant. Further responses to the safeguarding of water depth are provided below.
AP12	*Ports such as Medway, Tilbury and London Gateway Port do not appear to have been consulted on the Navigational Risk Assessment [**APP-203**]. Provide an explanation as to how the necessary additional consultation will be carried out.*	*Notwithstanding LGPL's status as a statutory consultee (the basis on which LGPL is a statutory consultee is set out in paragraph 4 of its Written Representation [REP1-142]). Contrary to the Applicant's statement at para 3.13.5 of REP1-112 (Applicant's Comments on the Relevant Representations of the Port of London Authority), LGPL has no record of any engagement from the Applicant prior to 28 October 2025. LGPL's first discussions with the Applicant regarding the Application took place on 17 November 2025.*	The Applicant can confirm that London Gateway Port was specifically engaged early on via email at the start of the project on the 20 April 2021 and 30 April 2021. The port falls outside of the Sea Link 10 NM shipping and navigation study area, however, the Applicant has and will continue to engage further with London Gateway Port.
AP13	*Consideration as to whether there are adequate controls in the draft Development Consent Order/Deemed Marine Licence with regard to under keel clearance during construction and future requirements.*	*As set out in LGPL's Written Representations [**REP1-142**], presently there are not adequate controls in the dDCO to secure the passage of vessels in the future. The Applicant has indicated the DML, protective provisions (or other agreed means of securing the requirements) will be provided alongside the management plans, such as the NIP and outline CSIP. Whilst this is helpful, we note the Applicant has: (i) not yet committed to securing the necessary controls in respect of under keel clearance by way of a Requirement in the dDCO (the reasons for a Requirement being necessary are set out in paragraph 5 of LGPL's Written Representations [**REP1-142**]); (ii) not committed to a deadline for the provision of the NIP and outline CSIP nor the cable protection plan for LGPL's consideration; and (iii) has not confirmed LGPL will be given adequate approval rights (either by way of protective provisions or by provision in the DML) of the plans and documents governing cable laying works and future maintenance.* *LGPL looks forward to sight of a revised draft of the dDCO as soon as possible so that these matters can be progressed and agreement reached with the Applicant.*	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.

Reference	Matter	LGPL Comment / Response	Applicant's Comments
			The Applicant will provide an updated version of **Application Document 9.12 Outline Navigation and Installation Plan [AS-104]** at Deadline 4. The Applicant is currently drafting the outline Cable Specification and Installation Plan (oCSIP) which will be provided at Deadline 4. This document will also incorporate the outline Sediment Disposal Management Plan (oSDMP).
AP14	*Response to London Gateway Port's questions about provision of draft cable laying and burial plan, cable protection plan and the cable specification installation plan.*	*It is unclear at what stage the outline version of the CSIP will be provided in the Examination. LGPL will require sight of the outline CSIP at the earliest possible opportunity and reserves its position regarding approval rights over the CSIP which is to be submitted pre-construction in accordance with the DML. In addition, the proposed content that the plans comprising the CSIP must cover should be prescribed in the outline CSIP (i.e. the outline CSIP must not simply reference the plans which will make up the CSIP without saying what they must cover). LGPL request the Applicant provides the outline CSIP as soon as possible and by Deadline 3 at the latest.* *The DML must contain sufficient provisions in the conditions to ensure that the final form of the CSIP is in accordance with the outline CSIP and LGPL (and the other relevant harbour authorities and the MCA) should have rights of approval (otherwise similar effect must be achieved in protective provisions).*	The Applicant is currently drafting the outline Cable Specification and Installation Plan (oCSIP) which will be provided at Deadline 4. This document will also incorporate the outline Sediment Disposal Management Plan (oSDMP).
2.1.2 Comments on the Applicant's Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]			
2.1.4 (Introduction)	*The following summarises the ongoing engagement with stakeholders on the matter of under-keel clearance:* *• The Port of London Authority (PLA) has provided GIS data for three Areas of Safeguarded Depth (the Areas of Interest): — 1) "Sunk Pilot Boarding area" where PLA have requested 22 m below Chart Datum (CD) minimum water depth; — 2) "Long Sand Head Two-Way Route crossing area" where PLA request 12.5 m below CD to be preserved; and — 3) "North East (NE) Spit area" where 12.5 m below CD is to be preserved.* *• The PLA also require in all areas of interest (1) to (3) to makes allowance for an 'over-dredge' tolerance of 0.5 m in addition to the stated depths attributable to standard dredging methodology.*	*LGPL are of the view a Requirement must be added to the draft DCO [**REP1-036**] to ensure a dredge depth of 22 metres below CD is not precluded in the Sunk Pilot Boarding Area. LGPL also endorses the proposed over-dredge tolerance 0.5 metres in addition to the stated depth proposed by the PLA and this must also be secured as part of the Requirement. These are allowances are required to ensure larger vessels in the future can use the Sunk route into the Thames Estuary.* *For the avoidance of doubt, LGPL maintains the view expressed in its Written Representations [**REP1-142**] that 12.5 metres below CD should also be maintained at Long Sand Head Two-Way Route crossing area and the North East Spit area. An allowance of 0.5 metres for over-dredging should also be secured in addition to the stated depths. Again, this safeguarding must be secured by way of a Requirement in the draft DCO.*	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.

Reference	Matter	LGPL Comment / Response	Applicant's Comments
	• Harwich Haven Authority (HHA) has also requested that 22 m below CD is safeguarded within "the Sunk area". Further detail on precise geographical extent of this area was provided on 7 November 2025. Further communication has established that the area of interest for the HHA consists of two circles centred at the Sunk Pilot Boarding Station charted and actual boarding locations. *• London Gateway Port has expressed that they support the PLA in seeking safeguarding of 22 m in the PLA's "Sunk Pilot Boarding Area", and 12.5 m below CD within the "Long Sand Head Two-Way Route crossing area" and "NE Spit area". They also have interest in regards powers of dredging rights adjacent to the Sunk which need to be considered.*		The Applicant is currently drafting the Protective Provisions for London Gateway Port and these will be sent for review in good time prior to Deadline 4.
2.3.8 – 2.3.13 (PLA's Sunk Pilot Boarding Area)	*Analysis of the seabed morphology within the PLA's "Sunk Pilot Boarding area" indicates that the seabed is in the main greater than 22 m CD, however in the northwest of the area there are linear seabed features trending SSW to NNE. The seabed features comprise of London Clay ridges with local accumulations of sands and granular material. The baseline depth along the corridor which passes through the low point in the ridge, is shallower than the PLA's requested 22 m below CD.* *The Applicant's main protection strategy for Sea Link is cable lowering, with the intention to lower the cable bundle between 2 m to-2.5 m deep within identified "High Risk Areas", of which the Sunk region is one (Application Document 9.21 Sea Link Cable Burial Risk Assessment [PDA-039]). The trench containing the lowered cable bundle will be backfilled with up to 2 m of protective rock, to 80%*	*LGPL notes the Applicant is considering additional cable depth of lowering in respect of parts of the Sunk Pilot Boarding Area which are already shallower than 22 metres below CD and that the Applicant is assessing engineering implications of the additional depth. The Applicant also notes the presence of London Clay ridges in the northwest of the identified area. LGPL has no concerns in respect of the methodology adopted by the Applicant, provided the approach does not preclude LGPL's ability to dredge to 22 metres below CD across the Sunk Pilot Boarding Area. Such is required notwithstanding (i) current depths already being shallower than 22 metres below CD; and (ii) the presence of the London Clay ridges. For this reason, describing the methodology alone is not sufficient as DoL is always relative to the existing bathymetry – instead the Requirement (which delivers an absolute, not relative outcome) must be included.* *In addition, the Applicant's commentary refers to the current absence of dredging applications in respect of the Sunk which, although not expressly stated, calls into question the need for depths to be secured across the area of concern and whether those areas would, in reality, be dredged. LGPL is not aware of any reason why the entirety of the Sunk Pilot Boarding Area could not be dredged nor why the necessary consents to carry out such dredging would not be issued.* *We also note the Applicant has suggested there are no "known cable crossings planned" (our emphasis) within the PLA's Sunk Pilot Boarding Area. LGPL's position is that there must be no cable*	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 currently drafting the Protective Provisions for London Gateway Port and these will be sent for review in good time prior to Deadline 4.

Reference	Matter	LGPL Comment / Response	Applicant's Comments
	(maximum 2 m backfill) of the lowered depth, to provide additional protection against anchor strike or drag interactions. *The Applicant is currently assessing the engineering implications of the additional cable Depth of Lowering (DoL) that may be required in areas of the "Sunk Pilot Boarding area" that are already shallower than the 22 m CD safeguard level. In the worse case, the cable DoL required may increase from 2.5 m to approximately 4.5m in the shallowest sections of the route. These changes require further investigation in terms of cable burial methodology and cable system design. The Applicant is undertaking the necessary technical assessments in order to reach agreement on wording of Protective Provisions on this matter.* *To note, the PLA and HHA have informed the Applicant that the current Sunk Pilot Boarding Station charted diamond is located to the west of the previously described shallow seabed feature within the Sunk region and therefore is not an area where large ships can receive pilots.* *Pilot boarding does not take place at the Sunk Pilot Boarding Station charted diamond, but currently takes place up to approximately 1.5 km to the east of the charted diamond i.e. in the vicinity of the large ridge where water depths are considerably shallower than 22 m CD.* *In discussions with PLA and HHA, they currently have been no detailed applications or provision of confirmed development plans for dredging of the natural features in question within the Sunk area,*	*crossings due to Work No. 6 within the Sunk unless such crossings are either (i) in areas where depths already exceed 22 metres below CD (with a 0.5 metre tolerance for over-dredging); or (ii) are implemented using a methodology which ensures a future dredge depth of 22 metres below CD plus the 0.5 metre tolerance is not precluded. Again, this must be secured by way of a Requirement in the DCO.* *A fuller description of the pilotage activities in the Sunk area is set out in the Written Representations of LGPL [**REP1-142**] and the PLA [**REP1-155**].*	The Applicant can confirm that there are no existing or known planned crossing locations within the Area of Safeguarded Depth "Sunk Pilot Boarding Area".

Reference	Matter	LGPL Comment / Response	Applicant's Comments
2.3.14 – 2.3.16 (PLA's NE Spit Area)	*The Applicant has been engaging with the Port of London Authority in respect of under-keel clearance within the PLA's "NE Spit area". Of particular consideration is the GridLink planned cable crossing, which is expected to be located within this area at approximately KP 101.* *The Applicant has engaged with GridLink to understand the development's plans for installation in this area, and with the goal of co-engineering and collaborating as required in order to ensure that the PLA's requirement for 12.5 m depth below CD can be met within the "NE Spit area", which is an area with shallow sections.* *The Applicant is satisfied that it has a solution to ensure that the 12.5 m depth is preserved even at the GridLink crossing location, by moving the planned Sea Link 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.* *The Applicant is undertaking the necessary technical assessments in order to reach agreement on wording of Protective Provisions on this matter.*	*LGPL are content for the GridLink crossing at NE Spit to be located in deeper waters so as to ensure sufficient water depth in the area of concern. We assume therefore that there would be no difficulty in entering into the Requirement sought in the DCO. LGPL's rights to approve the cable specification and installation plan (CSIP) must be secured by way of protective provisions or pursuant to the deemed marine licence.* *LGPL provided the Applicant with example wording for the relevant protective provision on 21 November 2025.*	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 currently drafting the Protective Provisions for London Gateway Port and these will be sent for review in good time prior to Deadline 4.
5.2.1 – 5.2.2 (Cable Specification and Installation Plan)	*The Applicant has submitted a draft DML which describes the provision of pre-construction plans and documentation including the CSIP.* *The CSIP will be submitted pre-construction in accordance with the DML and will be informed by the Contractor's final assessment of the site data, burial assessment study and detailed design and*	*The Applicant has not committed to a deadline to provide the outline CSIP.* *LGPL requests sight of the draft outline CSIP as soon as possible and at the latest by Deadline 3 of the Examination (9 December 2026). A summary of the details to be contained in the documents/plans comprising the CSIP must be included in the outline CSIP (i.e. not simply references to the plans which will make up the CSIP).*	The Applicant is currently drafting the outline Cable Specification and Installation Plan (oCSIP) which will be provided at Deadline 4. This document will also incorporate the outline Sediment Disposal Management Plan (oSDMP).

Reference	Matter	LGPL Comment / Response	Applicant's Comments
	methodologies. The Contractor's detailed design is still to be undertaken and therefore the final design and methodologies to inform the final CSIP is not currently known. The Applicant is in discussions with the relevant stakeholders on the scope of the CSIP to be submitted pre-construction. Discussions are ongoing to understand whether any further additional documents are required or whether the scope of information required can be captured in the documents proposed in the draft DML. The Applicant currently intends to submit an outline version of the CSIP once these discussions have progressed further.	*LGPL's right to approve the final CSIP must be secured by way of protective provisions or pursuant to the deemed marine licence.*	
2.1.3 Comments on the Table 6.1 of the Applicant's Responses to Selected Relevant Representation Responses [REP1-115]			
6.11.1	*Introduction and Background London Gateway Port Limited, LG Park Freehold Limited and LG Park Leasehold Limited (collectively hereinafter referred to as DPWLG) are the owners and operators of DP World London Gateway Port (the Port) and DP World London Gateway Logistics Park (the Logistics Park) on the north bank of the Thames Estuary in Stanford-le Hope, Essex. The Port is a Nationally Significant Infrastructure Project (NSIP) and makes a significant contribution to the national economy1. Once fully developed, the Port will comprise deep sea shipping and container handling facilities with an annual throughput that will equate to approximately 27% of the predicted national growth in such trade by 2030. The Logistics Park will provide up to approximately 740,000sq.m of vital commercial floorspace. Both are of national significance and importance.*	*As explained in paragraph 4 of its Written Representation [**REP1-142**] LGPL is a statutory consultee.*	This is noted by the Applicant.
6.11.2	*DPWLG Concerns The proposed cable corridor appears to run close*	*Please see the relevant points made in relation to the action points and technical note above.*	This is noted by the Applicant.

Reference	Matter	LGPL Comment / Response	Applicant's Comments
	to the Sunk and North Est Spit pilot station areas The aforementioned pilot stations are the only ones available for larger vessels to access London Gateway Port. In addition, the cable burial depth is key to ensure future vessel can be accommodated. Possible impacts include: *• Permanent impacts because of cable depths* *• Permanent and temporary impacts from surveys, cable laying and repair/maintenance* *• Permanent impacts from interaction with third party schemes (cable crossings)* *• Temporary impacts from interaction with third party schemes simultaneous operations)* *• Temporary and permanent impacts from the safety zones* *• Temporary and permanent impacts from dredging* *• Permanent impact from the change in cable depth due to changes in riverbed/sea* *• Temporary impact in the dredged depth during installation. The range of impacts vary from vessel displacement and delays to placing a constraint on the size of vessel that achieve access to London Gateway port and thus, its future growth and overall capacity.*		
2.1.4 Comments on the Applicant's Responses to Supplementary Agenda Additional Questions for ISH1 [REP1A-033]			
ISH1.01	*The shipping and navigation chapter 7 part 4 [**APP-080**] from paragraph 7.9.69 deals with the reduction in under-keel clearance. It acknowledges that this is an issue in particular locations including the Sunk but there is no clear assessment of baseline conditions in terms of depths below chart datum along the cable route or a clear conclusion as to the effect. The chapter [**APP-080**] states in paragraph 7.9.75 that the aim will be for the cable to be located in the*	*The Applicant explains its commitment to increasing cable burial depth throughout the Sunk Traffic Separation Scheme area, however, its commitment is then caveated by references to the need to ensure "minimal impact" to shipping and navigation and such measures will be carried out "so far as reasonably practicable". LGPL has no concerns in respect of the methodology adopted by the Applicant, provided (i) the approach does not preclude LGPL's ability to dredge to 22 metres below CD across the Sunk Pilot Boarding Area; and (ii) such is secured by way of Requirement. The importance of Gateway to UK trade is set out at paragraph 2 of LGPL's Written Representations [**REP1-142**].* *Please see the relevant points made above in relation to Applicant's engagement with LGPL (being a statutory consultee*	This is noted by the Applicant.

Reference	Matter	LGPL Comment / Response	Applicant's Comments
	deepest waters possible through the Sunk to avoid reduction to water depth. *Provide a clear baseline for areas where sea depth is critical to shipping.*	*and therefore a key stakeholder).* *Also, please see out comments above in respect of Document 9.74 Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [**REP1A-038**].*	
ISH1.02	*Paragraph 9.9.2 of the other sea users chapter 9 part 4 [**APP-082**] states that where burial of the cable cannot be achieved, rock backfill or external protection will be required where soil or rock conditions are too hard to achieve effective burial, or third party assets cross the route. Expected areas of rock backfill are located between KP38 to KP58 and KP81.5 to KP96.5. On this basis, the first area roughly coincides with the Sunk. The second area coincides with the North East Spit. These areas include anchorages and pilot boarding stations as well as having a high vessel track density, as shown for example on Figure 6.4.4.7.A 10 [**APP-283**].* *Has this information been carried across to chapter 9 as it shows that cables may not be buried in these areas. If not, why not?*	*Please refer to our comments below on the updated version of Application Document 6.2.4.9 (B) Part 4 Marine Chapter 9 Other Sea Users submitted at Deadline 1 [**REP1-061**].* *We also refer to paragraphs 4.13 to 4.14 of LGPL's Written Representations [**REP1-142**] which consider the shortcomings of the Applicants assessment in Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [**APP-080**]. Measures to avoid disruption during construction are to be welcomed and LGPL looks forward sight of the outline CSIP on that point, but such measures do not deal with the more fundamental issue of ensuring sufficient future depths and ensuring no reduction in present under-keel clearance.* *LGPL's position is that there should be no cable crossings in the areas of interest (see para 5.2 of **REP1-142**). Outside those areas, LPGL defers to and supports the MCA's position.*	The Applicant can confirm the clarification was sought with the PLA and LGP during the monthly online 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 Interest are permitted providing they do not exceed the 12.5 m below Chart Datum (and 0.5 m overdredge) which is preserved for future safeguarding.
ISH1.03	*Chapter 9 [**APP-082**] table 9.12 indicates future developments that would have cable crossings in the study area. Five Estuaries, NeuConnect and North Falls are all planned to cross between KP50 and KP54. This is also within the Sunk.* *The proposed development design as set out in [**APP-037**] indicates that where cables cannot be buried they would be covered in rock berms, to a height of 1 metre. Where cables cross over unburied assets it would result in a reduction in under-keel clearance of in excess of 1 metre, with the use of a mattress over the unburied asset,*	*LGPL welcomes the confirmation that there will be no cable crossings within the Sunk area of interest. This will need to be secured by the DOC Requirement. LGPL looks forward to similar confirmations regarding the other areas of interest. LGPL's right to approve the final CSIP must be secured by way of protective provisions or pursuant to the deemed marine licence.* *(Otherwsie, please refer to our comments immediately above with regards LGPL's requirements for cable crossings.)*	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

Reference	Matter	LGPL Comment / Response	Applicant's Comments
	followed by a rock berm over the new cable. Can the applicant confirm that the reduction in depth due to cable crossings could be in excess of 1 metre? *In the context of the baseline depths below chart datum, what would be the effect of the development on depths within the Sunk area, including cumulatively with existing and proposed cable routes, in situations where they cannot be buried?*		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.
ISH1.04	*Chapter 7 [**APP-080**] states in paragraph 7.9.80 that reductions greater than 5% will be discussed with the harbour authorities and the Maritime and Coastguard Agency (MCA), but the MCA has said that less than 5% reduction in under-keel clearance could still be a problem for the larger vessels. If there is a reduction in under-keel clearance that would affect the ability of large vessels to access the ports have you considered what the implications are for those ports?* *Provide more precise assessment of the effects of a reduction in under-keel clearance on shipping through important routes such as the Sunk. What is the basis for concluding that this would not result in a likely significant effect for shipping and navigation, particularly in terms of access to ports by the largest vessels, when considered cumulatively with other planned cable crossings?*	*The Applicant states "The Applicant considers that pilots of these very large vessels would be very well versed in navigating these waters in the Sunk region, very well trained and skilled, and would pay close attention to charted water depths, and as such would not route through specific areas where water depth is insufficient for their vessels, and would instead utilise different routes Therefore, in terms of likely significant effects, potential for vessel collision impacts is considered low." (emphasis added). This relies on the pilots avoiding areas where the required depths are not available – LGPL does not dispute that of course pilots would do so, so as to manage this risk. But none of this considers the concern that this need to ensure safety may mean that larger vessels have to cease to call at the Thames ports at all. Indeed, it is not clear from this Applicant's response it has grasped LGPL's concern that unless the necessary Requirement is included in the DCO then the routes into the Thames Estuary could be precluded (rendering the Applicant's statements which focus on safety and rely on the skill of pilots, irrelevant).* *Whatever cable laying and installation methodology is proposed to be adopted by the Applicant the result must not preclude LGPL's ability to dredge to 22 metres below CD across the Sunk Pilot Boarding Area – this much be secured by way of Requirement. The detail in relation to additional TDOL does not alter that position.* *We refer to our comments above in respect of cable crossings.*	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 currently drafting the Protective Provisions for London Gateway Port and these will be sent for review in good time prior to Deadline 4.
ISH1.05	*If there are likely significant effects in relation to the reduction in under-keel clearance, both as an individual project and cumulatively, how could this be mitigated?*	*As set out above, whatever cable laying and installation methodology is proposed to be adopted by the Applicant the result must not preclude a future dredge depth of the specified depths in the areas of interest (i.e. 22 or 12.5m respectively, with the appropriate tolerances).* *LGPL's right to approve the final CSIP must be secured by way of protective provisions or pursuant to the deemed marine licence.*	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

Reference	Matter	LGPL Comment / Response	Applicant's Comments
		LGPL requests sight of the draft outline CSIP as soon as possible and at the latest by Deadline 3 of the Examination (9 December 2026). A summary of the details to be contained in the documents/plans comprising the CSIP must be included in the outline CSIP (i.e. not simply references to the plans which will make up the CSIP).	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 currently drafting the Protective Provisions for London Gateway Port and these will be sent for review in good time prior to Deadline 4.
2.1.5 Comments on Chapter 7 of Part 4 – Shipping and Navigation [REP1-059]			
7.7.3	*N/A*	*The Applicant has amended the list of harbour authorities "which overlap with the shipping and navigation Study Area" to include Sizewell C Harbour Authority, yet continues to overlook LGPL, notwithstanding LGPL as harbour authority, has express statutory powers within the Study Area as defined in para. 7.6.2 ('a 10 nautical mile buffer around the Offshore Scheme') as set out in the London Gateway Port Harbour Empowerment Order.*	This is noted by the Applicant. The Applicant will provide an updated version of **Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [REP1-059]** at Deadline 4 which will address this.
7.7.53	*N/A*	*Future Baseline – despite the representations made by LGPL, the MCA and the other harbour authorities (see for example para 2.16 onwards of **REP1-142**, no update has been made to the Future Baseline description to acknowledge the increase in vessel sizes / draughts.*	This is noted by the Applicant. The Applicant will provide an updated version of **Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [REP1-059]** at Deadline 4 which will address this.
7.9.75	*N/A*	*In relation to the assessment of the reduction in under-keel clearance, amendments have been made acknowledging the PLA's concerns and the importance of the NE Spit buoy. However, there is no acknowledgement of LGPL or its concerns. As LGPL was not consulted, understandably the Applicant has not been able to add LGPL to the paragraph 7.9.85. However, in any event, the key point as set out in paragraph 4.13 onwards of **REP1-142** remains – that is to say there is still no assessment of reduction in under-keel clearance from the perspective of preventing access of vessels to the Thames estuary. Ultimately, as set out in paragraph 7.9.87 of **REP1-059**, the conclusion on EIA significance still considers only the risk of vessel foundering.*	This is noted by the Applicant. The Applicant will provide an updated version of **Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [REP1-059]** at Deadline 4 which will further acknowledge and address London Gateway Port's concerns, including further consideration of the matter of access to ports.
Table 7.11	*N/A*	*Through the table, additions have been made to acknowledge the commercial impacts of the various impacts listed. This in particular includes the commercial impacts of 'reduction in under-keel clearance' and 'disruption to multiple vessels using established routes and areas due [to] activities of the Offshore Scheme'. However, in all cases there has been no change to the mitigations*	This is noted by the Applicant. The Applicant will provide an updated version of **Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [REP1-059]** at Deadline 4 which will address this.

Reference	Matter	LGPL Comment / Response	Applicant's Comments
		identified (and see on this point the comment on the REAC below) and the conclusions on significance also remain unchanged. There is no clarity of how these conclusions have been reached.	
General	*N/A*	*In LGPL's view there has been no substantive changes to assess really the concerns that LGPL (and the other harbour authorities) raise regarding the impacts of preventing access by larger vessels if future dredge depths are prevent by the presence of the cable (Work No. 6)*	This is noted by the Applicant. The Applicant will provide an updated version of **Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [REP1-059]** at Deadline 4 which will further acknowledge and address London Gateway Port's concerns, including further consideration of the matter of access to ports.
2.1.6 Comments on Chapter 9 of Part 4 – Other Sea Users [REP1-061]			
9.9.1	*N/A*	*Additional text has been added in relation to cable crossings between KP 38 and KP 58 and KP 81.5 and KP 96.5. Those areas contain certain areas of interest to LGPL and the PLA. The additional text states that "where cable crossings are required in these areas, these will be designed in consultation with key shipping and navigation stakeholders to avoid, where possible, any potential reductions in current and future navigable water depths." LGPL does not raise concerns about the methodologies used or rock backfill save that in all cases, these should not preclude a future dredge depth of the specified depths in the areas of interest (i.e. 22 or 12.5m respectively, with the appropriate tolerances).*	This is noted by the Applicant.
9.9.1	*N/A*	*The additional text also states that "An assessment of potential impacts of cable protection and cable crossings on shipping and navigation receptors is provided in Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation" – as set out in **REP1-142** and above in this document, LGPL does not consider that to be the case.*	This is noted by the Applicant. The Applicant will provide an updated version of **Application Document 6.2.4.7 (B) Part 4 Marine Chapter 7 Shipping and Navigation [REP1-059]** at Deadline 4 which will provide further consideration of this matter.
2.1.7 Comments on Register of Environmental Actions and Commitments (REAC) [REP1-103]			
N/A	*N/A*	*The concerns set out in para 4.16 to 4.18 of **REP1-142** also remain - although the above assessment acknowledges the potential for impact and asserts measures will be proposed, LGPL notes (i) there is currently no meaningful assessment of the impacts on shipping and navigation and areas where cables are to be buried have not been identified; and (ii) the Applicant has not proposed any means of securing mitigation beyond "avoiding disruption" and holding discissions with stakeholders. All of the measures focus on safety which we assume would be in place anyway. No additional provision has been set out in the revised document. The proposed mitigation therefore continues to be insufficient and do not give LGPL the certainty that it requires.*	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

Reference	Matter	LGPL Comment / Response	Applicant's Comments
			provisions as necessary, and is working collaboratively with the port stakeholders to agree both the mechanism and the wording. The Applicant is currently drafting the Protective Provisions for London Gateway Port and these will be sent for review in good time prior to Deadline 4.
2.1.8 Comments on the Navigational Risk Assessment (NRA) [REP1-064]			
Table 7.7	*N/A*	*Contrary to the Applicant's statement at para 3.13.5 of **REP1-112** (Applicant's Comments on the Relevant Representations of the Port of London Authority), there is no reference in Table 7.7 (as now amended) to any consultation with LGPL on the NRA.*	This is noted by the Applicant. The Applicant will provide an updated version of **Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]**.
General	*N/A*	*No relevant substantive changes have been made to the NRA to take into account the harbour authorities' concerns regarding future vessels sizes / draught.*	This is noted by the Applicant. The Applicant will provide an updated version of **Application Document 6.3.4.7.A ES Appendix 4.7.A Navigational Risk Assessment [APP-203]** to include further consideration of the matter of future vessel draughts.

11. Applicant's Comments on the Submission from Marine Management Organisation [REP2-056]

Table 11.1 Applicant's Comments on the Marine Management Organisation's Deadline 2 Submission [REP2-056]

Reference	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 1			
1.1.	*Comments on Written Representations.*	*The MMO has reviewed a number of documents and written representations submitted at Deadline 1 and notes that the Applicant and other interested parties have outstanding concerns regarding the Project. The MMO has no comments at this stage regarding these documents and will continue to review updated documents and provide comments at subsequent deadlines where applicable.*	This is noted by the Applicant.
2.1.	*Comments on updates made to the draft Development Consent Order (REP1-036)*	*The MMO is in the process of reviewing the updates made to the DCO, including the DML, which was submitted at Deadline 1 and defers comment to a future deadline*	This is noted by the Applicant.
3.1	*Comments on the Applicants' response to the MMO's Relevant Representation*	*The MMO has reviewed the Applicant's responses to relevant representations from statutory bodies (REP1-112) and has the following comments to make:*	This is noted by the Applicant.
3.2	*Comments on the Applicants' response to the MMO's Relevant Representation*	*Comments 3.9.38 and 3.9.39:* *The Applicant has stated in their response that "the MMT Survey Report (2022) referenced is included in the Benthic Characterisation Report. The survey was undertaken in October 2021. An additional survey has also been undertaken by Next Geo between 22/08/2024- 03/09/2024 to supplement this data to sample 5 areas along the offshore route where the Offshore Scheme Boundary deviated from the 2021 survey area. This includes areas identified for pre-sweeping". The Applicant continues to state that "a draft version of the 2024 survey report including results was sent to the MMO for review on 29th May 2025. All analyses in this report were conducted by MMO approved laboratories. The final report for this additional offshore survey from 2024 can be submitted as supplementary information on XX if required".* *The MMO notes that the Applicant has provided the 2022 and additional 2024 survey reports but does not appear to have submitted the 2022 sample results (which are presented in the survey report) in the standard MMO results template as was requested in previous responses. Therefore, the sample data must be submitted in the correct format for review, and if possible, the Certificates of Analysis also provided.*	The Applicant can confirm that the 2024 Pre-Sweeping Sampling data can be submitted to the MMO in their requested template for contaminated sediment samples for review. This was submitted to the MMO via email on 02 January 2026. The environmental data collected as part of the 2021 survey was however not analysed by a MMO accredited laboratory. This was one of the reasons why a second geotechnical survey campaign in 2024 was required in order to fulfil this need in specific areas of pre-sweeping across the cable route following the receipt of sample plan advice from the MMO on 05 December 2022. We are therefore unable to provide the 2021 geotechnical survey data in the requested MMO template for review.

Reference	Matter	Point Raised	Applicant's Comments
3.3	*Comments on the Applicants' response to the MMO's Relevant Representation*	*The MMO assumes that the 2024 survey report that has been referred to is the same report as the 2024 geophysical survey report submitted. The MMO requests that the Applicant confirms if this is correct and submit any sediment results from the 2024 geophysical survey (if contaminants were analysed) in the standard MMO results template format. Additionally, it is not clear what 'XX' is referring to in point 3.9.39 of this response, and this should be clarified.*	The Applicant can confirm that this is correct and that the 2024 Pre-Sweeping Sampling data can be submitted to the MMO in their requested template for contaminated sediment samples for review. This was submitted to the MMO via email on 02 January 2026.
3.4	*Comments on the Applicants' response to the MMO's Relevant Representation*	*Comment 3.9.40:* *The Applicant has noted the MMO initial comment detailed in point 3.9.40 of this document and has provided no further response. As above, the 2022 results, and any available sediment contaminant results from the 2024 geophysical survey, have been requested in the standard MMO results template format.*	The Applicant can confirm that the 2024 Pre-Sweeping Sampling data can be submitted to the MMO in their requested template for contaminated sediment samples for review. This was submitted to the MMO via email on 02 January 2026. The environmental data collected as part of the 2021 survey was however not analysed by a MMO accredited laboratory. This was one of the reasons why a second geotechnical survey campaign in 2024 was required in order to fulfil this need in specific areas of pre-sweeping across the cable route following the receipt of sample plan advice from the MMO on 05 December 2022. The Applicant is therefore unable to provide the 2021 geotechnical survey data in the requested MMO template for review.
3.5	*Comments on the Applicants' response to the MMO's Relevant Representation*	*Comment 3.9.41:* *The Applicant has not provided a response to this comment; however, the MMO does not consider this to be critical. The MMO further notes from the Environmental Statement (Intertidal Surveys 2023) that "PSA samples were transported to Kenneth Pye Associates Ltd. for this analysis" who are validated by the MMO for Particle Size Analysis (PSA); therefore, the MMO considers that this resolves the initial comment with respect to PSA only. Whilst repeat analysis of samples for Total Organic Matter (TOM) and Total Organic Carbon (TOC) using validated laboratories and methods, if the samples were available (assuming they were stored appropriately since sampling) could be considered, given that the samples were collected in 2022 they are no longer considered timely as they surpass the OSPAR 3-year data validity window. However, although it is advised that MMO validated laboratories are used, provided the method and extraction rates are appropriate, the data is still considered useful as indicative, but the level of confidence in the data is lower. Moreover, the MMO considers that reanalysis of TOM and TOC could likely be considered pointless, again given the time that has passed since the samples were collected and the opportunity for the marine environment to have changed due to potential pollution incidences and storm events since. The Applicant should note for future reference to use MMO validated laboratories only.*	This is noted by the Applicant for future surveys.
3.6	*Comments on the Applicants' response to the MMO's Relevant Representation*	*The MMO requests that the Applicant confirm, if possible, whether the SOCOTEC method used was for marine sediment analyses, and not mistakenly soil analysis.*	The Applicant can confirm that this is correct, that this is for marine sediment analysis.

Reference	Matter	Point Raised	Applicant's Comments
3.7	*Comments on the Applicants' response to the MMO's Relevant Representation*	*Comment 3.9.42:* *The MMO notes that the Applicant has provided no further response regarding this comment. However, the MMO considers that the list of Polycyclic Aromatic Hydrocarbons (PAHs) analysed for is insufficient to fully characterise the risk concerning PAHs due to the lack of congeners such as C-group Naphthalene's, Fluoranthene etc. However, the highest concentrations (in samples Lagoon, PT2U and PT3U) are not at the level that usually exceed relevant upper assessment criteria. As such, it may be possible to assume that the PAH levels are of an acceptable risk or comparable to the broader area, however this relies heavily on assumptions. The MMO notes that the Applicant does not point to the exceedance of Action Level (AL) 2 for copper in the Lagoon sample in any of their assessment chapters. Whilst the associated construction activity (i.e. the drilling) does not equate to dumping under the London Protocol (and so the ALs do not apply), this does raise potential concern with respect to mobilising contaminated sediments throughout the water column. There is insufficient information in the application to determine whether such a concentration of copper is normal for the Lagoon, and whether any characteristics of the Lagoon (for example, if it is wholly/partially enclosed) could mitigate the spatial extent of any mobilisation. As such, the Applicant may wish to consider further assessing impacts to the Lagoon area from the proposed works or modifying the work programme to avoid the Lagoon area.*	This is noted by the Applicant for future surveys. The Applicant can confirm that the trenchless techniques proposed will avoid the saltmarsh and the lagoon area. In Kent, HDD exit points would be located approximately 105 m to 140 m seaward from the edge of the saltmarsh. An indicative HDD profile has the drill at 15-20 m depth of cover beneath the land section of the drill, the shallow lagoon, and the saltmarsh. Proposed works at the Kent landfall therefore avoid interacting with the lagoon area.
3.8	*Comments on the Applicants' response to the MMO's Relevant Representation*	*Comment 3.9.43:* *The Applicant has stated that "the reference to CEFAS classifications of drilling fluid is intended to illustrate the low risk to the marine environment posed by drilling fluid discharges in the absence of an alternative regulation scheme appropriate to the case of landfall Horizontal Directional Drillings. It should be noted that drilling fluid discharges from oil and gas installations are an order of magnitude larger than those from landfall drills". The Applicant refers to the Design Development Report which outlines how the drilling fluid break out will be assessed through the use of hydro fracture modelling and to commitments to assessing and managing the risk of drilling fluid break out in the Register of Environmental Actions and Commitments.* *The Design Development Report (Appendix A Landfall HDD Feasibility technical note) states that the drilling fluid will be made of 4% bentonite and 98% water, and that it is a non-toxic, natural clay mineral. Whilst it is true that some products called 'Bentonite' as a brand name may be pure Bentonite, other branded products may contain additives (either declared or not declared on the safety data sheet), therefore only pure bentonite or those products called 'Bentonite' that are either OSPAR PLONOR (pose little or no risk) or marked as PLONOR on the Definite Ranked List would be suitable for use. The OSPAR list of chemicals that*	This is noted by the Applicant.

Reference	Matter	Point Raised	Applicant's Comments
		Pose Little or No Risk to the marine environment can be found here: Offshore Chemicals | OSPAR Commission	
3.9	*Comments on the Applicants' response to the MMO's Relevant Representation*	*The report also comments that there may be a requirement for the use of Lost Circulation Material (LCM) typically sugar or cellulose starch-based product such as xanthan gum. As LCMs may contain other components that are not so benign, e.g. persistent plastics, then all LCMs and their chemical composition including supporting test data must be provided for use. If the product is on the OSPAR PLONOR list or Definitive Ranked List marked as PLONOR, whilst there is likely to be little or no toxic risk to the marine environment, the Applicant must still notify the MMO of the name of the product/chemical (CAS if pure chemical) and supplier with the quantity of the material to be used. This is to ensure that the material is approved for use in the marine environment.*	This is noted by the Applicant.
3.10	*Comments on the Applicants' response to the MMO's Relevant Representation*	*Comment 3.9.44:* This comment has been noted by the Applicant, who additionally stated that "*chemical risk assessments… will include chemical contents contained within the bentonite-based drilling fluid. It is understood that any chemical additives used in HDD for offshore wind farms do not need to be on the CEFAS approved list, and an offshore chemicals permit is not required. However, the activities may still need to be covered by the relevant licence and any conditions that are specified in this licence will need to be adhered to. A commitment is included in the Register of Environmental Actions and Commitments*". It is not clear where the Applicant has acquired the term for the 'Approved Ranked list'. The DCO provides requirements for carriage storage bunding and spills but not on chemicals/products for use in construction, and does not state that chemicals to be used should be on the 'Approved list': "(1) Unless otherwise agreed in writing by the MMO, the carriage and use of chemicals in the construction of the authorised scheme must comply with the International Convention for the Prevention of Pollution from Ships as amended…… (3) The storage, handling, transport and use of fuels, lubricants, chemicals and other substances must be undertaken so as to prevent releases into the marine environment, including bunding of 110% of the total volume of all reservoirs and containers. …. (7) The undertaker must ensure that any oil, fuel or chemical spill within the marine environment is reported to the MMO, Marine Pollution Response Team within 12 hours." The MMO and Cefas assumes that comments on the 'Cefas approved list' are referring to the 'Definitive Ranked list of	This terminology is understood by the Applicant, and it will use the correct term 'Definitive Ranked list of registered products' going forward.

Reference	Matter	Point Raised	Applicant's Comments
		registered products', found here: Downloads and useful links - Cefas (Centre for Environment, Fisheries and Aquaculture Science). It is a misnomer that using chemicals from this list is acceptable as they are 'pre-approved', as this is not the case. The registered products have had their chemical components identified and hazards assessed, ready for developers to be able to conduct a site-specific risk assessment of the use of the products in their operations. These site-specific risk assessments are then assessed by the oil and gas regulator (Department for Security and Net Zero) who liaise with Cefas to assess the chemical risk and justifications for use in the marine environment prior to regulatory approval. The chemicals registered where appropriate are modelled using the Chemical Hazard and Risk Model (CHARM). The model uses default parameters from oil and gas platforms and the data provided by the supplier to rank the chemicals. Therefore, all rankings are not relevant for the use of any product on an offshore wind farm for example. Chemicals that are non-charmable e.g. a cleaner, may be used and applied with the standard dose stated on the Cefas Template provided to a supplier and then have the similar relevant risk. These Templates indicate whether the substance is on the OSPAR list of chemicals that are anticipated to pose little or no risk to the marine environment (PLONOR) or at least considered PLONOR like and also shows whether there are chemicals in the product that would be considered sufficiently hazardous to be substituted for another (Sub or Substitution Warning). Where products contain substitution warnings or plastics and where there is a perceived risk e.g. Offshore Chemical Notification Scheme Group A or B chemicals (Definitive Ranked List). Therefore the use of non-charmable template data or the information on the published Definitive Ranked List by an operator to demonstrate a site specific risk would be acceptable, but it should be noted that Cefas specialists assessing the chemicals notified to the MMO for use in constructions are not able to access the data base used for the registration of products as the information contained is highly confidential and the data is not accessible for use other than for the registration and assessment of chemicals used and discharged in England's and Netherlands waters, by the oil and gas industry.	
3.11	*Comments on the Applicants' response to the MMO's Relevant Representation*	*If the Applicant uses only chemicals on the definitive ranked list that are either PLONOR and OCNS group E, provided sufficient justification of the chemicals/products physical impact has been provided the toxic risk to the marine environment is anticipated to be acceptable, and the MMO would likely have no objection to their use. However, notification should still be given of the product to be used giving the exact name (character specific) the supplier, the safety data sheet and the date of the downloaded list, together with any Template if available to the MMO with the quantity likely to be used along with the Construction Environmental Management Plan that the Applicant has committed to produce. This is to ensure that the MMO is aware of*	This is noted by the Applicant.

Reference	Matter	Point Raised	Applicant's Comments
		the chemicals and their hazard and risks that are being used in the marine environment and that they remain acceptable for use during the duration of the licence.	
3.12	*Comments on the Applicants' response to the MMO's Relevant Representation*	*If chemicals/products are to be used with contact to the marine environment that are not on the Definitive ranked list then these should be notified to the MMO for approval of use at least eight weeks prior to their use. These chemicals should be notified with evidence pertaining to their persistence bioaccumulation and toxicity (PBT), this would include relevant test reports, read across arguments, any other supporting documents relating to the site-specific risk for their use and discharge and where appropriate justification for use if deemed hazardous (Predicted Effect Concentration (PEC)/ Predicted No-effect Concentration (PNEC) >1). If the chemicals/products are on the Definitive Ranked list and contain substitution warnings and are not OCNS Group E, then the MMO should be notified of the reasons for the substitution warning and a justification for their continued requirement for use in the marine environment or be substituted for a chemical without warnings. This information should be included in the Construction Environmental Management Plan and also included as a condition in the DML.*	The Applicant can confirm that the DML within **Application Document 3.1 (F) draft Development Consent Order** has been updated and submitted at Deadline 3.
3.13	*Comments on the Applicants' response to the MMO's Relevant Representation*	*The MMO thanks the Applicant for their commitment to include additional information in the Construction Environment Plan on hydro fracture modelling and Drilling fluid management plan, however it suggests these are to be shared for information only with Natural England when completed. This may also be of interest to the MMO if hydraulic fracture were to occur in the marine environment and what contingency or mitigation if any would be required, as well as notification of the management of the chemicals. The MMO notes that the Applicant states that it would likely be less of an issue in marine environments for bentonite release, however consideration of volumes and impacts would likely be of interest, however the MMO as regulator should be fully advised on the impacts of chemicals used in the marine environment.*	This is noted by the Applicant.
3.14	*Comments on the Applicants' response to the MMO's Relevant Representation*	*In the Design Development report, it is stated that "the gravel is significantly stronger than the surrounding sediment (e.g. nodules of well cemented shells or calcium carbonate reef deposits) the gravels will need to be removed from the bore by additional swabbing of the hole and tripping the drilling bit entirely out of the bore when necessary. Further ground investigations will improve the understanding of this risk". If the HDD is to be undertaken from Sea to Land, the MMO requests that the Applicant clarify if the removed material from the bore is likely to be deposited in the marine environment and if so, the quantity and likely impacts of the disposed material should be provided to the MMO for approval.*	The Applicant can confirm that the HDD will be pilot drilled from land to sea, however if pull reaming is used to enlarge the bore from the pilot diameter, drilling fluid and drill cuttings during the reaming will flow to the exit on the seabed. Details of volumes of sediment released at the HDD exits have been provided in response 1PE6 of **Application Document 9.73 Applicant's Responses to First Written Questions** submitted at Deadline 3. The volumes provided assume the worst case of needing to pull ream the length of the HDD to enlarge from the pilot hole to the final bore diameter. It is likely that push reaming will be utilised for much of the bore enlargement and volumes will therefore be lower than those provided.

Reference	Matter	Point Raised	Applicant's Comments
			The Applicant confirms that the MMO will be consulted prior to any disposed material.
3.15	*Comments on the Applicants' response to the MMO's Relevant Representation*	*Comment 3.9.51:* *The Applicant's response makes reference to the MMO's comment which noted that the Sea Link cable route passes to the west of the Downs herring spawning ground, with a small section of the cable corridor passing through 'preferred' herring spawning habitat (based on the EMODnet data). The MMO previously noted that the suitability of the seabed sediments in these locations meant that herring spawning activity could not be ruled out, though any spawning that did occur was likely to be at a lower intensity. The Applicant's response acknowledges our comment and confirms that they have assessed the potential effects to these habitats, accordingly, concluding no significant effects. The MMO agrees with this conclusion in relation to cable laying activities.*	This is noted by the Applicant.
4.1	*Landfall Sediment Modelling Reports*	*The MMO has reviewed the Landfall Sediment Modelling reports for Aldeburgh and Pegwell Bay (PDA-037 and PDA-038 respectively) and have the following comments to make:* *The MMO considers that the methodologies and data sources are appropriate, comprehensive, and transparently presented. The approach is consistent with best practice for coastal morphological and sediment transport assessments and the key findings are wellsupported by the data and analysis. Both reports provide a balanced summary of current conditions, likely future changes, and the main risks, with appropriate caveats regarding uncertainty. The MMO therefore has no further comments to make.*	This is noted by the Applicant.

12. Applicant's Comments on the Submission from Maritime and Coastguard Agency

Table 12.1 Applicant's Comments on the MCA's Deadline 2 Submission [REP2-063]

Reference	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 1			
No ref provided [Paragraph 1]	*Deadline 2 (9th December) - Invitation for comment on information / submissions received by deadline 1 and deadline 1A.*	*The Maritime and Coastguard Agency (MCA) welcome the applicant's commitment in the updated documentation and submissions at deadline 1 and deadline 1A to discuss the shipping and safe navigation related detail with the ports, MCA and Trinity House, with further updates to be provided in the various documents as the details are agreed with stakeholders. Discussions should include the Port of London Authority, Harwich Haven Authority, London Gateway and Medway Port. The MCA would like to ensure that HM Coastguard who are responsible for the delivery of the SUNK Vessel Traffic Services are also included in those discussions which impact their jurisdiction.*	This is noted by the Applicant.
No ref provided [Paragraph 2]		*It is clear that the applicant is actively working to ensure a common understanding of the various stakeholders' specific requirements pertaining to the safeguard of water depth / under keel clearance as well as their requirements to consult on the proposed works including survey, monitoring and preconstruction/construction activities. The MCA welcomes the intention of further discussion on how the risk mitigation measures are secured within the Development Consent Order Deemed Marine Licence to the satisfaction of navigation safety related stakeholders. The MCA is scheduled to meet with the project team on 11th December 2025 to discuss the Statement of Common Ground between National Grid and the MCA.*	This is noted by the Applicant.
No ref provided [Paragraph 3]		*We note that the documents refer to the MCA requirement that works must not exceed a maximum 5% reduction in surrounding depth referenced to chart datum. We would like to highlight as per MCA Relevant Representation (RR-5382) submitted on 23 June 2025 that any depth reduction in areas where deep-draught vessels operate must be reviewed. Any reduction caused as a result of the cable lay or any associated cable protection measures should be discussed and agreed by the local ports and MCA, and secured through consent conditions.*	This is noted by the Applicant. The Applicant has scheduled a meeting with the MCA on the 16th 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 Statement of Common Ground.

13. Applicant's Comments on the Submission from Marlesford Parish Council [REP2-093]

Table 13.1 Applicant's Comments on the Marlesford Parish Council Deadline 2 Submission [REP2-093]

Reference	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 1			
2iii		In view of the significant seasonal peaks in traffic on the A12 and its feeder roads, we ask that the ExA put the Applicant under an obligation to contribute to the existing biannual traffic monitoring being carried out by SZC and in addition, to fund traffic monitoring in the peak summer holiday period around August Bank Holiday. The Applicant should be under an obligation to (as far as is possible within the highways constraints) remodel the Bell Lane Junction with the A12 in Marlesford in order to deliver improved visibility. There should also be a requirement to improve the road signage and road markings at the other Marlesford junctions with the A12 (as well as other junctions along the A12 that will be affected by the Applicant's proposals. That the Applicant contributes the majority share of the funding for the improvements to a pedestrian and cycleway between Marlesford Road, Marlesford and Fiveways Roundabout, Hacheston.	The Applicant considers the committed mitigation proposed within **Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]** and **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043]** to be sufficient for mitigating the potential impacts of the Proposed Project, including from a Traffic and Transport perspective. The traffic and transport assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** does not identify the potential for any significant effects on the A12 to the south of the A1094, including the A12 in Marlesford, as a result of the Proposed Project with this mitigation in place.. Nonetheless, and as identified within **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**, the Applicant will consider requests to include additional commitments within **Application Document 7.5.1.1 (B) Construction Traffic Management and Travel Plan – Suffolk [CR1-041]** where appropriate.
2iv		Suggested mitigation in relation to properties within 20m of the A12 in the form of funding for insulation.	The Applicant has assessed construction traffic noise in **Application Document 6.3.2.9.C (B) Appendix 2.9.C Suffolk Construction Traffic Noise Assessment [AS-117]**, including on the A12, and the increase in traffic noise is negligible. As such, there is no justification for noise insulation. Additionally, the works would not fall under the Noise Insulation Regulations 1975 (NIR). Regardless, the increase in noise level would not meet the criteria for noise insulation under the NIR regardless.
2v		Residents in East Suffolk are currently experiencing high levels of HGV traffic serving the already consented energy NSIPs and other solar farm projects. It is difficult to report the bad behaviour of some HGV drivers unless the vehicle can be positively linked to a project. MPC asks the ExA to require the Applicant's HGVs to carry a notice on the rear of the vehicle and in the windscreen to identity the project on which the vehicle is working. On roads identified as being most susceptible to rat running, the Applicant should (subject to agreement by the relevant communities) be required to fund signage and or other measures to discourage use of	The Applicant considers the committed mitigation proposed within **Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]** and **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043]** to be sufficient for mitigating the potential impacts of the Proposed Project, including from a Traffic and Transport perspective. Nonetheless, and as identified within **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**, the Applicant will consider requests to include additional commitments within **Application Document 7.5.1.1 (B) Construction Traffic Management and Travel Plan – Suffolk [CR1-041]** where appropriate.

Reference	Matter	Point Raised	Applicant's Comments
		unsuitable lanes by rat running traffic, or fund the introduction of "Quiet Lanes".	
3i		We ask that the Applicant is required to work with other NSIP projects to find ways of minimising its impacts on East Suffolk roads. There should be cooperation in the sharing of facilities that, for example, take HGVs off the public highway for the duration of tachograph breaks. The Applicant should be under an obligation to limit the number of workers traveling to its construction sites. Appropriate use should be made of existing park and ride facilities and where possible access should be given to SZC facilities for the Applicant's workers.	The Applicant is actively coordinating with Sizewell C, NGV, and SPR to minimise highways impacts on host communities. This includes exploring shared use of facilities such as Park and Ride sites and aligning construction schedules where feasible. Coordination is detailed in the DCO submission, specifically in **Application Document 7.10 Coordination Document [APP-363]** and cumulative traffic impacts are assessed in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. The Applicant remains open to further collaboration, including shared delivery management systems or permitting platforms, to reduce disruption. The Applicant has produced **Application Document 7.10 Coordination Document [APP-363]** to minimise environmental and local community effects of the Proposed Project in combination with other projects.

14. Applicant's Comments on the Submission from National Highways [REP2-131]

Table 14.1 Applicant's Comments on the National Highways Deadline 2 Submission [REP2-131]

Reference	Matter	Point Raised	Applicant's Comments
Paragraphs 1 and 2	*Strategic Road Network*	As raised at the Preliminary Meeting, National Highways' review of the Transport Assessment (6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note, document APP-122) highlighted an issue of concern to National Highways. As the statutory highway authority for the Strategic Road Network, National Highways has a legal responsibility for its safe and efficient operation. The junction between the A14 and the A12 to the East of Ipswich is part of the SRN and is on the route identified by the Applicant for construction traffic. Although not located in close proximity to the site, the Applicant forecasts a significant increase in vehicles using the interchange to access the construction site for the development.	This is acknowledged by the Applicant, and a stakeholder meeting took place between the Applicant and National Highways on 12 December 2025 to assure National Highways that the Suffolk Onshore Scheme will not have an impact on the Strategic Road Network (SRN), namely the Seven Hills Interchange. The presentation and meeting minutes were subsequently issued to National Highways and can be shared with the ExA or incorporated within a Statement of Common Ground with National Highways in due course if necessary.
Paragraphs 2 to 4	*Construction Traffic*	Table 7.3 Forecast Peak Daily Construction Vehicle Movements at the Seven Hills Interchange shows a forecast increase of 102 vehicular movements between 07.00 and 08.00, and of 101 vehicular movements between 18.00 and 19.00. National Highways would normally require a junction to be modelled where there is a forecast increase of at least 30 vehicles during the peak hour. The Applicant concludes in paragraph 7.3.9 that the Seven Hills Interchange does not need to be modelled as the large increases in traffic are expected to fall outside the peak hours (08.00-09.00 and 17.00-18.00). Further, the TA notes (in paragraph 7.3.11) that, "since the trips on the SRN are less than on the LRN and as the effects on the LRN are shown to be not significant there will be no significant impacts on the SRN. Notwithstanding these points, National Highways seeks further, evidenced assurance from the Applicant that the SRN in this location will not be adversely impacted by construction traffic arising from the development. The interchange is already congested and an increase in movements of approximately 100 vehicles, even in the peak shoulders, could be material.	The stakeholder meeting that took place between the Applicant and National Highways on 12 December 2025 reviewed peak hour flows at the Seven Hills Interchange, with the aid of a presentation. National Highways welcomed the additional detail and analysis presented and confirmed that this provided a strong argument that the Suffolk Onshore Scheme will not be expected to have an impact on the SRN.
Paragraph 4	*Cumulative Impacts and the A12 Scheme*	The Applicant is also asked to consider the cumulative impact at the junction, with other planned developments in this location and the proposals for a significant highway improvement of the A12, which would include amendments to the junction, and could be built to a similar timescale as the development. The A12 scheme is being promoted by Suffolk County Council and is currently at the consultation stage of a planning application.	This matter was reviewed during the stakeholder meeting that took place between the Applicant and National Highways on 12 December 2025. This included considerations relating to cumulative schemes and the approach for the cumulative assessment in Suffolk. The Applicant will carry out further consultation with Suffolk County Council (SCC) Highways during Examination, including with respect to the A12 scheme.

Reference	Matter	Point Raised	Applicant's Comments
Paragraph 5	*Consultation*	National Highways is keen to engage with the Applicant and its transport consultants to resolve the matter as soon as is practicable.	A meeting was held between the Applicant and National Highways on 12 December 2025 to resolve the matters raised. National Highways confirmed that the meeting had been useful to address potential issues early, and the presented information was positive. The presentation and meeting minutes were issued to National Highways after the meeting.

15. Applicant's Comments on the Submission from Natural England [REP2-058]

Table 15.1 Applicant's Comments on the Natural England Deadline 2 Submission [REP2-058]

Reference	Matter	Point Raised	Recommendation	Applicant's Comments
Natural England's additional comments regarding Landscape and Visual Impacts including reference to documents included in REP1- 120 regarding acid grassland proposals.				
1	Suitability of acid grassland mitigation / enhancement / creation proposals Documents reviewed: • [AS-004] 6.3.2.2.A (B) ES Appendix 2.2A Extended Phase 1 Habitat SurVey Report (Redacted) • [REP1-120] 9.47 National Landscape Section 85 Duty Technical Note • [AS-057] 7.1 (C) Planning Statement (Clean)	<u>Soil suitability</u> Natural England can see that the proposed location is on a suitable freely draining slightly acid sandy soils (https://www.landis.org.uk/soilsguide/soilscapes.cfm?ssid=10) for the creation and enhancement of dry acidic grasslands and heath. **However, the success of the restoration/enhancement will depend very heavily on the current soil fertility**. There is not enough time within the proposed project to have nutrient stripping and provide quality habitat (to offset losses elsewhere). Soil fertility levels must be low (P index 0 or 1) to be able to deliver quality habitat within the timescales of the project. This is particularly important when combined with the risk from localised N inputs from the adjacent land use (open pig farm). Natural England advise that a pH <5.5 and P index 0 or 1 is required, otherwise this will not lead to acid grassland. Natural England note that the pH of the acid grassland enhancement area is 6 (paragraph 5.3.2 of AS-059), and it therefore is unlikely to be suitable. Furthermore, it is not clear how the proposed 6 Ha area site is currently managed. It appears that the land may have been recently cultivated which would affect soil suitability within the proposed timeframes. It is of key importance that all baseline information is clearly presented to ensure confidence in the efficacy of the proposals.	Clarity on which area has been soil tested for acid grassland suitability and the results of those surveys	Natural England's list of concerns pertained to a large parcel of land that was previously unrefined and contained sub-optimal soil and drainage characteristics. The Applicant has since refined their strategy and are now proposing a smaller, more targeted area within the original broader parcel. This smaller area is already acid grassland (albeit degraded), thereby addressing concerns around the suitability of the site. Following discussions with the landowner, the Applicant has refined the areas that will be subject to restoration works. The arable and pasture areas immediately south of the piggery that would have required nutrient stripping were originally considered for possible inclusion as acid grassland reversion and therefore these fields were subject to the soil testing including pH, as noted by Natural England in their comment. However, the Applicant is no longer proposing creation of acid grassland on arable land such that nutrient stripping is no longer required. Instead, the Applicant is proposing restoration of 6 ha of existing degraded acid grassland (identified as such due to its botanical characteristics e.g. relict acid grassland species) within that parcel. Photographs are included later in this document. Since this is already identified as acid grassland (albeit degraded) the pH of this area does not require testing, and we can confirm that the land has not been recently cultivated. The acid grassland enhancement would be managed for 10 years and then returned to the landowner. For further information on the timeframes, refer to **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**.
2		<u>The proximity to intensive agriculture</u> There is an outdoor pig farm immediately to the north and upslope (albeit gentle slope) of the proposed location. Given free draining nature of soils there is likely to be at least some movement of nutrients following rainfall from surrounding land use, as well as localised air pollution.	Natural England advise that information to understand the fertility status of the 6ha area is needed, in addition to any further necessary mitigation.	Some movement of nutrients may occur but the refined area for habitat restoration is existing degraded acid grassland, and most is approximately 200 m south of the pig farm. Given the under-managed and bracken and gorse invaded nature of the degraded acid grassland there is considerable opportunity for enhancement in quality by introducing appropriate management. Given that reversion of former arable land is no longer proposed but instead existing degraded acid grassland, generally further from the pig farm, will be restored by improved management and

Reference	Matter	Point Raised	Recommendation	Applicant's Comments
		Data from the Agricultural Land Environmental Risk Tool (ALERT | PublicALERT Environment Agency) mapping tool identifies that the site will receive runoff from the pig farm. Further information is required to demonstrate how this impact pathway will be mitigated. In addition, baseline data regarding the current use of the farmed land is required to understand the fertility status of the proposed location, including: • The current management practice for the pig farm • Information on whether there a rotation between pigs and cows and what the timescales are for this. • How long is the paddock left to grass over between livestock rotations. • The practices for storage of muck/wash down. • Information on nutrient pollution impact pathways between the pig farm area and the proposed 6 Ha area.		invasive species removal, it is considered that further information on soil fertility status or pig farm management is not required.
3		<u>Baseline botanical information</u> Natural England note that paragraph 1.4.31 states that the "mitigation area" comprises "3.75 ha of semi-improved acid grassland" which is "species poor". It is unclear what the quality of individual parcels are and whether they are semi-improved acid grassland or priority habitat. More botanical species information is required on all areas of acid grassland highlighted in the Phase I survey. It is unclear what time of year the botanical survey was conducted. It is crucial that acid grassland is surveyed in late spring/early summer to pick up the more uncommon species in this habitat. By mid to late summer these will no longer be visible.	Natural England advise that the Applicant should provide details on the condition of the acid grassland being temporarily lost, and details on when the botanical survey was undertaken.	The Applicant can confirm that all the areas to be lost are semi-improved acid grassland but only one area within the Order Limits constitutes (semi-improved) priority habitat acid grassland. This area within the Order Limits measures 0.3 ha. **<u>East of Leiston Road</u>** All grassland East of Leiston Road was surveyed 9th July 2024 by an experienced botanist. A survey memo and map is provided to accompany this note. All areas were identified as having poor affinity to NVC community U1d *Festuca ovina-Agrostis capillaris-Rumex acetosella* grassland, *Anthoxanthum odoratum-Lotus corniculatus* sub-community. *Festuca ovina* was replaced by taller rank grasses such as *Anthoxanthum odoratum* and *Holcus lanatus*. Species diversity varied from 8 to 21 species per quadrat, with a number of species indicating dry, acid grassland including Common Bent (*Agrostis capillaris*), Common Cudweed (*Filago germanica*), Sheep's Sorrel (*Rumex acetosella*), Reindeer Lichen (*Cladonia* species), Lesser Hawkbit (*Leontodon saxatilis*) and Common Stork's-bill (*Erodium cicutarium*). Specifically: • **Field 1 (cable trench)** - The sward is dominated by common bent, ribwort plantain and sweet vernal grass. It meets the priority acid grassland criteria for species diversity >12 species per m^2, >30% cover of broad-leaved herbs and <10% cover of rye-grass and white clover. However, it does not meet the criteria for =>4 indicator species, with only two species on the list: constant Sheep's Sorrel and rarely present Common Stork's-bill. • **Field 2 (cable trench) -** The sward is dominated by ribwort plantain and mosses. The most abundant grass is sweet vernal grass. It meets the criteria for species diversity >12 species per m^2, >30% cover of broad-leaved herbs and <10% cover of rye-grass and white clover. It also meets

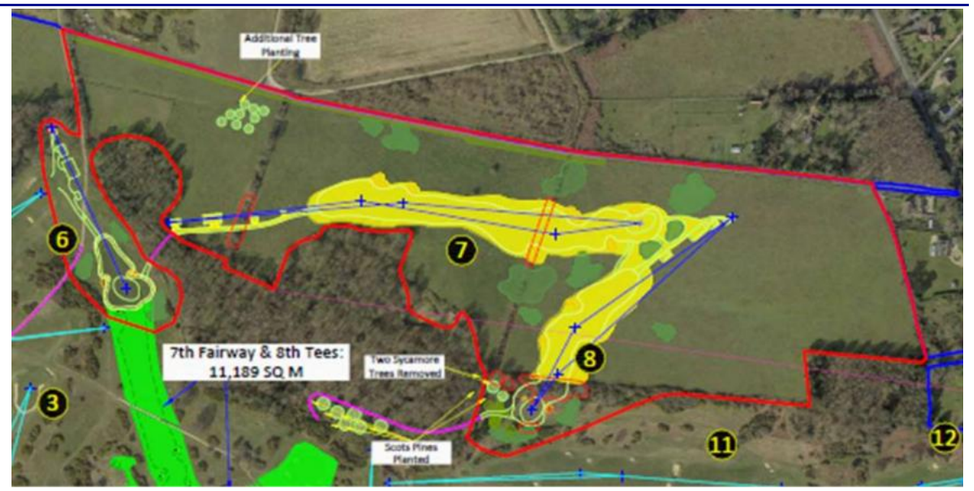
the criteria for =>4 indicator species, with five listed species being present (frequent Common Stork's-bill, and occasional Shepherd's Cress, Sheep's Sorrel, Reindeer Lichen, and Lesser Hawkbit). **This field is therefore considered Priority Habitat Acid Grassland.**

- **Field 3 (cable trench and HDD compound)** – The sward is dominated by sweet vernal grass, Yorkshire fog, common bent and ribwort plantain. It meets the criteria for species diversity >12 species per m^2, >30% cover of broad-leaved herbs and <10% cover of rye-grass and white clover. However, it does not meet the criteria for =>4 indicator species, with only two species on the list: constant Sheep's Sorrel and scarcely present Lesser Hawkbit.

West of Leiston Road

The grassland was subject to Phase 1 Habitat survey in 2023 but has not been resurveyed to avoid conflicting with the ongoing golf course expansion works. The species composition within the HDD corridor is 90% sweet vernal grass, with field sorrel, dandelion, small-flowered cranesbill, common thistle, ribwort plantain, rubus fructosis, meadow buttercup, common vetch, western gorse, common nettle, heath groundsel, spear thistle, bracken, broome spp., Yorkshire fog. We have classed this as semi-improved acid grassland.

Regarding the golf course extension proposals, these have already been implemented where they affect areas of acid grassland within and south of the Order Limits, as can be seen from comparing Google Earth imagery for 2025 and the next earliest year (2022). Within the Order Limits this has involved planting trees and gorse and tracking over the grassland. The golf course permission (granted March 2023) and Landscape and Ecology Management Plan (LEMP) submitted to discharge planning conditions (Golf club extension application number is DC/22/2697/FUL, while the LEMP can be found by searching for DC/25/0349/DRC) identify that the only area of priority habitat acid grassland (as opposed to semi-improved habitat that does not meet priority habitat standard) is the area south of the Order Limits where the golf course has already implemented their proposals including reprofiling and creating new bunkers. The golf course LEMP shows the priority habitat acid grassland in yellow, south of the corridor included in the Applicant's proposals:

Reference	Matter	Point Raised	Recommendation	Applicant's Comments
				 **Enhancement area** The 6ha area the Applicant will be enhancing is low quality as can be seen from structure of the vegetation (dense and tussocky) and gorse and bracken encroachment. The grassland to be restored/enhanced is primarily currently degraded acid grassland community U1b Festuca ovina-Agrostis capillaris-Rumex acetosella grassland. It is heavily bracken, gorse and scrub invaded in areas. Characteristic species are Agrostis capillaris (dominant)), Dactylis glomerata, Senecio jacobea, Galium aparine, Stellaria media, Montia, Rumex acetosella, and Pteridium aquilinum. The currently degraded nature is very clear from photos (taken in winter but the degraded state is clear).  Photo 1 – undergrazed with gorse encroachment  Photo 2 – degraded acid grassland, unmanaged, extensive bracken encroachment clearly visible.
4	Discrepancies with the Priority Habitat Inventory		Natural England advise that the Applicant explain the	See above. Only 0.3 ha of the acid grassland to be temporarily lost would qualify as 'priority habitat'. The MAGIC layer does appear to be flawed e.g. north of the golf course where two separate surveys by different consultancies (one for the

Reference	Matter	Point Raised	Recommendation	Applicant's Comments
		Area adjacent to Sandlings SPA and associated area to the east of Leiston Road The information provided suggests that this is lowland acid grassland priority habitat, and this is confirmed for much of the area by the Priority Habitat layer (PHI) on Natural England Maps, but there are discrepancies. Clarification on these discrepancies is needed. **Hazelwood Common Area** There are discrepancies between the Phase I map and PHI in this area. This also needs clarification. The PHI shows "no main habitat", but the Applicant's information suggests is that it is deciduous woodland. This shows that the land has been visited and entered on to the system, but there is no reference to acid grassland	discrepancies between the Priority Habitat Inventory and their Phase I survey to ensure the baseline for acid grassland is accurate.	Proposed Project and one for the golf course expansion) have not identified priority acid grassland within the DCO Order Limits. There is an area of woodland at the south of the parcel, but the Applicant will not be affecting this habitat. North of the woodland is the degraded acid grassland mentioned above. It is not shown on the priority habitat inventory because it is not priority habitat but very degraded.
5		Timeframes The project appears to propose a 10-year commitment to the restoration/enhancement area. If construction disturbance and the creation of new grassland is concurrent, Natural England do not understand how the creation replaces areas disturbed by the project. This is a relatively short timescale, particularly for the creation area, where this is aiming to replace other areas that are disturbed during the project. There does not appear to be any longer-term commitment to maintaining these areas beyond this point, only to restore areas disturbed by the construction phase. **10 years is a minimum to recreate lost habitat, which is not simply about above ground processes**. Natural England are therefore unclear what the Applicant's definition of a temporary impact is to acid grassland.	Natural England advise that the Applicant should justify why management is not provided for the lifetime of project and explain what happens to the habitat after 10 years. Natural England advise that the Applicant provides justification on how the proposed creation offers a genuine enhancement to the National Landscape, given that the habitat will be functional at the time its management ceases.	The impact is temporary because for most of the affected area, there will be a closed sward after 1-2 growing seasons, with perhaps 5 years (rather than 10 years) to match the existing grassland given even the small area of priority habitat is semi-improved. In the meantime, the Applicant will start restoring the degraded grassland before the existing grassland is lost to the Proposed Project. These timelines are set out in **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**.
6		Location of the acid grassland creation/enhancement Clarification is required on the specific location proposed for the acid grassland enhancement/creation. The area proposed is much larger than 6ha. If the flexibility is to allow for at least 6 ha acid grassland but the whole area will be restored to low fertility and pH land use (accepting that some areas may be more like neutral grassland) this may be acceptable. However, **if the flexibility is to allow the landowner to continue with more intensive agricultural practices on parts of the restoration/enhancement site, this would compromise the likely success of the restoration**.	Natural England advise that the Applicant explains why there is flexibility in the location of acid grassland creation/enhancement.	The flexibility was to allow the Applicant to agree with the landowner which areas he would continue to farm and which areas could be used as enhancement. The parts the landowner will continue intensive practices on would not overlap with the restored area.
7		Purpose of the acid grassland proposals	Natural England advise that clarity is provided	Clarification on a number of these points (e.g. the purpose of the acid grassland restoration, what acid grassland is 'priority habitat', whether the acid grassland is

Reference	Matter	Point Raised	Recommendation	Applicant's Comments
		REP1-120 explains that the additional acid grassland provision of 6ha is to "provide enhancement ecologically and within the context of the Suffolk Coast and Heaths AONB". Table 1 distinguishes the "Acid Grassland Areas Affected and Enhancement", in hectares. Natural England understand the proposals are being put forward by the Applicant to satisfy S245 LURA, and to provide mitigation for the temporary loss of Functionally Linked Land. The multiple stacked purposes of the 6ha area need to be clearly differentiated. For instance, its purpose as mitigation for loss of FLL, and to satisfy the Applicants duties under s245 LURA.	on the multiple stacked purposes of the acid grassland proposals (6ha) for the project Natural England advise that clarity is provided on whether this enhancement area is also mitigation, and whether acid grassland is being created or restored here, or both. Natural England advise that clarity is provided on what mitigation is being provided for the 7.61ha of acid grassland being temporarily affected. Natural England advise that the Applicant provides definitions for acid grassland mitigation / creation / enhancement / restoration / reinstatement.	functionally-linked to the SPA, whether it is required as mitigation for impacts on the SPA, and whether it is restoration or enhancement or both) are addressed in other sections of this document. The total area of semi-improved grassland is 7.6 ha. If this was to be lost permanently, there would be a need to create or enhance a minimum of 7.6 ha of grassland (probably more). However, this habitat is not being lost permanently and the amount of actual priority habitat within that 7.6 ha is 0.3 ha. Therefore, restoring 6 ha of degraded acid grassland to offset temporary losses of 7.6 ha of primarily semi-improved (rather than priority habitat) acid grassland is considered a benefit. Further information on this is provided in Section 3.2 of **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**.
8		<u>Applicants' acid grassland proposals to meet S245 LURA duty</u> The acid grassland note refers to the Planning Statement's justification for how the project meets s245 LURA. This is Natural England advise that the Applicant clarifies which special qualities are summarised as "*This includes acid grassland being a key and important habitat in the AONB so enhancement contributing towards local distinctiveness and that land management should provide for nature recovery which the acid grassland enhancement would contribute towards*." Para 7.3.22 of the Planning Statement provides National Grid's rationale for 6ha of acid grassland provision. Natural England advise that more detail needs providing to explain how the creation of "a comparatively wilder and more tranquil land use type" (paragraph 7.3.22 Planning Statement) justifies the proposed enhancement. This is because 6ha is a very small land parcel, and if established as acid grassland it would provide less habitat than that being lost, which has short-term management. The planning statement outlines that some of the landscape is noted to be in a poor condition due to agricultural land use, which the replacement of agricultural land with acid	Natural England advise that the Applicant clarifies which special qualities are being enhanced by the proposals. Natural England advise that the Applicant clarifies why an area of 6ha in size been determined as being appropriate, and how the proposed area was selected. Natural England would like to understand how the proposals are proportionate to the significance of the habitat and complexity of restoration. Natural England advise that the Applicant	Clarification on each of these aspects is set out in **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**.

Reference	Matter	Point Raised	Recommendation	Applicant's Comments
		grassland would assist in improving. It is not clear which special quality this replacement relates to, or whether the proposed land for enhancement is currently in poor condition.	clarifies how the enhancement would "assist in enlarging the area of the unique character of the AONB"? (paragraph 7.3.22 Planning Statement) in terms of the statutory purposes of the National Landscape. Natural England advise that the Applicant explains how the proposals to enhance acid grassland align with the national landscape management plan.	
9	Assessment of impacts to SPA nightjar and woodlark, which use acid grassland within and adjacent to the SPA. • [AS-007] Habitats Regulations Assessment	Overarching comment on HRA **Impacts to acid grassland, a key supporting habitat within the SPA and FLL are not clearly assessed within the HRA. This advice replaces comment A14 within Natural England's relevant and written representations**.	N/A	This is noted by the Applicant.
10		The Applicants assessment (7.2.9) states that although breeding birds have not been recorded the compound field is "very likely" to be functionally linked land. Natural England agrees with this assessment.	N/A	This is noted by the Applicant.
11		Natural regeneration is proposed to restore acid grassland after disturbance within the construction phase (Paragraph 4.2.4 of the Outline Landscape and Ecological Management Plan). Natural England support this proposal but advise that it is essential to understand soil fertility and pH for successful restoration.	See Point 1 (soil suitability section) for NE further advice.	The maximum time soils in acid grassland would be stockpiled would be six months, in the location of the trenchless drive compound. Where only trenching is required in acid grassland (i.e. the rest of the route through acid grassland), soils will be restored as soon as trenching is complete (i.e. within weeks for each section). No new soils will be brought into site from other locations. There would therefore be no difference in pH and fertility from the baseline. While the haul route west of Leiston Road will be present throughout the duration of construction of the Proposed Project, this will not require soils to be lifted.
12		One function of the restoration and enhancement (acid grassland) area appears to focus on providing habitat for bird species particularly Woodlark and Skylark, also invertebrates. It is not clear if the aim is to create priority habitat, because if the focus is habitat for bird species, then	Does the Applicant propose to create more Priority Habitat?	The primary aim is to restore an area of acid grassland to good condition both botanically and in terms of structure. These are linked in this sward as the degraded state is largely due to dense tussocky unmanaged habitat structure and excessive presence of undesirable species such as bracken. Once restored, the area will have consequential benefits for woodlark and skylark, similar to the acid

Reference	Matter	Point Raised	Recommendation	Applicant's Comments
		the grassland species composition may not be as crucial as the habitat structure.		grassland that is being affected. The Applicant has therefore noted those benefits within **Application Document 6.6 (C) Habitats Regulations Assessment Report [REP1-071]**.
13		<u>The nature, location, quantity, habitat type, timing and duration of possible impacts to acid grassland are not clearly stated with inconsistent data between documents.</u> **The quantity and location of acid grassland affected differs between documents.** For example: • the acid grassland note provided by the Applicant states that 7.61ha of acid grassland will be temporarily affected • Paragraph 7.2.5 (HRA) states that a **further area (totalling approximately 8 ha**) of acid grassland north of the golf course would also be temporarily removed while it is traversed by the cable trench. • ES Chapter 2 (Document: 6.2.2.2) paragraph 2.9.50 states an area of **approximately 9ha** of priority habitat acid grassland north of the golf course and east of the B1122 would be temporarily removed due to the trenchless compound • Paragraph 2.9.28 (HRA) states **approximately 2.5 ha of acid grassland would be temporarily lost adjacent to Sandlings SPA** due to the trenchless construction compound (S10) and associated section of cable trench east of Leiston Road and in addition (2.2.29) a **further 8km** loss north of the golf club. In addition to the uncertainty of the nature and location of impacts, The HRA currently lacks detail on the in-combination impacts of the proposal with the approved application for the extension of Aldringham Golf Course The extended area lies within the red line boundary of the Sea Link project, The HRA should include the plans for the golf course and implications for acid grassland reinstatement along this section of the route. **There is a lack of clarity on project timescales.** Paragraph 8.2.6 of HRA states that "For the temporary duration of works this will be offset by leaving an area of arable land on sandy soils fallow and/or seeding it as acid grassland to be maintained for 30 years, which will have a long-term benefit." All other references appear to refer to 10 years. Natural England advise that 30 years is a much more realistic timescale to create priority habitat.	NE advises that: • The nature, location, quantity, habitat type, timing and duration of possible impacts to acid grassland are clarified and clearly stated in one place. These details should be clarified within the oLEMP. • Clarification is needed on why the further 8ha of temporarily affected acid grassland is not included in the total amount of acid grassland temporarily affected by the project. • Clarity is required regarding why the acid grassland is not being avoided by HDD as per requirements of the	The Applicant acknowledges that the areas **in Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [APP-049]** were outdated and based on the order limits (rather than the likely works footprint) where much greater loss of acid grassland was calculated (e.g. the 8 ha mentioned). This has been addressed in the updated **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]**. The total area of semi-improved grassland affected is 7.6 ha of which 0.3 ha meets the criteria for 'priority habitat' acid grassland. The nature, location, quantity, habitat type, timing and duration of possible impacts to acid grassland are clarified and stated in **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**. See above comment on the golf course proposals. These have already been delivered and are therefore deemed part of the baseline, hence (along with the fact the HRA is not reliant on the acid grassland creation for its conclusion of no adverse effect on integrity of Sandlings SPA, see below) the golf course proposals are not discussed in the HRA. The Order Limits lie north of the golf course extension area and does not affect areas of priority habitat. This habitat will be restored to pre-works condition. To HDD the small area of priority habitat acid grassland would involve extending the duration of works close to Sandlings SPA and Leiston-Aldeburgh SSSI. This was considered less desirable than the much shorter timescale of open trenching through the acid grassland. Regarding timescales over which the restored acid grassland will be secured and managed, ten years is the correct duration. The reference to 30 years is an error and was updated in the submission of the HRA at Deadline 2. Following further discussion with the landowner, reversion of arable land to acid grassland is no longer proposed and the restoration work at Hazlewood Common will focus on restoring (by introducing appropriate management and invasive species removal) 6 ha of degraded acid grassland. Ten years is considered an ample timescale for this activity. The proposed process if reinstatement appears to be failing, is set out in the Suffolk oLEMP. There is a 5-year aftercare period during which it will become clear if reinstatement is failing. If it is, this would be rectified. However, regarding time required for areas to become suitable for woodlark and nightjar foraging, note as above that *"In 2024 surveys, arable land on sandy soils that have been left fallow have been used for nesting by woodlarks. This shows that habitat structure (i.e. short vegetation on sandy soils) are more important that actual botanical species composition. Therefore, the trenchless field is very likely to come back into use as foraging habitat in the next nesting season once works have ceased, without any lag time for acid grassland to re-establish."* Therefore, regarding use by SPA birds the Applicant does not consider that contingency measures are required. It has been assumed for the purposes of the HRA and Environmental Statement that all areas of identified acid grassland that will be affected between the SPA and across the north of the golf course (totalling 7.6ha) are functionally-linked to

Reference	Matter	Point Raised	Recommendation	Applicant's Comments
		The report concludes a temporary impact but does not take into consideration the possibility that acid grassland may fail to reinstate and therefore become a long-term impact. Para 7.2.5 states that the loss of foraging ground will last for a single nesting season, however contingency is required should habitats fail to reinstate during the expected timeframes. **Clarification is required on the locations of acid grassland that are considered to be Functionally Linked Land.** It is not clear from the evidence presented if the area of land to the north of the golf course is Functionally Linked to the Sandlings SPA. The 6ha area is also being proposed as mitigation for loss of FLL for Sandlings SPA and to conclude no AEOI. The report states (7.2.9) that the acid grassland reinstatement area will offset impact to foraging areas. However as above this depends on successful reinstatement and evidence that both species (nightjar and woodlark) would benefit. Furthermore, should the area prove appropriate it the establishment period requires careful consideration. It could take just as long to create the 6ha area as reinstate the temporarily lost acid grassland habitat.	mitigation hierarchy. • Clarification is needed on which acid grassland parcels are functionally linked to the Sandlings SPA.	the SPA as foraging habitat (see paragraph 4.2.5 of the HRA). No evidence of nesting by woodlark or nightjar within the Order Limits has been identified. It is <u>not</u> the case that the acid grassland is being proposed as mitigation for loss of FLL. See the Applicant's response to this question in row 5 of Table 1.82 in **Application Document 9.79: Applicant's Comments on Written Representations [REP2-034]**. In summary: • Acid grassland is considered functionally-linked for foraging woodlark and nightjar. No evidence of nesting has been found. • Evidence including results of surveys show that habitat structure (short vegetation on sandy soils with patches of bare ground) is more important than botanical composition. Evidence from the surveys show that if arable land on sand is left fallow woodlarks would start nesting. • The maximum duration of works in acid grassland is 6 months. There is over 100ha of acid grassland within 2km of the SPA (c. half within the SPA itself), plus arable fields left fallow, so area affected are < 5% of available foraging and nesting habitat. • Affected areas will come back into use as foraging habitat in the next nesting season once works have ceased, without any lag time for acid grassland to re-establish. There is high confidence on this prediction given how quickly woodlarks start using arable fields on sandy substrates when left fallow. The enhanced acid grassland is referenced purely because once enhanced (i.e. structure restored and opened, and invasive species removed) it is likely to be used by woodlark and possibly nightjar at least for foraging. So, it underlines the conclusion, but the assessment is not reliant on it to mitigate impacts on the Sandlings SPA.
14		<u>Impacts from the construction compound (Suffolk)</u> Natural England presume that the compound will be lit. Natural England advise that the impact of lighting from the construction compound on SPA birds has not been assessed.	Assessment of the impact of light spilling into the SPA and surrounding areas used by nightjars and woodlark is required as this would extend into the breeding season whilst the compounds are in operation	The **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047]** has assessed potential impacts from lighting. It has been assumed lighting would be used at the HDD compound during the HDD operation. Paragraph 2.9.42 states that "*A noise fence [proposed around the trenchless compound] would also act as a visual screen, thus protecting birds in the SPA from visual disturbance'*. Paragraph 2.9.85 on ornithology states that '*Lighting for construction should only be needed around construction compounds and the trenchless compound (S10). This would be targeted directional lighting with cowling and other lighting controls to manage (and in the case of the trenchless compound avoid) incidental illumination (B38)*'. REAC measure B38 states '*Around construction compounds and the converter station and substation works areas, direct illumination of boundary features would be avoided. Lighting would be designed to comply with published guidelines*". Paragraph 7.2.17 of the **Application Document 6.6 (C) Habitats Regulations Assessment Report [REP1-071]** also covers visual disturbance as follows '*The noise fence will also act as a visual screen and thus protect birds in the SPA from visual disturbance'*.
15		<u>Noise assessment</u>		This point was discussed during pre-application thematic meetings held with Natural England. Figure 3 of the HRA presents a blended 60 dB contour with the

Reference	Matter	Point Raised	Recommendation	Applicant's Comments
		Natural England advise that the noise contour map included in Appendix E Figure 3 requires additional clarification. This is because it appears to show noise as a uniform contour throughout the working corridor regardless of proposed activity. It is unclear how the impact of HDD for example or construction compounds has been considered in this assessment as it is likely that noise impacts would vary between these activities and this does not appear to be illustrated on the map presented.		outer limits set by the noisiest activity. Paragraph 7.2.15 of the HRA then explains that the HDD does not cause the 60 dB contour to stray into the SPA ("... *scrutiny of the underlying data indicates this* [the overlapping of the 60dB LAmax contour with the SPA boundary] *would only be during compound set up, which will take c. 1 month"* [this led to **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]** commitment B27 that setup would take place outside the nesting season]. *"The c. 4-month trenchless installation itself would not result in the 60 dB contour straying into the SPA because of the distance from the SPA (approximately 40 m) and the use of standard noise mitigation methods such as fencing...").* The blended contour map was produced for clarity and ease of reference.

16. Applicant's Comments on the Submission from Paul Smith [REP2-098]

Table 16.1 Applicant's Comments on the Paul Smith Deadline 2 Submission [REP2-098]

Reference	Matter	Point Raised	Applicant's Comments
REP2-098.01		My Relevant Representation (RR 4116) was Previous submissions have clearly raised cultural heritage concerns yet this appears to have been ignored. I have previously stated that I strongly object to the construction of a permanent access road and new bridge over the River Fromus, as it will negatively impact Hurts Hall, a Grade II listed building and its surroundings. Mine and other similar objections appear to have been ignored. The Examining Authority's Rule 6 Letter of 19 September (PD 010) required the Applicant to identify all parties and references to demonstrate that every representation had been answered. By failing to include RR 4116 in the Cultural Heritage theme, the Applicant has not complied with this requirement. Because of this omission, I must question the legitimacy of the Applicant's thematic responses as a whole	The Applicant acknowledges Mr Smith's written representation. Application Document **6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** addresses the impact of the Proposed Project on Hurts Hall. Furthermore, concerns received through relevant representations including those in relation to Hurts Hall and the River Fromus are addressed in **9.34.5 (B) Applicant's Response to Selected Relevant Representation Responses [REP2- 022]** which seeks to address selected responses over and above the thematic responses. Hurts Hall is also considered in the thematic response **9.34.6 (B) Applicant's Thematic Responses to Relevant Representations [REP2-024.]** Whilst it was not possible to provide an individual response to every Relevant Representation received, the Applicant did provide a thematic responsto the issues raised, and ntoes that Saxmundham Town Council has taken an active role in the Examination.
REP2-098.02		The treatment of Saxmundham Town Council's submission (RR 4896) also needs to be highlighted. The Council produced a detailed, thirty five page representation on behalf of more than 5,000 residents. As a statutory body, its views carry significant weight. Yet the Applicant has reduced this work to generic thematic responses, offering no substantive reason why other than to make them appear to be minor generic responses. This approach effectively silences the collective voice of Saxmundham and disregards the statutory role of Town and Parish councils. It is unacceptable that under resourced councils, who understand the lived impacts of these proposals, should be dismissed in this way. The Examining Authority must insist that such councils receive direct, substantive responses.	
REP2-098.03		I am particularly concerned by the Applicant's reliance on screening, topography, and planting schemes as supposed mitigation. In section 7.4 they claim that impacts to views and sense of place have been considered, and that cultural heritage effects have been "minimised within assessments." They point repeatedly to Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP 050] and to their response to SEAS (RR 5210) as if these references alone suffice. The proposed 26 metre tall converter stations will have a severe visual impact, adversely affecting open views to the south of Saxmundham, particularly adjacent to Hurts Hall. These views have been officially identified as important within the Saxmundham Neighbourhood Plan, underscoring their significance to the town's character and heritage." Due to the scale and industrial appearance of the converter stations, they will visibly dominate the	**6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]** sets out the assessment of the landscape and visual impact in Suffolk. It uses industry standard methodology and proposes significant mitigations to reduce any negative impact.

Reference	Matter	Point Raised	Applicant's Comments
		surrounding rural environment, drastically altering the area's landscape." These are not minor points that can be brushed aside with references to planting schemes and the Applicant must be requested to directly engage with the RR 4896 document from the Town Council and not lose all its points	

17. Applicant's Comments on the Submission from Pauline Trudy Klauber [REP2-099]

Table 17.1 Applicant's Comments on the Pauline Trudy Klauber Deadline 2 Submission [REP2-099]

Reference	Matter	Point Raised	Applicant's Comments
WR- REP2-099.01		The Thematic Responses Document does not address the situation of residents whose property will be directly affected by drilling and trenching from Thorpeness landfall to connecting up to Friston. The drilling and trenching rather than trenchless drilling will upset all wildlife and human residents with 24 hour drilling with lights and movement of plant and equipment. This is entirely unnecessary if National Grid will seriously consider taking the cable by sea to South East England, specifically the Thames estuary where the electricity is needed. This is not sufficiently considered as against the impact on habitat, local economy, specifically tourism and heritage landscape at a minimally greater cost. The trenching itself will be a phenomenal upheaval to local residents, traffic, wildlife etc in an area already hugely affected by the Sizewell C preparatory works. The narrow view in which these objections are ignored is simply related to speed and relatively greater expenses. We do not know what the land drilling and trenching costs will be, once started, this is a hasty and profit driven initiative by a private equity company. Please think again	The Applicant acknowledges the written representation provided by Ms Klauber and refers the Interested Party to documents; **6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise & Vibration [AS-109]** which details the Suffolk Construction Noise and Vibration Assessment. The prosed project seeks to use open cut installation technique from the Transition Joint Bay just beyond landfall to the Kiln Lane substation and then on to the Suffolk Converter site. The impact on wildlife has been assessed in document **6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP1-047**] and appropriate mitigations will be implemented. Sea Link is a transmission reinforcement project which seeks to reinforce the electricity transmission system between the South East of England and East Anglia. The existing transmission network infrastructure in East Anglia and the southeast of England was not originally designed to accommodate the large volumes of generation capacity that is planned to connect to the network in these areas. The network in and between East Anglia and the southeast of England therefore needs reinforcing for four main reasons: • the existing transmission network was not designed to transport electricity from where it is increasingly being generated (largely offshore); • the growth in offshore wind, interconnectors and nuclear power means that more electricity will be generated in the years ahead than the current network is able to reliably transport; • as a country, electricity demand is forecast to at least double by 2050, increasing the amount of energy needed to be transported to homes and businesses; and • upgrading the existing network as it is today (such as through replacing cables to carry more power) will not be enough to meet the increasing need for electricity whilst operating to required standards. In addition, documents **6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005]** considers the effect on Socio Economics, Recreation and Tourism and APP-050 assesses the impact on Local Heritage. **6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport]APP-054]** covers traffic and transport impact. Cumulative impacts have been considered

	and are detailed in **6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative [APP-059]**. Links to all of these documents can be found on the Sea Link examination web page via the examination library. These documents provide detailed assessments in relation to the environmental issues raised by the Interested Party.

18. Applicant's Comments on the Submission from Piers Sturridge [REP2-100]

Table 18.1 Applicant's Comments on the Piers Sturridge Deadline 2 Submission [REP2-100]

Reference	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 1			
Paragraph 2 and photographs on pages 3-4	Impact to Buxlow Manor Grade II* listed building (NHLE: 1215749)	Disagrees with the assessment of impact provided for Buxlow Manor and points to views between Buxlow Manor and Wood Farm as evidence that Saxmundham Converter Station would be more impactful than the Applicant has assessed.	It is the Applicant's view that the images provided further demonstrate the degree of existing screening present around Buxlow Manor and demonstrate that views towards the asset from the Order Limits, and from the asset towards the Order Limits do not form key aspects of the asset's setting that contribute to its heritage value. The Applicant further notes that in the images provided, from Wood Farm and Wood Farm Barns towards Buxlow Manor, the Saxmundham Converter Station would not be in the view, it would be offset to the right of the image, behind intervening woodland and set within an area of proposed environmental mitigation and landscaping. This is shown on **Sheet 1 of 6 of Application Document 2.5.1 (B) Work Plans – Suffolk [REP1-001]**
Paragraph 5	Impact to Buxlow Manor Grade II* listed building (NHLE: 1215749)	Notes that Saxmundham Converter Station will be visible over the treeline from Buxlow Manor. States that there is a 10m difference in height above sea level between Buxlow Manor and the Saxmundham Converter Station site.	The assessment of Buxlow Manor was carried out in Paragraphs 6.1.50 - 6.1.52 of **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109].** This concluded that there would be no potential for significant impacts to the asset as a result of the Proposed Project due primarily to the degree of existing screening planting around the asset, the existing woodland at Meadow Link Farm between the asset and the Converter Station, and the sloping local topography and distance between the asset and the Converter Station. Consultation regarding this asset was carried out with Historic England and East Suffolk Council in January – March 2024 in the process of agreeing required viewpoint locations and visualisations to demonstrate potential effects of the Proposed Project on heritage assets. No viewpoints or visualisations were required for this asset and there have been no concerns or objections raised by Historic England or East Suffolk Council in their submitted Relevant Representations regarding the assessment provided for this asset, or the decision taken to scope it out of full assessment in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050].** The Applicant considers that the cultural heritage assessment of impact through changes to setting in relation to Buxlow Manor therefore represents an appropriate level of assessment that is relevant and proportionate to the level of likely significant effects. The Applicant acknowledges that some views of the Saxmundham Converter Station will be possible within the wider environs of the listed building. Whilst it was determined that there is no likelihood of significant impacts to Buxlow Manor resulting from the Proposed Project, it was not stated that there would be no impact. For clarity, the impact of the Proposed Project on Buxlow Manor is considered to be negligible, which on an asset of High value, results in an effect that is not significant in EIA terms, as expected. The Applicant disputes the claim that there is a 10m difference in height above sea level between Buxlow Manor and the Saxmundham Converter Station site. Ordnance Survey data shows that the listed building and the Converter Station site are on relatively similar levels of elevation of between 23m and 26m above sea level.
Paragraph 6	Impact to Buxlow Manor Grade II* listed building (NHLE: 1215749)	Provides details of the historical development of Buxlow Manor and claims the Applicant has denigrated its history	The Applicant notes the historical information provided, however, none of the information provided, if verified, would change the assessment of the impact of the Suffolk Onshore Scheme upon the asset. The importance of the asset is acknowledged in its Grade II*

Reference	Matter	Point Raised	Applicant's Comments
			designation and this is taken into account in the assessment of the potential effects of the scheme upon this asset in Paragraphs 6.1.50 - 6.1.52 of **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109]**. The details of historical development and associations would be unchanged by construction and operation of the Suffolk Onshore Scheme.
Paragraph 7	Impact to Buxlow Manor Grade II* listed building (NHLE: 1215749)	States that Historic England were unaware of any request for comment on Listed Buildings around the Sealink site	Consultation with Historic England has been ongoing throughout development of the scheme design and completion of the DCO Application. Details of this consultation are provided in Table 2.1 of **Application Document 7.4.3 (B) Draft Statement of Common Ground Between National Grid Electricity Transmission and Historic England [REP1-075]**. As noted above, no concerns have been raised by Historic England regarding the Suffolk Onshore Scheme's potential impact on Buxlow Manor.

19. Applicant's Comments on the Submission from Pippa Southorn [REP2-101]

Table 19.1 Applicant's Comments on the Pippa Southorn Deadline 2 Submission [REP2-101]

Reference	Matter	Point Raised	Applicant's Comments
WR- REP2-101.01		Rebuttal to National Grid document 9.34.6 APP-355 – as explained this is not sufficient for this incredibly unique soil type (The Wantsum Sea Channel is the only silted up Sea Channel of considerable size in the world.) There is no precedent to follow, it is not possible to follow common practice for this farmland.	The Applicant ackowledges the written representation submitted by Ms Southorn and notes her comments. Document 9.34.6 is The Applicants Thematic Reponses to Relevant representations and has been superseded by Document **9.34.6 (B) Applicant's Thematic Responses to Relevant Representations [REP2-024].** **7.5.10.2 Outline Soil Management Plan – Kent [APP-355]** has been produced taking into account relevant guidance form DEFRA, The Institute of Quarrying and the British Standard Institution. Should Ms Southorn have any other relevant published guidance that has not been included, the Applicant would be pleased to receive and consider it.
WR- REP2-101.02		7.1.1. Loss of BMV land does not include 5+ years of reinstatement (as experienced with Nemo Link) required to get soil back to original condition. Drawdown on marsh water table and contamination from salt and heavy metals from boreholes impose permanent loss.	The Applicant does not consider loss and reinstatement to be the same thing. It is accepted that land takes time to recover and that the timeframes for this are not necessarily the same across the board. However, reinstatement and recovery does not mean the land cannot produce in that recovery phase. Any loss in production yield during the reinstatement phase will be appropriately covered by the Compensation Code. **6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]** looks at the Water Environment in Kent. It is noted that any water bodies are protected by the Water Framework Directive
WR- REP2-101.03		7.1.3. Full details on reinstatement approved by a alluvial clay soil specialist to confirm that farmland can continue to operate after construction traffic and temporary attenuation ponds.	**Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice [APP-341]** contains commitments that include measures to protect groundwater (quality) including GH02 (provision of Foundation Works Risk Assessment), GH08 (protocol for dealing with unexpected contamination) and GH09 (Hydrogeological Risk Assessment). Commitment GH09 requires that the nature and scope of any remediation or mitigation (based on the Hydrogeological Rik Assessment) is agreed with the Environment Agency or other stakeholders. Commitment GG15 describes that there will be no intentional discharge of site run off to ditches, watercourses, drains or sewers without appropriate treatment and agreement of the appropriate authority (except in the case of an emergency). The Applicant commits to completing pre and post work record of conditions as set out in **Application Document 7.5.3.2 CEMP Appendix B Register of Environmental Actions and Commitments [APP-342]**, paragraph GG06. A full photographic/aerial footage and descriptive record of condition (pre condition survey) will be carried out prior to commencing

		construction activities. This record will be available for comparison following completion of reinstatement works. **Document Number 7.5.10.2 Outline Soil Management Plan – Kent, Paragraph AS01** Agriculture and Soils within the above reference document confirms the specific guidance in relation to soil handling, including, soil stripping, soil stockpiling and soil reinstatement. These will be updated to Soil Management Plans prior to construction, to include information from soil and agricultural land classification (ALC) surveys. Measures will include but not be limited to the following: pre-construction surveys in accordance with published guidance to confirm ALC grade and soil type; specific measures for managing sensitive soils
WR- REP2-101.04	7.1.4. If reservoirs become contaminated expect broad workforce loss across fresh produce industry of over 1,000 people	The Applicant has secured, through inclusion within **Application Document 9.84 Register of Environmental Actions and Commitments (REAC),** several commitments to ensure control of pollution of the water environment e.g. GG04, GG05, GG24, W09, W24) . These measures will contribute to avoiding pollution risks to reservoirs
WR- REP2-101.05	Despite multiple requests environmental schemes: Natural England Higher Level and Sustainable Farming incentive are still not included as impacted by this project.	Natural England's Higher-Level Scheme and the Sustainable Farming Incentive will not be impacted by the proposed project. These schemes operate nationwide in conjunction with many infrastructure and utilities projects. Should there be any impact to these schemes as a direct result of the project, the Compensation Code will adequately provide for such a situation. The Applicant has met with Natural England and Ms Southorn to try an establish the details of the schemes to allow it to understand any potential impact and any necessary mitigation but neither party has provided any relevant details to date. It would assist the Applicant if a copy of the contract in relation to any relevant scheme or incentive could be provided (redacted as necessary) so the Applicant can ensure all reasonable steps are taken to mitigate any impacts.
WR- REP2-101.06	Confirmation on risk assessment for reservoirs required.	Surface water abstractions, including those associated with the reservoirs mentioned, are included in Table 2.2 Existing licensed surface water abstractions in **Application Document 6.3.3.4.A ES Appendix 3.4.A Water Environment Baseline Data [APP-168].** Within **Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]** it is stated that "*reduced water availability to support abstractions and assimilate discharges has also been scoped out for all stages. This is on the basis that the integrity of existing water interests would be protected during construction of the Proposed Project by the suite of measures detailed in Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan (CEMP) to prevent pollution of the water environment, and by the commitments to use water efficiently, as described in Application Document 6.2.1.4 Description of the Proposed Project. No new consumptive water abstraction is required to supply the Proposed Project water needs during construction or operation. Therefore, existing local water resource (quantity and quality) would not be significantly impacted*

		and those existing water interests that rely on these resources would not be consequently significantly affected".
WR- REP2-101.07	Access route for construction traffic along banks of River Stour inadequate, confirmation required.	The Applicant is not proposing any construction accesses along the banks of the River Stour. **Application document 2.14.2 Indicative General Arrangements – Kent [CR1-025]** includes information on the proposed accesses. Works along the Stour are limited to environmental mitigation, Public Right of Way diversions, overhead line protection and the temporary bridge crossing. These works are at isolated locations and will be accessed from the proposed accesses to be constructed for the works, this does not require the construction of accesses along the banks of the River Stour.
WR- REP2-101.08	National Grid have been shifting parameters during this consultation, and it has not been possible to hold a constructive dialogue with major concerns.	The Applicant is unclear what additional dialogue is needed over and above the heads of terms discussions which are ongoing with Ms Southorn, her land agent and her landlord. The Applicant would be pleased to attend any meetings as necessary to discuss concerns and the voluntary agreements. The Applicant can confirm this dialogue is continuing.
WR- REP2-101.09	Many hours have been wasted on late submissions and inaccurate information that should have been acknowledged when initially raised.	The Applicant is unclear as to what is meant by this statement and requests that detail of Ms Southorn's specific concerns if any remain unanswered through the heads of terms negotiations and responses to written representations
WR- REP2-101.10	I am not filled with confidence that the marsh will be respected throughout this project due to a deep lack of understanding or willingness to understand what they are working with.	Noted.

20. Applicant's Comments on the Submission from Port of London Authority [REP2-060]

Table 20.1 Applicant's Comments on the Port of London Authority's Deadline 2 Submission [REP2-060]

Reference	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 1			
1	Introduction	1.1. This is a written submission made on behalf of the Port of London Authority (PLA) in respect of comments on Deadline 1 and Deadline 1A submissions. 1.2. Documents referred to in this submission are: 1.2.1. Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]; 1.2.2. Applicant's Responses to Relevant Representations from Statutory Consultees and Bodies [REP1-112]; 1.2.3. Applicant's Thematic Responses to Relevant Representations [REP1-116]; 1.2.4. Applicant's Response to Supplementary Agenda Additional Questions for Issue Specific Hearing 1 [REP1A-033]; 1.2.5. Draft Development Consent Order [REP1-037]; 1.2.6. Marine Chapter 7 - Shipping and Navigation [REP1-060]; 1.2.7. Marine Chapter 9 – Other Sea Users [REP1-062]; and 1.2.8. Draft Statement of Common Ground – PLA [REP1-082]. 1.3 A number of the documents uploaded at Deadline 1 and Deadline 1A contain responses relating to shipping and navigation. The PLA has not commented on every document that contains references to shipping and navigation and has not commented on each individual point within a document. Instead the PLA has sought to draw out the key points and await the Applicant's proposals for securing the PLA's requirements, for example through a certified plan and the detailed drafting of the draft Development Consent Order ("dDCO").	These comments are noted by the Applicant.
2.1	Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]	The PLA welcomes the engagement with the Applicant and their agreement in principle of the need to safeguard water depths, to ensure sufficient under keel clearance for future deep drafted vessels in key areas. For the avoidance of doubt, the PLA's interest in the Sea Link Project is the Areas of Interest set out in figures 3-5 of its Written Representation [REP1-156]. The PLA has no comments on the wider cable route and the MCA's requirements regarding water depths but would, from its experience with other DCOs, highlight that it needs to be very clear where the maximum 5% reduction in water depth can occur and where it cannot. Any references to potential reductions in water	The Applicant notes these comments.

Reference	Matter	Point Raised	Applicant's Comments
		depth need to be very carefully worded to carve out the PLA's Areas of Interest and the absolute requirements that must apply here.	
2.2	Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]	The Applicant's summary regarding under keel clearance sets out that there are three areas which make up the Areas of Interest, and this is shown on plate 2.1. It sets out the minimum water depths that need to be preserved and recognises the need for a 0.5m over-dredge tolerance.	The Applicant notes these comments.
2.3	Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]	At paragraph 2.2.2 it is stated that "The Sunk region is of particular focus due to the high level of traffic here which route through the Sunk Traffic Separation Scheme and utilise the Sunk Pilot Boarding Station which HHA and PLA manage." The Sunk Boarding Area is managed by Sunk Vessel Traffic Services ("VTS") in terms of traffic management. HHA manage the pilot boarding and landing service. None of it is managed by the PLA.	The Applicant notes these comments.
2.4	Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]	The PLA welcomes the Applicant's commitment to preserve 12.5m below Chart Datum in the Long Sand Head Two Way Route crossing area (para 2.3.4).	The Applicant notes these comments.
2.5	Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]	The PLA notes that the Applicant is currently assessing the engineering implications of the additional cable depth of lowering ("DoL") that may be required in areas of the Sunk Pilot Boarding areas that are already shallower than the 22m CD safeguard level and that in the worse case, the depth of lowering may increase from 2.5m to approximately 4.5m in the shallowest sections of the route (para 2.3.9). Application documents will need to be updated once this has been determined as many documents, including sections of the technical note, still refer to a target DoL of 2-2.5m. Documents will also need to be checked for consistency across the documents (see for example section 8 below regarding backfill).	The Applicant notes these comments.
2.6	Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]	Paragraph 2.3.10 states "the PLA and HHA have informed the Applicant that the current Sunk Pilot Boarding Station charted diamond is located to the west of the previously described shallow seabed feature within the Sunk region and therefore is not an area where large ships can receive pilots." Paragraph 2.3.11 states "Pilot boarding does not take place at the Sunk Pilot Boarding Station charted diamond, but currently takes place up to approximately 1.5 km to the east of the charted diamond i.e. in the vicinity of the large ridge where water depths are considerably shallower than 22 m CD". If the reference in paragraph 2.3.10 to 'shallow seabed feature' refers to the area to the North West of the PLA's Sunk Area of Interest (see figure 3 of the PLA's Written Representation [REP1-156]) then it would be more accurately described as to the south and slightly west. There is sufficient depth of water for vessels to board and land pilots. However, boarding/landing tends to take place further to the east to give pilots more time on large vessels for a pilot/master exchange, before entering the deep water channels, or to clear a congested	The Applicant notes these comments.

Reference	Matter	Point Raised	Applicant's Comments
		area before landing. However, depending on traffic and environmental conditions, a large vessel could board and land there. For the avoidance of doubt current vessel draughts do not require 22m depth but there is a need to future proof to allow larger vessels of up to 20m draught to enter and exit the port in the future.	
2.7	Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]	At the North East Spit, it is noted that the Applicant has engaged with GridLink and that the Applicant considers that by moving the cable route to the east (within the Order Limits), sufficient water depth is available.	The Applicant notes these comments.
2.8	Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]	Further explanation is required regarding the comment at para 2.3.19 that there are no likely significant impacts foreseen regardless of how far the Applicant achieves meeting the 22m water depth requirement. The PLA considers that there would be significant impacts if the required depths are not achieved for the reasons set out in section 5 of its Written Representation [REP1-156].	The Applicant notes these comments.
2.9	Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]	The PLA notes that the Applicant has advised that boulders would be repositioned within the Order Limits "in appropriate water depths" (para 4.1.4). It is disappointing that the Applicant has not taken the opportunity to commit to no relocation of boulders to or within the Areas of Interest	The Applicant notes these comments.
2.10	Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]	The PLA welcomes tables 4.2 and 4.3 which provide a useful summary of crossings and water depths. The key next step is for commitments to be made rather than the Ports having to wait and hope that the Applicant finds it 'possible' or 'practicable' to meet the Ports requirements. The PLA would expect a certified plan, design requirement and protective provisions as securing mechanisms. Whilst positive discussions have been had on protective provisions, wording still needs to be agreed and it will specifically need to address how it will be ensured that the crossing with Grid Link takes place in deeper water so that the first project to be installed does not prevent the second project from coming forward	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 will provide an updated version of **Application Document 9.12 Outline Navigation and Installation Plan [AS-104]** at Deadline 4.

Reference	Matter	Point Raised	Applicant's Comments
			The Applicant is currently drafting the outline Cable Specification and Installation Plan (oCSIP) which will be provided at Deadline 4. This document will also incorporate the outline Sediment Disposal Management Plan (oSDMP).
2.11	Shipping and Navigation Under-Keel Clearance Marine Engineering Technical Note [REP1A-038]	The PLA notes and welcomes the Applicant's commitment to submit an oCSIP into the examination but would emphasise the need for this to be submitted as soon as possible to allow interested parties to review it and provide comments.	The Applicant is currently drafting the outline Cable Specification and Installation Plan (oCSIP) which will be provided at Deadline 4. This document will also incorporate the outline Sediment Disposal Management Plan (oSDMP).
3.1	Applicant's Responses to Relevant Representations from Statutory Consultees and Bodies [REP1-112]	The PLA notes that in response to entry 3.13.16, the Applicant confirms that wet storage is not applicable to the proposed project. Whilst this clarification is welcomed, it appears to be inconsistent with Marine Chapter 6 – Marine Archaeology [REP1-058] which refers to the use of wet storage areas (see table 6.16 (pages 57 and 60) and para 6.9.10).	**Application Document 6.2.4.6 (C) Part 4 Marine Chapter 6 Marine Archaeology [REP2-005]** will be updated 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".
3.2	Applicant's Responses to Relevant Representations from Statutory Consultees and Bodies [REP1-112]	At entry 3.3.19 the Applicant advises that discussions with PLA are ongoing on the scope of the Sediment Disposal Management Plan. The PLA is unaware of discussions regarding this specific plan but would welcome them.	The Applicant is currently drafting the outline Cable Specification and Installation Plan (oCSIP) which will be provided at Deadline 4. This document will also incorporate the outline Sediment Disposal Management Plan (oSDMP).
3.3	Applicant's Responses to Relevant Representations from Statutory Consultees and Bodies [REP1-112]	At entry 3.3.20 the Applicant agrees on the importance of the mitigations, actions and commitments made by the proposed project in the Navigational Risk Assessment ("NRA") and listed in the Offshore Construction Environmental Management Plan ("CEMP"). The outline offshore CEMP is a certified document in Schedule 19 of the dDCO [REP1-037] however reference to the subsequent production of an offshore CEMP substantially in accordance with the outline plan has been deleted at deadline 1 from Schedule 3 Requirement 6 of the dDCO. Given that the outline offshore CEMP [APP-339] is clear that the outline offshore CEMP will be updated when a principal contractor has been confirmed; it is a live document that will evolve and that "*compliance with the contents of the offshore CEMP is intended to provide a systematic approach to environmental management*" it is questioned why the dDCO no longer secures the production of an offshore CEMP.	The Applicant can confirm that the DML within **Application Document 3.1 (F) draft Development Consent** Order has been updated and submitted at Deadline 3.
4.1	Applicant's Thematic Responses to Relevant Representations [REP1-116]	The Applicant's response to the Relevant Representations that raise issues relating to shipping and navigation are set out in table 7.22 of REP1-116. The Applicant's responses generally emphasise that the establishment of communication plans with clear protocols to ensure effective communication and co-ordination between stakeholders is a key mitigation for minimising shipping and navigation impacts during construction. The Navigation and Installation Plan ("NIP") is identified as the mechanism to secure this.	The Applicant notes these comments.

Reference	Matter	Point Raised	Applicant's Comments
4.2	Applicant's Thematic Responses to Relevant Representations [REP1-116]	In response to entry 7.22.4 and Supplementary Agenda Additional Question ISH1.02 it is stated that cable joints in the Sunk will be avoided where possible (emphasis added). It is then stated that the jointing point of the cables will aim as far as practicable to be outside the Sunk area and the higher risk area to the cables in this heavily trafficked portion of the route. The PLA seeks a commitment from the Applicant that there will be no planned field joints within the Areas of Interest as field joints require the cable lay vessel to hold station for a number of days while the jointing is performed.	The Applicant can confirm that there are no planned cable joints within the three Areas of Safeguarded Water Depth excluding the need for any unforeseen repairs during installation and/or the operational lifetime.
4.1	Applicant's Thematic Responses to Relevant Representations [REP1-116]	The Applicant's response to the Relevant Representations that raise issues relating to shipping and navigation are set out in table 7.22 of REP1-116. The Applicant's responses generally emphasise that the establishment of communication plans with clear protocols to ensure effective communication and co-ordination between stakeholders is a key mitigation for minimising shipping and navigation impacts during construction. The Navigation and Installation Plan ("NIP") is identified as the mechanism to secure this.	The Applicant notes these comments.
4.2	Applicant's Thematic Responses to Relevant Representations [REP1-116]	In response to entry 7.22.4 and Supplementary Agenda Additional Question ISH1.02 it is stated that cable joints in the Sunk will be avoided where possible (emphasis added). It is then stated that the jointing point of the cables will aim as far as practicable to be outside the Sunk area and the higher risk area to the cables in this heavily trafficked portion of the route. The PLA seeks a commitment from the Applicant that there will be no planned field joints within the Areas of Interest as field joints require the cable lay vessel to hold station for a number of days while the jointing is performed.	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.
5.1	Applicant's Responses to Supplementary Agenda Additional Questions for Issue Specific Hearing 1 [REP1A-033]	The Applicant's responses to the shipping and navigation questions are set out in table 1.1. The Applicant's responses highlight the need for certainty. The Applicant uses phrases such as 'as far as reasonably practicable' and 'where possible.' There is also a reference in response to ISH1.05 to avoiding 'significant reductions' in under-keel clearance. This does not give the PLA the required certainty and protection of future depths. Instead the PLA is faced with the prospect, for example, of the Applicant installing the cable and post installation the Applicant stating that they tried as far as reasonably practicable to install the cable to the correct depth and that the reduction is not a significant reduction. This would leave the PLA with significant 6 long-term impacts. That is why the PLA requests a design requirement, protective provisions and a remediation clause to ensure that the cable is designed, installed, maintained and operated within the Areas of Interests at a depth that does not cause long term detrimental impacts to the Port of London.	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

Reference	Matter	Point Raised	Applicant's Comments
			provisions as necessary, and is working collaboratively with the port stakeholders to agree both the mechanism and the wording.
5.2		In response to ISH1.04 the Applicant states *"The Applicant considers that pilots of these very large vessels would be very well versed in navigating these waters in the Sunk region, very well trained and skilled, and would pay close attention to charted water depths, and as such would not route through specific areas where water depth is insufficient for their vessels, and would instead utilise different routes*" (emphasis added). This statement seems to rely on the pilots avoiding areas where the required depths have not been reached rather than committing to meeting the PLA's requirements regarding depths. Although the Applicant's statement is technically correct, pilots would avoid shallow areas, any reduction in available water would have consequences in terms of traffic management, risk of collision and grounding and longterm impacts on the Port of London. This area is also outside of the pilotage district and Sea Link should not rely on the assumed skill of pilots as mitigation.	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.
6.1	Draft Development Consent Order [REP1-037]	Various updates have been made to the dDCO at Deadline 1, of relevance to the PLA is the updated definition of commence which now includes details of when commence relates to the works seaward of MHWS: *"commence" means (a) In relation to works seaward of MHWS, the first carrying out of any licensed marine activities authorised by the deemed marine licence, save for operations consisting of offshore preparation works or pre–construction surveys and monitoring approved under the deemed marine licence and the words "commencement" and "commenced" must be construed accordingly;*	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.
6.2	Draft Development Consent Order [REP1-037]	Whilst noting this definition mirrors the definition of commence in Schedule 16, the PLA has concerns about this definition as some of the activities that have been carved out of the definition of commence can be extremely disruptive and therefore require	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**

Reference	Matter	Point Raised	Applicant's Comments
		careful management and co-ordination. The PLA has suggested an alternative definition of commence for its protective provisions which would satisfactorily address its concerns and would allow the Applicant's amendment to remain as set out in Article 2.	**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.
7.1	Marine Chapter 7 - Shipping and Navigation [REP1-060]	The PLA welcomes the updates to the Shipping and Navigation Chapter of the ES [REP1-060] which now includes at paragraph 7.9.80 reference to: • Sunk TSS and Sunk region, including the approach to Harwich Haven; • The approaches to the Port of London surrounding the NE Spit buoy; and • Pegwell Bay and the Kent landfall	This is noted by the Applicant.
7.2	Marine Chapter 7 - Shipping and Navigation [REP1-060]	Text has been included at para 7.9.85 to set out that the PLA has identified areas where they require specific under keel clearance to be preserved. However, the recommendation appears to be that the PLA are kept informed of seabed hazards and changes as they develop (para 7.9.85). As set out in the PLA's Written Representation [REP1-156] a certified plan and a design requirement alongside a clear remediation clause in protective provisions is required to ensure that the cable is installed and then maintained, operated and decommissioned at the required depth.	The Applicant is currently drafting the outline Cable Specification and Installation Plan (oCSIP) which will be provided at Deadline 4. This document will also incorporate the outline Sediment Disposal Management Plan (oSDMP). 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 [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

Reference	Matter	Point Raised	Applicant's Comments
			provisions as necessary, and is working collaboratively with the port stakeholders to agree both the mechanism and the wording.
7.3	Marine Chapter 7 - Shipping and Navigation [REP1-060]	Although Chapter 7 now includes reference to commercial impacts it does not provide any detail on how the commercial implications of not achieving the required depths have been considered. The Applicant has also not taken the opportunity to update the NRA and Marine Chapter 7 – Shipping and Navigation to recognise the future navigation baseline of 20m draught vessels. This is an omission that must be rectified.	The Applicant will provide an updated version of **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 (B) Navigational Risk Assessment [REP1-63]** at Deadline 4 to include further detail on the point raised.
8.1	Marine Chapter 9 – Other Sea Users [REP1-062]	The Other Sea Users Chapter of the ES [REP1-062] has been updated to include clarification that rock backfill may be up to or below seabed level (para 9.9.1 emphasis added). This is inconsistent with the Applicant's Response to ISH1 Action Points [REP1-124] which states rock backfill is proposed to a level below the original seabed level. The PLA has no in principle concerns about the use of rock backfill provided that its use does not impact future bed levels i.e. any rock backfill is placed at a depth that does not prohibit maintenance of water depths of -22m CD at the Sunk, -12.5m CD at Long Sand Head and -12.5m CD at North East Spit regardless of existing water depths (see section 5 of the PLA's Written Representation [REP1- 156]). The PLA raises this matter due to entry 3.3.11 in the Trinity House draft Statement of Common Ground [REP1-083] where Trinity House request that backfill should not overtop the top of the trench and the Applicant's response is that they are unable to commit to that request until a full CBRA has been completed.	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 agrees in-principle that rock emplacement should not overtop the top of trenches where used as backfill. This will be confirmed after the full Cable Burial Risk Assessment has been completed. The development of the Cable Burial Risk Assessment is ongoing and will be consulted on with the consultee post submission. A preliminary Cable Burial Risk Assessment (CBRA) has been undertaken which defines the target Depth of Lowering (DoL) and has been submitted to PINS at Procedural Deadline A (**Application Document 9.21 Sea Link Cable Burial Risk Assessment [PDA-039]**).
8.2	Marine Chapter 9 – Other Sea Users [REP1-062]	The PLA assumes that the Applicant cannot make the commitment that has been requested by Trinity House due to seabed conditions - see the Applicant's reference at paragraph 9.9.1 of REP1-062 which states that external protection (e.g rock berms) may be required where soil or rock conditions area too hard to achieve effective burial, or third-party assets cross the route. However, this commitment must be given in relation to the areas	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

Reference	Matter	Point Raised	Applicant's Comments
		that the PLA has sought to be safeguarded otherwise there could be a long-term detrimental impact on the Port of London. The Applicant states in its Responses to Supplementary Agenda Additional Questions that *"it 8 has made a commitment that where rock backfill is required (between KP38 to KP58 and KP81.5 to KP96.5) no additional external cable protection (rock berms) will be required. These areas correspond to the Sunk and North East Spit*." However given the PLA's comments above, the PLA would suggest that the Applicant's commitment is not clear and that it must be secured somewhere (for example in the oCSIP).	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 agrees in-principle that rock emplacement should not overtop the top of trenches where used as backfill. This will be confirmed after the full Cable Burial Risk Assessment has been completed. The development of the Cable Burial Risk Assessment is ongoing and will be consulted on with the consultee post submission. A preliminary Cable Burial Risk Assessment (CBRA) has been undertaken which defines the target Depth of Lowering (DoL) and has been submitted to PINS at Procedural Deadline A **(Application Document 9.21 Sea Link Cable Burial Risk Assessment [PDA-039]**).
8.3	Marine Chapter 9 – Other Sea Users [REP1-062]	Additional text has also been added to para 9.9.1 to advise that cable crossings will be designed in consultation with key shipping and navigation stakeholders to avoid, where possible, any potential reductions in current and future navigable water depths. Again the PLA would emphasise the need for certainty in the Areas of Interest and consistency across application documents.	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.
9.1	Draft Statement of Common Ground – PLA [REP1-082]	The PLA notes that an updated Statement of Common Ground ("SoCG") was submitted at Deadline 1 and that document that has	This is noted by the Applicant.

Reference	Matter	Point Raised	Applicant's Comments
		been submitted does not contain any tracked changes so it is not possible to easily identify what the Applicant has updated since they last submitted a draft. The PLA will work with the Applicant to update the SoCG jointly in time for submission at Deadline 3.	

21. Applicant's Comments on the Submission from Save Minster Marshes [REP2-103]

Table 21.1 Applicant’s Comments on the Save Minster Marshes Deadline 2 Submission [REP2-103]

Reference	Matter	Point Raised	Applicant’s Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 2			
5	The ‘need’ case/ non-compliance with mitigation hierarchy (Response to Ref 2.9.4, Para 20, p. 273)	We have recent experience of NG’s approach to a ‘formal amendment’ to the DCO in the form of their recent Change Request application of 16 September 2025 to expand the Draft Order Limits in Kent to include the hoverport and a further four amendments to their plans in Suffolk. This demonstrates that a formal amendment is not an onerous process so we have limited confidence in their assertion that they will not use open trenching.	It should be noted that making a formal change request during a DCO examination, prior to a DCO being granted by the Secretary of State is very different from making a change to a DCO once it has been made and becomes a statutory instrument. The change process subsequent to the making of a DCO, particularly if the changes are material, requires a formal process to be followed which is rigorous and may require a new/updated application and potentially a further examination to determine whether the change can be consented.
7	Traffic, Pollution and Health (Response to Ref 2.9.12, para. 52, p. 283)	This overlooks critical flaws in data collection and underestimates real-world impacts, particularly in a seasonally variable area like Thanet. SMM maintains that the January 2025 traffic surveys are unrepresentative, capturing off-peak conditions when tourism is minimal and seasonal businesses closed. Despite raising this as an issue, no supplementary surveys were conducted, breaching best practice for comprehensive EIA under NPS EN-1. NG's argument that lower baselines yield “conservative” (higher) impact percentages is misleading; it ignores peak summer congestion where added construction traffic could exacerbate delays, accidents, and pollution disproportionately. “Highway accident statistics, based on five-year KCC data, are similarly skewed by off-peak baselines, understating risks. The main artery A256 has been omitted which will require extensive repairs over the same proposed construction period	A response on these two matters (traffic surveys and highway accident statistics) is provided in Table 2.27, Reference 60, Save Minster Marshes (REP 1-246, REP1-248, REP1-250) in **Application Document 9.79: Applicant’s Comments on Written Representations [REP2-034]**, in response to Written Representations previously provided by Save Minster Marshes at Deadline 2.
7	Traffic, Pollution and Health (Response to Ref 2.9.12, para. 52, p. 283) - Air Quality (Para. 52)	NG's modeling of construction vehicles, dust, and NRMM emissions claims negligible changes below standards, but this relies on incomplete assessments that fail to model peak seasonal interactions or cumulative pollution from nearby projects. Detailed modeling outputs lack transparency on assumptions. Mitigation measures are generic, without enforceable monitoring to ensure “not significant” outcomes.	The cumulative traffic flows used in the assessment, as set out in **Application Document 6.3.3.13.B ES Appendix 3.13.B Preliminary Cumulative Highway Impact Assessment [APP-194]**, represent an unlikely scenario whereby all of the projects precisely overlap in terms of peak construction activity, at the same time as the peak construction years of the Proposed Project. These estimates are therefore overly worst-case. From a traffic and transport perspective, further details on the inter-project cumulative assessment are provided in response to SCC’s Local Impact Report (LIR) within **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**. The Applicant has also responded to the Examining Authority’s Written Questions 1TT1, 1TT5, 1TT12, 1TT17 and 1TT18 within **Application Document 9.73 Applicant's Responses to First Written Questions** submitted at Deadline 3, which include considerations relating to transport cumulative effects. The flows used in the air quality assessment were in the format of Annual Average Daily Traffic (AADT). The use of AADT reflects long-term exposure and is appropriate for

Reference	Matter	Point Raised	Applicant's Comments
			assessing annual mean objectives. While short-term spikes (such as convoys or concentrated deliveries) may occur, these are typically infrequent and short in duration and predicted concentrations for all receptor locations using the cumulative flows were all well below their respective air quality objectives, as presented in **Application Document 9.50 Cumulative Vehicle Emissions Assessment [REP1-123].** As stated in **Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]**, assumptions relating to the construction traffic data used in the assessment are provided in **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]**. All parameters used in the model and any assumptions made are set out in **Application Document 6.3.3.8.B ES Appendix 3.8.B Air Quality Modelling Methodology [APP-186]**. The mitigation measures proposed are appropriate and have been adapted to the Proposed Project. Additional measures have been added following consultation, where required. The measures are secured through Schedule 3 Requirement 6 of **Application Document 3.1 (F) draft Development Consent Order** submitted at Deadline 3**,** making them enforceable. **Application Document 7.5.6.2 (B) Outline Air Quality Management Plan - Kent** submitted at Deadline 3 outlines the air quality 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. As outlined in **Application Document 7.5.3 Outline Onshore Construction Environment Management Plan [AS-127]**, regular monitoring will be undertaken to ensure compliance with the Onshore CEMP and immediate action will be taken including, if necessary, 'stopping the activity in question, where safe to do so', should any incidents or non-conformance with the Onshore CEMP, be found during inspection.

22. Applicant's Comments on the Submission from Saxmundham Against Needless Destruction [REP2-104]

Table 22.1 Applicant's Comments on the Saxmundham Against Needless Destruction Deadline 2 Submission [REP2-104]

Reference	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 1			
5 – 8.	Landscape and Visual Impact	Failure to Address Scale and Dominance, Misrepresentation of Skyline Effects, River Fromus Bridge Impacts and Heritage Setting Conflicts	Regarding the proposed Saxmundham Converter Station and effects on the skyline, the comments provided within **Application Document 9.34.5 (B) Applicant's Response to Selected Relevant Representation Responses [REP2-022]** remain valid. The assessment of visual effects (detailed within **Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]**) reflects the scale of the converter station and this is not considered to have been downplayed. The assessment of visual effects also includes consideration of seasonal variation where appropriate, including providing a worst case winter year 1 assessment. Regarding the proposed River Fromus bridge, **Application Document 9.48 River Fromus Visualisations Parts 1 – 3 [REP1-298, REP1-299 and REP1-300]** should be referred to. The visualisations and accompanying text provide further details around how the River Fromus bridge would be experienced from the landscape to the west as views from elsewhere are screened by intervening landform and vegetation. Heritage impacts were assessed in **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109], 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** as part of the DCO submission. This has been supported by further documents including an assessment of impacts on the Grade II* listed Church of St John the Baptist in Saxmundham (**Late Deadline 1 Submission - 9.44 St John's Church Grade II* Listed Building Assessment - Accepted at the discretion of the Examining Authority [REP1-118]),** as well as a response to the assessment of impacts provided SEAS **(9.34.1: Applicant's Comments on Relevant Representations Identified by the ExA [REP1A-043]).**
9-12.	Landscape and Visual Mitigation	Screening Planting Cannot Mitigate Scale and Permanence, Cosmetic Design Principles Do Not Address Core Harm, Operational Requirements vs. Policy Compliance and Consultation on Alternatives Was Inadequate	Regarding the proposed landscape planting, the comments provided within **Application Document 9.34.5 (B) Applicant's Response to Selected Relevant Representation Responses [REP2-022]** remain correct. The assessment of visual effects (detailed within **Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098**]) is adequate and takes into consideration timeframes of planting maturing and seasonal variation where appropriate. **Application Document 9.14 Suffolk and Kent Illustrative Visualisations Part 1 of 2 [REP1-296]** should be referred to as this demonstrates the importance and value in locating the smallest feasible compound and the building mass within it, as far south as possible within the defined LoD to reduce visual impact, especially at year 15. This is secured as design principle CO.2 in the converter station design principles (refer to Table 3.1 in **Application Document 7.12.1 Design Principles – Suffolk [APP-366]**). The design principles are secured by Schedule 3

Reference	Matter	Point Raised	Applicant's Comments
			Requirement 3 within the draft DCO (**Application Document 3.1(E) draft Development Consent Order [CR1-027]**). The Applicant considers that points relating to operational requirements vs policy compliance and the adequacy of the consultation on alternatives have been responded to in previous submissions.
13-16	Site Selection	Failure to Justify Use of Prime Farmland, Inadequate Evaluation of Brownfield Sites, Proximity to Residential and Heritage Assets, Lack of Transparent Alternatives Process	Points relating to why brownfield sites were discounted and, therefore, why farmland had to be included in siting options for the Proposed Project, have already been responded to in **Application Document 9.34.5 (B) Applicant's Response to Selected Relevant Representation Responses [REP2-022].** Impacts on residential areas and heritage assets were factors considered during the siting of the Converter Station. The Applicant considers that points relating to the assessment of alternatives have been responded to in previous submissions.
26-27	Air Quality – Localised Impacts and Screening Criteria	The Applicant relies on IAQM/EPUK screening thresholds to dismiss impacts as negligible. These thresholds are designed for generalised assessment, not for rural towns with constrained junctions and sensitive receptors. Residents experience pollution at street level, not averaged across wide corridors. The Applicant's methodology therefore underestimates harm. The Applicant's modelling focuses on the A12 corridor but fails to assess confined streets and junctions within Saxmundham and surrounding villages where HGV traffic will concentrate. Narrow roads, residential frontages, schools, and pedestrian areas are highly sensitive receptors. Even modest increases in HGV flows can elevate localised NO_2 and particulate levels in these micro-environments, which are not captured by broad screening criteria.	The IAQM/EPUK screening thresholds applied in the air quality chapter (**Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]**) are nationally recognised thresholds based on empirical evidence and are widely applied in assessments (in both rural and urban areas) to ensure consistency and proportionality. The thresholds are designed to identify locations where changes in traffic flows could materially affect air quality concentrations and determine where detailed assessment is required. For routes that were not screened in for detailed assessment, including those through Saxmundham and surrounding villages, predicted traffic flows were well below the IAQM/EPUK screening thresholds. This approach was agreed in consultation with East Suffolk Council and Suffolk County Council. Where the IAQM/EPUK screening thresholds were exceeded, detailed dispersion modelling was undertaken at worst-case street-level receptor locations. Factors such as road widths were included in the model. The model was verified using data from seven air quality monitoring locations. This methodology ensures sensitive locations were fully considered and that any potential air quality impacts were robustly assessed.
28	Air Quality - Revocation of AQMAs Does Not Remove Risk	The Applicant notes that the A12 Air Quality Management Area has been revoked. This is irrelevant to Saxmundham's situation. Revocation reflects past compliance, not immunity from future exceedances. Introducing sustained HGV traffic through Saxmundham risks re-creating localised exceedances, particularly in confined streets where dispersion is poor.	The air quality chapter (**Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]**) referenced the revocation of the A12 Air Quality Management Area solely to provide context on current compliance with national air quality objectives. The Applicant fully acknowledges that revocation does not imply immunity from future exceedances. For this reason, detailed dispersion modelling was undertaken at worst-case street-level receptor locations along the A12, rather than relying on historic data alone. In terms of traffic movements through Saxmundham, construction traffic will be limited to environmental mitigation and mobilisation works (associated with the eastern abutment of the Fromus Bridge) only, which will be completed over a period of four months early in the programme, with a maximum of 25 vehicles, including just two HGVs per day. Once the new access to the Saxmundham Converter Station and the Fromus Bridge is constructed, all HGVs will use this access from the B1121 Main Road, avoiding routing through Saxmundham and nearby villages.
29	Air Quality - Cumulative and Temporal Effects Overlooked	The Applicant's modelling does not account for cumulative impacts from overlapping energy projects or peak construction traffic. Nor does it adequately consider temporal spikes, such as convoy movements or concentrated deliveries, which can cause short-term	Predicted air quality concentrations for all modelled receptor locations using cumulative flows are presented in **Application Document 9.50 Cumulative Vehicle Emissions Assessment [REP1-123].** The cumulative traffic flows used in the assessment, as set out in **Application Document 6.3.2.13.B ES Appendix**

Reference	Matter	Point Raised	Applicant's Comments
		exceedances harmful to health. These omissions undermine the credibility of the "negligible" conclusion.	**2.13.B Preliminary Cumulative Highway Impact Assessment [APP-142]**, represent an unlikely scenario whereby all of the projects precisely overlap in terms of peak construction activity, at the same time as the peak construction years of the Proposed Project. From a traffic and transport perspective, further details on the inter-project cumulative assessment are provided in response to SCC's Local Impact Report (LIR) within **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**. The Applicant has also responded to the Examining Authority's Written Questions 1TT1, 1TT5, 1TT12, 1TT17 and 1TT18 within **Application Document 9.73 Applicant's Responses to First Written Questions** submitted at Deadline 3, which include considerations relating to transport cumulative effects. These estimates are therefore overly worst-case. The flows used in the assessment were in the format of Annual Average Daily Traffic (AADT). The use of AADT reflects long-term exposure and is appropriate for assessing annual mean objectives. While short-term spikes (such as convoys or concentrated deliveries) may occur, these are typically infrequent and short in duration and predicted concentrations for all receptor locations using the cumulative flows were all well below their respective air quality objectives.
30	Air Quality - Public Health Risks Understated	Particulate matter (PM_{10} and $PM_{2.5}$) is linked to respiratory illness, cardiovascular disease, and childhood asthma. Even small increases in concentrations at sensitive receptors are significant for public health. The Applicant's dismissal of impacts as "not significant" ignores the precautionary principle and the duty under NPS EN-1 5.2 to protect human health.	The Applicant fully recognises that particulate matter is associated with serious health effects, including respiratory and cardiovascular diseases and childhood asthma. As presented in the air quality chapter (**Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]**), detailed modelling of construction vehicle emissions was undertaken in accordance with best practice guidance. In accordance with the IAQM/EPUK significance criteria, the predicted temporary changes in PM_{10} and $PM_{2.5}$ concentrations at worst case receptor locations as a result of the Proposed Project were all negligible and concentrations were well below the respective air quality objectives. Measures to minimise emissions as far as practicable have been included in **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043].** In addition to the measures proposed, monitoring of air quality pollutants, including PM_{10} and $PM_{2.5}$, is proposed at the boundaries of the construction compounds where there are receptors within 200 m, as well as at a location within the former Stratford St Andrew Air Quality Management Area, to ensure the mitigation measures are working effectively, as detailed in the **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129].**
33	Flood Modelling Limitations	The Applicant relies on flood modelling approved by the Environment Agency. However, modelling is based on assumptions and does not account for cumulative impacts of multiple energy projects in East Suffolk or climate change-driven extreme rainfall events.	As detailed in **Application Document 6.8 Flood Risk Assessment [APP-292]** the flood modelling of the River Fromus is based on survey data collected from site, gauged flow records and Environment Agency good practice, not assumptions. The modelling, as well as the operational drainage systems that will serve the Project during its operation, account for climate change, in terms of increases to peak rainfall intensity and river flows. The cumulative effect of other Projects within the Fromus catchment have been assessed as detailed in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**.
34	Water Management and Flood Risk	Heritage and Landscape Impacts of Hydrological Change	The above responses explain why significant hydrological changes are not anticipated with the adoption of mitigation measures, where necessary.
36.	Restrictions Do Not Prevent Harm	The Applicant cites caps on HGV movements and limits on percussive piling. However, 30 HGV movements per day still	A response to this comment regarding the matter of implementing a cap of 30 HGV movements per day for a list of allowable construction activities on Sundays

Reference	Matter	Point Raised	Applicant's Comments
		represents significant disruption in narrow rural streets, particularly when combined with noise from plant, alarms, and general construction activity. Even "low-impact" activities generate noise, dust, and traffic that intrude on residential amenity. These restrictions do not prevent harm; they merely ration it.	and Bank Holidays was provided within Reference 76 in Table 2.9 Traffic and Transport of the response to SCC Relevant Representation (**Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**). The construction vehicle routing has been planned to minimise impacts across the highway network, as set out within **Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041]**.
38.	Assessment Understates Real-World Effects	The Applicant's traffic and transport assessments conclude "no significant adverse effects". This conclusion is not credible. Residents will experience noise, vibration, dust, and traffic intrusion during weekends and holidays, when baseline activity is lowest and disruption most keenly felt. The assessments fail to capture the lived experience of continuous disruption in a rural town.	With regard to working hours including on Sundays and on Bank Holidays, the Applicant has responded on the matter in Table 6.7, Reference 6.7.13 of **Application Document 9.34.5 (B) Applicant's Response to Selected Relevant Representations [REP2-022]**. The Applicant has also provided a response to this with respect to construction noise and vibration in Table 2.27 of **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**. The Traffic and Transport assessments within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** demonstrate that with the proposed mitigation, no significant adverse effects are anticipated. Furthermore, the Applicant has committed to ongoing dialogue with the Local Highway Authority through detailed construction planning and coordination.
39.	Working Hours and Community Disruption	Lack of Binding Safeguards	The assessment findings do not rely on any further mitigation that may be agreed during ongoing dialogue; however, it should be noted that the relevant planning authority will be responsible for agreeing the final detailed management plans listed under Requirement 6 of the draft DCO (**Application Document 3.1(E) (Version 2, Change Request) draft Development Consent Order [CR1-028]**.

23. Applicant's Comments on the Submission from Shepherd + Wedderburn on behalf of Scottish Power Renewables (UK), East Anglia ONE North Limited & East Anglia TWO Limited [REP2-046]

Table 23.1 Applicant's Comments on the on the Shepherd + Wedderburn on behalf of Scottish Power Renewables (UK), East Anglia ONE North Limited & East Anglia TWO Limited Deadline 2 Submission [REP2-046]

Reference	Matter	Point Raised	Applicant's Comments
WR- REP2-046.01		1.1 We refer to the above Project and confirm we are instructed by ScottishPower Renewables (UK) Limited ("SPR"), East Anglia ONE North Limited ("EA1NL") and East Anglia TWO Limited ("EA2L"). 1.2 SPR is the parent company of EA1NL, who has the benefit of the East Anglia ONE North Offshore Wind Farm Order 2022 ("EA1N"), and EA2L, who has the benefit of the East Anglia TWO Offshore Wind Farm Order 2022 ("EA2"). EA1N, EA2L and SPR are interested parties to the examination of the application for development order for the Project (the "Examination"). 1.3 EA1NL, EA2L and SPR have reviewed submissions made by the National Grid Electricity Transmission Plc (the "Applicant") and interested parties at examination deadline 1 and deadline 1A and wish to respond to several points made in those submissions.	Noted, Thank you.
WR- REP2-046.02		2. Update on Landscape Management 2.1 SPR wish to provide an update on the status of landscape mitigation at the Kiln Lane (Friston) substation under the EA1N and EA2 development consent orders ("DCOs"). EA1NL and EA2L will shortly lodge their landscaping masterplan under Requirements 14 and 15 of the EA1N and EA2 DCOs.	
		2.2 The landscape masterplan has been prepared on the basis of the Outline Landscape and Ecological Management Strategy submitted and certified as part of the examination process for the EA1N and EA2 DCOs. The masterplan has been refined as part of detailed design in key areas, site visits post consent, further modelling of views, and landowner engagement.	The Applicant has been in further liaison with SPR about the approach to the landscape masterplan.
		The Project is currently in the early stages of Examination, and National Grid Ventures' ("NGV") Lionlink project is due to start statutory consultation in quarter 1 of 2026, with submission of an application expected in late 2026.	It is correct to say that Sea Link was in early stages of examination.
		2.3 It is anticipated that the landscape masterplan would have to be amended where the Project's or Lionlink's cables come through. SPR will continue to work closely with both the Applicant	The Applicant is pleased to continue its close liaison with SPR to ensure the projects can co-exist.

	and NGV (in respect of Lionlink) on revised mitigation plans that address the effects of these cables on the landscape masterplan. SPR's engagement with NGET and NGV to date indicates that the cables for the Project and Lionlink could affect limited sections of trees to the north-east and north-west. Based on SPR's knowledge, and engagement with NGET and NGV, it is considered that the functionality of the landscape framework can be maintained in the circumstances above.	The Applicant agrees that the landscape masterplan most recently developed by SPR requires amendment to accommodate Sea Link, and agrees that the cables associated with the Sea Link project can be implemented while maintaining the functionality of a detailed landscape design.
	2.4 Based on SPR's engagement with NGET and NGV, SPR have not been advised of any other changes that would be needed and SPR envisages that an appropriate revised mitigation plan can be agreed. Once an appropriate revised mitigation plan is agreed, EA1NL and EA2L will seek an amendment to their masterplan under Requirement 40 of the EA1N and EA2 DCOs and SPR will work closely with NGET and/or NGV to bring forward amendments.	The Applicant and SPR have been in continued liaison on this topic. including the extent of required changes to the most recently developed SPR landscape masterplan.
WR- REP2-046.03	3. Book of Reference and related documents 3.1 The Applicant's Book of Reference [REP1A-001], Land Plans [REP1-034] and [CR1-003], and Land Rights Tracker [REP1-126a] do not reflect the current position in terms of SPR, EA1NL and EA2L's property acquisitions. SPR, EA2L and EA1NL provided the Applicant with this information on 16 October 2025. SPR, EA2L and EA1NL ask that these documents are updated as soon as possible to reflect the up to date position in terms of their land interests. 3.2 It is also noted that EA1NL and EA2L are not included in the Schedule of Negotiations with Land Interests [REP1-044], and the Land Rights Tracker [REP1-126a]. We understand from the Applicant that these documents will be updated at Deadline 3 (9 January 2026), which limits the opportunity for SPR, EA1NL and EA2L (and other landowners) to review the changes ahead of the Compulsory Acquisition hearing scheduled for the week of 26 January 2026. It should be noted that if the Book of Reference is not appropriately updated at Deadline 3, SPR's ability to review the changes would be further compromised.	The Applicant thanks SPR for providing the shapefiles with updated land ownership information and can confirm it will be incorporated into the Deadline 3 Book of Reference updates with SPR showing as 'reputed owner' alongside the parties shown on HMLR until HMLR is sufficiently updated to confirm the updated SPR land interest. The parties set out in the schedule of negotiations follows the Book of Reference and as such will be updated alongside the Book of Reference for Deadline 3. The negotiations will be listed with SPR rather than EA1N or EA2 until we have confirmation of land ownership with the relevant project. At present the information provided just shows SPR as the Applicant understands the options are yet to be novated. The Applicant has been in liaison with SPR to advance all issues between the parties.
WR- REP2-046.04	4. Friston/Kiln Lane substation construction 4.1 SPR note that the Applicant have indicated that there is a possibility SPR will construct the Friston substation (for example, in the Applicant's responses to relevant representations from Statutory Consultees and Bodies [REP1-112], at page 132). SPR would like to clarify that, while the intention is the Kiln Lane (Friston) substation will be constructed under the EA1N/EA2 DCOs, SPR will not be constructing the substation. 4.2 SPR appreciate that construction planning is ongoing; however, the Kiln Lane (Friston) substation is being designed by the Applicant and it will be constructed by the Applicant. As noted by the Applicant in its Response to Issue Specific Hearing 1 Action	The Applicant agrees that National Grid is designing and constructing Friston (Kiln Lane) substation. Friston (Kiln Lane) substation is likely to be constructed under SPR's consents, but not constructed by SPR. The Applicant also agrees with SPR that the parties are working closely and intensely to progress agreements to deliver the substation. The Applicant also supports measures to accelerate construction, alongside other measures to minimise the impact on local residents. However, the Applicant agrees with SPR's position that there is no

	Points [REP1-124], the Applicant and SPR are working closely to put agreements in place to enable the delivery of the substation by the Applicant, including a transfer of benefit agreement and the transfer of necessary land rights held by EA1NL and EA2L. 4.3 East Suffolk Council's ("ESC") Local Impact Report [REP1-128] (at paragraphs 6.5.2.1 – 6.5.2.3) outlines ESC's preference for a "one phase" delivery of the Kiln Lane (Friston) substation. While SPR are supportive of measures to shorten the length of construction activities to reduce impacts on local residents, the EA1N and EA2 projects are Critical National Priority infrastructure (as discussed in the Overarching National Policy Statement for Energy (EN-1) and the National Policy Statement for Renewable Energy Infrastructure (EN-3). The Applicant's construction of the Kiln Lane (Friston) substation for the purpose of connecting the EA2 and EA1N projects to the national grid cannot not be delayed until after determination of the application for the Project (and discharge of relevant requirements) or determination of any Lionlink application (which is not yet submitted).	justification to delay construction of Friston (Kiln Lane) substation (or other aspects of the projects consented under the EA1N and EA2 DCOs) to wait for delivery of later projects. The Applicant would also emphasise that if Friston (Kiln Lane) is constructed under the SPR consents, the works required at the substation itself for Sea Link would be very limited.
WR- REP2-046.05	5. Protective Provisions 5.1 SPR, EA2L and EA1NL reiterate they will require protective provisions in any DCO which is granted for the Project. SPR, EA2L and EA1NL have commenced the development of draft protective provisions and will work with the Applicant in respect of these.	The Applicant will continue to liaise with SPR to ensure their assets are properly protected when constructed.

24. Applicant's Comments on the Submission from Snape Parish Council

Table 24.1 Applicant's Comments on the Snape Parish Council Deadline 2 Submission [REP2-106]

Reference	Matter	Point Raised	Applicant's Comments
-	*Introduction*	I write to respond on behalf of Snape Parish Council to the Applicant's responses to Relevant Representations, RR-5044 submitted on 19/06/25. We submit our views on the Applicant's responses in Paras 1-4, and draw your attention to the procedural issues noted in para 5, 'Procedural Issues'.	N/A
1	*General Comments on the Applicant's responses.*	1.1 Without doubt NGET has failed to address any or all of our specific points, which is disappointing, given that the ExA had asked for specific clarification NGET's failure to provide a Traffic Assessment rather than a 'Note'. Their response consists entirely of reference back to their own documents submission on which we were commenting, which is unsatisfactory and a breach of trust in the procedure. 1.2 We set out below in further detail issues on which we asked the Applicant to comment. They have not addressed the mitigation measures we suggested, nor made any explanation of the restricted study area, which excludes the consequent significant pressures that our village and the surrounding minor rural road network will face. These issues have been raised in consultation and engagement with the Applicant over the last few years.	The approach to prepare a Transport Assessment Note, rather than a Transport Assessment (TA), was discussed and agreed with key stakeholders prior to DCO submission; namely: Suffolk County Council (SCC) Highways and National Highways, in the interests of minimising repetition between documents. Further details of the various consultation held, including to review the proposed approach of the Transport Assessment Note are provided within Section 7.3 of **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. The information that would typically form part of standalone TA and is relevant to the Traffic and Transport assessment based on the agreed methodology can be found in other chapters and reports prepared for the Suffolk Onshore Scheme, including **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. The locations where this information can be found across the submission documents is signposted within **Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122]** which also includes further information where necessary, including to address feedback received from National Highways with respect to the Strategic Road Network, and to provide further details on the collision data analysis, permanent access points and committed developments. The Applicant has also provided responses to the Examining Authority's Written Questions within **Application Document 9.73 Applicant's Responses to First Written Questions** submitted at Deadline 3.
2	*Specific Issues without response from the Applicant at Deadline 1A*	2.1 We noted in our RR and OFH1 WR that NGET were making a completely unrealistic claim that their project will have so little impact on traffic and transport issues that they do not even need to prepare a Transport Assessment. NGET's error was at least partly due to their using a study area that excludes from consideration local roads south of the A1094 that are already bearing the pressures of diversionary tactics by drivers trying to avoid traffic pressures from SZC and SPR construction. This situation allows	As above, the approach to prepare a Transport Assessment Note, rather than a Transport Assessment (TA), has been agreed with SCC Highways and National Highways. The study area for the assessment was defined based on the area where there could potentially be a transport impact resulting from the construction of the Proposed Project. This includes routes along which HGVs will travel during the works programme, as well as the most likely routes that will be used by other construction workers.

		us to make very accurate predictions about where the further pressures that Sea Link will be adding will be felt. 2.2 Whilst our concerns centre on the dangerous and already overburdened junction A1094/B1069 Church Common junction, the wider picture includes four traffic 'nodes' where diversionary tactics, mostly by local drivers, will have significant impacts. These are Church Common itself, Friday Street, the Tunstall junction(s) of the B1078 and B1069, and the roads around the station at Wickham Market. Not all of these are 'Snape' roads, but they are all (excluding of course Friday Street) 'attractors' for traffic wishing to find a 'practical' route away from the A1094 and towards either the A12 south or the A1152 towards Rendlesham and Woodbridge; and all of them will bring traffic directly through Snape Village and Snape Maltings. 2.3 As traffic increases, a series of alternative routes open up, as we know from diversions for roadworks or flooding. There are five feasible junctions with the A12 south of the B1121 that affect Snape roads – Friday Street, Farnham, Tinker Brook, Church Road at Little Glemham and the Lower Hacheston junction via Campsea Ashe; and the B1069 leads to the A1152 at Rendlesham and leads on to Woodbridge. If we assume that for the foreseeable future the Friday Street junction (and indeed the A12 between Lower Hacheston and Kelsale) become options to avoid, then we will certainly have increases in: - Traffic from Saxmundham and north-east of Saxmundham using Sternfield Road crossing the A1094 at Church Common to the B1069 south for access to the A1152 and the A12; - Traffic on the A1094 from Leiston, Aldeburgh and eastern villages, turning left initially at the B1069 junction but then perhaps eventually via the quiet lane Priory Road, to join the B1069 in Snape Village, again for access to A1152 and A12; - Traffic from the A12 using the A1152 through Eyke and Rendlesham to join the B1069 northwards and then on to cross the A0194 at Church Common or via a quiet lane ratrun. All of these routes are already well known to local drivers, and Snape residents have seen traffic increases through the village steadily over 2025. None of the routes mentioned, however, falls within the 'study area' and therefore we reject the claim of 'no significant transport implications'.	The study area was defined (and agreed) following discussions with SCC Highways during the initial scoping meeting on 9 June 2023 and when reviewing the proposed scope of the traffic surveys in December 2023. The study area was subsequently refined following further discussions and feedback received during Targeted Consultation. The A1094 and the A1094/B1069 Church Common junction fall within the study area and have been assessed within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. The routes to the south of the A1094/B1069 Church Common junction will not be used by HGVs associated with the Proposed Project, as shown by the HGV routing figure within **Application Document 6.4.2.7 ES Figures Suffolk Traffic and Transport [APP-234]**. The assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** does 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. This includes parts of the highway network to the north of Snape including the A1094 and the A1094/B1069 Church Common junction. Therefore, it is not expected that road users will experience any significant traffic delays as a result of construction traffic associated with the Proposed Project during the peak construction phase (2028 Future Year scenario), nor will be encouraged to utilise alternative routes such as minor roads (including those through Snape) in this instance.
3	*The critical impacts for our Parish will include:*	3.1 Increased risk to drivers and pedestrians and settlement separation at the Church Common junction, which has poor visibility and has already been identified by SPR's EA1N/EA2 project as requiring safety upgrade; Snape PC's view is that at a minimum the A1094 speed limit between Snape Watering and (at the closest) the B1069 Leiston junction should be reduced to 40mph throughout, and signage at the junction adapted to the new stress on the junction that 346 daily Sea Link HGV movements will bring;	As shown by **Application Document 6.3.2.7.G ES Appendix 2.7.G Traffic Flow Diagrams** which informs **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, there is expected to be a daily maximum of 180 HGV movements through the A1094/B1069 Church Common junction and a weekday daily average of 58 HGV movements through this junction, which is considerably lower than the quoted figure of 346 HGV movements which represents the overall daily peak for the Proposed Project, split across multiple routes and accesses.

		3.2 Traffic congestion through the village will have negative impacts on air quality, noise, severance and road safety - Bridge Road, between the Village and Snape Maltings will be particularly impacted, affecting tourism and local employment; 3.3 Specifically, increased, heavy traffic will have a severe impact on the safety of children and parents at Snape Primary School, Church Road – it is essential that the present national speed limit between Church Common and the entrance to the village is reduced to a maximum of 30mph, preferably 20mph through the upper Village; 3.4 Rat-running through the minor rural road network cannot be eliminated entirely, but on behalf of all villages with Quiet Lanes, we feel strongly that action should be taken to preserve this amenity, and to save at least one opportunity for village residents not to be driven out of their rural environment by industrial pressures on local traffic; 3.5 Local residents have already reported serious damage to local roads used as diversions whilst SZC preliminary works are carried out; this damage to verges, hedgerows and the local ecology will become a permanent scar on our environment if we allow this project to add yet more to the pressure on the local network.	The assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** does not identify the potential for any significant effects on the highway network with respect to Severance, Driver Delay and Road Safety, including at the A1094/B1069 Church Common junction. Therefore, it is not expected that road users will experience any significant traffic delays as a result of construction traffic associated with the Proposed Project during the peak construction phase (2028 Future Year scenario), nor will be encouraged to utilise alternative routes such as minor roads (including those through Snape) in this instance.
4	*Mitigations Required*	4.1 For the record, we repeat here in summary our requests made to the ExA at OFH1: - We ask that the ExA requires Sea Link to carry out better specified traffic analysis, including detailed junction surveys, and to do this through close working with SZC and SPR; and to make any consequent changes to their traffic planning a requirement of the DCO; - On roads at most danger from rat running, Sea Link should be required to fund signage to discourage use of unsuitable, easily damaged and potentially unsafe roads and lanes by rat running, and required to fund the introduction of additional traffic calming or Quiet Lanes; - We join with other parishes to ask that the Applicant be required to fund local Town and Parish Councils to manage the vast pressures they face with this quite unmanaged NSIP onslaught.	Traffic surveys within Suffolk were carried out in January and February 2024, based on an agreed survey methodology with SCC Highways. The surveys and survey results including the A1094 and the A1094/B1069 Church Common junction and are considered to be appropriate and robust for the purposes of the assessment work within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**. The assessment within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** does 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. This includes parts of the highway network to the north of Snape including the A1094 and the A1094/B1069 Church Common junction. Therefore, it is not expected that road users will experience any significant traffic delays as a result of construction traffic associated with the Proposed Project during the peak construction phase (2028 Future Year scenario), nor will be encouraged to utilise alternative routes such as minor roads (including those through Snape) in this instance. As such, it is not necessary to provide mitigation beyond that already identified. The Applicant has previously provided responses to comments relating to financial compensation and community benefit funding within Table 7.24 and Table 7.31 of **Application Document 9.34.6 (B) Applicant's Thematic Responses to Relevant Representations [REP2-024]**. The Applicant has also provided responses to the Examining Authority's Written Questions within **Application Document 9.73 Applicant's Responses to First Written Questions** submitted at Deadline 3.

5	*Procedural Issues*	We strongly object to the procedural and administrative failings in the Applicant's responses to our Relevant Representation, on three grounds: 5.1 With vastly less resource that the Applicant, we have made Relevant Representation, OFH1 presentation and Written Representation on time, in accordance with the Examining Authority's published timetable. The Applicant has treated the timetable as optional, and their late submission has removed more than half of the time the Parish Council had counted on for review and agreement of our response to their views. That has been permitted, and yet the Parish Council is aware that the ExA will give Interested Parties no permission for late submission. This is inequitable. 5.2 The Applicant claims to place some importance on the views of local communities, and is aware of the roles played by Town and Parish Councils in gathering and reflecting the views of local people. With five months at their disposal to review our submission, however, they have chosen instead to group all local Parish, Town Councils and local community groups together with over 5,500 members of the public, and to prepare one single response on each of an arbitrarily selected set of 'themes'. The selection and allocation of responses has been based on a crude word-search, and thus 'answers' to Snape PC on two topics which we did not actually raise. This is undemocratic and unbusinesslike, and exemplifies the Applicant's dismissive attitude towards this Examination.. 5.3 The Applicant's administrative treatment of the documents has been terrible, and has cost us wasted time trawling through unmarked pages of lists and searching for potentially updated versions of files. Shown below is the completely unhelpful 'Contents Page' of 9.34.6, 'Applicant's Thematic Responses to relevant Representations', REP1-117. This is the complete page, and we wonder how this level of slipshod drafting has not only been accepted, but accepted at your discretion well after the due deadline. We must therefore reserve our position on 'wasted costs', in line with the ExA's Rule 17 letter of 28 November 2025.	The Applicant has provided a response to the Snape Parish Council Deadline 2 Response [REP2-106] above. The administrative issues identified by Snape Parish Council on **Application Document 9.34.6 Applicant's Thematic Responses to Relevant Representations [REP1-116]** have been addressed within **Application Document 9.34.6 (B) Applicant's Thematic Responses to Relevant Representations [REP2-024]**.

25. Applicant's Comments on the Submission from Suffolk & Essex Coast & Heaths National Landscape Partnership

Table 25.1 Applicant's Comments on the Suffolk & Essex & Heaths National Landscape Partnership for Deadline 2 Response [REP2-038]

Reference	Matter	Point Raised	Applicant's Comments
REP-130 Suffolk County Council Local Impact Report	Suffolk & Essex Coast & Heaths National Landscape and Suffolk Heritage Coast	To summarise the National Landscape considers that the effects during construction do not fully reflect the impacts on all defined features of the national landscape, including impacts on the defined scenic quality, relative tranquillity and relative wildness. The National Landscape consider that these impacts will be experienced by the designated landscape for a considerable period during the construction period and likely over a number of years.	The Applicant refers SECHNLP to **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]** and specifically the response to paragraphs 5.46 to 5.58. In addition, reference should be made to Appendix A 1LVIA9 Natural Beauty Indicators and their Sub-Factors within **Application Document 9.73.1 Applicant's Responses to First Written Questions – Appendices** submitted at Deadline 3 which provides further detail on how the sub-factors of the Natural Beauty Indicators have the potential to be affected by the Proposed Project.
REP1-120 Application Document 9.47 National Landscape Section 85 Duty Technical Note	Section 85 of the Countryside and Rights of Way Act (2000)	SECHNLP reaffirm their position recognised in the draft Statement of Common Ground [REP 1A-034] that '*Where the National Landscape Partnership's opinion diverges from the applicant's view relates to its view that the proposal may not be considered to fully mitigate the impacts of the construction phase*.' The National landscape Partnership note the continuing discussions and negotiations between other Nationally Significant Infrastructure Project proposers and National Landscapes, such as the Norwich to Tilbury Project (Dedham Vale), Lower Thames Crossing (Kent Downs) and North Falls (Suffolk & Essex Coast & Heaths). For the avoidance of any doubt, the National Landscape Partnership do not consider the potential impacts of the Sea Link proposals to be of the same magnitude as those of the projects listed above, but is not convinced that the acid grassland restoration and acid grassland creation fully meets the requirements of the enhanced section 85 Countryside and Rights of Way Act (2000). The National Landscape Partnership would welcome further dialogue and discussion with the scheme proposer on how the area of the National Landscape particularly impacted by the proposals could be further conserved and enhanced, perhaps through a contribution to its Sustainable Development Fund (a grant scheme to enhance the environmental, social and economic elements of the National Landscape), or a ringfenced or focused approach to the impacted area, noting that impacts to part of the National Landscape are considered to be an impact on the National Landscape as a whole.	The Applicant acknowledges the divergence of view between the SECHNLP and the Applicant regarding the strengthened section 85 duty requirement, reflected by the 'under discussion' status of section 3.1.1 of **Application Document 9.42 Draft Statement of Common Ground Between National Grid Electricity Transmission and the Suffolk & Essex Coast & Heaths National Landscape Partnership [REP 1A-034].** The Applicant is aware of the continuing discussions between other Nationally Significant Infrastructure Project proposers and National Landscapes and notes the importance of an appropriate and proportionate approach in meeting the enhanced duty requirements. The Applicant reaffirms their conclusion in paragraph 5.1.7 of **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]** that the s85 duty to seek to further the purposes of the AONB has been complied with. Notwithstanding this, the Applicant will continue dialogue and discussion with the SECHNLP on this point.

26. Applicant's Comments on the Submission from Suffolk County Council [REP2-062]

Table 26.1 Applicant's Comments on the Suffolk County Council Deadline 2 Submission [REP2-062]

Reference	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 1			
2.2 Significant Issues			
A1.1	*Benhall Railway Bridge RR 86*	The Applicant's response does not address SCC's concerns around the use of the bridge for AIL movements. The impacts of the 'mini bridge' option have not been fully assessed, such as the greater levels of traffic at nearby A12 junctions during closures of the bridge. It should be noted that SCC understands from its engagement with the Applicant that each AIL movement across the bridge will require a three-day closure of the bridge for the installation, AIL movement and removal of the mini bridge. In this scenario, closure of the bridge cannot be fully accommodated within a weekend and would interact with weekday levels of traffic which includes those generated from Sizewell C, EA1N and EA2 using the A12.	In relation to first point, further details relating to the potential impacts of the Proposed Project on Benhall Railway Bridge, including with respect to temporary road closures, are set out within **Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]**. This concludes that any effects will be minor and not significant, given that the duration of any impacts will be short-term. This does not affect the original conclusions set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, as no new or different likely significant environmental effects have been identified. We also refer SCC to the Applicant's responses to Examining Authority's questions 1TT2, 1TT3 and 1TT4 within **Application Document 9.73 Applicant's Responses to First Written Questions** submitted at Deadline 3. These matters will form part of further discussions between the Applicant and SCC in January 2026.
A1.1	*Benhall Railway Bridge RR 86*	Whilst SCC recognises that a three-day closure would cause temporary effects, SCC understands that repeated closures would be required for each AIL movement. SCC would appreciate clarity on the number of closures of the Benhall Rail Bridge required for the Applicant to retain this option so that the worst-case scenario of duration of effect can be established.	There are anticipated to be seven transformer movements, which equates to up to seven different closures. Further details relating to the potential impacts of the Proposed Project on Benhall Railway Bridge, including with respect to temporary road closures, are set out within **Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]**. This concludes that any effects will be minor and not significant, given that the duration of any impacts will be short-term. This does not affect the original conclusions set out within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**, as no new or different likely significant environmental effects have been identified. We also refer SCC to the Applicant's response to the Examining Authority's question 1TT4 within **Application Document 9.73 Applicant's Responses to First Written Questions** submitted at Deadline 3. This matter will form part of further discussions between the Applicant and SCC in January 2026.
A1.1	*Benhall Railway Bridge RR 86*	Other details including what Temporary Traffic Management measures will be implemented to mitigate impacts have also not been provided. Drawings showing indicative design and layout of the option have not been provided either, meaning the feasibility of the option is unclear. The lack of crucial details and assessments means that neither SCC nor the ExA can have full knowledge of the impacts this scenario could have.	This comment has been considered in our previous response on this matter within Reference 6-9 in Table 2.2 Significant Issues of the response to SCC RR (**Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**).
A1.1	*Benhall Railway Bridge RR86*	SCC is unable to evaluate the feasibility of potential mitigation measures and questions the Applicant's confidence that it will be able to minimise impacts to a sufficient extent without any detail of these potential measures being provided.	This comment has been considered in our previous response on this matter within Reference 6-9 in Table 2.2 Significant Issues of the response to SCC RR

Reference	Matter	Point Raised	Applicant's Comments
			(**Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**).
A1.1	*Benhall Railway Bridge RR86*	SCC considers this lack of assessment to contradict Advice Note 9 which states: "4.9 If, in the course of preparing an ES, it becomes clear that it will not be possible to specify all the details of the Proposed Development, the ES must explain why and how this has been addressed. The ES will need to establish the relevant parameters for the purposes of the assessment. Where this approach is adopted the assessments in the ES should be undertaken on the basis of the relevant design parameters applicable to the characteristics of the Proposed Development included within the DCO. The assessment should establish those parameters likely to result in the maximum adverse effect (the worst-case scenario) and be undertaken accordingly to determine significance. It is therefore questionable whether the inclusion of this option can be consented in accordance with EIA regulations and other relevant legislation without adequate assessment.	This comment has been considered in our previous response on this matter within Reference 6-9 of Table 2.2 Significant Issues of the response to SCC RR (**Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**). In addition, scoping for any junction capacity assessments will be undertaken with SCC, at the request of the Examining Authority.
A1.1	*Benhall Railway Bridge RR86*	Specifically for the closure of the B1121 at the Benhall Rail Bridge, diverted traffic would likely impact the B1119/B1121 signalised crossroads in Saxmundham and the A12/B1119 Rendham junction. The diversion of traffic from cumulative schemes should also be considered. The B1119/B1121 Mill Lane 4-way traffic lights in the centre of Saxmundham – over capacity already at peaks, will be even worse with diversion route, not anything you can do without knocking windows down. There is also a safety concern in relation to the Primary School on Brook Lane in terms of students crossing the road to get to school.	A response to this comment has been provided within References 86 and 87, within Table 2.9 SCC - Traffic and Transport (Including Public Rights of Way) of the response to SCC RR (**Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**). We also refer SCC to the Applicant's responses to the Examining Authority's questions under References 1TT2 to 1TT4 within **Application Document 9.73 Applicant's Responses to First Written Questions** submitted at Deadline 3.
A1.1	*Benhall Railway Bridge RR86*	The Applicant has provided an Assessment for Approval in Principle for Benhall Rail Bridge. Due to restricted in-house resources SCC is required to commission is term maintenance contractor assist in the approval of this assessment and will incur costs doing so. SCC cannot progress this until agreement is reached regarding funding this work.	This comment is acknowledged and understood. The Applicant will engage with SCC on this matter as and when the SCC commissioned Assessment is reviewed.
A1.2	*River Fromus Crossing RR 10 -13*	SCC further considers that the landscape and visual effects of the bell mouth construction at the B1121 and proposed road from there to the bridge do not appear to have been sufficiently reflected in the assessment of effects.	Refer to the Applicant's response to WQ1 1LVIA14 (**Application Document 9.73 Applicant's Responses to First Written Questions** submitted at Deadline 3).
A1.2	*River Fromus Crossing RR 10 -13*	SCC notes that a consented access has been constructed to the south of the applicants proposed access. The use and proximity of this access needs to be included in the design considerations of the access of the B1121 to the Fromus Bridge.	Refer to the Applicant's response to WQ1 1LVIA14 (**Application Document 9.73 Applicant's Responses to First Written Questions** submitted at Deadline 3)).
A1.2	*River Fromus Crossing RR 10 -13*	SCC does not agree with the Applicant (see paragraph 1.10.11 of [APP-048]) that the existing road and railway, which have both been long-established and are well integrated into the landscape can be relied upon as detracting features in the landscape, which would reduce the negative impacts and adverse effect resulting from the proposals within the Fromus River valley.	Understanding the character of a particular landscape requires analysis of the characteristic elements which can be both positive and negative. Identifying the presence of detracting features in the landscape as well as those which contribute positively to the character is entirely appropriate in establishing the baseline character to report on the assessment of landscape effects. Regarding Landscape Character Area (LCA) B4: Fromus Valley, both the Applicant's extensive site work and review of the published landscape character information (refer to Table 2.4 within **Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline**

Reference	Matter	Point Raised	Applicant's Comments
			[APP-096]) conclude that the part of LCA B4 in which the Suffolk Onshore Scheme effects has existing influence from road, rail and industry infrastructure. The Applicant is not in agreement that a feature must be new to constitute a detracting feature in the landscape. The description of the assessment of effects on LCA B4 at all project stages is detailed within Table 3.1 within the landscape assessment (**Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**). This refers to a variety of characteristics that the Suffolk Onshore Scheme would interact with in the Fromus Valley including the influence of existing features such as traffic movement along the B1121. Additionally, a section of the hedgerow vegetation along the B1121 has been removed since the time of writing the assessments detailed within **APP-097** and **APP-098**. 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..
A1.4	Construction Working Hours - Description of Proposed Project	Another reason which, in SCC's view, undermines the Applicant's position relates to the Applicant's construction programme found in its Description of the Proposed Project [REP1A-003]. Paragraph 4.6.2 of that document states that the construction works are expected to be functionally completed by the end of 2031. Therefore, the Applicant's claim that the proposed working hours are necessary to deliver the project by 2030 is not reflected in its construction programme. It, therefore, appears to be inconsistent for the Applicant to suggest that working hours in line with SCC's proposal would prevent the project from being delivered by 2030 since the project is not designed to be delivered by 2030 in any case. In addition, even an operational date of 2031 would seem questionable, given that the project timeline in Table 4.10 is SEA LINK – EXAMINATION D2 Page 12 of 89 Ref. No Topic Summary of Submission SCC Response Document Ref(s) premised on a DCO consent by the end of Q2, 2026. Clearly that date would not seem realistically achievable, given that the Examination is not expected to conclude before May 2026.	The requirement from the Government's Clean Power 30 (CP30) document is for the project to be operational by the end of 2030. The program and details provided do this, the statement that the construction works are expected to be functionally complete by the end of 2031 relate to the works post energisation where landscaping and reinstatement works along with some works to ancillary buildings etc will continue following the energisation at the end of 2030 into 2031. Refer to the Applicant's response to WQ1 1GEN49 within **Application Document 9.73.1 Applicant's Reponses to First Written Questions – Appendices** submitted at Deadline 3).
A1.4	Construction Working Hours – Impacts on Public Health and Wellbeing	The proposed construction working hours present a significant concern for the protection of public health. The working hours as proposed, leave local communities with little opportunity for respite from construction related noise, vibration, traffic, and disruption. Continuous exposure to these stressors, especially when compounded by overlapping NSIPs in the region, is likely to have a substantial impact on mental health and wellbeing. Vulnerable groups, including older people, disabled residents, and those without access to private vehicles, may be disproportionately affected, as they have fewer options for respite or alternative travel. The lack of quiet periods and predictability in daily life can exacerbate stress, anxiety, and feelings of powerlessness, and may contribute to health inequalities within the affected communities with more vulnerable members being impacted to a greater extent. SCC considers the considerations set out here and elsewhere require its request for more restrictive working hours to be implemented.	The Council's comments regarding the potential mental health and wellbeing effects associated with construction activities during the proposed core working hours, including issues of limited respite and cumulative pressures from overlapping projects, have been noted and previously considered within Reference 128 in Table 2.1.12 (**Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**). This response addresses the matters raised in full.

Reference	Matter	Point Raised	Applicant's Comments
		Whilst it is noted that percussive piling is proposed to be restricted to the hours of 07:00–19:00 on weekdays and 07:00–17:00 on Saturdays, it nevertheless still presents public health concerns. Noise and vibration from piling, alongside construction related traffic, may impact community wellbeing and access to social infrastructure even when works are not immediately adjacent to residential properties. Particularly, early morning starts from 07:00 may coincide with sensitive periods for residents, disrupting sleep and rest, and increasing stress particularly for vulnerable groups. Similar concerns apply to the permitted HGV movements on Sundays and Bank Holidays.	
2.3 Landscape and Visual			
A2.1	Potential Adverse Effects on Landscape and Visual Mitigation Measures of other Projects – Appendix 1-Detailed Technical Comments RR 5-6	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	Refer to the Applicant's response to WQ1 1LVIA15 (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).
2.5 Cultural Heritage			
A3.2	General Comments on Response to Relevant Representations RR 32, 33, 35, 43	SCCAS are concerned that there has been no engagement from the applicant within their response to the Relevant Representations regarding the advice which was set out within this by SCCAS relating to the need for the applicant to update DCO Requirement Wording 14 and the Part 4 Supplemental Powers (see above for further details). SCCAS would welcome further discussion on this matter with the applicant at the earliest opportunity.	The Applicant notes that it has amended Requirement 14 in **Document 3.1(F) Development Consent Order** which is submitted at Deadline 3 to reflect the wording recommended by SSCAS,
2.6 Water Environment			
A4.1	Water Environment – Flood Risk at Friston Station RR22-25 [APP-292]	The Applicant needs to clearly demonstrate that the outline surface water drainage strategy (Appendix C of [APP-292]), adheres to the National standards for sustainable drainage systems (SuDS). Appendix C of the Application Document 6.8 Flood Risk Assessment [APP292] is in the LLFA opinion lacking insufficient detail at this time to provide sufficient assurance that a surface water drainage strategy will be implemented in accordance with LLFA requirements, i.e. basin depth, water depth, side slopes etc. The DCO should reference an outline drainage strategy for both the converter station and the substation	A Drainage Strategy has been prepared by the Applicant that provides evidence of adherence to the National Standard for SuDS, The document (**Application Document 9.17.1 Suffolk Drainage Strategy**) will be submitted to the examination at Deadline 3 X.

Reference	Matter	Point Raised	Applicant's Comments
A4.2	Water Re-use [APP-366]	The LLFA also recognises that the Applicant has alluded to water reuse being included in the overall SuDS proposals; for instance, around the Saxmundham Converter Station, which is stated as a key design principle in [APP-366]. Whilst this is welcomed, the LLFA considers that the Applicant should provide a comprehensive strategy for water reuse during construction with details of storage and management. It is widely acknowledged that the Sizewell C project has water scarcity issues, resulting in water management/reuse. There may be adjacent landowners where they would welcome addition water for irrigation.	The appointed Main Works Contractor(s) would further consider the potential for water reuse during construction, with additional information provided as part of the full Construction Environmental Management Plan.
A4.3	Sustainable Drainage – RR 25	The applicant should be required to submit a construction surface water drainage strategy as part of a discharge of requirement for all developed areas in accordance with the National standards for sustainable drainage systems (SuDS). SCC recognises the commitment made in the REAC regarding SuDS which should be updated to reference the National Standard.	This is noted and would be prepared based on the detailed design of the Project. As evidenced within the forthcoming Drainage Strategy (**Application Document 9.17.1 Suffolk Drainage Strategy** submitted at Deadline 3), the outline drainage proposals comply with the National Standards.
2.10 Public Rights of Way			
A6.1	Public Rights of Way – Lack of Respite for PRoW users RR21 and RR 99	The Applicant projects that there will be, on average, no more than three HGV movements per hour between 7am and 5pm on Sundays and Bank Holidays, which the Applicant suggests will not be perceptible. However, averaging out a daily total in this way does not necessarily reflect how users will experience this level of HGV movements. The Applicant is not proposing an hourly limit (so within any given hour there could be considerably more than three movements). Also, even if there was a broadly even distribution of HGV movements during the construction hours, such a pattern of use would mean there is little respite for PRoW users on Sundays and Bank Holidays during construction. If all PRoWs are given priority over construction roads and are manned and/or gated to give PRoW priority, horse rider on bridleways may have different experiences to other PRoW users. One day of no construction and construction traffic would be beneficial to horse riders and their horses, thus encouraging the use of these routes for recreation and tourism.	A response to this comment can be found within Reference 20-21 in Table 2.2 of **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**). The Applicant's response in this regard states no more than three HGV movements per hour, not considered to be perceptible, and therefore does not suggest clustering of HGV movements. It is reiterated that these flows are the for the period of worst-case peak construction period and are short term. The proposed management and mitigation relating to Public Rights of Way is set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]** which has been submitted in outline form to specify the overarching principles and measures to minimise and mitigate, as far as reasonably practicable, the potential effects of the construction activities associated with the Proposed Project on the surrounding PRoW network. A detailed PRoW Management Plan will be developed in accordance with the Outline Plan and approved by SCC post consent in accordance with requirement 6 of the draft DCO. In paragraph 11.91 in Table 9.1 of **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**, a response is provided which is set out as follows: The proposed management and mitigation relating to Public Rights of Way is set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]** which has been submitted in outline form to specify the overarching principles and measures to minimise and mitigate, as far as reasonably practicable, the potential effects of the construction activities associated with the Proposed Project on the surrounding PRoW network. A detailed PRoW Management Plan will be developed in accordance with the outline plan and approved by SCC post consent in accordance with requirement 6 of the draft DCO
A6.2	Cumulative effects on PRoWs RR 21, RR30, RR36, RR 92 and RR 93	In principle, SCC supports greater coordination between projects to minimise negative impacts. However, SCC is concerned by the lack of detail given by the Applicant on how this measure will ensure cumulative effects are adequately mitigated.	This is acknowledged and pursuant to approval of **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]**, the detailed Public Rights of Way Management Plan, developed in consultation with

Reference	Matter	Point Raised	Applicant's Comments
			SCC, will include measures to ensure adequate coordination between measures to minimise impacts.
A6.2	Cumulative effects on PRoWs RR 21, RR30, RR36, RR 92 and RR 93	SCC understands that the Applicant has a working relationship with SPR as the promoter of EA1N and EA2 and would like confirmation from the Applicant that SPR is supportive of the Applicant's proposal in terms of its feasibility and effectiveness. For instance, the Applicant must be aware of the respective works programmes of EA1N and EA2 in terms of their planned timings of PRoW diversions and closures to ensure that these are compatible with the Applicant's own programme. Problems would arise if these closures and diversions are to be implemented by SPR prior to Sea Link gaining development consent or otherwise cannot be made compatible with the Applicant's works programme. Without these details, SCC cannot be confident that the measure will adequately mitigate cumulative effects as claimed by the Applicant.	Details on the coordination with SPR can be found in **Application Document 7.10 Coordination Document [APP-363].** Ongoing coordination will take place with SPR in order to align activities to minimise the requirement for PRoW diversions and closures. Notwithstanding the above document the Applicant has a strong working relationship with SPR and is regularly reviewing the SPR programmes for EA1N and EA2 alongside the National Grid Friston (Kiln Lane) Substation programme and the Sea Link Programme, to ensure PRoW's are not closed or diverted at the same time as others which will be used as a diversion.
A6.2	Cumulative effects on PRoWs RR 21, RR30, RR36, RR 92 and RR 93	There is also a lack of detail regarding how the effectiveness of the measure will be measured and secured. Due to their different works programmes, PRoWs could be diverted/closed for a longer period at a time than were they affected by just one of the promoters. There may also be impacts which are different in kind which arise from longer but fewer PRoW closures/diversions according to the behaviours of users. There should be a worst-case scenario assessment of how PRoWs will be affected with this mitigation in place to give local stakeholders and the decision maker confidence that cumulative effects on PRoWs will be adequately mitigated. This would then provide a Rochdale Envelope whereby the Applicant commits to not exceed the effects assessed. At minimum, the Applicant should make commitments to implement alternative forms of mitigation where the proposed coordination cannot achieve the required level of mitigation. SCC is willing to engage with the Applicant regarding what alternative arrangements would be appropriate.	This is acknowledged and pursuant to approval of **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]**, the detailed Public Rights of Way Management Plan, developed in consultation with SCC, will include measures to ensure adequate coordination between measures to minimise impacts.
A6.3	Public Rights of Way Management Plan RR 94	Extra information that should be provided in the PRoW MP that has been included in similar schemes such as EA1N is: *Management measures will be in place to ensure the continued safe use by the public of the PRoW which cross the onsite access route (i.e. the Substations Haul Road (SHR)).* *The following safety measures will also be employed for each PRoW crossing:* • *Where a PRoW crosses the haul road, the surface will be firm, smooth, level, and free draining with no loose stones or voids on the surface. This may require additional work to the type 1 surface such as compacting fines (4 or 6mm to dust aggregate) to fill voids.* • *No steps or gradients will be introduced which could deter wheeled users (1in 20 is accepted standard). The crossing will be maintained in a safe and fit condition for use by pedestrians, wheeled users, cyclists, and equestrians (as appropriate) all year round, to the reasonable satisfaction of the Highway Authority.* • *Use of signage (including Give Way signs) to ensure that haul road users are aware of the potential for PRoW users to cross their path*	Regarding keeping PRoW open and giving PRoW users priority, a response is provided within Table 9.1 Traffic and Transport (Including Public Rights of Way) of the response to SCC LIR (**Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]).** Each of the proposed measures will be agreed with SCC and drafted into the detailed PRoW Management Plan.

Reference	Matter	Point Raised	Applicant's Comments
		and PRoW users are aware that they are approaching a construction interface with the associated hazards. • *Use of vehicle marshals during construction hours to ensure the general public using the PRoW are able to safely cross the construction area.* • *A speed restriction to 10mph along the haul road/construction roads in the vicinity (circa 20m) of the PRoW (speed limit on the remainder of the haul road will be 30mph).* • *Information regarding the presence of the PRoW and the potential for PRoW users will be included in the Method Statements, such that vehicle and plant operators will be mindful always for members of the public (hikers, dog walkers, horse riders, cyclists etc).* • *No-reversing restrictions will be in place at locations where construction traffic interact with PRoW.* • *Stopping/parking of vehicles and mobile plant will not be permitted at locations where construction traffic interact with PRoW.* • *Temporary fencing to be installed along the length of the working width, with gaps in the fencing to allow access along the PRoWs. Signage will be in place so that users can quickly identify the continuation of the route across the haul road.* • *Information regarding these measures will be a compulsory part of the induction training for drivers.* • *The surface of each PRoW where it crosses the construction road will be kept in a safe and fit condition at all times for all legal users. The PRoW will be maintained to a standard agreed with SCC as Local Highway Authority; and* • *The positioning of site notices will be carefully considered to keep sign clutter to a minimum and to collate information on route closures where appropriate. Signs will be carefully worded with clear, uncomplicated information showing maps that the public would be familiar with (e.g. OS maps with topography context) to give them confidence that their walk or ride will still be possible, albeit with a minor diversion.*	
A6.4	Converter Station site RR 100	SCC PRoW considers the loss of amenity due to walking around new buildings instead of countryside and the increased traffic impact on the B1119 to be reasons to request the modest mitigation put forward."	The Applicant considers the committed mitigation proposed within the various Management Plans and **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043]** to be sufficient for mitigating the potential impacts of the Proposed Project, including from a Traffic and Transport perspective. Nonetheless, the Applicant will review the Council's request for additional mitigation 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.
A6.5	Improvements to the PRoW network RR101	SCC PRoW welcomes the engagement on the other requests to enhance the PRoW network and would request that this is discussed and agreed at the earliest opportunity.	Acknowledged and agreed. Further engagement will take place with SCC regarding requests to enhance the PRoW network. The Examining Authority, in Written Question 1TT16, has also requested a response to SCC requests for suggested PRoW enhancements, to which the Applicant has provided a response within

Reference	Matter	Point Raised	Applicant's Comments
			Application Document 9.73 Applicant's Responses to First Written Questions submitted at Deadline 3.
2.11 Socioeconomics, Recreation and Tourism			
A7.3	Socioeconomics, Recreation and Tourism – Workforce Competition and churn RR 107	SCC strongly disagrees with the Applicant's conclusion that cumulative labour supply will be sufficient within a 60-minute travel area. This assumption fails to account for the significant pressure on specialist skills created by multiple NSIPs operating concurrently in Suffolk and the wider region. These schemes will overlap in construction timelines and compete for similar roles such as high-voltage plant specialists, cable jointers, commissioning engineers, traffic management operatives, ecologists, and heritage specialists. SCC expects the Applicant to undertake detailed scenario-based workforce modelling that reflects low, medium, and high demand profiles for each project phase and skill category.	The Council's comments regarding the 60-minute travel area and workforce churn have been noted and previously considered within Reference 108-109 in Table 2.11 (**Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**).
A7.4	Study Area definition RR 108	SCC requires dual geographies: workforce geographies by phase and skill, and supply chain geographies at hyper-local, local, and regional levels. The methodology for defining these geographies must be agreed with SCC prior to reliance in the Examination. Due to the distinct difference between workforce and supply chain, the applicant is expected to define a separate economic study area for these two elements.	
A7.5	Scenario modelling RR 109	SCC expects the Applicant to undertake robust scenario based workforce modelling that goes beyond the limited assumptions currently presented. Specifically, the Applicant must provide low, medium, and high scenarios for both home-based and non-home-based workforce requirements, broken down by month and by work package, to reflect the full temporal profile of labour demand throughout the construction period. This modelling should incorporate the distinct phases of the project—such as civils, mechanical and electrical, and commissioning—and identify the skills required within each phase.	
A 7.6	Local employment leakage RR 110-111	SCC considers this unacceptable as the majority of jobs created by the project would be filled by workers from outside the local area. Therefore, there will be minimal benefit to Suffolk communities, despite significant disruption and negative impacts, particularly when considered cumulatively. A binding Skills and Employment Plan must be in place with clear targets for local trainees, apprenticeships, and under-represented groups. Furthermore, coordination with initiatives such as "College on the Coast" alone is insufficient because it does not guarantee structured interventions or measurable outcomes.	As part of the DCO submission it is noted that 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. However, the appointed contractor has set clear aims with regard to providing social value. As such, this matter will be discussed further with the Council in the course of ongoing engagement.
A7.7	Labour Sensitivity RR 112	SCC disagrees with the Applicant's assessment that the local labour force is of low sensitivity. This conclusion fails to reflect the cumulative demand created by multiple NSIPs in Suffolk and the wider region.	The Council's comments regarding the sensitivity of the local workforce have been noted and previously considered within Reference 112 in Table 2.11 (**Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**).
A 7.8	Operational Employment RR 113	SCC expects operational employment to be scoped in cumulatively.	The Council's comments regarding the sensitivity of the local workforce have been noted and previously considered within Reference 113 in Table 2.11 (**Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**).

Reference	Matter	Point Raised	Applicant's Comments
A 7.9	Ongoing Skills Governance RR 114	SCC requires the Applicant to establish an agreed governance framework for skills and educational enhancement in collaboration with Suffolk County Council, as set out in the Supplementary Guidance.	As part of the DCO submission, 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. However, the appointed contractor has set clear aims with regard to providing social value. As such, this matter will be discussed further with the Council in the course of ongoing engagement.
A 7.10	Tourism and Visitor Perception RR 115-117	In summary, SCC does not consider the available evidence to demonstrate that there will be no material negative impacts on tourism. SCC recognises the limited evidence available on the matter; however, it is the responsibility of the Applicant to gather further evidence. If this is not undertaken, SCC would consider a commitment to further assessment post-consent and a contingency fund, should evidence of negative impacts be found at a later date to ensure such impacts are adequately mitigated or offset, to be a suitable and necessary approach in this scenario	The Council's comments regarding impacts on tourism and visitor perception have been noted and previously considered within Reference 115-117 in Table 2.11 (**Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**). Application Document **9.40 Visitor and Tourism Assessment Technical Note - Suffolk** submitted at Deadline 3 provides evidence from evaluations of similar DCO schemes. This evidence indicated that there were no material impacts on tourists and visitors from these schemes, post-consent. The Applicant, however, will seek to discuss with SCC the potential for monitoring impacts on visitors and tourism following consent.
A 7.11	Impacts of Workers on Visitor Economy RR 118-119	SCC would like to add that it is unlikely that the Applicant's assessments which are referred to truly represent the worst-case scenario. The figure referred to as the project's peak workforce number is 324 Full Time Equivalent ("FTE"). The fact that the figure is measured in this way means that the raw number of peak workers may be much higher on account of part-time working which would increase impacts on local accommodation, potentially undermining the robustness of the assessment. The Applicant should clarify whether the 324 figure represents the peak worst case total figure of workers or whether the raw number is higher when accounting for part time working. SCC is also concerned about the lack of avenues for mitigation should cumulative effects exceed those currently assessed.	Section 10.9 of **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005]** presents the assessment of construction workforce generation. As detailed in paragraph 10.9.5, the Applicant estimates that the Suffolk Onshore Scheme will require a peak workforce of 327 full-time equivalent (FTE) staff. The Applicant confirms that the 327 workers required represents the peak worst case total figure of workers. The number of construction workers required is not higher when accounting for part time workers. Therefore, the assessment of inter-project cumulative socio-economic effects presented within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects** Assessment remains valid, and no mitigation is required.
2.12 Health and Wellbeing			
A8.1	Health and Wellbeing – Community Engagement RR 123-135	Whilst the Applicant's Consultation Report may demonstrate compliance with the minimum legislative requirements, The Council's SGD and the Council's established position make clear that effective engagement must extend well beyond this legal baseline. The Council considers it essential that the Applicant adopts a pragmatic, responsive and adaptive approach to ongoing community engagement, ensuring that engagement opportunities are accessible, inclusive, and genuinely meaningful.	The Applicant will continue to employ a Community Relations Team throughout the Examination and into the construction phase, providing a dedicated point of contact for local stakeholders and the community. This team will be a dedicated point of contact responsible for all proactive and reactive communications with local stakeholders, including Parish Councils, and the local community.
A8.2	Mental Health RR 126	However, as set out in the Council's Relevant Representations and in the Community Engagement and Wellbeing SGD, the Council's position is that the effective assessment and mitigation of health and wellbeing impacts, particularly mental health, requires a more holistic and locally responsive approach. Whilst the receptors chosen by the Applicant reflect the ISEP guidance, SCC considers that there is a lack of detail in the assessment of these receptors when considering the wide range of factors affecting mental	The Council's comments regarding the potential mental health effect and the receptors assessed have been noted and previously considered within Reference 126 in Table 2.1.12 (**Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**). This response addresses the matters raised in full.

Reference	Matter	Point Raised	Applicant's Comments
		wellbeing as identified in the ISEP guidance. [chapter 14 of its LIR [REP1-130], such as in paragraphs 14.56, 14.57, 14.63 and 14.64.]	
A8.3	Cumulative impacts and mental health RR 127 [APP-058] [APP-060]	The Council do not agree with the determinations of [APP-058] paragraph 11.11.2 that there are no likely significant residual effects in relation to health and wellbeing receptors during construction, operation and maintenance and decommissioning of the Suffolk Onshore Scheme nor with the conclusion within [APP-060] paragraph 13.4.14 the health and wellbeing CEA anticipates no significant adverse effects on mental health. The Council considers that the assessments do not fully recognise or address the mental health impacts associated with the scheme, including those arising cumulatively from the concentration of multiple NSIPs in Suffolk.	The comments have been noted and have already been fully considered and responded to in relation to mental health impacts, including cumulative effects arising from multiple NSIPs within Reference 126 in Table 2.1.12 (**Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**). This response addresses the matters raised in full.
A8.4	Working Hours RR 128 [APP-045]	The Council maintains that the potential for construction activities taking place within the core working hours stated have the potential to generate significant mental health and wellbeing impacts for local communities through limited respite from construction traffic, noise, vibration, general disruption, and the cumulative pressures arising from sequential and overlapping projects in the area.	The Council's comments regarding the potential mental health and wellbeing effects associated with construction activities during core working hours, including issues of limited respite and cumulative pressures from overlapping projects, have been noted and previously considered within Reference 128 in Table 2.1.12 (**Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**). This response addresses the matters raised in full.
2.13 Air Quality			
A9.1	Air Quality – Cumulative Impacts and Monitoring RR 127 (REP1-130 pages 175-183)	Whilst individual reports on individual projects may conclude impacts to be 'negligible' or 'not significant' Public Health have concerns that the number of concurrent NSIPs and other major developments taking place in the same locality and temporal space will place notable pressure on the health and wellbeing of local communities through increased traffic and air pollution with little respite.	The Council's comments regarding cumulative impacts on health and wellbeing from overlapping projects, have been noted and previously considered within Reference 127 in Table 2.1.12 (**Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**). This response addresses the matters raised in full.
2.16 Emergency Planning			
A10.1	Emergency Planning – Emergency Planning RR 138	SCC welcomes the production of an emergency planning document to ensure that emergency planning arrangements, including the Sizewell B Off-site Radiation Emergency plan, are not compromised by the proposed development. SCC refers the Applicant to paragraphs 15.66 to 15.70 of SCC's LIR [REP1-130] which gives the Council's position on the necessity of a requirement to be included in the DCO for the production and approval of this plan prior to commencement. As things currently stand, the Applicant agrees that the document should be produced but the application lacks any legal mechanism requiring its production and approval. This means that the Applicant would be able to alter its position post-consent by commencing construction without any emergency plan in place.	The Council's comments regarding the emergency planning document have been noted and previously considered in Table 13.1A**pplication Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**,
Document 6.2.2.2 Ecology and Biodiversity (REP1-047)			
B1.1	Section 2.2.4 Legislation	Intertidal habitats are not included in the BNG baseline. This does not account for the possibility for impacts on this habitat arising; for instance, from frack outs from HDD. SCC considers that a precautionary approach would include it in the baseline.	Paragraph 2.2.4 of in (**Application Document 6.12 Biodiversity Net Gain Feasibility Report [REP1A-025])**. States that there will be no impact to intertidal habitats and have therefore been omitted from the BNG parameters line. This was carefully considered at the time of undertaking the BNG assessment. As the works proposed within these habitat types.

Reference	Matter	Point Raised	Applicant's Comments
B1.2	Section 2.3.3 Statutory Consultation	With regard to the 30-year maintenance period for habitats, this should be implemented on linear habitats such as hedgerow and river corridors. Area habitats as mitigation should also be subject to the 30-year management and monitoring period.	All habitats that are delivered or enhanced for the purpose of contributing to Biodiversity Net Gain outcomes will be subject to a minimum 30-year management and monitoring period, in accordance with the statutory BNG framework. As set out in **Ex1.1.6** and reflected throughout the BNG assessment methodology, the BNG Feasibility Report adopts a defined BNG Parameters Line and distinguishes between habitats reinstated following temporary construction impacts within the linear corridor and habitats that contribute to BNG delivery. Reinstated habitats within the construction corridor are assumed to be returned to their baseline condition and pre-development management, rather than secured under long-term BNG management obligations. Consistent with the delivery approach described in **Section 5.2** of the BNG Feasibility Report, the Project's BNG strategy therefore focuses on locations where long-term management can be realistically secured, including land under National Grid control and off-site delivery through appropriate mechanisms, rather than on-site BNG delivery along third-party linear corridors.
B1.3		SCC is concerned that watercourse habitats do not appear to have been assessed using the River Condition Assessment? This is mandatory for river corridor BNG.	River condition has been assessed for the purposes of the Biodiversity Net Gain assessment, as set out in **Sections 2.3.4 and 2.3.6** of the BNG Feasibility Report. These sections describe the approach taken to assign habitat condition using available survey information and professional judgement, in accordance with the Statutory Biodiversity Metric. For watercourse habitats, condition assessment has been informed by MoRPh surveys, which provide the geomorphological and physical habitat evidence required to derive river condition scores. While MoRPh is not itself a condition classification tool, its outputs have been used to inform the assignment of river condition in line with the Metric's condition criteria, as described in Sections 2.3.4 and 2.3.6. The requirement to assess river condition for river habitats has therefore been met.
B1.4	Table 3.1 Suffolk Baseline Habitats	SCC is unclear as to why there are two parcels of bracken, one low Strategic Significance, one high Strategic Significance (SS) – what is the difference in significance being put down to?	The difference in strategic significance assigned to the two parcels of bracken reflects their differing spatial context rather than differences in habitat type. As set out in **Section 2.3.11** of the BNG Feasibility Report, strategic significance is assigned based on the location of habitats in relation to mapped strategic priorities and ecological networks, rather than being determined by habitat type alone. One parcel of bracken is located within an area identified as strategically significant, while the other lies outside such an area. The resulting difference in strategic significance classification is therefore consistent with the approach to assigning strategic significance described in Section 2.3.11 of the BNG Feasibility Report and the Statutory Biodiversity Metric.
B1.5	Table 3.1 Enhanced Habitats	The column headings do not appear to match up with the relevant data fields (first two column headings are repeated).	The Applicant notes the comment regarding the column headings in Table 3.1. The table spans multiple pages and the column headings are repeated for clarity; this may give the impression of duplication when viewed across page breaks. The underlying data fields and values are correctly aligned and consistent throughout the table. No changes to the assessment or calculations are required. However, the table presentation will be reviewed and clarified in any future iteration of the document to avoid confusion.

7.5.3.2: CEMP Appendix B Register of Environmental Actions and Commitments (REAC)(REP1-102)

Reference	Matter	Point Raised	Applicant's Comments
B2.1	Potential loss of trees	With regards to A20: Impacts to retained trees within W708S from proposed hedgerow planting. Any hedgerow planting does not only need to avoid important tree roots at planting. Any actions that could cause harm to the retrained trees, in the short or long term, need to be avoided (such as creating undue competition within the root zone). This should be further clarified.	As detailed within **Application Document 6.10 Arboricultural Impact Assessment [APP-294]** W708S is an established woodland ranging from young to early mature in age, and comprising predominantly oak species. Therefore, the planting of a new hedgerow is not considered likely to form significant enough competition with the woodland in the short or long term range to significantly negatively impact the existing trees. Furthermore where the height and width of the hedgerow is maintained this will further reduce any competition potential.
Document 9.26 Traffic and Transport Cumulative Impacts (REP-110)			
B3.1	Methodological concerns	Whilst SCC appreciates the update given on the methodology used for the cumulative effects assessment in section 2, it does not agree with certain aspects of the approach taken by the Applicant. Plate 2.1 shows that where potentially significant effects are found, the Applicant will then refine its assessment to account for the mitigation measures included in other schemes before coming to a conclusion on the magnitude of impact. This can mask potentially significant cumulative effects in the scenario that the delivery of these mitigations does not match the Applicant's assumptions in terms of delivery. SCC notes that the source used for peak construction traffic flows is the planning submission documents for the schemes being considered. Whilst SCC accepts that such information is useful, it is not always the most up to date information available for those schemes. It is commonplace that as projects move from the consenting phase to the implementation phase further details become available (for example through discharge of requirements applications). SCC considers that the methodology would have been more robust if the Applicant had verified with the developers of the schemes concerned whether the planning submission material remained realistic as a worst-case assessment. For Sizewell C, many mitigation measures for traffic and transport impacts have either not started construction or are otherwise not yet in operation. Notable examples include the Two Village Bypass and the Sizewell Link Road, both of which have not yet started construction. Whilst these measures may be operational for a substantial portion of Sea Link's construction phase, they cannot be assumed to be operational during the peak of Sea Link's construction phase for the purposes of the reasonable worst case scenario approach of this assessment. Whilst Sizewell's daily two-way HDV (HGVs plus buses) movement cap cannot rise from 600 to 750 until certain mitigation measures are in place, movements of other vehicles such as workers will likely continue to rise even if the delivery of transport mitigation measures are delayed. Table 3.3 shows that three of the four receptors identified as having potential significant effects from this project in combination with Sizewell C are dismissed based on residual effects of Sizewell C after mitigation. This implies that Sizewell C's mitigation will be in place before Sea Link's construction phase begins which is not representative of a reasonable worst-case scenario in SCC's view. Nor should it be assumed that the mitigation delivered by others is that required by this project. SCC is also concerned by the methodology stated in table 2.1 in relation to the cumulative assessment covered in this technical note. The table shows that effects are scoped out from being assessed out based on magnitude of impact without undertaking any quantitative analysis. This is problematic due to the	The Applicant has provided responses to SCC comments below. In addition, a formal meeting has been arranged with SCC Highways in January 2026 to further review matters relating to the traffic and transport cumulative assessment. Furthermore, the Applicant has responded to the Examining Authority's Written Questions 1TT1, 1TT5, 1TT12, 1TT17 and 1TT18 within **Application Document 9.73 Applicant's Responses to First Written Questions** submitted at Deadline 3, which include considerations relating to transport cumulative effects. The methodology adopted for the cumulative assessment is considered to be reasonable as this assumes that the embedded mitigation that is proposed by other schemes, will be secured (and therefore delivered) as a legal requirement of the respective DCOs. This is considered to be a reasonable and standard approach given that the cumulative assessment considers the peak construction traffic of other projects, when their required mitigation should be in place. The Applicant cannot control the mitigation of other schemes and the purpose of the cumulative assessment is to determine whether the Proposed Project will result in the potential for significant cumulative effects to arise when combined with other projects, not the other way around. If there are delays to the mitigation delivered by other schemes, then this is outside of the Applicant's control and is not a consequence of the Proposed Project. The traffic data for the cumulative schemes was sourced from the latest versions of the planning submission documents available at the time of the cumulative assessment (which was carried out back in 2024). For example, Sizewell C peak traffic data was obtained from the latest version of the Sizewell C Consolidated Transport Assessment, as requested previously by SCC Highways (see Table 1.16 of **Application Document 5.1.6 Appendix E Statutory Consultation Part 4 of 4 [APP-312]** for reference). Therefore, this information is considered to be appropriate for use. The approach identified within Table 2.1 replicates the same approach set out in **Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]** which was adopted for all disciplines within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. For the Traffic and Transport cumulative assessment, the magnitudes of impact and potential significance for the Proposed Project is based on **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** which is underpinned by quantitative analysis for various assessment criteria including severance, pedestrian delay, non-motorised user amenity, fear and intimidation, driver delay and road safety. The magnitudes of impact and potential significance of cumulative schemes also follow the same methodology, adopting quantitative analysis by comparing forecast construction traffic levels against Future Baseline traffic flows.

Reference	Matter	Point Raised	Applicant's Comments
		baseline data used in the assessments of cumulative schemes potentially being outdated. SCC's previously articulated concerns regarding the Applicant's study area for its Traffic and Transport assessment [APP-054] also apply to the cumulative effects assessment. Traffic associated with Sea Link will affect the A12 beyond that covered in the study area and will interact with traffic associated with cumulative schemes. Due to the Applicant's restricted study area, these effects have not been assessed which means these parts of the A12 may experience significant effects without mitigation. SCC challenged some of the sensitivities used in the Applicant's assessment in its LIR [REP1-130] such as in paragraphs 11.125, 11.159, 11.161 and paragraph 11.187 in relation to cumulative effects which apply to this technical note. Other methodological concerns detailed in SCC's LIR on the Applicant's Traffic and Transport assessment [APP-054] also have implications on the cumulative effects assessment. It would be worthwhile for the Applicant to consider the sensitivities determined by other applicants for schemes consented by the Secretary of State.	Therefore, the methodology is considered to be reasonable and only scopes out schemes if a Negligible effect is expected to arise as a result of ether the Proposed Project or the cumulative scheme, following quantitative analysis (not before). The Applicant has previously responded on comments relating to the study area, the sensitivity of receptors and the traffic and transport assessment within **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**.
B3.2	Lack of quantitative analysis	There is a lack of quantitative analysis throughout the document regarding numbers of vehicle movements of cumulative schemes. The Applicant's methodology, as explained in section 2.1, is based on traffic flows for cumulative schemes in combination with the proposed project before coming to a conclusion on the magnitude of potential effects. However, details of cumulative traffic volumes at shared receptors compared to the baseline are not given. Only the magnitude of potential effects are. This means that SCC as the Local Highway Authority for Suffolk cannot confirm that the conclusions reached by the Applicant on magnitude of impact are robust in relation to the cumulative increase in vehicle movements. The increase in vehicle movements must also be compared to up-to-date baseline data which has changed since the production of the Environmental Statements for the cumulative schemes. This further demonstrates the need for quantitative analysis since changes in the baseline are not accounted for in conclusions of magnitude of impact from cumulative schemes which have been used in the Applicant's. Whilst the baseline is changing as construction traffic varies with time the consented projects are committed to providing reports that contain data that can be used to disaggregate their impact to a degree.	The Applicant disagrees, quantitative analysis is included within the document including in the various graphs, which identify daily vehicle and HGV movements for the Proposed Project where the potential for cumulative effects with other schemes could arise, including their expected dates and duration. The cumulative traffic flows for each cumulative scheme (Sizewell C, EA1N, EA2 and LionLink) are also held within Appendix B of **Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]**. These cumulative traffic flows have been assessed against the latest Future Baseline (2028) based on the traffic surveys which were carried out for the Proposed Project in 2024 (and then factored up to 2028 using National Trip End Model datasets), rather than out-of-date Baseline traffic flows taken from the Environmental Statements of the cumulative schemes. The 2028 Future Baseline traffic flows have previously been provided; these are held within **Application Document 6.3.2.7.D ES Appendix 2.7.D Baseline Traffic Movements [APP-125]**. In terms of the approach for the cumulative assessment, this does not combine construction traffic associated with the Proposed Project and other cumulative schemes before being carried out. The cumulative assessment adopts the findings of the Proposed Project for each receptor and assessment type based on **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** and then assesses the potential impact of each cumulative scheme separately, for the equivalent receptor and assessment type. The identified levels of potential significance for the Proposed Project and each cumulative scheme have then been compared based on the methodology identified in Table 2.1 (replicating the approach set out in **Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]**), to determine whether a potential significant cumulative effect could arise for a given receptor and assessment type. The Applicant will review these matters and discuss further with SCC Highways during the formal meeting which has been arranged in January 2026.

Reference	Matter	Point Raised	Applicant's Comments
B3.3	Lack of total cumulative effects assessment	The technical note lacks quantitative detail on impacts associated with the total vehicle movements from each project in combination on shared receptors. This lack of detail means SCC is unable to analyse the total cumulative effects arising from all projects in combination on shared receptors. The lack of such an assessment is a critical flaw in the assessment's methodology since effects considered to be not significant may become significant when cumulative schemes are assessed together. This applies not only to the effects on receptors considered in the assessment but also to the initial scoping process for effects to be assessed cumulatively, as this was undertaken on an individual basis for cumulative schemes. Therefore, SCC cannot be confident that significant cumulative effects will not occur when considering the effects of cumulative schemes together. Paragraph 6.1.1 states that the peaks of construction traffic should be assumed to overlap with Sea Link's peak in an assessment of a reasonable worst-case scenario. SCC does not consider this statement to be reflected in this technical note given the lack of assessment of total cumulative effects. SCC notes that consideration of total cumulative effects has been given in Table 13.41 of [APP-060]. There, however, the Applicant states that the low likelihood for project peaks to overlap is a relevant factor in determining that total effects are not significant which appears to diverge with what the Applicant claims to be the worst-case scenario. Such divergence undermines the Rochdale Envelope approach since a scenario which is not the worst case is being referred to justify a lack of significant effects in the worst case. This is important because numbers of vehicle movements for cumulative schemes may remain high outside of their peak, especially for Sizewell C.	As above, the cumulative traffic flows for each cumulative scheme (Sizewell C, EA1N, EA2 and LionLink) are provided within Appendix B of **Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]**. These can be compared against the 2028 Future Baseline traffic flows within **Application Document 6.3.2.7.D ES Appendix 2.7.D Baseline Traffic Movements [APP-125]** to identify forecast increases in traffic levels as a result of each of these individual cumulative schemes. Total cumulative traffic flows of all cumulative schemes combined (without the Proposed Project), in comparison to 2028 Future Baseline flows including percentage increases have also previously been provided within **Application Document 6.3.2.13.B ES Appendix 2.13.B Preliminary Cumulative Highway Impact Assessment**. Each cumulative scheme has been assessed against 2028 Future Baseline traffic flows to determine whether these could result in the potential for significant effects to arise for each receptor within the study area, for each assessment type. This is illustrated by the methodology identified in Plate 2.1 of **Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]**. The cumulative assessment work is therefore underpinned by quantitative analysis as previously identified. The peak construction traffic flows of the Proposed Project compared against 2028 Future Baseline traffic flows are provided within **Application Document 6.3.2.7.H ES Appendix 2.7.H Preliminary Highway Impact Assessment [APP-129]**. This has been used to underpin the quantitative analysis within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** and to inform **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]**. Further to this, it is considered to be highly unlikely that the peak construction periods for each project would fully overlap. For instance, Sizewell C and EA1N/ EA2 are already under construction with varying peaks expected, and Lionlink construction is expected to commence some two years after Sea Link and with a similar programme to Sea Link (albeit off-set by two years). As above, the Applicant would be happy to review these matters and discuss further with SCC Highways during the formal meeting which has been arranged in January 2026.
B3.4	Insufficient Mitigation	SCC considers there to be inadequate provision for mitigation should significant cumulative effects arise or where embedded in the project robust controls to ensure they are effective. The Applicant has not committed to reduce its own vehicle movements were peaks of other projects to overlap; rather, it states that "potential cumulative effects may be able to be mitigated by seeking to manage construction peaks of the Proposed Project within overlapping construction programmes." Section 6.3 lists opportunities for coordination with other projects as potential mitigation. Whilst SCC welcomes the Applicant's willingness to seek to minimise impacts and coordinate with other projects, no mitigation is proposed should these endeavours prove unfeasible during delivery. It should be noted that for any mitigation measure to be enforceable, it must be required by the DCO such as through the approval of a control document.	No additional mitigation is expected to be required to that already outlined within the DCO Application for the Proposed Project based on the Traffic and Transport cumulative assessment of the Proposed Project combined with other projects. Nonetheless, and as identified within **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**, the Applicant will consider the Council's request to include these additional commitments within **Application Document 7.5.1.1 (B) Construction Traffic Management and Travel Plan – Suffolk [CR1-041]**, including with respect to caps on construction vehicle movements.
B3.5	Appendix B Cumulative Scheme Peak Traffic Flows	There is no reference to the source of the data used in Appendix B which appears to form the basis of the Applicant's assessment. Two assessments for Sizewell C are referenced in the "References" section of the document, but it is not specified which is used as the source for the data in Appendix B. In terms of HDVs (HGVs plus buses), these numbers are capped in the CTM&TP for	Full references of the data sources used to inform Appendix B are provided within Section 9 of **Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122]**.

Reference	Matter	Point Raised	Applicant's Comments
		Sizewell C both in total and for individual receptors which should form the worst-case scenario in this regard. Without reference to how the Applicant arrived at the figures cited in Appendix B, SCC cannot comment on the accuracy or validity of the data within Appendix B Cumulative Scheme Peak Traffic Flows. For example, the SZC peak construction traffic flows for S-RL1 A12 S of A1094 seem significantly less than understood by SCC (i.e. 85% of 600 early years daily HDV cap = 510 HGV movements not 173). SCC will be able to provide further comments once the sources of the data used by the Applicant in this assessment has been confirmed. The tables of data for EA1N and EA2 do not include any figure of HGVs at the AM Peak or PM Peak without any explanation for the lack of such data. Lion Link is stated as have 0 HGVs during these times. Whilst SCC recognises the lack of data for this project given its stage in the planning process, a reasonable worst-case scenario would not assume that HGVs at peak hours would be 0. The Council hopes that when information is provided by Lion Link as part of their forthcoming statutory consultation in 2026, this is considered by the Applicant in its assessment. It is also not clear what metric is being used for the numbers included in the column titled "Daily (12hr/24hr)" as these two definitions of daily movements may yield different results.	For Sizewell C, the trip generation forecasts were taken from the Consolidated Transport Assessment which informed the Sizewell C DCO submission, including Tables 8.7 and 8.8 which identified forecast traffic flows across the network during the peak construction phase for the weekday peak hours and across the day. These vehicle trips also include other elements of Sizewell C during the construction phase, including the Northern Park and Ride and Southern Park and Ride facilities. The proportion of HGV movements has been estimated by comparing the HGV trip generation (Table 7.4) with the overall vehicle trip generation (Tables 7.2 to 7.6 combined) for the various periods. For the A12 to the south of the A1094, there is expected to be a daily peak of 1,900 total vehicles for Sizewell C on the A12 near Marlesford based on Tables 8.7 and 8.8 (Location AB). As HGV movements are not identified, these has been estimated based on the forecast proportion of HGVs compared to total construction traffic movements (see above). Nonetheless, the cumulative assessment considers both HGVs and total construction traffic movements, meaning that the 1,900 figure which includes HGVs has been assessed. For EA1N/ EA2, the trip generation forecasts in terms of daily movements (including total vehicles and HGVs) across the highway network have been taken from the traffic flow diagram held in Appendix 26.16 of Chapter 26 Traffic and Transport of the Environmental Statement which informed both DCO submissions for EA1N/ EA2. The cumulative traffic flows for EA1N and EA2 combined have been taken from Appendix 26.25 of Chapter 26 Traffic and Transport of the Environmental Statement which informed both DCO submissions. The cumulative assessment of the LionLink Offshore Interconnector includes peak construction traffic associated with the converter station, based on equivalent forecasts for the Proposed Project (Saxmundham Converter Station). This information has been used to allow a cumulative assessment to be carried out, in the absence of any details on forecast construction vehicle trips for the LionLink Offshore Interconnector itself, given that DCO has yet to be submitted for this scheme. The traffic flows presented are for the worst-case shoulder peak hours of 7am-8am and 6pm-7pm when the highest levels of total construction vehicle movements are expected. Whilst there are not expected to be any HGVs during the shoulder peak hours, there would be some HGVs during the network peak hours of 8am-9am and 5pm-6pm (up to 20 HGV movements are expected). Nonetheless, the assessment was based on the higher construction traffic forecasts during the shoulder peak hours to provide a robust assessment. In terms of Daily trips (12hr/24hr) this reflects construction traffic flows between 7am and 7pm, with no construction vehicles expected before 7am or after 7pm. Therefore the construction traffic flows are anticipated to be the same for both time periods, hence the reason for showing these together rather than presenting the same information separately.
B3.6	Appendix C Duration of Effect – Worked Example based on Hypothetical Projects and Scenarios	Whilst SCC appreciates that the exercise in this Appendix is stated as purely hypothetical, its assumptions do not reflect the projects involved in the cumulative effects assessment. By consequence, SCC does not see how any conclusions reached on this basis could inform conclusions reached in the cumulative effects assessment as is claimed in paragraph C1.8. Specifically, there are several discrepancies between the scenario modelling and the projects assessed elsewhere in the technical note. These include assumptions of project lengths being equal and numbers of vehicle movements to distribute as a bell curve, both of which are particularly untrue for Sizewell C where	The Applicant is surprised with SCC's response, given that the principles of the hypothetical scenarios within Appendix C were originally discussed during the meeting with SCC on 6 August 2025, and subsequently included within the Technical Note for illustrative purposes only. The point of the worked example was to consider the potential trade-off between the duration of a cumulative effect and the overall magnitude of change from Baseline conditions depending on when various (example) projects came forward, relative to each other. As stated in paragraph C1.8, the information presented in the worked example is hypothetical only and does not directly relate to the Proposed Project or the cumulative

Reference	Matter	Point Raised	Applicant's Comments
		controls on HGVs creates a stepped profile. There is also potential for projects to have multiple peaks such as for installation and removal of haul roads. SCC raised the point in its LIR [REP1-130] that the SPR projects could have multiple peaks such as during the removal of the haul road which is not captured in the Applicant's modelling. It is stated in Appendix C that 500 vehicle movements is the threshold for a large magnitude of change. Paragraph C1.9 clarifies that "the potential cumulative effect would nonetheless be Minor / Moderate if both the example project, and the cumulative project(s) are expected to be Minor in isolation." SCC does not see how the magnitude of effect can be altered depending on whether the effect is caused by a project in isolation or in combination if in either case the number of vehicle movements are equal.	assessment, but is designed to identify potential theoretical scenarios to inform the conclusions of the TN. This was provided within an Appendix, rather than the main body of the report for this purpose. Nonetheless, the worked example does not affect or alter the outcomes of the cumulative assessment work within the TN but is designed to show how different scenarios/ degrees of overlap between schemes could affect the magnitude and duration of potential cumulative effects. The potential for cumulative effects would be short-term in nature in the unlikely scenario that several projects overlap. There would be less potential for cumulative effects to arise if the construction programmes of different projects were staggered. The exercise highlights the importance of ongoing engagement with other projects to minimise environmental and community effects, such as by off-setting construction schedules where feasible in the worst-case scenario that construction programmes fully overlap. Further details on the construction programmes of cumulative schemes and the potential for these to overlap with the Proposed Project have also been provided by the Applicant, in response to ExA's Written Question 1TT1 and 1TT12 within **Application Document 9.73 Applicant's Responses to First Written Questions** submitted at Deadline 3.
Document 9.45 Approach to Assessment Public Rights of Way (REP1-119)			
B4.1	The lack of a standalone PRoW chapter in ES	Paragraph 3.1.4 states that is not conventional practice for an ES topic chapter for a standalone PRoW assessment. SCC has asked for this in all correspondence, and it is contained in SCC's NSIP guidance. The examples of previous projects cited in this paragraph does not mean that the approach is best practice. It is understood that the DMRB and other guidance may not yet request the assessment of PRoWs to be its own ES chapter. However, a separate chapter would allow the assessment and its findings to be communicated with far greater clarity than the current sporadic approach spanning many documents allows. By consequence, IPs would be able to participate more effectively in this regard through improved accessibility to the assessment and its findings. This point not only applies to local authorities and other organisations registered as IPs but is also especially pertinent to IPs registered as individuals, such as members of the public, who already face barriers to effective engagement on account of the large quantity of technical documents forming the application and the amount of time needed to do so.	The ES presents a full assessment of likely significant effects on PRoW in accordance with well-established practice in Environmental Impact Assessment (EIA) where effects on specific aspects associated with PRoW are assessed within the relevant environmental topics. The full reasoning is all set out in **Application Document 9.45 Approach to Assessment of Public Rights of Way (PRoW) [REP1-119].** The intra-project effects assessment has considered the combined effects on PRoW and their users that have been identified across the various environmental topic chapters. The intra-project cumulative effects assessment found that users of only one of the PRoW were considered likely to experience significant cumulative effects (491/010/0), the result of combined effects on both visual amenity and changes to user experience and local travel patterns. See **Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra-Project Cumulative Effects [APP-059]**.
B4.2	Request for new PRoW route north of the Convertor Station site	Paragraph 3.2.2 mentions the requested mitigation from SCC PRoW regarding a new PRoW route to the north of the converter station and to the south of the B1119 and that they are not included as mitigation in the DCO. SCC PRoW considers this is mitigation for the visual impact and amenity and the permanent closure and diversion of the Public Footpath due to the location of the Saxmundham Converter Station. The landscape and views will be significantly altered from open farmland to large industrial buildings and infrastructure with some planting. A new route away from the built form will also be beneficial to PRoW users whilst temporary diversions and closures are in place, which may impact on user behaviour if the diversions are not desirable or commensurate to the existing routes. This northern route would also create an off-road link to existing PRoWs and footways to encourage use by non-motorised users for health, wellbeing and recreation and a safer offroad route for commuting. Sizewell C produced an "Amenity & recreation" assessment, ES Volume 4 Chapter 8 Amenity and	As set out within **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**, the Order Limits along the B1119 do not include a Public Right of Way (PRoW) connection as it is not identified as essential mitigation in the Environmental Statement and therefore powers are not sought for this. It is noted that powers sought for compulsory acquisition must be necessary and proportionate and whilst it is acceptable in this context to seek rights for maintenance of the ditch and new planting; obtaining the rights for a permanent Public Right of Way is more challenging in the context that it has not been identified as being essential in the Environmental Statement. It is acknowledged that PRoW E-491/005/0 will be permanently closed and diverted due to Saxmundham Converter Station. The proposed mitigation for this, which includes the provision of a permanent diversion route, is set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk**

Reference	Matter	Point Raised	Applicant's Comments
		Recreation, which considers the effects on the experience of users of amenity and recreation resources as a result of: • physical changes to resources (for example changes to PRoW through diversions or creation of new road crossings). • changes to the experience people have when using recreational resources due to perceptual or actual changes to views, noise, air quality, or traffic movements; and • changes to the experience people have when using recreational resources due to increases in the numbers of people using them. Therefore, SCC PRoW considers that it has been established that the loss of amenity for PRoW users such as due to walking around new buildings instead of open countryside is an effect which must be considered and mitigated appropriately.	**[CR1-047]**. The assessment of PRoW closures and diversions within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** assigns a large magnitude of impact to PRoW E-491/005/0 in recognition of the proposed permanent closure and diversion. Nonetheless, the measures set out within **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]** are designed to reduce the impact of this diversion on users of PRoW E- E-491/005/0. For example, the diversion will provide a connection with PRoW E-491/006/0 to improve the connectivity between routes and to allow PRoW users to use alternative routes if desired. As a result, no potential for significant effects have been identified within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** as a result of this permanent closure and diversion of PRoW E-491/005/0, with the proposed mitigation in place. The creation of a new PRoW along the B1119 is not considered to form mitigation for visual impacts. The diversion of the existing PRoW due to the location of the proposed Saxmundham Converter Station has been designed to be in a similar locality, providing continuity with the existing PRoW network with the additional creation of a new circular walk, set within a range of landscape settings including woodland and open grassland. The permanent diversion utilises the screening benefit from mitigation woodland planting to partially screen views towards the Saxmundham Converter Station whilst providing open glades to enhance the visual amenity for recreational users. Any views from a PRoW along the B1119 would also have views to the Saxmundham Converter Station, albeit at a slightly increased distance. The effects on visual receptors, including nearby viewpoints such as Viewpoint 1 and the visual receptor group 'Users of the local PRoW network within the study area, including public footpaths and public bridleways' has been detailed within **Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]**. Amenity impacts are assessed in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** in particular considering the potential for visual, traffic, noise, and air quality effects arising from construction of the Suffolk Onshore Scheme. For PRoW, impacts on amenity are assessed within the 'Social Cohesion and Community Identity' health determinant. As defined in **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]**, this considers the *"potential adverse impacts on health and wellbeing resulting from disruption to community connectivity and potential changes to landscape and visual amenity, which could impact mental health".* This determinant draws on evidence across multiple environmental disciplines to provide a comprehensive assessment, including the landscape and visual, socio-economics, and traffic and transport effects. Drawing on this evidence, and applying professional judgement, the assessment concludes that there would be no significant effects on social cohesion and community identity. Similarly, **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** considers impacts on amenity under the "Air Quality" health determinant, including adverse health impacts and disruption to local amenities for residents. The assessment concludes that increased exposure to dust and

Reference	Matter	Point Raised	Applicant's Comments
			particulate matter during the construction phase would not result in significant effects on health and wellbeing. Potential impacts on amenity are also considered under the "**Noise and Vibration**" health determinant. This assessment also concludes no significant effects on health and wellbeing. The cumulative effects on health and wellbeing are assessed in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060].** The assessment also draws upon the conclusions of other relevant environmental aspects including landscape and visual, traffic and transport, air quality, and noise and vibration. The assessment concludes that there are no anticipated significant effects on health and wellbeing, including on the experience of users of amenity due to noise, air quality, visual, or traffic effects. On this basis, the Applicant does not consider that there will be a material loss of amenity value which would result in significant adverse effects on the PRoW network. **Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [APP-057]** assesses the potential effects of the Proposed Project on disruption to the use of PRoW and recreational routes. Overall, it is concluded that no significant socio-economic, recreation and tourism effects are anticipated on PRoW. The Applicant acknowledges the potential for the Suffolk Onshore Scheme to increase the volume of users of PRoW in the wider network given residents and tourists may decide to use PRoW and recreational routes that are not anticipated to be impacted by the Suffolk Onshore Scheme. However, given the nature of the impacts and the provision of appropriate mitigation measures, the Applicant considers that this will be limited and temporary in nature. As detailed in **Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047],** a range of mitigation measures will be implemented to minimise disruption to PRoW users on impacted routes, including diversions, site fencing and gates, and safety scaffolding and netting. These measures allow PRoW and recreational routes impacted by the Proposed Project to remain open and available for use and limited disruption to users journeys.
B4.3	Requested enhancement to the PRoW network	Regarding paragraph 3.2.3, SCC PRoW welcomes the engagement on the other requests to enhance the PRoW network and would request that this is discussed and agreed at the earliest opportunity.	Acknowledged and agreed. Further engagement will take place with SCC regarding requests to enhance the PRoW network. As set out within paragraph 3.2.2 of **Application Document 9.45 Approach to Assessment of Public Rights of Way [REP1-119]**, additional PRoW enhancements which go beyond essential mitigation are not included as part of the Proposed Project and therefore powers are not sought for this as part of the DCO. The Examining Authority, in Written Question 1TT16, has also requested a response to SCC requests for suggested PRoW enhancements, to which the Applicant has provided a response within **Application Document 9.73 Applicant's Responses to First Written Questions** submitted at Deadline 3.
S.85 Technical Note			
B5.1	Acid Grassland enhancement	Whilst SCC considers the enhancement of acid grassland to be an appropriate measure which seeks to further the purposes of the natural beauty of the SECHNL, it is unlikely that the proposal in its current form will be sufficient to	The appropriateness of enhancement of acid grassland to seek to further the purposes of the Suffolk & Essex Coast & Heaths Area of Outstanding Natural Beauty (SECHAONB) is noted. Regarding the concerns around whether the

Reference	Matter	Point Raised	Applicant's Comments
		allow the duty to be discharged. As pointed out in paragraphs 5.46 to 5.56 of SCC's LIR [REP1-130], the project's impacts on the SECHNL go beyond affecting only acid grassland meaning the position set out in paragraphs 5.57 and 5.58 remains unchanged. In addition to these impacts, table 4.1 finds that there are likely significant cumulative effects on the following natural beauty indicators: Landscape Quality, Scenic Quality, Relative Wildness and Relative Tranquillity. No measures are proposed in relation to these effects which means the duty cannot be discharged in this regard either. SCC recognises that effects beyond acid grassland removal affect a limited area of the SECHNL and are temporary in nature. It is therefore likely that additional activities need only be modest in scope to allow the duty to be discharged. This could be achieved through additional measures or a contribution to existing nature recovery funds ringfenced for environmental enhancements in proximity to the works within the SECHNL. Regarding the acid grassland proposal itself, paragraph 3.3.6 of the Statement of Reasons [REP1- 040] states that the acid grassland enhancement "is required to offset the temporary loss of acid grassland habitat during the construction of the transition joint bays, and the associated recovery period". Paragraph 3.3.7 clarifies that the 10-year management period is required "to offset the lag time in restoration of the existing acid grassland that can be expected once the transition joint bays compound and cable trench works are complete". The proposed enhancement is required to offset the harm caused by the project to acid grassland within the SECHNL. Offsetting is required where impacts cannot be avoided or mitigated according to the mitigation hierarchy. Even if the proposal is sufficient to offset effects on acid grassland, it does not follow that it therefore shows compliance with the duty on account of the requirement to seek to further the purposes of conservation and enhancement of natural beauty. The Applicant must demonstrate that the measure does not only offset effects on acid grassland but also furthers its status in relation to the National Landscape's natural beauty. When considering whether the proposal succeeds in furthering conservation and enhancement of the SECHNL's natural beauty in terms of acid grassland, it should be noted that the proposal does not increase the amount of acid grassland through creation, as was previously proposed in para 7.3.21 of the Planning Statement [AS-030] but enhances existing acid grassland. This change lessens the benefits of the proposal by no longer increasing the provision of acid grassland and means that there will be a temporary deficit of 7.61 ha of acid grassland for several years until the existing grassland is restored. As a result, is not clear to SCC that the proposal goes beyond the required offsetting for impacts on acid grassland in terms of balancing the temporary reduction of acid grassland provision with the benefits of enhanced acid grassland once affected grassland is reinstated. Therefore, it is doubtful that the proposal is sufficient to discharge the duty, both in relation to effects on acid grassland and, most certainly, in relation to the other impacts of the proposed development on the SECHNL as previously referenced.	proposals in the current form are appropriate, as noted in **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**, the enhancement of the area of land within the SECHAONB will contribute to aspirations within the SECHAONB Management Plan (National Landscape Partnership, 2023) and that the proposed acid grassland enhancement within the SECHAONB is considered to target the Natural Beauty and Special Qualities indicators as it has multifunctional purposes to further the purpose of the AONB, notably including landscape, ecology and biodiversity. This includes landscape quality, scenic quality, relative wildness, relative tranquillity, natural heritage features, community and ecosystem goods and services. The Applicant considers that the Section 85 duty to seek to further the purposes of the SECHAONB has been complied with for the reasons detailed in **REP1-120**. In the decision letter for the Five Estuaries Offshore Wind Farm (published December 2025) on page 44 it is stated that "*The Secretary of State considers that the duty to conserve and enhance does not necessarily require all effects whatsoever, to be offset by enhancement measures*".
Document 9.14 Suffolk and Kent Illustrative Visualisations Part 1 of 2 (REP1-296)			
B7.1	Visualisations	SCC welcomes the refined massing provided for the visualisations, acknowledging that this is not the final design.	With regard to the brown and grey shapes within the background in Viewpoint 1, these do not represent the NGET Friston substation (Kiln Lane) as the NGET

Reference	Matter	Point Raised	Applicant's Comments
		SCC would ask for clarification with regards to some elements of the rendition in Viewpoint 1: SCC assumes that the brown and grey shapes in the background (towards Friston) are representations of elements of the Kiln Lane (Friston) substation works, but would welcome this being confirmed, including identification of the relevant Works Numbers, so that the visualisations can be related to the works plans/general arrangement plans. SCC considers that the visualisation of Viewpoint 1 in year 15 clearly demonstrates, why a layered approach to mitigation and screen planting is required to successfully integrate the converter station site into its surroundings. If the field north of the converter station site had been retained within the DCO limits (see paragraph 5.85, SCC LIR [REP1-130]), additional planting could have been provided in the middle ground, screening the converter station after 15 years.	Friston substation is shown on the visualisation and in the key as a red dashed box noted as being 'not visible' (Friston Scenario 2). The brown and grey shapes are located on the Saxmundham Converter Station site and are part of the illustrative model of the proposed Saxmundham Converter Station. This should be compared with the extent of the block photomontages illustrating the maximum parameters within **Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 1 of 7 [APP-208]**. As noted by SCC, the appearance in the background demonstrates the importance and value in locating the smallest feasible compound and the building mass within it, as far south as possible within the defined LoD to reduce visual impact, especially at year 15. This is secured as design principle CO.2 in the converter station design principles (refer to Table 3.1 in **Application Document 7.12.1 Design Principles – Suffolk [APP-366]**). The design principles are secured by Schedule 3 Requirement 3 within the draft DCO (**Application Document 3.1(E) (Version 2, Change Request) draft Development Consent Order [CR1-027]**). Regarding additional mitigation planting within the field to the north of the converter station, the year 15 visualisation from Viewpoint 1 demonstrates the benefits of the belt of native woodland planting proposed to the north of the converter station in softening views and screening the lower extents of the operational built form. This pattern of planting is considered to be appropriate within the local landscape character and provides the opportunity to reinstate historic woodland blocks on the site. Further planting is also not considered in the northern part of the field due to the requirement to consider co-location of other projects which is explained within section 6.2.43 of **Application Document 7.10 Coordination Document [APP-363]** and section 7.6 of **Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk [CR1-046]**.
Document 9.48 River Fromus Visualisations Part 1 of 3 (REP1-298)			
B8.1	Visualisations	SCC welcomes the additional visualisations and refined rendering and considers that this adds to the wider picture, even if it does not complete it. The focus is (rightly) on the Fromus Valley, the bridge, the converter station in the background and the relationship to listed assets. What is left out are the impacts and effects of the access from the B1121 to the proposed bridge. At a speed limit of 60mph, the required visibility splays could extend to over 200m either side (please consult SCC Highways). It is not clear whether this is reflected in Viewpoint 2, which does show roadside hedge. Apart from the bell mouth construction and associated required visibility splays in the approach to the bridge, the bridge construction would alter the landform within the Fromus Valley, which 'would directly change a small part of the distinctive valley system' (as identified in the ES [APP-143]). As stated at paragraph 5.73 of the SCC LIR [REP1-130], the land to the south of Saxmundham and east of the B1121, has been identified as sensitive by the Suffolk Coastal Sensitivity Assessment (2018). The adverse visual effects of this become more pronounced as the clearance height of the bridge increases. SCC further considers that, taking into account all impacts and effects of this approach to the converter station site, even a lower bridge clearance height will not make the overall access (including bell mouth, visibility splays, access road towards bridge and between bridge and converter station site) acceptable. SCC therefore maintains its position that this access should be temporary.	The additional visualisations provided from locations to the west of the B1121 (Viewpoints A, B and C) are considered fully representative to understand potential intervisibility with the Suffolk Onshore Scheme and how this intervisibility changes for recreational receptors using the PRoW network in the local landscape to the west of the River Fromus. As noted in **REP1-298**, the additional visualisations further reinforce the conclusions in the Environmental Statement and demonstrate that these conclusions are unlikely to change as a result of minor changes as the detailed design progresses. Refer to the Applicant's response to WQ1 1LVIA14 (**Application Document 9.73 Applicant's Responses to First Written Questions** submitted at Deadline 3) regarding the effects arising from the Suffolk Onshore Scheme in the vicinity of the River Fromus bridge, including vegetation removal and the bell mouth construction along the B1121, and how this is displayed within the visualisations for Viewpoints 2 and 20. Regarding the request for the access to be temporary, section 5.72 – 5.77 in Table 3.1 in **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]** should be referred to.

Reference	Matter	Point Raised	Applicant's Comments
Document 9.48 River Fromus Visualisations Part 2 and 3 (REP1-299)			
B9.1	Visualisations	Viewpoint A demonstrates that the bridge with 6m clearance would remain visible after 15 years.	This is acknowledged. It is also noted that the year 15 is shown at winter which is considered to be worst-case and that this represents potential views from a short section of the PRoW network in the local landscape to the west of the River Fromus.
Document 9.48 River Fromus Visualisations Part 2 and 3 (REP1-299)			
B10.1	Visualisations	SCC welcomes that the bridge (at any height would largely be screened) from Viewpoints B and C. Viewpoint B demonstrates however, how the access road would visibly cut across the former parkland landscape.	Comments are acknowledged. The effects of the permanent access road and proposed landscape planting along it are fully assessed with regard to landscape (refer to **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**) and visual receptors (refer to **Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]**) at all project stages.
SCC's Comments on the Applicant's Schedule of Changes (REP1-107)			
B11.1	dDCO ref. Art.1	SCC has three drafting comments – First, the similar text regarding "commencement" and "commenced" which is included at the end of subparagraphs (a) and (b) only needs to be included once, i.e. at the end of the definition. Second, SCC consider that, for clarity, in sub-paragraph (b), the reference to "precommencement operations" is changed to "onshore pre-commencement operations" and that follow-up amendments are made throughout the draft DCO. Third, after sub-paragraph (a), "In relation" should be replaced with "in relation" and, after sub-paragraph (b), "In respect of" should be replaced with "in respect of." Taken together, these points would result in the following amendments to the definition of "commence" – "commence means" — (a) In in relation to works seaward of MHWS, the first carrying out of any licensed marine activities authorised by the deemed marine licence, save for operations consisting of offshore preparation works or pre-construction surveys and monitoring approved under the deemed marine licence ~~and the words "commencement" and "commenced" must be construed accordingly~~. (b) In in respect of any other works comprised in the authorised project, the carrying out of any material operation (as defined in section 155(2) (when development begins) of the 2008 Act) forming part of the authorised project other than the onshore pre-commencement operations ~~and "commencement" and "commenced" are to be construed; accordingly~~," and "commencement" and "commenced" are to be construed accordingly.	The Applicant has updated the definition of 'commence' to reflect these drafting comments in **Document 3.1(F) Development Consent Order** submitted at Deadline 3.
B11.2	Art. 5	SCC makes no comment on this amendment. On reflection, however, SCC considers article 5(1)(a) should be recast, for clarity, as follows – "5.— (1) Subject to paragraph 4, the undertaker may— (a) in respect of the onshore and offshore electric line forming part of the authorised project for which it is granted development consent by paragraph (1) of article 3 (development consent etc. granted by the Order), ~~the undertaker may — (a)~~ deviate from the lines or situations of the authorised project shown on the Works Plans within the limits of deviation relating to a Work shown on those plans and carry out construction activities for the purpose of the authorised project anywhere within the Order limits;" ~~and~~ In addition, at the end of paragraph (c), after "convenient," add "and."	The Applicant has updated the formatting of article 5(1)(a) to reflect these drafting comments in **Document 3.1(F) Development Consent Order** submitted at Deadline 3.

Reference	Matter	Point Raised	Applicant's Comments
B11.3	Art.5	Notwithstanding the proposed amendment, SCC's maintain its comments in its LIR [**REP1-130]** on the impacts of Friston substation. These include impacts on landscape (see paragraphs 5.103 and 5.104 and 5.146 to 5.148), archaeology (paragraph 7.47), flood risk associated with the substation's construction and operation (paragraph 8.32 onwards), and the need for more information regarding vehicular movements during its construction, particularly AILs (paragraph 11.155)	The Applicant refers to its response within **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**, in respect of these various points.
B11.4	Art.7	SCC has one drafting comment: in paragraph (4), after both (a) and (b), replace "Where" with "where". In addition, SCC maintains the point (subject to one drafting change shown below) made in respect of this provision in paragraph 15.8 of its LIR [REP1-130], namely – "This article allows any or all of the benefits of the provision of the Order to be transferred, with the consent of the Secretary of State, to others. In the event of such a transfer, owing to its role in determining consents under the dDCO, SCC requests that it is notified as soon as reasonably practicable of any such transfer and that the dDCO is updated to reflect this."	The Applicant has updated the formatting of article 5(1)(a) to reflect these drafting comments in **Document 3.1(F) Development Consent Order** submitted at Deadline 3
B11.5	Art.62	SCC has one drafting point: in paragraph (b), the words "For the avoidance of doubt" are unnecessary and should be omitted.	The Applicant will consider this drafting amendment and update the draft DCO if appropriate.
B11.6	Sch. 1	SCC assumes the reference to "requirement 16" should be to "requirement 6 (construction management plans to be approved". SCC will consider the new version of the Works Plans and comment as appropriate in due course.	The Applicant has updated this reference within the draft **Document 3.1(F) Development Consent Order** submitted at Deadline 3.
B11.9	Sch.3 Req. 3	Notwithstanding the proposed amendment, SCC maintains its position (and suggested drafting amendment) included in paragraphs 15.38 and 15.39 of its LIR **[REP1-130]** – "15.38 Requirement 3 refers to "the Key Design Principles set out in the Converter Station Design Principles". What is the status of the documents which include the Design Principles (Suffolk: [APP-366], Kent: [APP-367])? Neither is referred to elsewhere in the dDCO and SCC would suggest they should be defined and included in the schedule of certified documents. SCC would therefore suggest that existing requirement 3 is renumbered paragraph (1) and a new paragraph (2) is included in requirement 3 which includes a definition of the document e.g. – "(2) In paragraph (1), the Converter Station Design Principles means Design Principles – Suffolk and Design Principles – Kent, certified under article 60 (certification of documents) by the Secretary of State as Design Principles – Suffolk and Design Principles – Kent for the purposes of this Order". 15.39 In Schedule 19 (certified documents) to the dDCO, "Design Principles – Suffolk" and "Design Principles – Kent" should then be added to the list of documents".	The Applicant has incorporated these drafting comments in **Document 3.1(F) Development Consent Order** submitted at Deadline 3
B11.8	Sch. 3 Part 7	Paragraph 14.60 of SCC's LIR [REP1-130] considers Scenario 2 and states, given the consented hours for construction work set out in the East Anglia One North and East Anglia Two Windfarm Orders 2022, there is no justification for works associated with Scenario 2 to require extended working hours. In that context, SCC considers this amendment to Requirement 7 is preferable to the position included in the previous dDCO. SCC's wider point on construction hours is set out in paragraphs 15.47 to 15.56 of the LIR [REP1-130]. For the avoidance of doubt, it is the position articulated in those paragraphs that SCC considers should be included in Requirement 7.	The Applicant refers to its response in relation to construction working hours contained within **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**,

Reference	Matter	Point Raised	Applicant's Comments
		This would result in consistent working hours across the project, and This would result in Requirement 7 being drafted as follows – Construction hours 7.—(1) Subject to sub-paragraphs (2), (3), and (4) ~~and (7)~~ onshore construction work may only take place between 0700 and 1900 Monday to Friday and between ~~0700~~ 0800 and ~~1700~~ 1300 on Saturdays~~, Sundays and Bank Holidays (the core working hours),~~ unless otherwise approved by the relevant planning authority. (2) ~~Percussive piling works are limited to 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays and may not occur on Bank Holidays, unless otherwise approved by the relevant planning authority.~~ No percussive piling works may take place outside of the hours of 0700 to 1900 Monday to Friday and 08.00 to 13.00 on Saturdays, unless otherwise approved by the relevant planning authority. (3) Subject to sub-paragraph (4), no HGV deliveries ~~are limited to~~ may be made outside the hours of 0700 to 1900 Monday to Friday and ~~0700~~ 0800 to ~~1700~~ 1300 on Saturdays and may not occur on Bank Holidays, unless otherwise approved by the relevant highway authority. (4) The following operations may take place outside the core working hours referred to in sub-paragraph (1)— (a) ~~trenchless crossing operations including at landfalls and beneath highways, railway lines, woodlands, nature reserves, Sites of Special Scientific Interest or watercourses.~~ ~~(b)~~ (a) the installation and removal of conductors, pilot wires and associated protective netting across highways, railway lines, or watercourses. ~~(c)~~ (b)the jointing of underground cables. ~~(d)~~ (c) the continuation of any work activity commenced during the core working hours to a point where they can securely and or safely be paused. ~~(e)~~ (d) delivery to the transmission works of abnormal loads and any highway works requested by the highway authority to be undertaken outside the core working hours. ~~(f)~~ (e) the testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities. ~~(g)~~ (f) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities that the undertaker and its contractor agree forms the critical path for the accepted construction programme. In such cases, the undertaker must, as soon as practicable, notify the relevant planning authority of the disruption or interruption and explain why that work could not be completed within the core working hours referred to in sub-paragraph (1). ~~(h)~~ (g) activity necessary in the instance of an emergency where there is a risk to persons or property. ~~(i)~~ (h) marine works (all works below the mean high water springs line). ~~(j)~~ (i) security monitoring. ~~(k)~~ (j) intrusive and non-intrusive surveys. ~~(l)~~ (k) mechanical and electrical installation works within buildings once erected and enclosed;	

Reference	Matter	Point Raised	Applicant's Comments
		and ~~(m)~~ (l) any highway works requested by the highway authority to be undertaken on a Saturday or Sunday or outside the core working hours. (5) The core working hours referred to in subparagraph (1) exclude start up and close down activities up to 1 hour either side of the core working hours. A 50dBA noise limit (LOAEL) will apply at the nearest noise-sensitive receptors for start-up and close down activities up to one hour either side of the core working hours. (6) The severe weather conditions referred to in sub-paragraph (4)(g) means any weather which prevents work from taking place during the core working hours referred to in sub-paragraph (1) and, as the case may be, the hours referred to in sub-paragraph (3) by reason of physical incapacity (whether for reasons of visibility, ground conditions, power availability, site access, wind or otherwise) or being contrary to safe working practices. (7) In respect of Work No.1A and Work No. 1B, construction work may only take place between 0700 hours and 1900 hours Monday to Friday and 0700 hours and 1300 hours on Saturdays, with no activity on Sundays or bank holidays, except as specified in sub-paragraph (8).	
B11.11	Sch.3 Req.15	SCC would welcome further information in respect of this provision. For instance – 1. Except in new requirement 15, in the dDCO **[REP1-037]** "amendment" is used in the context of a change to a plan, or document and not in the context of works. What, in this context, would constitute an "amendment" to works? 2. How would the "amendments to … works" differ from those works which are included in the definition of "maintain"? 3. Should Requirement 15 include a second paragraph along the following lines – b. "(2) No amendment to any part of Work No.1B may be constructed unless the undertaker demonstrates to the satisfaction of the relevant planning authority that the amendment will not give rise to any materially new or materially different environmental effects from those assessed in the Environmental Statement". If not, why not? Finally, a drafting point: for consistency with the rest of the dDCO **[REP1-037**], "Authorised Project" should be recast as "authorised project".	Requirement 15 intends to prevent the Friston substation being constructed under one Order after already being constructed under another. Question 1GEN11 within **Application Document 9.73.1 Applicant's Reponses to First Written Questions – Appendices** submitted at Deadline 3 provides further detail in relation to this requirement.
B11.12	Sch. 3 Req. 6	SCC makes no comment in respect of the deletion of the marine environment plans from Requirement 6. Notwithstanding the proposed amendment, SCC maintains its position (and suggested drafting amendment) included in paragraphs 15.45 and 15.46 of its LIR **[REP1-130]** – "15.45 Again, for clarity, the reference to "or other discharging authority as may be appropriate to the relevant plan" should be replaced with the name of the authority the Applicant has in mind. For instance, the subject matter of the following documents fall within SCC's statutory responsibilities, and it would be appropriate for SCC to approve these – ~~(c)~~ (b) Construction Traffic Management and Travel Plan – Suffolk (which must be substantially in accordance with the Outline Construction Traffic Management and Travel Plan – Suffolk). ~~(k)~~ (j) Public Rights of Way (PRoW) Management Plan – Suffolk (which must be substantially in accordance with the Outline PRoW - Suffolk).	The Applicant refers to the response given in **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**,

Reference	Matter	Point Raised	Applicant's Comments
		~~(q)~~ (n) Material and Waste Management Plan. ~~(r)~~ (o) Construction Drainage Management Plan; and ~~(s)~~ (p) Flood Management Plan 15.46 In respect of the documents mentioned in sub-paragraphs ~~(q), (r) and (s)~~, (n), (o) and (p) it is not clear why no outline document is being provided. No explanation is provided in the EM [AS-090] at paragraph 5.3.10 (which concerns requirement 6)". The document references in the suggested amendment have been updated so they are the same as those used in the dDCO **[REP1- 037].** The point made in paragraph 15.16 of the LIR **[REP1-130]** querying why no outline document is being provided for the Material and Waste Management Plan, the Construction Drainage Management Plan; and the Flood Management Plan applies equally to new document (q) the Operational Drainage Management Plan. SCC requests that the applicant justifies its position. The "rationale for the Change" included in the Schedule of Changes **[REP1- 107]** does not assist in this regard.	

27. Applicant's Comments on the Submission from Suffolk Energy Action Solutions (REP2-114)

Table 27.1 Applicant's Comments on the Suffolk Energy Action Solutions Deadline 2 Submission [REP2-114] Landscape and Visual

Reference	Matter	Point Raised	Applicant's Comments
7-12	Landscape and Visual	Executive Summary	The Applicant reaffirms the responses provided within **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** in response to SEAS Landscape and Visual RR and in **Application Document 9.81 Applicant's Response to Suffolk Energy Action Solutions (SEAS) Relevant Representation – Micelle Bolger Expert Landscape Consultancy (MBELC) Report 2025** submitted at Deadline 3. In addition, the Applicant refutes the cultural heritage comments in point 11 of their Executive Summary and refers to **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-104]** and specifically **Appendix A** of that document for a detailed response to SEAS's comments on cultural heritage submitted as part of their Relevant Representation at Deadline 1.
13-17	Landscape and Visual and Cultural Heritage	Purpose and Scope	The Applicant reaffirms the responses provided within **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** in response to SEAS Landscape and Visual RR and Cultural Heritage RR and in **Application Document 9.81 Applicant's Response to Suffolk Energy Action Solutions (SEAS) Relevant Representation – Micelle Bolger Expert Landscape Consultancy (MBELC) Report 2025** submitted at Deadline 3. Point 17 suggests that '*for clarity and transparency, SEAS has prepared a tabular appendix (Appendix A) setting out each theme, the Applicant's response, and SEAS's counter-response'*. The Applicant refutes that this is clear or transparent as it selectively extracts and summarises the Applicant's response providing a misleading interpretation of REP2-014 and consequently ambiguous counter response from SEAS.
18-20	Landscape and Visual	Significant and Irreversible Harm to Landscape Character	The Applicant reaffirms the responses provided within **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** in response to SEAS Landscape and Visual RR and in **Application Document 9.81 Applicant's Response to Suffolk Energy Action Solutions (SEAS) Relevant Representation – Micelle Bolger Expert Landscape Consultancy (MBELC) Report 2025** submitted at Deadline 3.
21-23	Landscape and Visual	Effects on the National Landscape (AONB) and its Setting	The Applicant reaffirms the responses provided within **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** in response to SEAS Landscape and Visual RR and in **Application Document 9.81 Applicant's Response to Suffolk Energy Action Solutions (SEAS) Relevant Representation – Micelle Bolger Expert Landscape Consultancy (MBELC) Report 2025** submitted at Deadline 3. In addition, the Applicant disagrees with the statement that there is '*failure to give great weight to designated landscapes and Areas of Search so small it omits assessment of the River Alde estuary'*. The Landscape and Visual Impact Assessment (LVIA) gives full consideration of National Landscapes and their setting. The LVIA study area is reasonable and proportionate and was agreed with stakeholders (Suffolk County Council, East Suffolk

Reference	Matter	Point Raised	Applicant's Comments
			Council, National Landscape Partnership). As illustrated on Figure 6.4.2.1.5 **Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 1 of 7 [APP-208]** J4: Alde Estuary lies almost entirely outside the study area. The Zone of Theoretical Visibility does not indicate any theoretical visibility within this landscape character area other than a very small area to the south of Snape Maltings where there would be no discernible change to the character of the landscape. Consequently, this landscape character area was scoped out of the LVIA which was agreed with stakeholders through thematic meetings.
24-27	Landscape and Visual	Severe Visual Harm from Key Receptors	The Applicant reaffirms the responses provided within **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** in response to SEAS Landscape and Visual RR and in **Application Document 9.81 Applicant's Response to Suffolk Energy Action Solutions (SEAS) Relevant Representation – Micelle Bolger Expert Landscape Consultancy (MBELC) Report 2025** submitted at Deadline 3. Point 27 claims that cultural heritage assets in Iken and Slaughden were afforded too little value or entirely omitted. These areas fall outside the agreed study areas for cultural heritage impact assessment in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]**.
28-30	Landscape and Visual	Cumulative Impact with Other Major Infrastructure Projects	The Applicant reaffirms the responses provided within **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** in response to SEAS Landscape and Visual RR and in **Application Document 9.81 Applicant's Response to Suffolk Energy Action Solutions (SEAS) Relevant Representation – Micelle Bolger Expert Landscape Consultancy (MBELC) Report 2025** submitted at Deadline 3.
31-34	Landscape and Visual	Access Road and Bridge across the River Fromus	The Applicant reaffirms the responses provided within **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** in response to SEAS Landscape and Visual RR and in **Application Document 9.81 Applicant's Response to Suffolk Energy Action Solutions (SEAS) Relevant Representation – Micelle Bolger Expert Landscape Consultancy (MBELC) Report 2025** submitted at Deadline 3. The Applicant reaffirms the responses within **Appendix A** of **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-104]** with regards to cultural heritage assets. Visualisations using winter photography for heritage assets will be submitted before the end of the examination.
35-46	Landscape and Visual	Visualisations and Photomontages	The Applicant reaffirms the responses provided within **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** in response to SEAS Landscape and Visual RR and in **Application Document 9.81 Applicant's Response to Suffolk Energy Action Solutions (SEAS) Relevant Representation – Micelle Bolger Expert Landscape Consultancy (MBELC) Report 2025** submitted at Deadline 3. In response to point 42 the bridge model assessed as part of the submission allows for appropriately inclined approaches.
47-50	Landscape and Visual	Site Selection Transparency	The Applicant reaffirms the responses provided within **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** in response to SEAS Landscape and Visual RR and in **Application Document 9.81 Applicant's Response to Suffolk Energy Action Solutions (SEAS)**

Reference	Matter	Point Raised	Applicant's Comments
			Relevant Representation – Micelle Bolger Expert Landscape Consultancy (MBELC) Report 2025 submitted at Deadline 3. Visualisations using winter photography for heritage assets will be submitted before the end of the examination.
51-55	Landscape and Visual	Conclusion	The Applicant reaffirms the responses provided in **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** and in particular does not agree with the claim that the assessment of effects on landscape and visual receptors and cultural heritage are deficient or reveal systematic understated harm, flawed methodology or non-compliance with national policy.

28. Applicant's Comments on the Submission from Suffolk Energy Action Solutions [REP2-116]

Table 28.1 Applicant's Comments on the Suffolk Energy Action Solutions Deadline 2 Submission [REP2-116] Cultural Heritage

Reference	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 2			
50-51	Buxlow Manor Grade II* Listed Building (NHLE 1215749)	States that the Applicant's assessment that the impact to the asset would be negligible and less than substantial at the lower end of the scale, outweighed by public benefits, is unsound.	The Applicant disputes this, and points to the conclusions of SEAS's own Cultural Heritage Impact Assessment written by David Edleston, Conservation Architect & Historic Built Environment Consultant that was submitted as part of their **RR on Cultural Heritage at Deadline 1 [RR-5210].** Paragraphs 6.5 and 6.6 of that document conclude that the harm to Buxlow Manor would be less than substantial at the lower end of the scale.
56	Co-location of Suffolk Onshore Scheme and LionLink	States that co-location materially alters the assessment of impact on Buxlow Manor. Historic England guidance requires consideration of seasonal views and cumulative experiential setting. The presence of two converter stations, shared infrastructure, and expanded compounds will significantly degrade the Manor's rural setting.	Cumulative effects have been assessed following the cumulative effects assessment guidance published by the Planning Inspectorate and are reported in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].** This assessment has considered cultural heritage and includes assessment of LionLink. The assessment refers to the co-location of converter station sties and notes that there is no significant cumulative effect on heritage assets. Cultural heritage assets were considered in relation to the co-location of converter station sites. The approach to co-location and coordination with other projects is presented in **Application Document 7.10 Coordination Document [APP-363].** It is the Applicant's view that, rather than adding a cumulative significant effect, the presence of LionLink Converter Station, once constructed, will serve to further screen views of Saxmundham Converter Station from the wider environs of Buxlow Manor as it would be located north of Saxmundham Converter Station and closer to the asset. No significant cumulative effect is therefore identified, over and above the likely effects of LionLink in isolation.
89-102	Cumulative effects	States that the cumulative impact assessment has not been carried out appropriately and argues that harm across multiple assets results in cumulative harm to cultural heritage.	Cumulative effects have been assessed following the cumulative effects assessment guidance published by the Planning Inspectorate and are reported in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].** This assessment has considered cultural heritage and includes assessment of LionLink. The assessment refers to the co-location of converter station sties and notes that there is no significant cumulative effect on heritage assets. Cultural heritage assets were considered in relation to the co-location of converter station sites. The approach to co-location and coordination with other projects is presented in **Application Document 7.10 Coordination Document [APP-363].**

Reference	Matter	Point Raised	Applicant's Comments
			It is the Applicant's view that the statements regarding cumulative harm to cultural heritage misinterpret the purpose of cumulative assessment. A cumulative assessment is made where multiple schemes have the potential to result in greater effects to an individual asset. This assessment has been made for cultural heritage assets in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].** There is no historic environment statute, policy or guidance that requires assessment to be made of what we will term 'collective impact/harm' to cultural heritage. Impact/harm to assets is assessed on an individual basis and collective impact/harm does not add to this impact/harm.

29. Applicant's Comments on the Submission from Suffolk Energy Action Solutions [REP2-119]

Table 29.1 Applicant's Comments on the Suffolk Energy Action Solutions Deadline 2 Submission [REP2-119] - Agriculture

Reference	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 1			
	Introduction and Summary	*SEAS welcomes the Applicant's detailed response REP1A-043 Table 2.56 SEAS Agriculture and Soil to our Relevant Representation RR-5210. However, upon close review, it is clear that several core matters remain inadequately addressed, and in some cases the Applicant's responses introduce new uncertainties, rely on incomplete evidence, or present assurances unsupported by data. The aim of this rebuttal is to clarify where the Applicant's explanations fall short of providing the Examining Authority with the reliable information required under the Planning Act 2008, the EIA Regulations 2017, and NPS EN-1/EN-5. The following sections provide a considered analysis, mindful of the need to protect nationally significant agricultural land.*	*Noted*
	Reliability of BMV Land Loss Figures	The Applicant asserts that permanent BMV loss totals 23.66 ha, but this figure is derived entirely from predictive mapping, which both Natural England and the Applicant acknowledge is indicative only. SEAS notes that the Applicant rejects the 50.7 ha figure cited in our representation, yet provides no field-survey data to verify its own calculation. Without ground-truthed ALC surveys, the true extent of BMV land affected remains unresolved. It is therefore difficult for the Examining Authority to place confidence in the revised BMV totals offered by the Applicant at this stage.	The Applicant is unsure as to where the figure of 50.7 ha stated by SEAS has been derived. Permanent land take covers permanent access, substations, converter station and pylon footings as noted in Table 6.13 of **Application Document 6.2.2.6 Part 2 Suffolk Chapter 6 Agriculture and Soils [PDA-019],** and Table 6.14 of **Application Document 6.2.3.6 Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023]** . When considering purely land predicted to be BMV the permanent land take is 11.45 ha in Suffolk and 12.21 ha in Kent. Even discounting the Predicted ALC grade of the land, the total permanent land take is calculated to be 11.59 ha in Suffolk, and 12.26 ha in Kent.
	Timing of ALC Surveys and Implication For Assessment	The Applicant confirms that full ALC surveys will not be undertaken until Autumn 2025. This means that the Examination must proceed—and potentially a decision reached— before the critical baseline information exists. The ES therefore continues to rely on assumptions rather than verified soil classifications. These surveys are not minor refinements; they underpin the core assessment of agricultural impact and the feasibility of soil reinstatement. SEAS maintains that essential data cannot be deferred until post-consent without undermining the integrity of the assessment.	Agricultural Land Classification surveys were delayed from the original application process due to the increased risk of UXO presence across the Project route. Since the submission there have been further delays to land access, however the surveys are currently in the process of being undertaken. At present the Applicant has completed the auger survey in Suffolk and have completed 81% of the auger locations for Kent. Follow on pit surveys are being planned to complete the data requirement to calculate ALC grades across the Project. The Applicant is currently working towards a completion of the surveys and the updates to the required documentation 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).
	Drainage and Irrigation Infrastructure-Commitments without evidence	The Applicant references Requirement W10/AS05 and offers reassurance that existing drainage systems will be reinstated. However, no survey information is provided to identify: • the location of current field drains,	The Applicant has requested the current land drainage system information from the landowners affected by any surveys carried out to date, and where any damage to land drains has happened this has been repaired to the satisfaction of the landowner. The Applicant will again follow this process during the construction of the project.

Reference	Matter	Point Raised	Applicant's Comments
		• their condition, • their depth, • or their hydrological function. Absent this information, reinstatement is more an intention than a demonstrable capability. If the existing infrastructure is not understood, there is no basis to confirm that it can be reinstated effectively. SEAS does not dispute the Applicant's willingness, but notes that a commitment without underlying evidence cannot properly address the risk to long-term agricultural productivity.	The Applicant will also employ a suitably qualified land drainage consultant to assist with this process as part of the detailed design.
	Soil Management Plan – Lack of measurable outcomes	The Applicant highlights new details in the Soil Management Plan (SMP), including training, monitoring, wet-weather cessation procedures, and an aftercare period. However, these measures do not include measurable restoration outcomes, such as: • target bulk density, • organic matter content, • drainage capacity, • or the ALC grade to be achieved post-works. Without explicit standards, it is unclear how reinstatement success will be assessed or enforced. The SMP therefore remains largely procedural rather than performance-based, leaving unresolved whether BMV soils can be returned to productive condition within a realistic timeframe	The outline Soil Management Plans (oSMP) provided for both Suffolk **[APP-354]** and Kent **[APP-355]** both contain soil management and handling measures based on accepted good practice contained in the Defra Construction Code of Practice for the sustainable use of soils on construction sites[1] . The guidance contained in the Defra Code of Practice is recognised as appropriate to be able to help protect and enhance the soil resources on site. 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 increase the likelihood of successful reinstatement. 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 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. The oSMPs also commit to an Aftercare Management Plan to be produced by the Contractor(s) which will detail the aftercare period, monitoring frequency and interventions which may be required depending on issues highlighted by monitoring during construction. Register of Environmental Actions and Commitments Item AS02 [CR1-043] commits to "Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be recreated. This will be achieved to a depth of 1.2 m (or the maximum natural soil depth if this is shallower) except over buried cables where the reinstated soil depth will be a minimum of 0.9 m. This will aim to restore land to the pre-construction ALC grade (unless otherwise agreed with the landowner)", as such the target restoration grade will be the same as the preconstruction grade, unless otherwise agreed by the landowner. ALC grading is determined by the interaction of key soil properties, including soil structure and bulk density (which influence rooting depths etc.), soil drainage and wetness class (which can affect trafficability and crop success etc.), soil texture and available water holding capacity, and topsoil depths. These parameters are not considered in isolation within the ALC system, rather, they are collectively reflected in the calculated ALC grade. As such, successful restoration of land to its pre-construction ALC grade provides an outcome-based measure that soil physical condition, drainage, and overall soil function have been reinstated to a level appropriate for agricultural production.
	Thermal Effects of HVDC Cables Beneath Agricultural Land	SEAS raised the issue of long-term soil heating from 2 GW HVDC cables. In response, the Applicant emphasises that thermally suitable backfill will be used and cites a single external study suggesting limited heating effects. However:	Assessment of the actual cables thermal performance can only be completed once the actual cable to be used is known. The input into any thermal modelling requires detailed design of the cable system and the cable alignment to be completed. This is a post consent activity. As previously highlighted the method of mitigation of the thermal dissipation of heat from the

Reference	Matter	Point Raised	Applicant's Comments
		• No cable-specific thermal modelling has been carried out for Sea Link. • No projections are provided for temperature changes in the soils along the route. • No consideration is given to how BMV soils may respond differently to elevated temperatures or moisture changes. The Applicant's reliance on general statements rather than project-specific analysis leaves important questions unresolved. Given the scale of BMV land affected, the absence of modelling is a notable omission.	cable system is a standard design process and involves designing the cable spacing, depth, surround and trench backfill to meet the thermal requirements of the cable system.
	Cumulative Agricultural Impacts	The Applicant refers to a separate cumulative effects chapter (APP-060) and suggests that cumulative considerations are therefore adequately covered. However, cumulative agricultural impacts are not addressed within the agriculture chapter, and the Applicant confirms that the combined BMV loss from Sea Link and other NSIPs remains "significant". This conclusion is reached without: • any cumulative analysis of soil quality degradation, • any assessment of combined drainage disruption, or • any evaluation of the cumulative impact on the viability of agricultural holdings. Given the concentration of energy infrastructure in East Suffolk, SEAS submits that a more integrated assessment is required.	The cumulative assessment detailed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060], considers the cumulative impact as a result of the potential for a development to remove land from agricultural use and/or disturb soil resources within a 2km Zone of Influence from the Sea Link Project. Sea Link has committed to restoring agricultural land required temporarily to its preconstruction grade (Register of Environmental Actions and Commitments Item AS02; [CR1-043]). Restoration will be undertaken in line with good soil handling practices as outline in the outline Soil Management Plan for Suffolk [APP-354]. Upon successful reinstatement, no lasting impacts on soil function or quality are anticipated, with the only permanent effect being the loss of land associated with the permanent infrastructure. Accordingly, no cumulative effects are predicted in respect of soil quality beyond the permanent land-take associated with permanent infrastructure.
	Compulsory Acquisition – Limited consideration of agricultural viability	The Applicant cites several routeing and design evolution reports to justify compulsory acquisition. However, none of these documents: • assess the operational impact on affected farms, • evaluate severance, • consider access disruption, or • examine whether smaller areas of permanent infrastructure could be sited on lower-quality land. The Applicant places considerable reliance on the existence of compensation mechanisms. Compensation, however, does not substitute for the statutory test of necessity, nor does it address long-term loss of productive capacity to the region.	The Applicant is confident that the need for compulsory acquisition has been demonstrated and that matters relating to compensation and productivity have been properly considered.
	Overarching Concern: Heavy reliance on future work	Across several areas—ALC surveys, drainage surveys, thermal modelling, detailed SMP design—the Applicant indicates that important information will be developed during the detailed design stage, after consent is granted. This approach sits uncomfortably alongside the Applicant's assertion that the ES is sufficient for Examination. SEAS believes it is not possible for the Secretary of State to reach a sound conclusion on agricultural harm while key evidence remains unavailable.	It is standard practice for certain elements of the design of DCO projects, and supporting information such as management plans, to remain at an outline stage during examination, with detailed design, and in some cases surveys, being undertaken post-consent. The ES, including the agricultural and soils assessment, has been prepared on a wort-case scenario, which ensures that likely significant effects are robustly assessed. Notwithstanding this, as noted above, ALC surveys are currently in the process of being undertaken and the results will be submitted before the end of the Examination, ensuring that the Secretary of State has access to this information prior to decision-making. In addition, and as indicated above, the Applicant has committed to providing an update to the oSMPs upon the completion of the ALC surveys. This demonstrates the Applicant's commitment to providing relevant data within the Examination timetable, where possible. Therefore, the absence of detailed information

Reference	Matter	Point Raised	Applicant's Comments
			does not undermine the adequacy of the ES or prevent the Secretary of State from reaching a sound conclusion.
	Conclusion	SEAS acknowledges the Applicant's attempt to provide further clarification in response to our Relevant Representation. However, the fundamental issues remain unresolved. Core aspects of the assessment continue to rely on assumptions, deferred evidence, or generalised commitments lacking the detail needed for meaningful scrutiny. The protection of nationally important agricultural land requires a robust, evidence based approach. SEAS therefore invites the Examining Authority to consider whether the Applicant has provided a sufficiently secure basis for assessing agricultural impacts and whether essential information has been deferred until after consent in a manner inconsistent with the requirements of good EIA practice. SEAS respectfully submits that these matters must be satisfactorily addressed before Development Consent can properly be granted.	The Applicant hopes that the answers provided above are helpful in providing the clarifications that have been requested.

30. Applicant's Comments on the Submission from Suffolk Energy Action Solutions (REP2-120)

Table 30.1 Applicant's Comments on the SEAS Deadline 2 Submission [REP2-120] – Traffic and Transport

Reference	Matter	Point Raised	Applicant's Comments
3.1.2 to 3.1.12	Traffic	Invalid baseline data and omission of seasonality	The Applicant reaffirms the responses on the traffic baseline data as previously provided within **Application Document Applicant's response to the ExA's s89(3) letter of 5 September 2025 - 9.18 s89 (3) 16 September Covering Letter [AS-106]** and in relation to the SEAS Traffic/Transport Relevant Representation within Table 2.57 of **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**.
3.1.13 to 3.1.15	Traffic	Inadequate capacity and safety of rural roads on the construction routing	The Applicant reaffirms the response on the capacity and safety of rural roads as previously provided in response to the SEAS Traffic/Transport Relevant Representation within Table 2.57 of **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**.
3.1.16 to 3.1.22	Traffic	Underestimation of impacts on junctions – "Paragraph 116 of NPPF identifies the importance of "severe" impacts, where junctions are already unsafe or operating over capacity even small amounts of new traffic might be. The response received from NGET continues to completely ignore such impacts and the existing performance of key junctions, notably those on the A12 and A1094, and the impacts of HGVs on the operation of these junctions.	The Applicant disagrees on the potential for severe impacts and has previously responded to this point as part of the response to the SEAS Traffic/Transport Relevant Representation in Table 2.57 of **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**. The Applicant has arranged a meeting with SCC Highways in January 2026 to review the requirements for, and the scope of further junction modelling within the study area.
3.1.23 to 3.1.25	Traffic	Insufficient mitigation and weak commitments – "Understandably concerns raised about the lack of binding caps, physical mitigation, and enforcement mechanisms therefore remain. The overarching sentiment remains that these will be addressed at a later date.	The Applicant reaffirms the responses previously provided in relation to mitigation including the responses to SCC within Table 2.10 and to SEAS within Table 2.57 of **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**.
3.1.26 to 3.1.29	Traffic	Cumulative impact is critically underplayed – "This latest cumulative impact document [Application 9,26 Traffic and Transport Cumulative Assessment (Suffolk)] again fails to provide any detailed modelling or considered assessment. Relying on assessment only in terms of IEMA guidance and without any detailed modelling."	The Applicant has previously responded to comments on cumulative impacts from SCC and SEAS in Table 2.9 and Table 2.57 of **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**. The Applicant is also responding to comments received from SCC on **Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110]** at Deadline 3. Further to the above, the Applicant is aware of SEAS' rebuttal to **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]** with respect to inter-project cumulative effects. From a traffic and transport perspective, responses have previously been provided on these matters as above, as well as in response to SCC's Local Impact Report (LIR) within **Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026]**. The Applicant has arranged separate meetings with KCC Highways and SCC Highways in January 2026 to review matters relating to junction modelling and the cumulative assessments. The Applicant also refers SEAS to its responses to the

Reference	Matter	Point Raised	Applicant's Comments
			ExA's Written Questions (**Application Document 9.73 Applicant's Responses to First Written Questions**) submitted at Deadline 3, which include considerations relating to junction modelling in Written Question 1TT11, and traffic and transport cumulative effects within Written Questions 1TT1, 1TT5, 1TT12, 1TT17 and 1TT18.
3.1.30 to 3.1.32	Traffic	Severe and prolonged disruption to public rights of way – "By overlooking the permanence of some changes, the extreme duration of "temporary" closures, and the subsequent degradation of public amenity, the proposal constitutes significant and unacceptable adverse impacts, thereby still fails to meet the required policy tests under NPS EN-1 paragraph 5.14.9.	The Applicant has previously responded to comments on Public Rights of Way from SCC and SEAS in Table 2.10 and Table 2.57 of **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**.
3.1.33 to 3.1.35	Traffic	Deficient Use of Policy Tests – "The matters raised therefore remain of significant concern and the scheme continues to fail to meet established national transport guidance on data collection, impact significance, modelling and mitigation design."	The Applicant has previously responded to comments from SEAS on policy tests in Table 2.57 of **Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**.
4.1.1 to 4.1.10	Traffic	SCC – Local Impact Report: concerns that are consistent with concerns raised by PJA: • *"The lack of detailed junction modelling and consideration of cumulative impacts within that context.* • *The capacity of junctions on the strategic and major road networks, particularly if delivery of multiple NSIPs coincide.* • *The suitability of many of the construction traffic access routes.* • *The lack of proper mitigation to support the proposals.* • *The inadequacy of the cumulative impact assessments".*	The Applicant has provided responses to the points raised within the SCC Local Impact Report in Table 9.1 of **Application Document 9.35.1 Applicant's Comments on the Local Impact Report from Suffolk County Council [REP2-026]**. The matters raised are also due to be discussed with SCC at a formal meeting in January 2026.

31. Applicant's Comments on the Submission from Suffolk Energy Action Solutions (REP2-121)

Table 31.1 Applicant's Comments on the SEAS Deadline 2 Submission [REP2-121] on Air Quality

Reference	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 1			
1.	Dust Risk and Mitigation	The Applicant confirms a high dust risk to residential and designated ecological receptors but still provides no enforceable dust limits, no $PM_{2.5}$ or NO_2/NOx thresholds, and no clear action protocols. Mitigation remains generic and non-binding. This does not satisfy EN-1 or the EIA Regulations.	A response to this comment regarding mitigation being generic and unenforceable was provided within Reference 3.1 and 3.2 in **Table 2.58 SEAS - Air Quality** of **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**). The proposed air quality monitoring as outlined in **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129]** will be used to ensure the proposed mitigation measures are working effectively. Should monitored concentrations exceed the agreed thresholds as a result of the construction activities, additional abatement controls would be implemented, or the site works may temporarily stop until the issue is rectified. New procedures or controls would be developed where problems continue to occur, and **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129]** would be updated if required. As previously noted, the trigger thresholds will be determined following a period of baseline monitoring and will be agreed with the local authorities.
2.	Model Underprediction	The dispersion model required a verification factor of 3.79, showing severe underprediction of NO_2. The Applicant provides no explanation, sensitivity testing, or additional verification. Model uncertainty remains unresolved, undermining confidence in all predicted concentrations.	As presented in **Application Document: 6.3.2.8.B Part 2 Suffolk Chapter 8 Appendix 2.8.B Air Quality Modelling Methodology [APP-133]**, the unadjusted model underpredicted monitored nitrogen dioxide (NO_2) concentrations, therefore the modelled concentrations were adjusted by a verification factor. This methodology is in accordance with Defra's Local Air Quality Management Technical Guidance LAQM.TG(22) (DEFRA, Local Air Quality Management Technical Guidance (TG22), 2022). As detailed in **Section 1.3** of **Application Document: 6.3.2.8.B Part 2 Suffolk Chapter 8 Appendix 2.8.B Air Quality Modelling Methodology [APP-133]**, there are a number of reasons why there are discrepancies between modelled and monitored data. In addition to these reasons, it is likely that the unadjusted model underpredicted concentrations as the minor roads were not included in the model (due to data not being available). A verification factor of this magnitude is not uncommon in areas where pollutant concentrations and traffic flows are relatively low. As indicated in **Table 1.6** of **Application Document: 6.3.2.8.B Part 2 Suffolk Chapter 8 Appendix 2.8.B Air Quality Modelling Methodology [APP-133]**, the fractional bias is 0.0 after adjustment, indicating that the model is not showing a systematic tendency to over or underpredict concentrations. The Root Mean Square Error (RMSE) is used to define the average error or uncertainty of the model. After adjustment, the RMSE was 3.4. In accordance with Local Air Quality Management Technical Guidance LAQM.TG(22), the RMSE should ideally be within 10% of the air quality objective, which equates

Reference	Matter	Point Raised	Applicant's Comments
			to 4 µg/m^3 for the annual average NO_2 objective. As such, the RMSE is considered acceptable and in line with best practice guidance and no additional verification using alternative datasets was required.
3.	Mitigation Not Enforceable	The CEMP, REAC and Outline Air Quality Management Plan contain only high-level commitments. The Applicant introduces no binding limits, no trigger levels, and no enforceable response measures. This falls short of policy expectations for nationally significant infrastructure.	A response to this comment regarding mitigation being generic and unenforceable was provided within Reference 3.1 and 3.2 in **Table 2.58 SEAS - Air Quality** of **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**). It should be noted that the measures are secured through Schedule 3 Requirement 6 of **Application Document 3.1 draft Development Consent Order [CR1-027],** making them enforceable. The proposed air quality monitoring as outlined in **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129]** will be used to ensure the proposed mitigation measures are working effectively. Should monitored concentrations exceed the agreed thresholds as a result of the construction activities, additional abatement controls would be implemented, or the site works may temporarily stop until the issue is rectified. New procedures or controls would be developed where problems continue to occur, and **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129]** would be updated if required. As detailed in **Application Document 7.5.6.1 Outline Air Quality Management Plan – Suffolk [AS-129]**, a period of baseline monitoring will be undertaken prior to the commencement of construction. The results of this monitoring will provide a robust understanding of existing site conditions. Following a review of the baseline data, site-specific trigger thresholds will be developed and agreed in consultation with the local authorities. This approach ensures that thresholds are tailored to the actual air quality conditions at the site, allowing for effective and proportionate management of dust and emissions during construction.
4.	Cumulative Impacts Across NSIPs Not Quantified	The Applicant confirms that cumulative assessment across Sizewell C, EA1N, EA2, LionLink and Sea Link is qualitative only. No cumulative emissions modelling has been undertaken for dust, vehicle emissions, NRMM or generators. This is a fundamental evidential gap given the scale of overlapping works.	Cumulative emissions from construction traffic have been modelled and predicted air quality concentrations for all modelled receptor locations using cumulative flows are presented in **Application Document 9.50 Cumulative Vehicle Emissions Assessment [REP1-123].** The cumulative traffic flows used in the assessment, as set out in **Application Document 6.3.2.13.B ES Appendix 2.13.B Preliminary Cumulative Highway Impact Assessment [APP-142]**, represent an unlikely scenario whereby all of the projects precisely overlap in terms of peak construction activity, at the same time as the peak construction years of the Proposed Project. These estimates are therefore overly worst-case. This demonstrates that even under an unlikely scenario there would be no exceedances of air quality thresholds. The dust risk assessment has been carried out in accordance with best practice guidance (the Institute of Air Quality Management (IAQM) construction dust guidance (IAQM, Guidance on the assessment of dust from demolition and construction, 2024)) following the Applicant's Scoping Report. The IAQM construction dust guidance adopts a risk-based methodology to assess the risk of dust and to determine the appropriate mitigation measures that will control dust during the construction activities. This approach is consistent with the methodologies used for other applications such as Sizewell C, therefore even if the construction activities overlap between projects, dust will be sufficiently controlled to ensure that it does not cause a statutory nuisance.

Reference	Matter	Point Raised	Applicant's Comments
			Assessment of NRMM (Non-Road Mobile Machinery) emissions associated with the Proposed Project and cumulative NRMM emissions was qualitative rather than based on detailed modelling. Whilst emissions data is available for the proposed machinery, comparisons against emissions from Heavy Good Vehicles can be made to demonstrate that there would be no significant impact on air quality thresholds. NRMM emissions are generally similar to HGV emissions. The number of NRMM to be used on the Proposed Project are relatively small, far smaller than for example the number of HGVs that have been modelled on the road network as part of the construction vehicle emissions assessment. Predicted air quality concentrations at receptors close to the road network, where HGV volumes are higher and distances to receptors are shorter than for NRMM, were found to be well below air quality thresholds and changes as a result of the Proposed Project were negligible. Given the much lower numbers and greater distances from receptors for NRMM, their emissions are expected to result in even lower concentrations. Therefore, detailed air quality modelling of NRMM emissions was not considered necessary, as the potential impacts would be far less than those already demonstrated to be insignificant for road traffic emissions. This approach is considered robust and is consistent with industry best practice. As stated 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 Saxmundham Converter Station LoD or Friston Substation LoD. As such, detailed modelling of back-up generator emissions was not required.
5.	NRMM and Generator Emissions Unquantified	The Applicant still provides no numerical emissions estimates for Non-Road-Mobile Machinery (NRMM) or backup generators, relying instead on professional judgement. These omissions are not credible for a high-risk, multi-year construction programme.	Please see response above.
6.	No Operational Air Quality Assessment	Despite EN-1 requiring assessment of all project stages, the Applicant provides no operational emissions modelling and no quantification of backup generator emissions. The omission remains unjustified.	A response to this comment regarding operational emissions modelling and quantification of generator emissions was provided within Reference 6.1 and 6.2 in **Table 2.58 SEAS - Air Quality** of **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**).
7.	Policy Compliance Not Demonstrated	The Applicant asserts compliance with EN-1, the EIA Regulations and the Air Quality Standards Regulations, but without resolving the missing data, major modelling uncertainties, or lack of enforceable mitigation. Compliance is claimed, not evidenced.	The responses above and in **Table 2.58 SEAS - Air Quality** of **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**) clearly demonstrate how the Proposed Project will avoid significant adverse health and ecological effects from air pollution, in compliance with NPS EN-1 and the EIA Regulations.

32. Applicant's Comments on the Submission from Suffolk Energy Action Solutions (REP2-125)

Table 32.1 Applicant's Comments on the SEAS Deadline 2 Submission [REP2-125] – Cumulative Effects

Reference	Matter	Point Raised	Applicant's Comments
2.1.1 Comments on Any Other Submissions Received at Deadline 2			
3.1	Assessment of assets with shared settings	States that the applicant's approach to assessment does not take account of asset's which have a shared experiential setting such as Hurts Hall, Saxmunham Conservation Area and the Church of St John the Baptist.	The Applicant disputes this statement. Where relevant to the heritage value of the assets, views that encompass several assets into one experiential setting are considered in the assessment of individual assets. The assessments are presented in **Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109], 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]** and **Late Deadline 1 Submission - 9.44 St John's Church Grade II* Listed Building Assessment - Accepted at the discretion of the Examining Authority [REP1-118].**
3.2 – 3.3	Co-location of LionLink and Saxmundham Converter Station	States that cultural heritage assessment has not addressed the co-location of LionLink and Saxmunham Converter Stations	Cumulative effects have been assessed following the cumulative effects assessment guidance published by the Planning Inspectorate and are reported in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].** This assessment has considered cultural heritage and includes assessment of LionLink. The assessment refers to the co-location of converter station sites and notes that there is no significant cumulative effect on heritage assets. Cultural heritage assets were considered in relation to the co-location of converter station sites. The approach to co-location and coordination with other projects is presented in **Application Document 7.10 Coordination Document [APP-363].**
3.4 and 3.7	Combined harm across multiple assets	States that the Applicant's approach to assessing effects does not consider combined harm across multiple assets, or the 'heritage landscape'.	It is the Applicant's view that these statements misinterpret the purpose of cumulative assessment. A cumulative assessment is made where multiple schemes have the potential to result in greater effects to an individual asset. This assessment has been made for cultural heritage assets in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].** There is no historic environment statute, policy or guidance that requires assessment to be made of what we will term 'collective impact/harm' to cultural heritage. Impact/harm to assets is assessed on an individual basis and collective impact/harm does not add to this impact/harm.
3.6	Policy	States that the Suffolk onshore scheme does not comply with Policies SAX10 and SAX12 of Saxmundham Neighbourhood Plan.	The Applicant's approach to policy compliance in relation to SAX10 and SAX12 is presented in **Appendix Table C.3 of Application Document 7.1(C) Planning Statement (Clean) [AS-057]**.
5.1	Absence of cumulative groundwater modelling	States that the ES does not evaluate cumulative changes to groundwater levels, quality or flows arising from;	**Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** provides an assessment of the likelihood for significant effects in relation to impacts on groundwater flow, levels and

Reference	Matter	Point Raised	Applicant's Comments
		• trenching for cables; • HDD works at river crossings; • deep excavations for converter stations; • long-term changes in permeability due to extensive construction.	quality, and also infiltration and recharge, and is supported and informed by **Application Document 6.3.2.5.B Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117]**. The assessment includes overhead line, opencut trenches, trenchless crossings, the converter station and substation – and concluded that significant effects are not likely and not significant. On that basis cumulative impacts are not anticipated.
5.2	No assessment of cumulative dewatering impacts	Large-scale excavations across Sea Link, Sizewell C and EA1N/EA2 may require dewatering. The ES does not: • assess combined drawdown effects; • evaluate interactions between multiple dewatering zones; • consider cumulative changes in groundwater pressure; • assess the risk of settlement or subsidence arising from regional groundwater lowering.	**Application Document 6.3.2.5.B Appendix 2.5.B Qualitative Groundwater Risk Assessment [APP-117]** is informed by site specific ground and groundwater information. The assessment has not identified the need for dewatering in the Suffolk Onshore scheme. Therefore, **Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** has assessed that impacts on groundwater from dewatering would result in a negligible and not significant effect. On that basis cumulative impacts related to dewatering are not anticipated.
5.3	Cumulative contamination risks	The ES does not assess risks of contaminant mobilisation or migration when multiple NSIPs disturb soils simultaneously. Potential cumulative sources include: • historic landfill sites; • agricultural pollutants; • remobilised sediments; • disturbed shallow groundwater pathways.	**Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** provides an assessment of the likelihood for significant effects in relation to existing contamination and is supported and informed by **Application Document 6.3.2.5.A ES Appendix 2.5.A Preliminary Contamination Risk Assessment [APP-116]** (PRA). The PRA identified potential sources of contamination (PSC) within the study area and where appropriate, included a Source Pathway Receptor assessment in accordance with Environment Agency guidance Land Contamination Risk Management (LCRM). The PRA identified one PSC within the Suffolk Onshore Order Limits and concluded that this represented a low risk for generating contamination. Therefore the assessment in the ES Chapter concluded that effects on receptors from existing contamination would be not significant. Should unexpected contamination be encountered during construction, then the protocol secured by GH08 within **Application Document 9.83 Outline Code of Construction Practice** would be applied and therefore significant effects are considered unlikely. On that basis cumulative impacts relating to existing contamination are not anticipated.
5.4	No cumulative geotechnical stability analysis	Multiple excavations, haul roads, earthworks and embankments can collectively alter slope stability, bearing capacity and soil compaction. The ES does not consider cumulative: • soil compression; • erosion; • embankment pressure; • settlement risks near sensitive receptors.	Geotechnical stability is a fundamental part of engineering design for any and every project. Commitment GH01 within **Application Document 9.83 Outline Code of Construction Practice** secures the requirement for additional site specific ground investigation and assessment to be carried out, to inform appropriate geotechnical design in relation to the site/structure specific ground conditions including ground instability/adverse ground conditions. Therefore impacts and effects related to geotechnical stability are not anticipated either in isolation or cumulatively.
5.5	Interactions with climate change and other NSIPs	The ES does not combine the expected effects of climate-driven groundwater changes with cumulative construction impacts from multiple NSIPs.	**Application Document 6.2.2.5 Part 2 Suffolk Chapter 5 Geology and Hydrogeology [APP-052]** includes an assessment of the 'Future baseline' which provides discussion regarding climate change in relation to soil erosion, groundwater levels and mobilisation of contamination.

Reference	Matter	Point Raised	Applicant's Comments
8.1 and 8.3	Absence of cumulative emissions modelling across NSIPs No quantitative assessment of NRMM or generator emissions	Despite the coexistence of Sea Link, Sizewell C, EA1N/EA2 and LionLink (let alone non-NSIP major projects), the Applicant undertakes no cumulative modelling for: • construction-phase dust emissions, • $PM_{2.5}$ or PM_{10} concentrations, • cumulative NO_2 or NOx emissions from construction traffic, • NRMM emissions, • generator emissions. A qualitative narrative does not satisfy EN-1 or the EIA Regulations. Without quantified cumulative assessment, there is no basis for concluding that cumulative air-quality effects will be acceptable.	Cumulative emissions from construction traffic have been modelled and predicted air quality concentrations for all modelled receptor locations using cumulative flows are presented in **Application Document 9.50 Cumulative Vehicle Emissions Assessment [REP1-123].** The cumulative traffic flows used in the assessment, as set out in **Application Document 6.3.2.13.B ES Appendix 2.13.B Preliminary Cumulative Highway Impact Assessment [APP-142]**, represent an unlikely scenario whereby all of the projects precisely overlap in terms of peak construction activity, at the same time as the peak construction years of the Proposed Project. These estimates are therefore overly worst-case. This demonstrates that even under an unlikely scenario there would be no exceedances of air quality thresholds.
		The Applicant provides no numerical emissions estimates for NRMM or backup generators, despite their potential to contribute significantly to cumulative concentrations over a multi-year construction programme. The reliance on professional judgement is inadequate for a project of this scale, and makes cumulative evaluation impossible	The dust risk assessment has been carried out in accordance with best practice guidance (the Institute of Air Quality Management (IAQM) construction dust guidance (IAQM, Guidance on the assessment of dust from demolition and construction, 2024)) following the Applicant's Scoping Report. The IAQM construction dust guidance adopts a risk-based methodology to assess the risk of dust and to determine the appropriate mitigation measures that will control dust during the construction activities. This approach is consistent with the methodologies used for other applications such as Sizewell C, therefore even if the construction activities overlap between projects, dust will be sufficiently controlled to ensure that it does not cause a statutory nuisance. Assessment of NRMM (Non-Road Mobile Machinery) emissions associated with the Proposed Project and cumulative NRMM emissions was qualitative rather than based on detailed modelling. Whilst emissions data is available for the proposed machinery, comparisons against emissions from Heavy Good Vehicles can be made to demonstrate that there would be no significant impact on air quality thresholds. NRMM emissions are generally similar to HGV emissions. The number of NRMM to be used on the Proposed Project are relatively small, far smaller than for example the number of HGVs that have been modelled on the road network as part of the construction vehicle emissions assessment. Predicted air quality concentrations at receptors close to the road network, where HGV volumes are higher and distances to receptors are shorter than for NRMM, were found to be well below air quality thresholds and changes as a result of the Proposed Project were negligible. Given the much lower numbers and greater distances from receptors for NRMM, their emissions are expected to result in even lower concentrations. Therefore, detailed air quality modelling of NRMM emissions was not considered necessary, as the potential impacts would be far less than those already demonstrated to be insignificant for road traffic emissions. This approach is considered robust and is consistent with industry best practice. As stated in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]**, there are no human or ecological receptors

Reference	Matter	Point Raised	Applicant's Comments
			within 200 m of the Saxmundham Converter Station LoD or Friston Substation LoD. As such, detailed modelling of back-up generator emissions was not required.
8.2	Unresolved model underprediction undermines all cumulative conclusions	The dispersion model required a verification factor of 3.79, indicating severe underprediction of NO_2. The Applicant provides: • no explanation for this level of model error, • no sensitivity testing, • no additional verification using alternative datasets. Because the baseline model does not reliably predict concentrations, any cumulative assessment derived from it is inherently unsound. The uncertainty is particularly serious when multiple NSIPs contribute simultaneously to pollutant levels.	As presented in **Application Document: 6.3.2.8.B Part 2 Suffolk Chapter 8 Appendix 2.8.B Air Quality Modelling Methodology [APP-133]**, the unadjusted model underpredicted monitored nitrogen dioxide (NO_2) concentrations, therefore the modelled concentrations were adjusted by a verification factor. This methodology is in accordance with Defra's Local Air Quality Management Technical Guidance LAQM.TG(22) (DEFRA, Local Air Quality Management Technical Guidance (TG22), 2022). As detailed in **Section 1.3** of **Application Document: 6.3.2.8.B Part 2 Suffolk Chapter 8 Appendix 2.8.B Air Quality Modelling Methodology [APP-133]**, there are a number of reasons why there are discrepancies between modelled and monitored data. In addition to these reasons, it is likely that the unadjusted model underpredicted concentrations as the minor roads were not included in the model (due to data not being available). A verification factor of this magnitude is not uncommon in areas where pollutant concentrations and traffic flows are relatively low. As indicated in **Table 1.6** of **Application Document: 6.3.2.8.B Part 2 Suffolk Chapter 8 Appendix 2.8.B Air Quality Modelling Methodology [APP-133]**, the fractional bias is 0.0 after adjustment, indicating that the model is not showing a systematic tendency to over or underpredict concentrations. The Root Mean Square Error (RMSE) is used to define the average error or uncertainty of the model. After adjustment, the RMSE was 3.4. In accordance with Local Air Quality Management Technical Guidance LAQM.TG(22), the RMSE should ideally be within 10% of the air quality objective, which equates to 4 $\mu g/m^3$ for the annual average NO_2 objective. As such, the RMSE is considered acceptable and in line with best practice guidance and no additional verification using alternative datasets was required.
8.4	No operational cumulative air-quality assessment	EN-1 requires assessment of all stages of a nationally significant infrastructure project. However, the Applicant: • provides no operational emissions modelling, • provides no quantified generator emissions, • offers no cumulative operational scenario combining Sea Link with other NSIPs. This persistent omission prevents robust decision-making on long-term cumulative impacts.	A response to this comment regarding operational emissions modelling and quantification of generator emissions was provided within Reference 6.1 and 6.2 in **Table 2.58 SEAS - Air Quality** of **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**). The Applicant has considered the potential for cumulative operational air quality impacts in relation to other Nationally Significant Infrastructure Projects (NSIPs) in the region, such as Sizewell C, EA1N/EA2, LionLink, and other relevant developments, as presented in **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].** Given the absence of sensitive receptors within 200 m of the Proposed Project's substation and converter station, together with the infrequent and limited scale of operational activities and emissions, the likelihood of significant cumulative air quality effects is considered negligible.

Reference	Matter	Point Raised	Applicant's Comments
8.5	Mitigation is generic and unenforceable, preventing cumulative control	The CEMP, REAC and Outline Air Quality Management Plan contain only high-level commitments. There are: • no enforceable dust limits, • no $PM_{2.5}$, NO_2 or NOx thresholds, • no trigger levels, • no binding response protocols. Without enforceable controls, cumulative emissions from multiple NSIPs cannot be managed or mitigated.	A response to this comment regarding mitigation being generic and unenforceable was provided within Reference 3.1 and 3.2 in **Table 2.58 SEAS - Air Quality** of **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**). It should be noted that the measures are secured through Schedule 3 Requirement 6 of **Application Document 3.1 draft Development Consent Order [CR1-027],** making them enforceable. In relation to cumulative control, measure AQ04 of **Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [CR1-043]** includes the following measure: *"Hold regular liaison meetings with other high risk construction sites within 500 m of the site boundary, to ensure plans are co-ordinated to minimise dust and particulate matter emissions and to understand the interactions of the off-site transport/deliveries which might be using the same strategic road network routes."* The other developments in the vicinity of the Proposed Project will be bound by their own CEMP, where applicable, and it is assumed each development will apply best practice construction methods so as to minimise air quality impacts. The proposed air quality monitoring as outlined in **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129]** will be used to ensure the proposed mitigation measures are working effectively. Should monitored concentrations exceed the agreed thresholds as a result of the construction activities, additional abatement controls would be implemented, or the site works may temporarily stop until the issue is rectified. New procedures or controls would be developed where problems continue to occur, and **Application Document 7.5.6.1 Outline Air Quality Management Plan - Suffolk [AS-129]** would be updated if required. As detailed in **Application Document 7.5.6.1 Outline Air Quality Management Plan – Suffolk [AS-129]**, a period of baseline monitoring will be undertaken prior to the commencement of construction. The results of this monitoring will provide a robust understanding of existing site conditions. Following a review of the baseline data, site-specific trigger thresholds will be developed and agreed in consultation with the local authorities. This approach ensures that thresholds are tailored to the actual air quality conditions at the site, allowing for effective and proportionate management of dust and emissions during construction.
8.6	Policy compliance is claimed but not evidenced	The Applicant asserts compliance with EN-1, the Air Quality Standards Regulations and the EIA Regulations, yet fails to provide: • complete baseline verification, • cumulative emissions modelling, • quantified NRMM or generator emissions, • operational modelling, • enforceable mitigation. Compliance is asserted but not demonstrated.	The responses above and in **Table 2.58 SEAS - Air Quality** of **Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]**) clearly demonstrate how the Proposed Project will avoid significant adverse health and ecological effects from air pollution, in compliance with NPS EN-1 and the EIA Regulations.

References

DEFRA, Local Air Quality Management Technical Guidance (TG22), 2022

IAQM, Guidance on the assessment of dust from demolition and construction, 2024

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