

The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.89 Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 2

Planning Inspectorate Reference: EN20026

Version: A
February 2026

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1. About This Document

1.1 Introduction

- 1.1.1 This document summarises the oral submissions made by National Grid Electricity Transmission plc (the Applicant) at Issue Specific Hearing 2 (ISH2) held between Wednesday 28 January 2026 and Friday 30 January 2026, in relation to the Sea Link Project (the Proposed Project).
- 1.1.2 The hearing on Wednesday 28 January was split into four sessions across the day, and commenced and concluded at the following times:
- Session 1, Wednesday 28 January 2026, start 10.00, closed 11.26
 - Session 2, Wednesday 28 January 2026, start 11.40, closed 13.11
 - Session 3, Wednesday 28 January 2026, start 14.00, closed 15.19
 - Session 4, Wednesday 28 January 2026, start 14.00, closed 17.27
- 1.1.3 The hearing on Thursday 29 January 2026 was split into four sessions across the day, and commenced and concluded at the following times:
- Session 1, Thursday 29 January 2026, start 10.00, closed 11.31
 - Session 2, Thursday 29 January 2026, start 11.45, closed 13.23
 - Session 3, Thursday 29 January 2026, start 14.00, closed 15.24
 - Session 4, Thursday 29 January 2026, start 15.40, closed 17.23
- 1.1.4 The hearing on Friday 30 January 2026 was split into three sessions across the day, and commenced and concluded at the following times:
- Session 1, Thursday 29 January 2026, start 10.00, closed 11.26
 - Session 2, Thursday 29 January 2026, start 11.40, closed 13.14
 - Session 3, Thursday 29 January 2026, start 14.00, closed 15.26
- 1.1.5 The agenda for the ISH2 dealing with environmental matters was set out by the Examining Authority (ExA) in advance of the hearing **[EV6-002]**. The summary of oral submissions provided in this document follows the order of the agenda items as undertaken during the issue specific hearing, noting that the numbering is not in order to reflect the discussions during the sessions.
- 1.1.6 It should be noted that agenda item 6.0 Fish and Shellfish was not addressed during the ISH2 session.
- 1.1.7 This document has been prepared with the assistance of Artificial Intelligence (AI). In this instance CoPilot was used in February 2026 to help with summarising the dialogue between the Applicant and the ExA during Issue Specific Hearing 2. The Applicant's use of AI has been limited to highlighting key points in the back-and-forth discussion between the parties, captured in Tables 2.1 – 19.1. The use of AI has not replaced

members of the project team taking notes during the hearings or listening back to the recordings of the hearings.

- 1.1.8 Furthermore, in line with the Planning Inspectorate's guidance, the Applicant's use of AI has been lawful and the Applicant takes responsibility for the factual accuracy of the content and conclusions within this document.

1.2 Attendees on Behalf of the Applicant

- 1.2.1 [REDACTED] KC appeared on behalf of National Grid Electricity Transmission plc, the Applicant.

- 1.2.2 The following representatives were also in attendance:

- James Riley (Ecology)
- Andrew Holmwood (Marine engineering)
- Neal Gates (Ornithology)
- Jackie Hill (Benthic Ecology)
- Sarah Edwards (Marine EIA)
- Ruth Mauritzen (Landscape)
- Robyn Jones (Marine Consents)
- Ollie Laycock (Arboriculture)
- Gillian Scott (Built Heritage)
- Jonathan Shipley (Archaeology)
- Seb Stevens (Consents)
- Tim Riggall (Onshore Engineering)
- Ali Leeder (Consents)
- James Parker (BCLP)
- Chris Burlton (Traffic and Transport)
- Jeremy Douch (Traffic and Transport)
- James Buckley (Onshore Engineering)
- Dave Widger (Socio-economic and Tourism)
- Nigel Pilkington (Terrestrial EIA)
- Adam Lawrence (Noise and Vibration)
- Tom Beckford (Community Relations)
- Lisa Driscoll (Water Environment)
- Mark Anderson (Shipping and Navigation)

2. Applicant's Summary of Case on Item 3.0: Ecology and biodiversity

Table 2.1 The Applicant's Summary of Oral Submissions on Item 3.0: Ecology and Biodiversity

Item discussed	Summary of Oral Case
3.1 Kent landfall	
Implications of previous cable works for impact assessment and mitigation.	<p>In response to measures suggested by KWT, the Applicant highlighted that in terms of mitigating for Nemo Link, this is a separate project. In terms of work the Applicant is doing, based on assessments, no residual impacts have been identified, other than those identified in the saltmarsh habitat. The Applicant has already committed in initial stages to avoid impacts on the saltmarsh, through a trenchless technique beneath the saltmarsh. Mitigation is included in the REAC and is a commitment. Open cut trenching has not been considered and will not be used as a fall back.</p> <p>There are other measures in the REAC to further reduce the potential impacts on that saltmarsh habitat. That includes provision of a separation distance of 105m from the edge of saltmarsh for HDD exit pits as well as a 50m working area distance [B59 of of the REAC [REP3-078]].</p> <p>There is no pedestrian or vehicular access proposed across the saltmarsh. Any vehicle access to works areas will be agreed and informed by a saltmarsh habitat survey that will be completed pre-construction to ensure no direct impacts on saltmarsh habitat.</p> <p>In terms of impact assessment work undertaken, the Applicant has not identified that those residual impacts associated with Nemo link have resulted in any changed conclusions to the Proposed Project impact assessment.</p>
Terrestrial based requirement for trenchless works	Action Point 6 seeks clarification from the Applicant in regard to a terrestrial based requirement for trenchless works. An equivalent terrestrial provision will be drafted unless otherwise justified.
Access via the hoverport	The Applicant confirmed that updates had been made to the REAC to remove duplicated commitments. At Deadline 3, amendments were submitted to address these duplications and to include a specific requirement to

Item discussed**Summary of Oral Case**

consult with Natural England (NE) and Kent Wildlife Trust (KWT), which had not previously been expressly stated. The Applicant explained that this wording change was made in response to the ExA's question 1ECOL06 and reflects the intention that these parties will be involved in agreeing the route, which is informed by ecological investigations on B66 of of the REAC **[REP3-078]** (the ecological watching brief identifying vegetation).

The Applicant further explained that discussions had taken place with the engineering team regarding the access route across the hoverport. The route would need to be sufficiently wide to accommodate the required vehicles, and seasonal lateral growth of bushes may necessitate some trimming back. However, the Applicant emphasised that there is no requirement for vegetation clearance, only minimal trimming if necessary.

In relation to vehicle types and sizes, the Applicant noted that the main works contractor has only recently been appointed, and therefore the exact vehicle specifications are not yet defined. The approach will be to use the available route width to determine the appropriate vehicle types. The Applicant agreed to take this point away and provide further detail.

Regarding surface condition and repair, the Applicant stated it is not opposed to a condition survey and agrees in principle to remediation measures where required, acknowledging concerns raised through site photographs. The Applicant clarified that some images shown relate to areas such as the Manston Airport outfall, which are not within the proposed access route. Remediation will be focussed on areas that will actually be traversed.

Responding to concerns about surface degradation (raised by Save Minster Marshes), the Applicant explained that the Order Limits have been drawn widely to allow identification of the most suitable route whilst avoiding sensitive areas. Once on the main apron of the hoverport, the intention is to avoid zones with the most significant degradation. Precondition surveys will be undertaken for all work areas, including the hoverport, and protective measures such as track matting and structures will be used to protect both vehicles and the surface. Condition surveys will be undertaken for all work areas, including the hoverport, and protective measures such as track matting and structures will be used to protect both vehicles and the surface. Condition surveys will be undertaken for all work areas, including the hoverport, and protective measures such as track matting and structures will be used to protect both vehicles and the surface. Condition surveys will be undertaken for all work areas, including the hoverport, and protective measures such as track matting and structures will be used to protect both vehicles and the surface. Condition surveys will be undertaken for all work areas, including the hoverport, and protective measures such as track matting and structures will be used to protect both vehicles and the surface.

The Applicant confirmed that it does not propose to use the hoverport area as a compound, as the compound is clearly shown elsewhere. While not part of the application, the Applicant indicated it would be willing to consider an explicit statement precluding such use if that would assist.

On reptiles, the Applicant considered that reptile surveys are not necessary, explaining that the proposed routes do not cross vegetated or ruderal areas. Photographs and route mapping demonstrate that access begins on

Item discussed	Summary of Oral Case
	<p>tarmac and then concrete, with limited habitat present. The Applicant noted that the northern part of the concrete apron contains more vegetation and is more suitable for reptiles, but this is not part of the proposed route. Reptile surveys are designed to identify active populations during the active season. If reptiles were hibernating within cracks, simply driving over the surface would not disturb them; any structural risks (e.g., cracks collapsing) will be assessed as part of the structural survey.</p> <p>In relation to INNS (invasive non-native species), the Applicant explained that it will take all necessary steps to ensure INNS are not spread, including managing INNS where they lie adjacent to the route. However, the Applicant emphasised it does not have a duty to remediate INNS across the whole hoverport, only in areas where works interact with them.</p> <p>Finally, the Applicant confirmed that pre-condition surveys will be carried out for all areas and agreed to consider whether a specific measure relating to the hoverport would be appropriate. This matter will be reviewed further, with the Applicant intending to respond at Deadline 4.</p> <p>Action Point 7: Reinsert reference to an intertidal survey in Provision B70 of the REAC [REP3-078] or clarify why this is not required.</p> <p>Action Point 9: Provide additional detail regarding the hoverport construction access route width and whether / what type of fencing the route and the order limits would need.</p> <p>Action Point 10: Provision GG06 of the REAC [REP3-078] should be revised to include reference to carrying out a precondition structural survey at the hoverport.</p> <p>Action Point 11: Provide details of any construction compounds and parking needed at the hoverport or provide wording for a requirement or REAC measure to preclude use of the hoverport for these purposes.</p>
<h3>3.2 Suffolk Landfall</h3>	
<p>Access to intertidal area</p>	<p>Request for additional marine licence for access.</p> <p>The Applicant does not consider that it is necessary for a marine licence for access, as it is based on the works proposed and the access across the intertidal mudflats has always been included. The assessment completed has not differed in any additional impacts, associated with the intertidal mudflats. On that basis, a separate marine licence was not considered to be required.</p>
<p>Disturbance effects, emissions and mitigation</p>	<p>The Applicant addressed the question of 3-metre-high fencing, explaining that while it is reluctant to commit to a fixed height due to the need for flexibility in fence sizing, it has no objection in principle. The Applicant confirmed it would be content to commit to a minimum height of 3 metres, with flexibility above that if required.- The</p>

Item discussed**Summary of Oral Case**

Applicant confirmed it would be content to commit to a minimum height of 3 metres, with flexibility above that if required high fencing, explaining that while it is reluctant to commit to a fixed height due to the need for flexibility in fence sizing, it has no objection in principle. The Applicant confirmed it would be content to commit to a minimum height of 3 metres, with flexibility above that if required-high fencing, explaining that while it is reluctant to commit to a fixed height due to the need for flexibility in fence sizing, it has no objection in principle. The Applicant confirmed it would be content to commit to a minimum height of 3 metres, with flexibility above that if required.

In relation to the operational period at the HDD compound, the Applicant noted that the works would operate for around six months. In terms of ecological effects, the Applicant advised that long term exposure is what influences habitat sensitivity, and therefore a six-month operational period would not elevate annual average acid deposition levels at the SSSI. The Applicant considered there to be no need for acid deposition monitoring, nor for adjustments to plant. It does not expect emissions to exceed critical levels, nor to affect the annual average exposure. The only relevant short-term threshold would be the 24hour NOx limit, and the Applicant stated there is no potential for this to be breached. Long-term exposure is what influences habitat sensitivity, and therefore a six-month operational period would not elevate acid deposition levels at the SSSI. The Applicant considered there to be no need for acid deposition monitoring, nor for adjustments to plant. It does not expect emissions to exceed critical levels, nor to affect the annual average exposure. month operational period would not elevate acid deposition levels at the SSSI. The Applicant considered there to be no need for acid deposition monitoring, nor for adjustments to plant. It does not expect emissions to exceed critical levels, nor to affect the annual average exposure. The only relevant short-term threshold would be the 24hour NOx limit, and the Applicant stated there is no potential for this to be breached. The Applicant confirmed that no construction activities would take place in the beach area; any access would be solely for monitoring purposes term exposure is what influences habitat sensitivity, and therefore a six-month operational period would not elevate acid deposition levels at the SSSI. The Applicant considered there to be no need for acid deposition monitoring, nor for adjustments to plant. It does not expect emissions to exceed critical levels, nor to affect the annual average exposure. The only relevant short-term threshold would be the 24-hour NOx limit, and the Applicant stated there is no potential for this to be breached.

Regarding beach access, the Applicant explained that access would only be required in the highly unlikely event of a frac out occurring on the beach, which would allow a cleanup response. However, the design is such that a beach frac out is not anticipated. The Applicant agreed to review and consider revised wording relating to beach access, recognising that current drafting may imply access for construction vehicles.

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	<p>Action Point 12: Update REAC provision B23 [REP3-078] to reference a minimum 3m fence height, or greater where the noise assessments undertaken at detailed design stage indicate that a taller fence would be appropriate.</p> <p>Action Point 13: Update REAC provision B23 [REP3-078] to include a commitment to adaptive management at the HDD compound to address potential breaches in thresholds.</p> <p>Action Point 14: Amend paragraph 2.9.14 of the Suffolk Ecology and Biodiversity chapter [REP1-047] which currently suggests that HDD generators would operate for “up to 3 years” to reflect the 6-month construction period.</p> <p>Action Point 15: Confirm whether reference to construction vehicles using Suffolk Access S-BM13 off Thorpe Road in the Construction Traffic Management Plan [CR1-041] is correct. The ExA understands that the applicant has committed that no vehicles would access the beach (except in a limited number of cases in the event of frac-out).</p>
Unexploded ordnance	<p>The Applicant explained that an unexploded ordnance (UXO) survey would be required at the HDD drilling location itself. This survey would be undertaken using a drone, with the necessary SSSI assent in place, which would set out the permitted drone specifications and appropriate timing restrictions. The Applicant noted that, if required, the survey could alternatively be carried out manually on the ground.</p> <p>In relation to dealing with any UXO identified, the Applicant stated that the approach would involve making the item safe in-situ before removing it for disposal elsewhere. The Applicant confirmed that no controlled explosions would take place in proximity to the SPA or SSSI.</p> <p>The Applicant also agreed to take away and consider wording to clarify the treatment of designated sites within REAC commitment GG39 which currently only references accordance with the UXO risk assessment, and to update this accordingly.</p> <p>Action Point 16: Clarify how UXO impacts on the Sandlings Special Protection Area (SPA) and Leiston-Aldeburgh Site of Special Scientific Interest (SSSI) would be managed in the event that they were found at the HDD compound and in shallow drilling. Update management plans and/or UXO risk management accordingly.</p>
3.3 Update on intrusive ground investigations	
Intrusive ground investigations	<p>The Applicant explained that the only ground investigation (GI) works proposed within designated sites relate to certain areas within Pegwell Bay. These investigations are required to inform the detailed design of the trenchless crossing technique. Although Natural England (NE) has not yet signed off these specific GI works, the Applicant</p>

Item discussed	Summary of Oral Case
	<p>confirmed that the proposals would be consistent with previous GI activities undertaken within the SSSI and would be carried out under the necessary SSSI assent.</p> <p>The Applicant noted that, for GI works of this nature, the SSSI assent process typically focuses on the methodology, which is developed in consultation with NE and relevant landowners. The Applicant agreed to take this matter away for further consideration, including whether the GI approach could be reflected within the REAC. If not included as a REAC measure, the Applicant emphasised that a separate legal mechanism would govern and control these works.</p> <p>Action Point 17: Provide clarification regarding measures that have been required by Natural England to mitigate the impact of ground investigations within the designated sites in Kent and Suffolk in the event that mitigation is required to be secured for further ground investigations in designated sites.</p>
<h3>3.4 Effects on protected species such as bats, dormice and reptiles</h3>	
<p>Wildlife bridges and dormouse records</p>	<p>The Applicant clarified the position regarding Animex bridges within the OLEMP. While dormice typically avoid crossing gaps, evidence exists of them crossing major roads, such as motorways. The Applicant explained that several of the measures proposed in the OLEMP to maintain connectivity for bats could also function effectively for dormice. An Animex bridge has been suggested to the Council, and the Applicant intends to update the OLEMP at Deadline 4 to reflect this.</p> <p>Responding to ESC's comments in the PADSS, the Applicant noted that there are no confirmed dormouse records in the area (only one ambiguous record), although various parties have suggested their possible presence. The Applicant emphasised that, if dormice are present or colonise the area in future, the proposed woodland planting, particularly areas closer to the historic dormouse record, would be beneficial. Given the 40-year timescale of the project, this planting would support any future dormouse population. The Applicant highlighted that the discussion remains hypothetical at present.</p>
<p>Bat records</p>	<p>In relation to bats, the Applicant explained that HDD was not proposed under hedgerows, as this approach could be more disruptive due to the need for launch and reception compounds. Instead, the impact assessment has taken a precautionary approach, assuming all hedgerows are suitable for bats. Measures to maintain connectivity are included within the OLEMP and have been developed with ESC and SCC. The Applicant noted that the survey strategy never sought to census bats at every hedgerow; instead, transect surveys were used. Where temporary gaps are required, examples from SEAS, such as the use of Heras fencing with mesh, demonstrate effective mitigation.</p> <p>The Applicant highlighted that the Sizewell C project includes significant permanent surface infrastructure, whereas the Proposed Project proposals predominantly involve temporary gaps in hedgerows, with all but one</p>

Item discussed	Summary of Oral Case
	<p>hedgerow being reinstated. The Applicant considered that trapping bats for tracking surveys would be intrusive, would require a licence, and is only justified where new evidence is essential. The Applicant does not consider such surveys necessary, nor would they provide information that would materially change the impact assessment. No statutory consultees have requested bat tracking surveys.</p> <p>Finally, the Applicant confirmed that it has been in ongoing discussions with ESC. All ecological mitigation has been reviewed by both the engineering team and those who would implement the measures on the ground. The Applicant acknowledged that some measures in the OLEMP require higher levels of effort but noted that examples such as Heras fencing are practical and feasible to deliver.</p>
<p>Responding to queries from Kent County Council</p>	<p>The Applicant provided an update on its ongoing discussions with Kent County Council (KCC). It explained that KCC had identified a number of points that would be more appropriately addressed in the final LEMP, rather than at this outline stage. In response, the Applicant is preparing updates to the Kent OLEMP for Deadline 4 to address several of the matters raised by KCC.</p> <p>The Applicant also noted that it is developing additional information on the timing of habitat delivery, reflecting the Council's comments. Dialogue with KCC is continuing, and further details are being added to the documentation to respond to the concerns raised.</p>
<p>3.5 Impacts on trees</p>	
<p>DCO controls on tree felling</p>	<p>Further discussion on the DCO controls on tree felling took place later in the hearing under agenda item 21 on the draft DCO.</p> <p>Action Point 18: Respond to ExA comments on the potential to remove ancient and veteran trees due to the conflicting controls in Article 51 and REAC provisions A02 and A05 and update wording to address issues unless otherwise justified.</p>
<p>Implications of the proposed attenuation ponds shown on sheet 1 of 7 of the Indicative General Arrangement Plans [CR1-024] to the south side of the access and the River Fromus bridge</p>	<p>The Applicant explained that an arboricultural impact assessment has been undertaken, including a review of the position of the proposed pond. The Applicant confirmed it is satisfied that there is no interaction between the Root Protection Areas (RPAs) of nearby trees and the ability to construct the pond.</p> <p>Regarding drainage, the Applicant noted that the pond is designed to capture excess road runoff. A drainage pipe would connect the road to the pond and then convey flows to the Fromus. While the current pipe alignment is indicative, it will be refined during detailed design to ensure that Category A trees are avoided.</p>

Item discussed	Summary of Oral Case
proposal, on trees T875S and G874S.	<p data-bbox="474 284 2063 464">Seasonality in cutting of trees The Applicant explained that the restriction on vegetation management between March and June inclusive reflects the core nesting bird season. While some breeding activity can occur through to September, the March-June window covers the period with the greatest likelihood of encountering active nests. In practice, whenever verge cutting or tree trimming is proposed, an ecological inspection would be undertaken first to confirm whether nests are present and whether works can proceed.</p> <p data-bbox="474 480 2063 624">The Applicant noted that the number of trees affected is relatively small. Where individual trees are shown not to contain nesting birds, there would be flexibility to carry out height-reduction or trimming outside the primary restriction period. The Applicant added that it would be open to amending the restricted period if Natural England maintained a different position, which is why the current restriction has intentionally been kept narrow.</p> <p data-bbox="474 639 2063 775">The Applicant confirmed that the REAC will secure measures for both construction and operation, with measure B65 applying to operation. Measure B02 sets out a general requirement to either undertake tree works outside the nesting season or to undertake an ecological watching brief to ensure no active nests are present and applies across the scheme.</p>
<h3>3.6 Securing biodiversity net gain</h3>	
Explanation on securing BNG commitments	<p data-bbox="474 871 2063 935">The Applicant explained that the appropriate legal mechanism for securing Biodiversity Net Gain (BNG) commitments will be a section 106 unilateral undertaking (UU) with the relevant local authorities.</p> <p data-bbox="474 951 2063 1094">The Applicant noted that BNG delivery will be reviewed post-implementation to understand how it interacts with the environment over time. The section 106 UU will commit the Applicant to deliver BNG in line with its corporate commitments, and to secure the measures required in relation to the biodiversity metric. The Applicant confirmed that it would provide further detail on this matter later in the Examination.</p> <p data-bbox="474 1110 2063 1254">The Applicant stated that the intention is for the obligation to be secured via a unilateral undertaking, which will carry the same enforcement powers as a bilateral section 106 agreement. The Applicant is in the process of preparing draft heads of terms, which will be shared with the local planning authorities shortly for comment. A draft undertaking will then be submitted into the Examination at a later deadline.</p> <p data-bbox="474 1270 2063 1334">In response to questions about timing, the Applicant confirmed that while no exact date is available, the documentation will be issued to the LPAs soon.</p> <p data-bbox="474 1350 2063 1453">Action Point 19: Provide clarification regarding item 3.5.17 [REP3-036] in the Dover District Council SoCG. This should explain which habitat creation measures would be considered non-significant enhancements and therefore not subject to 30 years monitoring and which habitat creation measures</p>

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would be subject to legal agreement. The clarification should address any implications for the applicant's Biodiversity Net Gain assessments.

3. Applicant's Summary of Case on Item 4.0: Ornithology

Table 3.1 The Applicant's Summary of Oral Submissions on Item 4.0: Ornithology

Item discussed	Summary of Oral Case
4.1 Construction impacts	
Works in Pegwell Bay	<p>The Applicant clarified that the visual disturbance distances assessed at the Stour estuary mouth were based on indicative working areas using the maximum limits of deviation. If the working areas were to shift within the Order Limits, the implications for disturbance distances may also change. The Applicant confirmed that it would take this matter away for further consideration and provide an update at Deadline 4.</p> <p>Action Point 21: Provide commentary, or where relevant an updated habitats regulations assessment, to address the implications of moving the cable works in Pegwell Bay to their southern extent within the limits of deviation. In particular, address the implications for sensitive roosting and foraging areas.</p>
Impacts and mitigation for functionally-linked land	<p>The Applicant explained that turtle dove had not been specifically taken into account in the assessment of functionally linked land for golden plovers, as this aspect of the assessment was primarily driven by the SPA and golden plover populations. However, the Applicant noted that turtle doves would make use of the woodland planting proposed around the converter station, and that this habitat creation would be beneficial to turtle doves should they occur in the area, although this is not proposed as a specific mitigation measure.</p> <p>In response to questions on skylark plots, the Applicant stated that no industry-standard metric exists for calculating replacement skylark plots. However, a commonly applied rule of thumb is two replacement plots for every plot lost. The proposed development is resulting in the permanent loss of a single skylark territory and is proposing four replacement plots per hectare across a 10-hectare site, thus far exceeding the indicative ratio of 2 plots for every territory lost. The Applicant emphasised that, although only one skylark pair currently uses the affected field, the enhancement measures provide benefits for skylarks more widely across the site.</p>
Impacts and mitigation for the effect of vessel movements on Red	<p>The Applicant explained that the main source of potential disturbance to red throated divers (RTDs) would arise from vessel movements associated with cable installation. A seasonal restriction is already in place to prevent installation activities during sensitive periods. The Applicant noted that a limited number of low-level engineering activities are excluded from this restriction, and it has provided an explanation as to why these activities are not</p>

Item discussed	Summary of Oral Case
Throated Diver of the Outer Thames Estuary and implications for habitats regulations assessment	<p>considered to affect site integrity based on the nature and scale of the vessels involved and vessel movements associated with cable installation. A seasonal restriction is already in place to prevent installation activities during sensitive periods. The Applicant noted that a limited number of low-level engineering activities are excluded from this restriction, and it has provided an explanation as to why these activities are not considered to affect site integrity based on the nature and scale of the vessels involved. RTDs would arise from vessel movements associated with cable installation. A seasonal restriction is already in place to prevent installation activities during sensitive periods. The Applicant noted that a limited number of low-level engineering activities are excluded from this restriction, and it has provided an explanation as to why these activities are not considered to affect site integrity based on the nature and scale of the vessels involved.-throated divers (RTDs) would arise from vessel movements associated with cable installation. A seasonal restriction is already in place to prevent installation activities during sensitive periods. The Applicant noted that a limited number of low-level engineering activities are excluded from this restriction, and it has provided an explanation as to why these activities are not considered to affect site integrity based on the nature and scale of the vessels involved.</p> <p>However, the Applicant acknowledged that JNCC and Natural England have sought further clarity on the robustness of this assessment. In response, the Applicant is working with both bodies and undertaking a quantification exercise to provide the necessary detail.</p> <p>The Applicant clarified that while the repair window is described as six months, this refers to the <i>period within which repairs may occur</i>, not the duration of physical works. The actual repair operations would be closer to two months, with the longer window reflecting uncertainties such as vessel availability and mobilisation times. This explanation will be incorporated into the quantification work currently underway.</p> <p>The Applicant added that the quantification exercise will also cover construction activities that are presently excluded, including any monitoring activities that might be required. Further clarity will also be provided on vessel numbers, drawing on information from other transmission projects to offer additional context.</p> <p>Action Point 20: REAC provision B45 [REP3-078] states that works to install the pylons either side of Sandwich Bay to Hacklinge Marshes SSSI will not cover the whole breeding season (March to September included) but will either take place outside the breeding season or only occupy approx. 2 months of the breeding season. Given that works could occur in the core breeding season, explain how this provision can be relied on to avoid likely significant effects on breeding birds.</p> <p>Action Point 22: Provide quantified information relating to the effect of vessel movements on Red-Throated Diver of the Outer Thames Estuary as requested by Natural England. Update the habitats regulations assessment as necessary and where adverse effects on integrity cannot be ruled out through the further information and discussions with Natural England, provide a derogation case in respect of pre-lay grapnel works and maintenance activity effects on Red-Throated Diver.</p>

Item discussed	Summary of Oral Case
	<p>Action Point 23: Confirm likely vessel numbers required for operation and maintenance by reference to similar cable operations in the marine environment and provide additional evidence regarding likely maintenance duration periods.</p>
<p>4.3 Collision risk and mitigation</p>	
<p>Collision risk along the River Stour</p>	<p>The Applicant explained that potential collision risk for birds associated with designated sites would depend on the species involved, particularly those using the River Stour in Kent as a commuting route. In assessing collision risk, the Applicant noted that birds currently interact with an existing wirescape across the River Stour and are already taking appropriate avoidance behaviour. Many birds fly over the existing wires, adjusting their flight height as needed, while some species may fly beneath them. The Applicant stated that this behavioural evidence has been addressed in previous submissions.</p> <p>On the matter of night-time effects, the Applicant confirmed that it does not consider additional bird diverters necessary on existing lines. Birds already navigate the existing wires effectively, and the Applicant does not expect any funnelling effect to occur, as birds continue to follow the established Stour flight corridor and take natural corrective action. The Applicant is, however, committed to installing diverters on the new section of overhead line.</p> <p>The Applicant noted that bird collisions tend to occur during periods of poor weather, rather than due to darkness alone, as birds are capable of night-time navigation. Diverters proposed for the scheme include fluorescent panels that enhance visibility during adverse conditions and act as an additional layer of mitigation. An example referenced earlier in the hearing in relation to swan mortalities related to a location at Monkton.</p> <p>The Applicant added that the panels absorb light during the day; it will check how long illumination persists into the night, although this is not relied upon as the principal mitigation measure. They are intended to provide supplementary visibility, strengthening the overall conclusion of no significant effect.</p> <p>Action Point 24: Provide a specification for bird diverters to demonstrate that they are able to function throughout the entire night period. The applicant should demonstrate how this functionality is secured through the draft Development Consent Order (dDCO) or control documents.</p> <p>Action Point 25: Applicant to respond to hearings questions deferred to action points:</p> <ul style="list-style-type: none"> • Briefly explain what the primary mortality factors are for bird collisions. Is it the physical collision with infrastructure or is it electrical shock? Explain whether the earth wire is a specific collision risk? • What proportion of the bird species identified in the vantage point surveys as regularly commuting up and down stream are likely to fly through the area proposed for the overhead line crossing.

4. Applicant's Summary of Case on Item 5.0: Benthic Ecology

Table 4.1 The Applicant's Summary of Oral Submissions on Item 5.0: Benthic Ecology

Item discussed	Summary of Oral Case
5.2 Scour and cable protection	
Halo effects	<p>The Applicant addressed questions regarding potential colonisation of cable protection and the possibility of “halo effects.” It explained that while colonisation of marine structures does occur, halo effects arise only under very specific environmental conditions, typically where tall, complex structures (around three to four metres high) create depth gradients that support filter-feeding communities. These effects have been observed only on large structures such as windfarm foundations, artificial reefs, and shipwrecks. The Applicant stated that the type of colonisation that may occur on cable protection would not lead to the development of such complex communities, and therefore halo effects are not expected. It added that very few studies exist on colonisation effects specific to cable protection, and where colonisation is recorded, it occurs only in niche conditions that do not apply here.</p> <p>Action Point 27: Would the applicant be prepared to commit to a type of cable protection that is most easily removable at decommissioning?</p>
Pre-construction surveys	<p>The Applicant confirmed that pre-construction surveys will be undertaken across the marine corridor. The aim is to retain maximum flexibility in the routing of the cables within the corridor to minimise impacts. Route selection is ultimately an engineering-led decision, informed by environmental surveys but also by other technical and practical considerations.</p> <p>Action Point 30: Would the scope and methods used for the offshore pre-construction surveys be agreed with the Marine Management Organisation (MMO) and/or NE prior to their undertaking? How would this be secured?</p>
Cable protection	<p>The Applicant explained that a suite of cable protection measures is available, but it is not a wide range of options. Priority is placed on identifying solutions that are deliverable and meet engineering requirements, environmental requirements and also the safety of other sea users, with decommissioning considerations addressed subsequently. This reflects a multidisciplinary process, and the Applicant agreed to provide further detail at Deadline 4.</p>

Item discussed	Summary of Oral Case
	<p>With respect to planned works, the Applicant outlined that the primary method of protection is cable burial. Cable protection at crossings will follow agreed designs, and the known crossing locations have already been accounted for.</p> <p>Regarding rock placement, the Applicant stated that rock backfill may be used in high-risk areas where anchor strike is more likely. Unplanned rock protection may be required in the unlikely event that full burial depth cannot be achieved. However, the Applicant emphasised that unplanned rock protection would be very limited in the context of the overall scheme. It will respond fully to Natural England’s recent comments at the next deadline, including providing further detail on these aspects.</p> <p>Action Point 28: Provide some indication in map/plan form where cable protection would likely be required for the offshore works.</p>

5.5 Planning micro-siting of cable route

Micro-siting commitments	<p>The Applicant confirmed that commitments relating to micro-siting are already secured through a number of measures connected to installation and engineering solutions. These measures enable adjustments to be made on the basis of pre-construction survey results, allowing the route or installation method to be refined to avoid sensitive features where possible.</p> <p>The Applicant added that it would clarify these commitments in the context of benthic ecology, ensuring that, in the event priority habitats are identified during the pre-construction surveys, that commitments to sensitive routing including as appropriate, requirements for micro-siting will be secured appropriately within Application Document 9.84 Register of Environmental Actions and Commitments</p>
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5.6 Monitoring of effects and adaptive management

Benthic mitigation plans	<p>The Applicant explained that its current benthic assessment has not concluded significant effects on benthic habitats for the Proposed Project. A Benthic Mitigation Plan would only be required if habitats of conservation importance within the marine corridor were identified during pre-construction surveys. These habitats would be highlighted, described and categorised using the available evidence base, including reference to recent guidance documents on features such as Sabellaria reefs, which can be difficult to distinguish in the field.</p> <p>In response to questions on how the mitigation plans would be secured and approved, the Applicant explained that the approval process would sit with the Marine Management Organisation (MMO). The Applicant noted that the project description already identifies the surveys required prior to commencement, which span both environmental and engineering considerations. The Applicant agreed to take away the point regarding process clarity on securing mechanisms.</p>
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Item discussed	Summary of Oral Case
	<p>The Applicant stated that while post-consent surveys may occasionally identify unexpected habitats, extensive research and survey work has already been undertaken. Based on this, the Applicant does not anticipate encountering previously unrecorded sensitive habitats within the marine corridor.</p> <p>Action Point 29: Confirm who would sign off approval of a submitted benthic mitigation plan and its proposed mitigation. How would the approval of a benthic mitigation plan and its implementation be secured?</p>
Monitoring plans	<p>The Applicant and its advisors recognised that monitoring plans can be important documents, particularly for offshore wind farms. However, the Applicant stated that in this case, both the impact assessment and the evidence available indicate no significant benthic impacts, and no habitats have been identified that would trigger a need for dedicated monitoring. Two commitments have therefore been included within the REAC, establishing that the Applicant would consult with NE or other relevant stakeholders to prepare an in-principle monitoring plan should new data emerge before construction. If sensitive habitats were identified at a later stage, a monitoring plan could then be implemented.</p> <p>The Applicant confirmed that following installation, an as-built survey of the cable route would be carried out from an engineering perspective, to confirm the condition of the cable and the cable protection used along the route. The Applicant noted that a post-construction benthic survey would not normally be undertaken unless sensitive habitats had been impacted, which is not expected for this project.</p> <p>The Applicant clarified that a referencing error identified at Deadline 1 has now been corrected. Although the volume of backfill had increased, the assessment still concluded no significant impacts, as the proportional increase did not alter the conclusions. The Applicant also confirmed that sensitivity ratings were drawn from Natural England’s designated site information and noted that sea caves had been initially omitted from the assessment but are not considered sensitive in this context. The Applicant will review NE’s Deadline 3a submission and address any points requiring clarification.</p> <p>Action Point 31: Does the applicant intend to undertake a post-installation cable route survey which could provide information on benthic ecology and whether there is the need for adaptive management?</p> <p>Action Point 32: Consider the submission of an outline In-Principle Monitoring Plan, indicating what would likely be the focus for post-cable installation monitoring and the methods that would be used, for example.</p> <p>Action Point 33: NE [REP3A-027] advised that reef features within the Thanet Coast Special Area of Conservation (SAC) should have ‘Medium’ sensitivity to suspended sediment concentrations (SSC) and deposition in line with the precautionary principle. If the assessment of suspended sediment is updated to a medium sensitivity for receptors, how would this change the ES assessment on benthic ecology at</p>

Item discussed**Summary of Oral Case**

Thanet Coast SAC as a result of potential suspended sediment and smothering impacts? Would this then be a potential significant effect?

Action Point 36: Respond to Natural England's comments at DL3, including those on the outline Marine Mammal Management Plan.

5. Applicant's Summary of Case on Item 7.0: Marine Mammals

Table 5.1 The Applicant's Summary of Oral Submissions on Item 7.0: Marine Mammals

Item discussed	Summary of Oral Case
7.1 Assessment of effects of project on seal behaviour	
Potential disturbance to seals in Pegwell Bay	<p>The Applicant addressed questions on potential disturbance to seals in Pegwell Bay. It explained that seals tend to emerge from the river at high tide to forage. However, construction lighting and works in Pegwell Bay will not coincide with this period, as all construction activities in this area occur at low tide. The barge will also not move during high tide, meaning activity levels during the period when seals pass the area will be low. Although some equipment will remain visible, there will be very limited activity at high tide, and this is not when seals are most sensitive.</p> <p>The Applicant noted that seals spend the majority of their foraging time underwater, surfacing intermittently, and that the foraging area lies at a distance from the location of the planned works. The separation between the works and seal foraging locations means that visual disturbance is not expected, particularly as seals in Pegwell Bay are already accustomed to human activity in the wider area.</p> <p>The Applicant confirmed that activities at Aldeburgh are entirely sub-tidal and therefore will not disturb seals. Most seals remain close to haul-out locations, and nothing within the Aldeburgh works area is anticipated to cause disturbance.</p> <p>The Applicant also confirmed that noise modelling incorporates the topography of Pegwell Bay and the river, including effects on saltmarsh habitats. As most activities occur at low tide, noise disturbance during high tide (when seals may be present) will be minimal.</p> <p>The Applicant acknowledged that seal pups are present at the haul-out site, although it is not a primary breeding area. The assessment considers disturbance to both adults and pups, noting that pup behaviour is closely influenced by the behaviour of the adults.</p> <p>Responding to concerns raised by Kent Wildlife Trust regarding seal disturbance at the River Stour, the Applicant stated that no marine mammal mitigation measures are required at this location because no disturbance is expected. It reiterated that the predicted noise and activity levels would not result in disturbance to seals.</p>

Item discussed**Summary of Oral Case**

7.2 Assessment of effects on cetacean species close to the Kent landfall

Assessment of effects on cetacean species close to the Kent landfall

The Applicant confirmed that its underwater noise and marine mammal assessments have been undertaken on a worst-case basis. It noted that cetacean-specific surveys are not normally required for interconnector projects; while anecdotal observations may inform understanding, formal impact assessment requires density data, which is sourced from established survey units rather than project-specific cetacean counts.

The Applicant highlighted that underwater sound impact assessment forms a key part of the Environmental Statement. All underwater noise effects have been considered, and the activities associated with the project are not high-intensity continuous sound sources. Standard JNCC mitigation measures would be applied where appropriate.

On HDD drilling, the Applicant noted that although HDD operations continue for a significant period, the generation of underwater noise only occurs when the drill exits the duct into the marine environment. Because the drilling progresses through sediment, the associated underwater sound is brief and short-lived.

The Applicant confirmed that its assessment considered the effects of underwater noise on prey species, including potential vibration impacts on fish, and the corresponding implications for harbour porpoise, birds and seals. No effects on prey availability were identified. Seals in the area have wide foraging ranges, and any effects were assessed as minor.

6. Applicant's Summary of Case on Item 9.0: Landscape and visual

Table 6.1 The Applicant's Summary of Oral Submissions on Item 9.0: Landscape and visual

Item discussed	Summary of Oral Case
Visual assessments in Suffolk	
Suffolk Viewpoint 1	<p>The Applicant responded to questions relating to Viewpoint 1 and associated landscape matters. It confirmed agreement on the residual significant visual effects and referred to areas of additional planting identified by East Suffolk Council (ESC). The Applicant has addressed these in written responses. It explained that woodland planting around the section of Public Right of Way (PROW) that is diverted during construction and reinstated during operation, would frame the corridor, closing views to the wider landscape while channelling views along the PROW toward the converter station</p> <p>The Applicant noted that ESC's Local Impact Report also suggested additional planting along the B1119. The Applicant confirmed that further planting could be included within the Order Limits, including a strengthened belt of planting along a section of the B1119 corridor up to the point where the existing hedgerow planting in that area is already subject to landowner concerns.</p> <p>In relation to ESC's comments on the PROW alignment, the Applicant explained that part of the route follows an existing track before crossing a field, creating a channelled view towards the converter station. The Applicant noted that this has implications for landowner engagement and land acquisition.</p> <p>Responding to Suffolk County Council (SCC), the Applicant addressed comments on the width of planting suggested along the B1119. Cross-sections submitted at Deadline 3 illustrate that there is space for more than hedgerow and tree planting. These cross-sections will be updated at Deadline 4 to illustrate how planting could appear in this part of the corridor. The Applicant highlighted that the PROW also functions as a permanent utility corridor, which places limits on the extent of tree planting that can be accommodated.</p> <p>In response to concerns raised by SEAS about site selection, the Applicant stated that extensive work supports the selection of this particular part of the site. The location to the south of the site provides the greatest distance</p>

Item discussed	Summary of Oral Case
	<p>from the approach to Saxmundham and allows the scheme to work with and enhance existing woodland. The Applicant also noted that the location at Viewpoint 1 represents the highest point of the site.</p> <p>On earthwork considerations and the possibility of cutting into the ground like LionLink, the Applicant confirmed that opportunities for earthworks and the use of cut and fill were examined during early design iterations. At the Proposed Project site, there is limited ability to undertake extensive cut and fill. Some material may be available for bunding, which could contribute to landscape mitigation. Once detailed design progresses and the amount of material available becomes clearer, opportunities for bunding will be confirmed and incorporated into the detailed LEMP to be submitted post-consent.</p>
Suffolk Viewpoint 4	<p>The Applicant addressed matters relating to Viewpoint 4 and planting resilience. It acknowledged the point raised regarding unreliable rainfall, noting that this has been discussed at thematic meetings with the local planning authorities. In response, the Applicant has included an adaptive management approach within the oLEMPs. This approach will allow planting to be actively managed and monitored, enabling management techniques to be adjusted to reflect changing climatic conditions and rainfall patterns. The Applicant confirmed that the detailed LEMP will provide further information on how this adaptive management will be implemented.</p> <p>The Applicant agreed with East Suffolk Council’s comments on this matter. In response to the point raised regarding replacement planting for any failures, the Applicant committed to take away and consider wording to confirm that such replacement planting would be secured through the DCO, consistent with the approach taken on previous SPR DCOs. The Applicant confirmed that the oLEMP already includes provision for adaptive aftercare, which will be carried forward into the detailed LEMP.</p> <p>On the question of additional planting at this location, the Applicant referred to the area at the corner of the land owned by the referenced landowner, close to the existing Christmas tree planting. Cross-sections have been provided to show the available space, including the location of a drainage ditch. The Applicant noted that while there is physical space to accommodate additional planting, achieving this requires a balance in light of landowner constraints and sensitivities in this area and as such no additional planting would be proposed in this specific section adjacent to the B1119.</p>
Suffolk Viewpoint 5	<p>The Applicant explained that the land referenced in relation to additional planting opportunities is not owned by the Applicant and is subject to compulsory acquisition (CA) powers. The Applicant emphasised that CA powers are subject to stringent legal tests and can only be exercised where they are necessary and in the public interest. From a landscape perspective, the Applicant confirmed that it is seeking to deliver as much mitigation planting as possible, but any planting beyond current proposals would require additional CA powers, which must be justified. The Applicant also noted that existing utilities constrain parts of the land, limiting where trees can be planted. Overall, the Applicant is working within these constraints to maximise landscape mitigation.</p>

Item discussed	Summary of Oral Case
	<p>Responding to the Examining Authority’s query about residual major adverse effects, the Applicant explained that it had reviewed this location carefully. Visual effects at this viewpoint relate to a stretch of bridleway and local road sitting at a lower elevation, looking upwards toward the converter station. This area in the visualisation is shown at the maximum limit of deviation which would never be built out to the maximum height across the entire site and as such it is worth referring to the illustrative visualisations submitted at Deadline 1 [REP1-296]. The Applicant has sought to reduce effects by moving the Order Limits further south to enable delivery of a belt of woodland in advance of operation. The topography presents challenges: the land drops away and a large attenuation pond is located at a lower point. The proposed planting has been designed to work with these constraints. The Applicant has taken a significant area within the Order Limits solely for planting, to reduce effects on visual receptors as far as practicable.</p> <p>In response to comments from ESC and SCC, the Applicant addressed matters relating to planting along the B1119. Planting cannot be extended across the entire roadside corridor due to landownership constraints associated with the referenced landowner. However, the Applicant confirmed that planting is nevertheless proposed within the application boundary, and that cross-sections submitted at Deadline 3 demonstrate that there is sufficient width to accommodate hedgerows and tree planting as currently proposed. The Applicant will submit an updated oLEMP and revised cross-section at Deadline 4 to provide greater clarity on planting in this location.</p>
Suffolk Viewpoint 20	<p>The Applicant confirmed that the photograph from Viewpoint 4 is a winter view and noted that additional photography has been provided in the River Fromus Visualisations submitted at Deadline 1 [REP1-298 to REP1-300].</p> <p>In response to the Examining Authority’s query about potential additional planting at the top of the access road, the Applicant explained that this location has been looked at carefully through an iterative design process. The area is particularly sensitive in historic landscape terms, lying within the wider context of the Hurts Hall landscape, and the Applicant has been in discussion with heritage officers about appropriate treatment of the access road as it rises toward the converter station. The Applicant stated that large woodland blocks in this location would not be beneficial in terms of further mitigating effects on heritage assets.</p> <p>When asked about the potential for individual trees within the skylark area, the Applicant responded that although this option had been considered, the conservative height assumptions at Year 15 demonstrated that the planting would do very little to mitigate the relevant effects. The Applicant reiterated that a design principle for this location has been to position the tallest parts of the converter station as far south as possible, reducing the visual prominence shown in the full limits-of-deviation visualisation.</p>
Suffolk Viewpoint 21	<p>The Applicant responded to East Suffolk Council’s comments regarding Viewpoint 21. It explained that the viewpoint represents the most open section from the PRoW; moving further along the route, existing trees</p>

Item discussed	Summary of Oral Case
	<p>provide increasing levels of screening. The Applicant confirmed that this portion of the view has been examined closely, and that within the existing Order Limits it is possible to provide enhanced planting as discussed already (excluding the land parcel owned by the referenced landowner).</p>
<p>Landscape mitigation planting</p>	<p>Action Point 37: Consider whether similar wording with respect to failed planting/ adaptive management as secured in the dDCO as per the wording for Scottish Power Renewables (SPR) East Anglia 1 (EA) North and EA2 could be applied to Sea Link.</p> <p>Action Point 38: Clarify whether advance planting includes any riparian planting.</p> <p>Action Point 39: Provide detailed response to landscape impacts at viewpoints (VP) identified in Suffolk and if any improved mitigation can be provided and secured within the order limits (VP1, VP2, VP4, VP5, VP20, VP21) including whether additional landscaping, either woodland or parkland trees, in the vicinity of the permanent access route to the west of Bloomfield’s Covert.</p> <p>Action Point 40: Provide detailed consideration of Suffolk County Council’s (SCC) suggestion that additional planting around the converter station could be designed to avoid ‘channelling’ of views towards the converter station but could assist in filtering of views.</p> <p>Action Point 43: Provide updated oLEMP for Suffolk to include additional planting alongside B1119 as discussed.</p>
<p>Kent visual and landscape character assessment</p>	
<p>Kent Viewpoints</p>	<p>The Applicant responded to Thanet District Council’s comments, confirming that it will provide a specific response to the viewpoints raised by TDC at Deadline 4.</p>
<p>Landscape character assessment in Kent</p>	<p>Turning to the Landscape Character Assessment, the Applicant explained that the proposed landscape strategy and planting aim to establish a degree of separation between former marshland, agricultural land, and the existing woodland network around the energy park. The Applicant considers these measures would contribute to reducing effects on the perceptual landscape qualities, which is why no residual landscape character effect has been identified.</p> <p>Regarding planting further away from the converter station, the Applicant explained that this was examined as part of the overall landscape design process. Extensive inspection of the Public Rights of Way (PROW) network within the marsh character area demonstrated that these routes follow existing drainage lines and are defined by riparian and scrubby vegetation. The Applicant noted that introducing planting at greater distance from the converter station would be contrary to the inherent character of the marsh landscape, which is not defined by</p>

Item discussed	Summary of Oral Case
	<p>wider blocks of woodland planting. As such, the proposals have been designed to remain consistent with the prevailing landscape characteristics.</p> <p>Action Point 41: Provide a detailed response to landscape impacts at viewpoints identified by Thanet District Council (TDC) regarding significant effects (VP3, VP4, VP5, VP6 and VP7) and if any improved mitigation can be provided and secured within the order limits.</p> <p>Action Point 42: Consider whether any additional mitigation can be included to reduce likely significant effects in terms of landscape and visual.</p>
Impact on the National Landscape	
Effects on the Suffolk & Essex Coast & Heaths National Landscape	<p>The Applicant responded to the question regarding whether the Proposed Project could meet the exceptional circumstances test required for the Secretary of State to grant development consent for development within an Area of Outstanding Natural Beauty (AONB). The Applicant noted that this is a matter that will be addressed in full at Deadline 4, including consideration of how the project interacts with national policy tests and the Councils' positions on the issue.</p> <p>The Applicant confirmed that the setting of the National Landscape was fully considered in the assessment, including during the construction phase of the onshore and offshore works. The assessment also examined the western edge of the National Landscape which could be considered to comprise its setting, where the construction of the HVDC cable corridor would occur which is predominantly across agricultural land. Further information including the effects on the setting of the National Landscape and the Natural Beauty Indicators and their subfactors were submitted at Deadline 3.</p> <p>The Applicant explained that construction machinery and activity in this area had been reviewed against the National Landscape "natural beauty" indicators, and that additional information on these indicators had been provided at Deadline 3. The assessment concluded that the temporary construction works would not result in significant effects on the qualities contributing to the area's natural beauty.</p> <p>Action Point 45: In terms of cumulative effects on the Area of Outstanding Natural Beauty (AONB), the applicant identifies significant residual cumulative effects on natural beauty indicators at construction in the Suffolk onshore inter-project effects – table 13.35. in relation to– landscape quality, scenic quality, relative wildness, relative tranquillity. The assessment that has led to these conclusions lacks clarity. Provide an updated assessment clarifying how the conclusions have been arrived at.</p> <p>Action Point 46: Heritage Coast – Notwithstanding the applicant's response to the written question, define the natural beauty and special character of the Heritage Coast.</p>

Item discussed	Summary of Oral Case
	<p>Action Point 47: Having regard to paragraph 5.10.11 of National Policy Statement (NPS) EN-1, can you explain whether you consider the development is compatible with the special character of the Heritage Coast?</p>
<p>Acid grassland restoration</p>	<p>The Applicant confirmed that it had amended the land plans to reduce the area of land required for acid grassland. This reflects ongoing refinement of the design and mitigation strategy to avoid impacts on this habitat type where possible.</p> <p>The Applicant also responded to Natural England’s comments regarding the potential effects of pig farming on habitats within the area. It explained that this matter had already been addressed in its Deadline 3 submission, which set out how these considerations had been factored into the assessment. The Applicant reiterated that pig farming does not pose a risk in this context but committed to review the point further and clarify the position in its next submission.</p> <p>The Applicant referred to the National Landscape Section 85 Duty Technical Note [REP1-120], confirming that it sets out a clear timeline for the enhancement of acid grassland. The Technical Note identifies an approximately four-year period for the habitat to reach full enhancement. The Applicant stated that this timeframe remains appropriate in demonstrating compliance with the s85 duty.</p> <p>The Applicant also confirmed that the particular parcel of land identified for acid grassland enhancement is secured under a 10-year agreement, ensuring that the enhancement can be delivered and maintained over a sufficient period.</p> <p>Action Point 44: With reference to NE’s comments in [REP2-058], a response is required regarding the possible future use of land to the south of the pig farm and north of the acid grassland enhancement area, which is still within the order limits. If it is used in the future for pig farming or similar intensive use could run off and nutrient enrichment interfere with the achievement of acid grassland enhancement.</p>
<p>Landscape mitigation for Kiln Lane substation</p>	
<p>Friston landscape mitigation</p>	<p>The Applicant explained that the plan referenced by the Examining Authority was originally based on SPR’s consented landscape scheme, which has evolved considerably since that time. As a result, certain aspects of the plan are now out of date, including the depiction of construction compounds. In addition, the Applicant noted that some areas shown as structural planting on that plan are in fact grassland, which can make the plan more difficult to interpret.</p> <p>The Applicant confirmed that both the HVAC and DC cables for the Proposed Project could be routed through the existing planting shown on the consented scheme without significant interface issues, except at the eastern edge of the site. The Applicant will therefore update Figure 5 of the Suffolk oLEMP at Deadline 4 so that it reflects</p>

Item discussed	Summary of Oral Case
	<p>SPR's recently submitted landscape masterplan design. Were the Proposed Project to construct the substation, this updated plan would be the basis for the combined landscape approach. The Applicant emphasised that the cables would be designed to work with the planting, rather than disrupt or alter it.</p> <p>In relation to the position where the SPR project might not come forward, the Applicant confirmed that it would take this point away and consider the implications further.</p> <p>Finally, the Applicant confirmed it will respond to SPR's specific landscape points at Friston by Deadline 4.</p> <p>Action Point 50: Kiln Lane substation mitigation. The overlay [AS-063] with SPR mitigation indicates much less landscape mitigation planting to the north of the Kiln Lane substation than is shown for the SPR landscape mitigation. Whilst it is understood that the SPR landscape mitigation has since evolved, if the SPR consented scheme did not come forward and or was not fully implemented (scenario 2), explain how the rest of the landscape mitigation would be secured as it is not shown in the outline Landscape and Ecological Management Plan (oLEMP). Provide an updated oLEMP for scenario 2 indicating the entirety of the outline landscape mitigation for Kiln Lane substation.</p>
Lighting	<p>Action Point 51: The ExA notes the applicant's comments in response to the first written question 1LVIA4 and the provision of the illustrated lux plots. However, there is insufficient information to assess the lighting effects in areas of relatively dark skies. A more detailed nighttime assessment is therefore requested.</p>

7. Applicant's Summary of Case on Item 11.0: Cultural heritage

Table 7.1 The Applicant's Summary of Oral Submissions on Item 11.0: Cultural Heritage

Item discussed	Summary of Oral Case
11.3 Scoped out heritage assets	
11.3 Scoped out heritage assets	<p>The Applicant explained that certain heritage assets had been scoped out of the Environmental Statement (ES) because the assessment identified no impact or only negligible impact. This applied to the three assets under discussion. The Applicant reiterated that the purpose of Environmental Impact Assessment is to identify significant effects, and as none were identified for these assets, they were correctly scoped out.</p> <p>The Applicant further clarified that several other assets were scoped out because they had already been assessed as part of the ScottishPower Renewables (SPR) proposals. As no additional impacts from the Proposed Project had been identified beyond those previously assessed, these were considered to be of neutral impact. The Applicant noted that although the earlier assessment had been based on a “consented but not yet constructed” scenario, it is now its understanding that the SPR scheme is under construction and therefore forms part of the enacted baseline. The Applicant stated that it had considered whether the Proposed Project would give rise to any additional effects beyond those already concluded in that assessment.</p> <p>The Applicant confirmed that it can provide, in writing, an assessment of the impacts based solely on the Proposed Project proposals, without reliance on the SPR material, should the Examining Authority require this.</p> <p>The Applicant also clarified that the additional assets referred to by SEAS IP within the Alde Estuary lie outside the EIA study area for the Proposed Project. This study area had been established and agreed with Historic England and the relevant local authorities at the scoping stage. However, the Applicant stated that they could nevertheless consider these assets on a desk-based basis, even though they fall outside the defined assessment area. Based on the information currently available, the Applicant indicated that they do not anticipate any impact on these heritage assets but will give this further consideration.</p> <p>Action Point 52: Heritage assets listed by the applicant [REP3-070] which are scoped out of the ES include those which are described as experiencing an adverse impact, though less than substantial at</p>

Item discussed	Summary of Oral Case
	<p>the lower end of this scale. For example, asset ID 1215749 - Buxlow Manor in Suffolk. For this example and the others like it, provide additional information as to the potential impact to the significance of each asset and further justification as to why it was scoped out. For all relevant Councils and Historic England, is it appropriate to scope out from the ES assessment heritage assets which are considered to have (lower end of) less than substantial impact on their significance?</p> <p>Action Point 53: For other heritage assets within the scoped-out list [REP3-070], there is sometimes the reason given that the asset was assessed as part of the consent for the East Anglia (EA)1 North and EA2 proposals and as no additional impacts were predicted it was considered a neutral impact. The ExA requests that for these heritage assets, it is also expressed as to the potential effect of the Sea Link proposed development alone, and not based on potential additional impacts over and above that assessed for the EA projects?</p>
<h3>Heritage cumulative impacts</h3>	
<p>Proposed Kiln Lane substation and Saxmundham Converter Station in combination with other developments</p>	<p>The Applicant stated that, during the colocation exercise in Suffolk, the area selected for the proposed substation was identified as one of the most suitable locations when considered across all environmental and technical disciplines. At that stage, no issues relating to cumulative effects to cultural heritage assets were identified in connection with this location.</p> <p>Action Point 54: Applicant to provide a similar list of heritage assets to the scoped-out list in [REP3-070], but for all the heritage assets scoped in for any level of ES assessment, clearly stating the anticipated impact of both the Sea Link and cumulative impact to the significance of these assets.</p> <p>Action Point 55: Applicant to submit a more thorough and detailed assessment of the cumulative impacts on settings of cultural heritage assets and the historic wider landscapes.</p>
<h3>11.4 Effects on setting of listed buildings</h3>	
<p>Impacts on Hill Farmhouse</p>	<p>The Applicant responded to the points raised in relation to Hill Farmhouse. The Applicant noted that the concern identified by East Suffolk Council relates specifically to LVIA Viewpoint 5. This viewpoint had not been considered a key heritage viewpoint within the assessment, although all viewpoints were reviewed as part of the cultural heritage appraisal.</p> <p>The Applicant explained that the first step in assessing whether change to a view impact heritage significance is to determine the extent to which a given view contributes to the asset's significance. The asset itself was not shown in the original LVIA Viewpoint 5 so the Applicant had provided an expanded view as Plate A.1 in Application Document 9.35.2 Applicant's Comments on Local Impact Report from East Suffolk Council</p>

Item discussed	Summary of Oral Case
	<p>[REP2-027] extending further west to include the asset’s location. This expanded view shows that the farmhouse sits within a cluster of trees where its heritage values cannot be appreciated. In this case, it is Applicant’s professional judgement that views towards the asset, such as Viewpoint 5, do not contribute to the significance of Hill Farmhouse.</p> <p>The Applicant added that the existing view from this location does not provide a view of open fields within the Saxmundham Converter Station site, due to the local topography, what is shown is an absence of development behind the existing modern agricultural units. As the asset cannot be seen, and the view does not express or contribute to the heritage values of the farmhouse, change within this view cannot affect the significance of the asset.</p>

11.2 Remaining archaeological on-site assessment work and reporting

<p>Applicant update on ongoing archaeological investigations.</p>	<p>The Applicant provided an update on ongoing archaeological investigations. Recent work has been undertaken in the area of Change Request 1 near the G-Shaped enclosure near Friston, and the interim report was completed last week. This has been shared with Historic England and Suffolk County Council and will be submitted at Deadline 4, with a full report to follow at Deadline 5.</p> <p>The Applicant explained that the remaining geoarchaeological work in Kent is expected to be completed on site by the end of February, and that conclusions will depend on the findings from this final stage of sampling. Work at Saxmundham has not yet commenced, and the Applicant is not currently able to confirm timescales for that element of the programme.</p> <p>The Applicant outlined that the geoarchaeological approach has been agreed with Historic England. It consists of modelling based on the sampling undertaken as part of the GI works, including for Minster Marshes in Kent and the Fromus Valley in Suffolk. This is designed to identify deposits that may require further investigation, and these matters are addressed in the Overarching Written Scheme of Investigation (OWSI).</p> <p>The Applicant confirmed that while some archaeological work would be undertaken post consent, there is an agreed process for continued engagement with Historic England and the two county councils. Should any new findings emerge, the Applicant stated that it would be possible to identify and secure appropriate mitigation, supported by a robust mitigation strategy. The Applicant also noted that the only areas not subject to evaluation trenching are those where no ground disturbance is proposed, such as areas set aside for environmental mitigation, as well as a limited number of areas where access was not available or where development works were taking place (i.e. Aldeburgh Golf Course extension). consent, there is an agreed process for continued engagement with Historic England and the two county councils. Should any new findings emerge, the Applicant stated that it would be possible to identify and secure appropriate mitigation, supported by a robust mitigation strategy. The Applicant also noted that there is an agreed process for continued engagement with Historic</p>
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Item discussed	Summary of Oral Case
	<p>England and the two county councils for any further works required. Should any new findings emerge, the Applicant stated that it would be possible to identify and secure appropriate mitigation, supported by a robust mitigation strategy. The Applicant also noted that the only areas not subject to -consent, there is an agreed process for continued engagement with Historic England and the two county councils. Should any new findings emerge, the Applicant stated that it would be possible to identify and secure appropriate mitigation, supported by a robust mitigation strategy. The Applicant also noted that the only areas not subject to</p> <p>In responding to Historic England’s comments regarding mechanisms in the REAC or the outline WSI, the Applicant stated that discussions will continue. The Applicant drew attention to Requirement 14, which obliges the preparation and approval of the WSIs and sets out how archaeological matters will be addressed. The Applicant expressed the view that an additional measure within the REAC is unlikely to be necessary.</p>

11.5 Ebbsfleet Peninsula Multi-Period Complex archaeology impacts

Further understanding of the Ebbsfleet Peninsula Multi-Period Complex	<p>The Applicant explained that the area under discussion lies on slightly elevated land. Geophysical survey work has been undertaken, and the Order Limits have been refined to avoid sensitive archaeological areas (a large enclosure possibly associated with Caesar’s invasion) to the south. The trenching results, alongside the geophysical survey, have informed the identification of further areas to be avoided within the Order Limits.</p> <p>The Applicant stated that, in response to the findings, elements of the design have been modified. Specifically, the larger construction compound has been relocated to Minster Marshes to avoid areas of archaeological sensitivity (a series of Bronze Age burials and associated enclosures). This forms part of a wider design-led mitigation strategy.</p> <p>The Applicant acknowledged that some physical impacts on archaeological remains are expected where avoidance is not possible. In these areas, full archaeological excavation is proposed as the appropriate form of mitigation. The Applicant confirmed ongoing engagement with project engineers to minimise impacts on known archaeology wherever practicable.</p> <p>The Applicant noted that discussions with Historic England and Kent County Council’s archaeological advisors are continuing in relation to working areas within the Order Limits and the scope of mitigation. The Applicant confirmed that an overlay map illustrating the understood extent of the archaeological area can be produced, in collaboration with Kent County Council, and submitted at Deadline 4.</p> <p>Action Point 56: Agree on a plan to submit showing the extent of the Ebbsfleet Peninsular Multi Period Complex with the proposed order limits, proposed compounds and haul roads overlaid.</p>
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11.6 Richborough Roman Fort

Item discussed	Summary of Oral Case
Impacts on Richborough Roman Fort	The Applicant confirmed that no further comments were necessary on this matter. The visualisations provided from the viewing platform at Richborough Fort (Late Deadline 1 Submission - 9.14 Suffolk and Kent Illustrative Visualisations Part 2 of 2 - Accepted at the discretion of the Examining Authority [REP1-297]) have assisted Historic England in understanding the proposals, and it has been agreed that Historic England will continue to be involved in the design process.

8. Applicant's Summary of Case on Item 13.0: Traffic and transport

Table 8.1 The Applicant's Summary of Oral Submissions on Item 13.0: Traffic and transport

Item discussed	Summary of Oral Case
13.3 Junction modelling and traffic flows on construction routes	
Junction modelling and traffic flows on construction routes	<p>The Applicant provided an update on Traffic and Transport assessment work and the associated junction modelling.</p> <p>The Applicant stated that extensive assessment of traffic impacts has been undertaken, focusing on the busiest construction periods and worst-case scenarios. Given the marginal level of impact on traffic flows, no detailed capacity modelling is required. The Applicant has however engaged with National Highways and the relevant Local Highway Authorities (Suffolk County Council and Kent County Council) to discuss any appropriate analysis in order to show impact at key junctions. In a meeting with National Highways, it was agreed that no detailed analysis would be required at the key strategic A14/A12 interchange due to the marginal impact of the Project. No other Strategic Road Network (SRN) junctions are within close proximity of the Project.</p> <p>A meeting with Kent County Council (KCC) was held in January 2026, and the outcome is that the Applicant will undertake junction capacity modelling for three junctions in Kent; namely the Minster, Sevenscore and Ebbsfleet roundabouts. This is being progressed collaboratively with the Authority. In addition, a meeting was held with Suffolk County Council (SCC) in January 2026 whereby although no material traffic impacts are anticipated on the local highways, the Applicant agreed to progress capacity modelling at the A12/ B1121, the A1094/ B1069, and the B1121/ A1094 junctions given these junctions are on the key construction traffic routing. This work is underway albeit the Applicant is awaiting agreement from SCC of the approach being undertaken. The Applicant is awaiting SCC to confirm a date for a further meeting to confirm their expectations.</p> <p>Action Point 59: Updates provided for junction modelling for both Kent and Suffolk (to include cumulative traffic), if the modelling is not fully submitted at DL4.</p>
13.4 Cumulative impact of traffic	

Item discussed	Summary of Oral Case
Traffic and transport cumulative assessment	<p>In response to questions on cumulative assessment, the Applicant confirmed that cumulative schemes will be incorporated within the junction modelling scenarios, both with and without committed developments. A significant amount of cumulative assessment work has already been completed, including consideration of Sizewell C (SZC), Scottish Power Renewables (SPR) and LionLink schemes, and the resulting peak construction traffic flows have been reviewed.</p> <p>The Applicant noted that it is aware of ongoing/upcoming improvements to the A12 and the Two Village Bypass and that these, alongside other cumulative schemes, have been factored into the cumulative assessment. Peak construction traffic flows, including those associated with other schemes, will inform the junction modelling.</p> <p>The Applicant further explained that each junction assessment will reflect the specific peak periods relevant to the different parts of the network. The programme for the Proposed Project involves different access points at different stages, including along the A12/B1121 corridor for the converter station and the A12/A1094 route for the landfall and substation works. A worst-case overlap with peak activity from other schemes has been assumed as reported in the original cumulative assessment work and the subsequent cumulative traffic note in Suffolk.</p> <p>The Applicant added that SCC is seeking the most up-to-date traffic information from other schemes, such as EA2. From a cumulative perspective, the Applicant has assessed the worst-case scenario based on the traffic secured through other DCOs. The Applicant confirmed it has relatively recent information from SPR and, subject to further review, considers that the cumulative situation is unlikely to be materially worse than the established worst-case, and may in fact involve lower traffic volumes than those already secured in the relevant DCOs.</p> <p>Action Point 61: Applicant to provide an updated cumulative traffic assessment based on an updated list of other projects and developments or provide an update as to when this will be submitted.</p>
Further junction assessment	<p>The Applicant responded to the points raised, noting that a meeting had taken place with Suffolk County Council (SCC) the previous week. SCC had raised similar comments to those put forward regarding the A12 scheme and the junctions along that network, and the Applicant confirmed that these matters are being considered as part of the ongoing assessment.</p> <p>In relation to concerns about the school-time afternoon peak, the Applicant explained that construction working hours are designed to avoid worker movements during the school pick-up period, thereby preventing impacts during this sensitive time.</p>
Consideration of emerging schemes, such as Helios solar	<p>In response to points raised by SCC Highways in regard to cumulative impacts associated with nearby developments, in particular Helios solar and the Essex and Suffolk water pipeline, the Applicant confirmed to SCC that there was a continuing dialogue with these projects.</p>

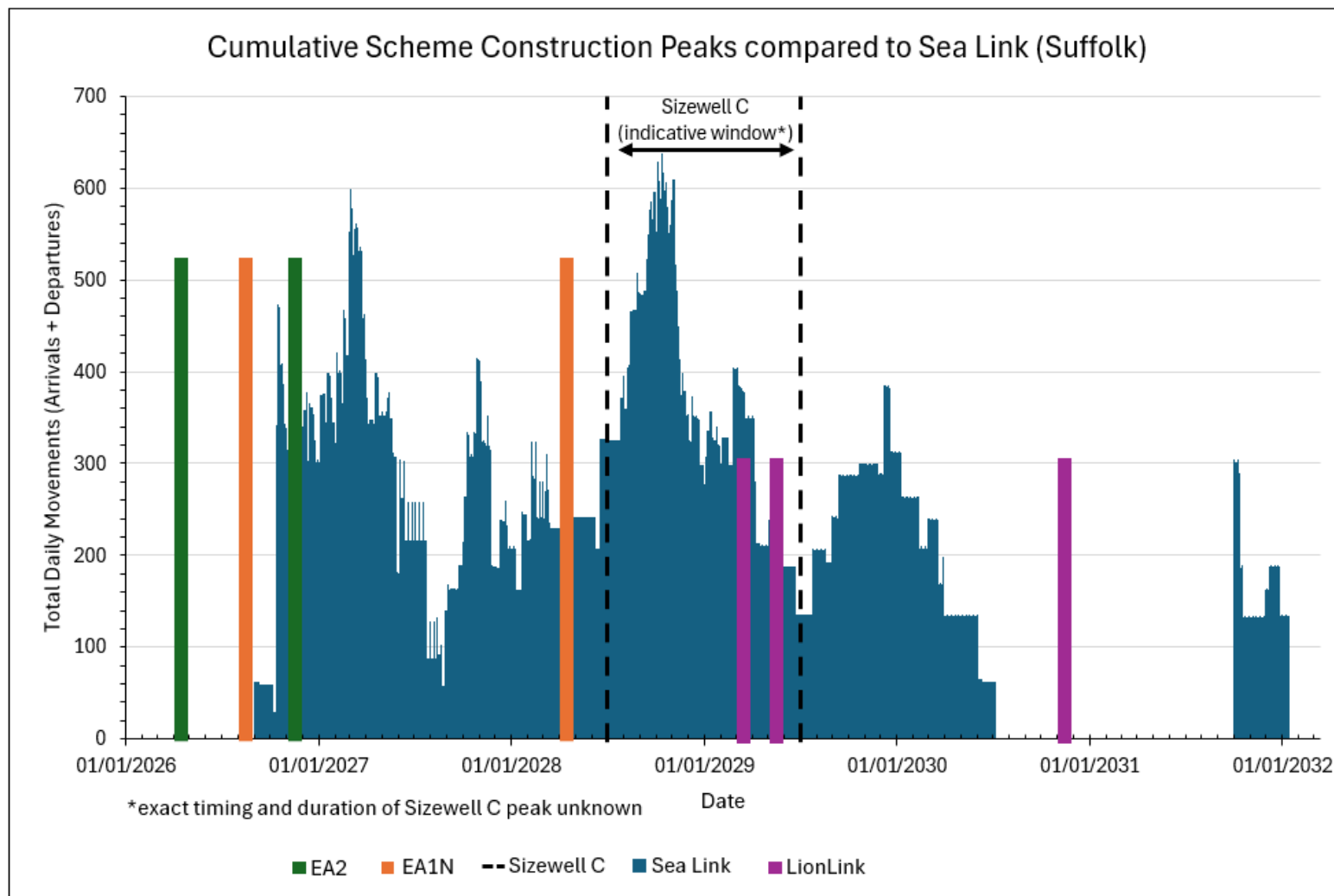
Item discussed	Summary of Oral Case
and Essex & Suffolk Water pipeline	
Junction modelling for cumulative assessment	<p>The Applicant confirmed that notes of its recent meeting with National Highways are available, which set out the agreed position. In addition to the three junctions which will be modelled in Kent (Minster, Sevenscore and Ebbsfleet roundabouts), three junctions in Suffolk are also proposed to be modelled as part of the ongoing transport assessment work:</p> <ul style="list-style-type: none"> • A12 / B1121 Main Road (south of Saxmundham) • A1094/ B1069 (Snape Road) • A1094/ B1121 (Aldeburgh Road) <p>The Applicant also provided an update on engagement with other developers, including Helios. The Applicant holds monthly coordination meetings with all relevant scheme promoters, including Helios, and a dedicated meeting is scheduled in three weeks' time to discuss their project, its position within the National Electricity System Operator (NESO) process, and network connection matters. A Statement of Common Ground has been agreed with Helios, submitted at Deadline 3 and to be updated at Deadline 5.</p> <p>The Applicant noted comments regarding additional junctions that may require assessment and confirmed that these have been recorded for consideration. In response to concerns about potential diversionary traffic along the B1119, the Applicant clarified that there are no plans to route construction traffic via the diversion. For the Benhall bridge works or the installation of the temporary mini-bridge, only light goods vehicles would use that route.</p> <p>The Applicant addressed questions relating to Application Document 6.3.2.13.B ES Appendix 2.13.B Preliminary Cumulative Highway Impact Assessment. It was explained that this appendix sets out the total cumulative traffic volumes for all cumulative schemes assessed within the Environmental Statement, including Sizewell C (SZC), EA1N, EA2, and LionLink, alongside several other developments. This represents a “total cumulative scenario”, informed by the busiest construction periods of all projects combined, although the Applicant emphasised that it is highly unlikely that all peak periods will coincide in reality.</p> <p>The Applicant clarified that Sea Link’s traffic was not included within this appendix, as the analysis was intended to compare total cumulative traffic flows from other developments against the baseline. When these figures are read alongside the equivalent assessment in Chapter 7, where Sea Link’s peak construction traffic figures are provided, they provide the full cumulative context. The Applicant confirmed that an equivalent set of tables would be provided with Sea Link’s traffic included, as an Action Point.</p> <p>Regarding peak construction activity, the Applicant confirmed the following indicative timeline:</p> <ul style="list-style-type: none"> • Sea Link peak: 2028

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- Sizewell C (SZC): likely overlap in **2028/29**
- LionLink peak: approximately **2030**
- EA2 peak: **2026** (before the Sea Link peak)

The Applicant has since prepared a graph to help illustrate the different construction peaks of various projects as shown below:



The graph shows the following:

- Construction traffic for the Suffolk Onshore Scheme (blue) across the construction programme (consistent with Plate 7.1 in **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]**), with a daily maximum of 638 construction vehicle movements (319 arrivals and 319 departures).
- EA2 (green) - works started in July 2025 and construction peak is currently expected to be April 2026 (Heavy Goods Vehicles) and November 2026 (Light Goods Vehicles), based on the latest EA2 CTMP which was submitted in November 2025. It is understood that construction vehicle movements will be within the levels previously assessed in the EA2 Environmental Statement, which represented a daily maximum of 524 construction vehicle movements (262 arrivals and 262 departures) within the Suffolk Onshore Scheme study area.
- EA1N (orange) - works started in July 2025 and construction peak is currently expected to be Month 14 (August 2026) and Month 34 (April 2028) with a daily maximum of 524 construction vehicle movements (262 arrivals and 262 departures) within the Suffolk Onshore Scheme study area
- Sizewell C (black dashed lines) - works started in January 2024, construction peak was originally expected to be in 2028, but could now be 2029 as the works started slightly later than originally expected. A range has been identified in the absence of further information (given the exact timing and duration of Sizewell C peak is currently unknown), with significantly higher construction traffic movements than other projects.
- LionLink (purple) - construction peaks based on the Suffolk Onshore Scheme (access S-BM09 for the converter station) but offset by two years, resulting in two short peaks in 2029 and one short peak in 2030, duration of one month each, with a daily maximum of 310 construction vehicle movements (155 arrivals and 155 departures).

The Applicant noted that SZC's traffic volumes are significantly higher than those of the other schemes, which drives much of the cumulative picture. The year **2028** represents the peak for Sea Link (in Suffolk) and is therefore the principal focus of cumulative assessment work, as some schemes peak before this point and others afterwards.

Action Point 62: Consider and discuss between County Councils and applicant whether information regarding predicted journey time analysis is required to be part of a robust traffic and transport assessment, including cumulative assessments.

Item discussed	Summary of Oral Case
Construction peaks for cumulative schemes	<p>The Applicant clarified that the cumulative assessment has modelled peak construction year traffic for Sizewell C (SZC), rather than the early years of that project. Within SZC’s submission documents, 2028 is identified as the peak year, and the Applicant’s assumptions are based on that position.</p> <p>The Applicant explained that a cumulative traffic note has been produced, which identifies the parts of the road network where Sea Link’s peak construction traffic is expected to arise. The Applicant acknowledged that there may be two distinct peak periods. The assessment therefore identifies the duration over which various peaks could occur and examines whether any overlap with other schemes may arise, and if so, for how long. The Applicant emphasised that this analysis is network-specific, reflecting the different conditions and traffic patterns across the construction corridor. The assessment has therefore not relied solely on the busiest single day of the programme but considers the cumulative context across the full four-year construction period.</p> <p>In response to questions about the distribution of construction workers, the Applicant explained that sensitivity testing has been undertaken, including scenarios where the majority of workers approach from the south via the A12. Through the Construction Traffic Management and Travel Plan (CTMTP) and the travel planning measures set out within this document, facilities will be provided on site to minimise the need for workers to travel during the working day. All modelling has been undertaken on a worst-case basis, assuming peak construction conditions, with a focus on the key construction routes.</p> <p>Action Point 57: Regarding the Preliminary Cumulative Highway Impact Assessment [APP-142], explain what developments have been included and for what time period or scenario? Furthermore, submit a revised table to also include the worst-case Sea Link construction traffic.</p>

13.2 Construction traffic and abnormal indivisible loads

13.2 Construction traffic and abnormal indivisible loads – suitability of routes proposed	<p>The Applicant provided an update on the assessment of Abnormal Indivisible Load (AIL) routes. For context, the Applicant explained that National Grid moves AILs routinely across the network, with more than 400 transformers in operation nationally. AIL transport is therefore a well-established, business-as-usual activity. The appointed contractor, Siemens, will carry out detailed assessments of AIL route feasibility from relevant ports through the highway network prior to any movement taking place. This would involve structural assessments of bridges and other structures, and the Applicant confirmed that it is aware of the issues recently identified by Suffolk County Council (SCC).</p> <p>The Applicant stated that AIL deliveries for Sea Link are expected in 2029, at which point a full route assessment will be undertaken. This will be carried out in collaboration with SCC and the police, consistent with standard industry practice. The Applicant noted that it is unlikely that wholly different routes will be required; rather, specific structural mitigation measures may be necessary at certain points along the network. The Applicant referred to</p>
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Item discussed	Summary of Oral Case
	<p>precedent at Sizewell C, where adjustments were made to accommodate local constraints, and emphasised that its consultants are highly experienced in this type of work, whether for Nationally Significant Infrastructure Projects (NSIPs) or for routine operational transformer movements.</p>
<h3>13.1 Benhall Bridge proposed works, with potential diversions</h3>	
<p>13.1 Benhall Bridge proposed works, with potential diversions and rail line effects</p>	<p>The Applicant responded to questions regarding whether works at the Benhall bridge would require closure of the rail network. The Applicant explained that further survey work is needed to fully understand the extent of repairs required at the bridge. While a closure of the rail line may potentially be necessary, this is yet to be confirmed. Reports have already been provided to Network Rail and to the county authority for comment, and the Applicant is engaging consultants to prepare the risk assessments and method statements (RAMS) required for the survey work.</p> <p>The Applicant clarified that although there may be a 28-day closure of the road to facilitate bridge repairs, this does not equate to a 28-day closure of the railway. There are ongoing discussions with Network Rail include the possibility of coordinating possessions with pre-planned level-crossing closures, to reduce additional disruption. In response to questions about whether Network Rail could refuse access, the Applicant confirmed that all works will be progressed in accordance with the standard Asset Protection Agreement process. Possessions will be agreed through Network Rail’s programme, which must take account of other significant movements on the network, including those associated with Sizewell C. The Applicant noted that a temporary “mini-bridge” solution may be required if full bridge repairs cannot be scheduled immediately within Network Rail’s preferred possession windows.</p> <p>The Applicant confirmed that a Statement of Common Ground has been prepared and sent to Network Rail in November, and discussions have taken place with their asset protection team. As the bridge is a county-owned asset, works may not require full Network Rail possession depending on final method statements. The Applicant stated it is working closely and collaboratively with Network Rail on these matters.</p> <p>The Applicant confirmed that the mini-bridge would be stored within an existing construction compound adjacent to the River Fromus crossing, where temporary accommodation (such as site cabins) would also be located. There would be no storage within the road boundary or immediately adjacent to the bridge itself. The Applicant may seek to secure voluntary access from a local landowner if additional temporary space is required and noted there may be a suitable location in Benhall, although this is outside the Order Limits.</p> <p>The Applicant is actively planning the timing of strengthening works to the bridge. Comments from SCC Highways are awaited, and discussions with the appointed contractor are ongoing, with further engagement expected over the coming two to three months. The Applicant acknowledged the importance of clear programming and</p>

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confirmed it is seeking an appropriate timing window aligned with Network Rail possessions, potentially using a hybrid approach that incorporates the temporary mini-bridge if necessary.

The Applicant confirmed that it has met with local residents at White Arch residents park and has ensured that access will be maintained throughout the works, including for emergency vehicles.

The Applicant reiterated that all relevant documentation is currently with the county authority for review. The Applicant will respond to the points raised in due course and noted that all issues have been subject to extensive discussion already, and none of the matters raised are new.

Action Point 58: Submit an assessment of feasibility of both proposed options for the use of abnormal loads across Benhall Railway Bridge.

Action Point 64: Provide a map showing the main diversion routes if Benhall Rail Bridge needed to be closed for a period of time to traffic.

Action Point 65: Provide an explanation and commitment as to when any closure of Benhall Rail Bridge would be phased in to occur, such as prior to other proposed onshore works in Suffolk for example.

Action Point 66: Would there be a preference as to the option chosen by the applicant for abnormal load crossings of Benhall Rail Bridge, if both options were feasible?

9. Applicant's Summary of Case on Item 12.0: Public Rights of Way

Table 9.1 The Applicant's Summary of Oral Submissions on Item 12.0: Public Rights of Way

Item discussed	Summary of Oral Case
12.1 Public rights of way impacts and proposed mitigation and coordination	
Impacts on Public Rights of Way	<p>The Applicant responded to the query regarding Public Rights of Ways (PRoW) and confirmed that a wide-ranging assessment has been undertaken. At this stage, and following application of the mitigation hierarchy, including potential diversions, the Applicant has not identified any significant effects on rights of way in the immediate vicinity the Saxmundham ranging assessment has been undertaken. At this stage, and following application of the mitigation hierarchy, including potential diversions, the Applicant has not identified any significant effects on rights of way in the immediate vicinity. At this stage, and following application of the mitigation hierarchy, including potential diversions, the Applicant has not identified any significant effects on rights of way in the immediate vicinity.</p> <p>In relation to concerns about available width for a right of way within the Order Limits bordering the A1119, the Applicant confirmed that a temporary diversion is proposed along the relevant route and that there is sufficient width to accommodate this. The Applicant noted, however, that it does not hold permanent land rights along that particular section.</p> <p>Addressing questions on compensation or enhancement measures for PRoWs, the Applicant explained that two PRoWs (one bridleway in Suffolk and one footpath in Kent) have been identified as being subject to significant cumulative effects. The Applicant outlined that efforts focus on addressing the contributing factors behind these effects. The principal contributor is the visual impact, which has already been mitigated as far as practicable through the application of the mitigation hierarchy.</p> <p>For the bridleway in Suffolk, the Applicant explained that a short temporary diversion will be required during two periods of four weeks each. Given the short duration of diversion, user priority measures, and the constraints posed by the nature of the cumulative effects, the Applicant stated that there is limited scope for any further meaningful mitigation.</p>

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The Applicant clarified that any proposed new permanent right of way along the B1119 would represent an enhancement, not compensation, as there is both spatial and temporal separation between the affected PRow during construction (Bridleway 491/010/0) and the location and timing of the PRow along the B1119 being proposed by SCC.

The Applicant also confirmed that discussions with Suffolk County Council have identified additional enhancements that can now be delivered. These include:

- Permissive access within new landscape planting at the Saxmundham Converter Station; and
- Permissive access along the permanent access from the B1121 to the Saxmundham Converter site, including access across the Fromus Bridge.

The Applicant confirmed that it is already securing the necessary rights to deliver these enhancements and is content to do so.

10. Applicant's Summary of Case on Item 14.0: Noise and vibration

Table 10.1 The Applicant's Summary of Oral Submissions on Item 14.0: Noise and vibration

Item discussed	Summary of Oral Case
14.1 Construction noise assessment (including assessment assumptions, noise contour figures, s61 consents, mitigation and monitoring)	<p data-bbox="477 659 2069 839">The Applicant explained that, once a contractor is appointed, they will undertake a further detailed assessment of construction noise effects. This reassessment will be informed by the confirmed construction plant, methodologies, equipment types, and operational timings. The Applicant stated that this process will allow for considerably greater certainty compared to the ES, removing assumptions and providing a clearer understanding of whether significant effects may arise.</p> <p data-bbox="477 852 2051 959">The Applicant also noted that discussions will take place with the relevant local authorities to determine whether Section 61 applications are required. Some local authorities have indicated that such applications may not be necessary, but the Applicant confirmed that they will submit them where appropriate.</p> <p data-bbox="477 971 1962 1042">In response to the Examining Authority's query regarding rewording commitments from "may" to "will", the Applicant confirmed that this amendment can be made.</p> <p data-bbox="477 1054 2024 1270">The Applicant outlined its approach to monitoring, explaining that routine monitoring to check whether the ES assessment remains accurate has not been proposed. Monitoring would instead be linked to specific circumstances where potential significant effects are identified, undertaken at defined trigger points and in agreement with local authorities. The Applicant referred to the agreed noise monitoring at the SPA barrier and noted that consideration could be given to additional locations if appropriate but reiterated that no significant effects have been identified that would necessitate broad routine monitoring.</p> <p data-bbox="477 1283 2051 1353">The Applicant provided further explanation regarding the application of Best Practicable Means (BPM). BPM will involve:</p> <ul data-bbox="524 1366 1344 1442" style="list-style-type: none"> • selecting quieter plant and equipment where available; • avoiding sensitive periods where practicable; and

Item discussed	Summary of Oral Case
	<ul style="list-style-type: none"> • using physical barriers or screening to reduce noise at source. <p>The Applicant emphasised that, once the contractor is appointed and the detail of the works finalised, the opportunities for BPM will become more specific and can be applied more effectively.</p> <p>Action Point 68: Applicant to respond to:</p> <ul style="list-style-type: none"> • Appendix B of the applicant’s Pegwell Bay Construction Method Technical Note [REP2-011] states ‘not available’ under the sound source for the Offshore trencher, argocat and mass flow excavator. Does this mean that these elements were or weren’t assessed and in which case what assumptions were used and what are the implications for the noise contour mapping? • The applicant’s response to ExQ 1NV15 [REP3-069]] explains that noise contour mapping work assumes that the hoverport is soft ground and that this is proportionate due to the size of the area modelled. Given that the hoverport is largely hardstanding with vegetation and that it will be extensively used by construction vehicles, can the applicant provide further justification for this assumption? • First written question 1NV4 [PD-017], asked about use of hovercraft in Pegwell Bay. The applicant’s response to 1NV4 [REP3-069] explains that the use of hovercraft is for safety purposes only and won’t be used on a regular basis. Can the applicant explain how they would be brought to the site and how they would be stored? Can the use of the hovercraft be limited to emergency use in the dDCO or REAC? <ul style="list-style-type: none"> • ExQ 1MO4 [REP3-069]] regarding piling noise levels and the use of an LAFmax of 91dB at 10m. This confirmed that the maximum piling noise level in the applicant’s data set was 104dB but values were more typically in the low 90dB range. Is the applicant able to provide this dataset to the examination to support this assumption? • At DL3 the applicant provided an operational noise contour plan for Saxmundham [REP3075]. Produce a similar plan for Minster converter station. • Explain why in figure 2 of the Operational Noise contour Plan [REP3-075] the noise level change contours are being compared with a 38dB LAeq8h level.
14.2 The need for operational noise limits at all operational sites	
Noise limits to not exceed background levels at operational sites.	The Applicant clarified, in response to the Examining Authority’s query, that the noise assessment does include character correction considerations. The Applicant explained that an allowance of 4 dB for tonality has been incorporated into the assessment to account for noise character and confirmed that further detail can be provided in writing.

Item discussed	Summary of Oral Case
Noise limits at the Kiln Lane substation	<p>The Applicant responded to the Examining Authority’s query regarding requirements relating to noise limits and any relationship with the ScottishPower Renewables (SPR) scheme. The Applicant confirmed that it has access to all relevant noise data for the SPR substation as part of SPR’s discharge of conditions. The Applicant noted that no transformers are proposed at the Sea Link substation site and therefore no comparable noise-generating equipment is anticipated. The Applicant agreed to confirm the relevant noise levels in writing.</p> <p>The Applicant stated that, in principle, it did not consider that a separate noise limit would be required at the Friston/Kiln Lane substation, as the Proposed Project does not introduce significant noise-producing plant that would contribute materially to operational noise levels.</p> <p>In response to further points raised, the Applicant confirmed that these have been noted and that a detailed response will be provided in writing.</p> <p>Action Point 69: Provide a form of requirement wording, co-ordinated with SPR, that would enable the previous East Anglia 1 North Requirement 27 noise limit requirements for Friston/Kiln Lane substation to be satisfied.</p>

14.3 Operational noise impacts including low frequency noise

Low frequency noise	<p>The Applicant confirmed that the noise assessment already incorporates consideration of key frequency components, including low-frequency characteristics associated with transformers and other relevant equipment. These frequency elements have been built directly into the overall noise assessment methodology.</p> <p>In response to the query about whether a separate low-frequency noise requirement is necessary within the REAC, the Applicant explained that this is not required, as low-frequency content is already embedded within the underlying assessment. The Applicant reiterated that the approach adopted adequately captures frequency-based effects without the need for an additional, standalone control.</p> <p>The Applicant also confirmed that it would review what the current assessment shows in relation to dB(C) levels, based on the indicative design information available at this stage, and can provide this clarification in writing.</p> <p>Action Point 70: Provide a detailed assessment of low frequency noise impacts for proposed operational sites, based on the most up to date level of design detail available, incorporating comparison of dB(A) and dB(C) levels.</p>
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11. Applicant's Summary of Case on Item 8.0: Marine physical environment

Table 11.1 The Applicant's Summary of Oral Submissions on Item 8.0: Marine physical environment

Item discussed	Summary of Oral Case
Agenda items moved to Action Points	<p>Action Point 72: The applicant is asked to respond to the following question that was moved from the agenda to action points: The MMO [REP2-056] suggests that further work is necessary to assess contamination in the lagoon area including polycyclic aromatic hydrocarbons (PAH) and copper. The applicant comments that the lagoon would be avoided by trenchless crossing and that there would be testing for contamination at the HDD exit location – can the applicant explain whether there is any risk that contaminants might be exposed due to open cut trenching in Pegwell Bay and whether any testing of these sediments is also required?</p>
8.1 Coastal erosion	
Depth of cable burial	<p>The Applicant explained that the proposed burial depth beneath the River Stour is 1.5 metres, based on assessment work undertaken to inform the design. No further deepening is anticipated to be required. The Applicant stated that there is no expectation that the river channel will migrate northwards from its current position in a way that would necessitate additional cable lowering.</p> <p>Referring to figures presented during the hearing, the Applicant explained that the mapping shows an envelope of variation derived from several years of LiDAR data. The yellow and orange shading indicates areas of minimal channel variability, and the marine cable corridor consistently lies within these zones. The Applicant noted that the areas of active movement are shown in purple, corresponding to the present River Stour channel, which is steep-sided and stable. Although some plots suggest that the channel has historically been positioned further north, these relate to remnant or historic channels, not to migration of the current active channel. The Applicant therefore considers the likelihood of significant northward migration to be low, and not a matter of concern.</p> <p>In response to a question about climate change and how this might influence channel behaviour, the Applicant stated that fluvial processes are the dominant influence on the system. Evidence from the technical assessment demonstrates that the channel is capable of self-maintenance, handling significant sediment movement without</p>

Item discussed	Summary of Oral Case
	<p>causing lateral migration. The Applicant's view is that increased fluvial discharge associated with climate change is more likely to have a stabilising or beneficial effect, reinforcing the channel's existing position and making migration less likely.</p> <p>Addressing a query regarding a potential lowering depth of 3 metres, the Applicant noted that this would equate to approximately 4.5 metres below the base of the active channel. This has been considered from a feasibility perspective, including review of a specialist report commissioned from ABPmer. The initial view is that such a depth is likely to be feasible, but this would ultimately require confirmation from a trenching specialist. An initial written response will be provided at Deadline 4.</p> <p>When asked about possible methods for future remedial works, the Applicant confirmed that sheet piling would not be used. Based on the project description, any remedial lowering would instead utilise typical marine protection measures, such as mattresses or other standard engineering solutions. The Applicant agreed to confirm whether any variation from the standard suite of measures would be required.</p> <p>In responding to the query from Kent Wildlife Trust (KWT), the Applicant clarified that the length of route under discussion (between the HDD exit point and the intertidal area) does not involve a trenchless crossing of the saltmarsh.</p> <p>Action Point 74: Provide an explanation of whether a 3m depth of lowering in Pegwell Bay (3m below the bed level of the River Stour) is feasible and what the implications would be for the applicant's Environmental and Habitats Regulations assessments.</p> <p>Action Point 75: Provide details of remedial measures that would be considered/implemented if buried cables in Pegwell Bay became exposed by future possible migration of the river channel from the HDD exit seaward.</p>
National Coastal Erosion Risk Mapping (NCERM2)	<p>The Applicant confirmed that the NCERM2 dataset was used in the main Environmental Statement (ES) chapter, forming part of the consideration of future baseline coastal change. Some supporting figures within the APBmer technical report still display the earlier NCERM dataset, which differs from NCERM2. The Applicant clarified that this earlier dataset did not feed into the ES chapter, which was prepared separately. The NCERM2 dataset, including its limitations, has been incorporated appropriately and used to provide an indication of the future baseline conditions relevant to the assessment of potential impacts, rather than forming the basis for any major conclusions requiring reassessment.</p> <p>In response to the question regarding whether a standalone assessment was necessary, the Applicant sought clarification as to whether this query related to the Flood Risk Assessment.</p>

Item discussed	Summary of Oral Case
Coralline Crag, Suffolk Horizon Directional Drilling exit location and Register of Environmental Actions and Commitments provisions	<p>The Applicant explained that the indicative HDD design shows a thin wedge of material extending beyond the Coralline Crag, with the HDD exit point positioned outside this feature. More detailed geological mapping and ground investigation will be undertaken during the detailed design stage to refine the exact exit point and ensure sufficient cover beneath the outcrop. The Applicant confirmed that the Coralline Crag is a stable and competent material for drilling, comprising a mix of grain sizes that allows it to support itself during HDD works, with only temporary support required while the duct is installed.</p> <p>In response to questions about the level of certainty shown in the figure presented, the Applicant acknowledged that it is a high-level representation. The Applicant agreed to provide further detail, including clarification regarding the 45metre offset referenced in relation to potential frac out risk, at the next examination deadline. The Applicant agreed to provide further detail, including clarification regarding the 45-metre offset referenced in relation to potential frac-out risk, at the next examination deadline.</p> <p>Addressing why the HDD route could not be moved further south of the coralline crag, the Applicant confirmed that this point would be taken away and addressed in an explanatory note to be submitted at Deadline 4.</p> <p>Action Point 76: Provide a technical note in relation to the effect of the HDD bore emerging at the seabed on the Coralline Crag, explaining in detail why it would not create a longer-term point of weakness within the wider sub crop.</p> <p>Action Point 78: Provide a clearer plan in relation to the HDD bore exit location, including a 45m offset from the Coralline Crag and suggested requirement or REAC wording to provide certainty regarding the exit location.</p> <p>Action Point 79: Provide a technical note additional to the information provided in [APP-044] explaining the reasons for not moving the proposed cable route entirely south of the Coralline Crag as previously proposed.</p>

12. Applicant's Summary of Case on Item 17.0: Climate change

Table 12.1 The Applicant's Summary of Oral Submissions on Item 17.0: Climate change

Item discussed	Summary of Oral Case
17.1 Matters relating to R (on the application of Finch on behalf of the Weald Action Group) v Surrey County Council judgements	
Downstream emissions effects	<p>The Applicant responded to the points raised by SEAS, confirming that it is not possible to quantify any downstream emissions effects associated with the project. The Applicant emphasised that, as previously explained in its written submissions, there is no meaningful or robust methodology available to calculate such effects, nor to predict them in a way that would withstand scrutiny.</p> <p>The Applicant noted that this position is consistent with relevant case law, including the Finch judgment, which establishes that an assessment should only consider effects for which there is evidential support and a methodology capable of generating a meaningful assessment. The Applicant also referred to the Luton Airport judgement, which aligns with the same approach.</p> <p>The Applicant acknowledged Suffolk County Council's understanding of this position and reiterated that it is not appropriate, nor legally required, to speculate or guess at emissions that cannot be evidenced or reliably quantified.</p>

13. Applicant's Summary of Case on Item 18.0: Water environment

Table 13.1 The Applicant's Summary of Oral Submissions on Item 18.0: Water environment

Item discussed	Summary of Oral Case
18.1 Matters relating to flooding and the adequacy of the Flood Risk Assessment	
Update on discussions with Suffolk County Council (SCC) in regard to flood risk and drainage matters.	<p>In relation to sensitivities at Friston, the Applicant explained that the Flood Risk Assessment (FRA) draws on Environment Agency datasets, national datasets, and available local surface water modelling. The Applicant has engaged closely with SCC and the district council to understand the flood risk context in this location.</p> <p>At Deadline 3 the Applicant submitted an updated detailed drainage strategy [REP3-060], building upon the information in Appendix C of the FRA [APP-292], setting out how surface water would be managed. The Applicant noted that SCC has indicated that this additional detail goes some way towards addressing its outstanding comments. This submission represents supplementary information in a new report, rather than an update to the FRA itself.</p> <p>The Applicant responded to further points raised by SCC in its role as Lead Local Flood Authority (LLFA), confirming that additional discussions would be welcomed and that a meeting is being arranged within the coming weeks. The date of the meeting has been confirmed and will take place on the 12/02/2026. The Applicant highlighted that the REAC contains a commitment requiring the contractor, at detailed design stage, to prepare a surface water drainage design for permanent above ground infrastructure that accords with the policy and guidance requirements of the relevant Lead Local Flood Authorities and to include allowances for climate change [W11].</p> <p>On construction-phase surface water management, the Applicant confirmed that SCC had requested further clarity. The Applicant reiterated that the REAC already includes a commitment for the preparation of a Construction Drainage Management Plan to be submitted to the Local Planning Authority for approval prior to construction works for the Proposed Project commencing [W14].</p>

Item discussed	Summary of Oral Case
	<p>The Applicant also provided an update on resolving the outstanding matters identified in SCC's Deadline 3 submission, noting that many relate to topics discussed earlier in the hearing. The Applicant confirmed that engagement with SCC is ongoing and expressed confidence that these issues can be resolved.</p> <p>The Applicant further explained that it is working closely with ScottishPower Renewables (SPR) on the surface water drainage management plan, with the intention of reflecting the approach adopted for SPR's site. The Applicant agreed to consider the appropriate control mechanism within the DCO and to provide updated drafting or clarification in writing.</p> <p>Action Point 82 Applicant to update the drainage plan for Friston substation in coordination with SPR</p>
<p>Responding to the Environment Agency's outstanding points</p>	<p>The Applicant responded to the Environment Agency's (EA) outstanding points and confirmed that close engagement is ongoing. The Applicant will provide a full written response to all matters raised.</p> <p>Regarding the fluvial flood issue identified by the EA, the Applicant explained that new information had been received from the EA in the previous week and has since been assessed. The Applicant confirmed that, in terms of operational infrastructure, only four new pylons are located within the fluvial flood zone. Relocating these pylons is not feasible. The Applicant has therefore undertaken an assessment to calculate the floodplain volume losses associated with these structures.</p> <p>A technical note has been prepared detailing this work and will be submitted at the next deadline. The Applicant also noted its intention to introduce a new REAC commitment associated with the outcome of this assessment.</p> <p>Action Point 85 Provide an update on if it necessary to relocate the proposed location of attenuation ponds for functional need including fluvial flooding matters.</p>
<p>Responding to point raised in Kent County Council Local Impact Report</p>	<p>The Applicant confirmed, in relation to the KCC Local Impact Report (LIR), that the project has assessed its interactions with existing agricultural and land drainage infrastructure. The Applicant explained that commitments are secured within the REAC to ensure that any land drains affected by the project will be maintained, protected, or reinstated to ensure their continued operability following construction [AS05, W10].</p> <p>The Applicant also noted, for awareness, that a technical note will be submitted concerning the Minster Converter Station, specifically addressing the ground improvement works and the points raised by local councillors. This will be provided at examination deadline 5.</p>
<p>18.2 The application of the sequential and exception tests</p>	
<p>Location of surface water ponds</p>	<p>The Applicant responded to the Environment Agency's (EA) request regarding the potential relocation of surface water ponds. The Applicant acknowledged that a small number of ponds overlap slightly with surface water flood zones; however, these ponds have been designed and located so that they function as intended. There is limited</p>

Item discussed	Summary of Oral Case
	<p>scope to move them without undermining their operational purpose. The Applicant confirmed that there is no intention to relocate these ponds but that discussions with the EA will continue.</p> <p>The Applicant also confirmed that the project has been treated as essential infrastructure for the purposes of the National Planning Policy Framework (NPPF) vulnerability classification. This is clearly set out in the Flood Risk Assessment (FRA), and the project has not been compartmentalised into separate classifications.</p> <p>In response to further comments from Suffolk County Council (SCC), the Applicant confirmed that it will provide a written response to the outstanding concerns raised.</p> <p>Action point 86 Set out all remaining areas of disagreement regarding the applicant’s approach to applying the sequential and exception tests.</p>

18.3 Effects on the achievement of the environmental objectives of the Water Framework Directive

<p>Updates and responses to the Environment Agency, including requirement for the River Fromus Crossing</p>	<p>The Applicant confirmed that it is working very closely with the Environment Agency (EA) on the wording and principles of the relevant requirement relating to the River Fromus Crossing and the bridge soffit height and considers that agreement is now very close.</p> <p>Responding further to the EA’s position, the Applicant agreed that the EA’s summary of the five outstanding matters linked to water quality is accurate. The Applicant explained that it is currently refining a series of updates to the REAC commitments which will address these remaining points. The Applicant expressed confidence that these matters can be resolved and confirmed that the updated commitments will be submitted at the next examination deadline.</p> <p>Action point 87 Set out position with respect to requested wording for requirement in dDCO regarding the Water Framework Directive (WFD) and a 4m bridge soffit height at the proposed River Fromus</p> <p>Action point 88 Confirm any outstanding concerns with respect to meeting the objectives of the WFD.</p>
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14. Applicant's Summary of Case on Item 19.0: Shipping and navigation

Table 14.1 The Applicant's Summary of Oral Submissions on Item 19.0: Shipping and navigation

Item discussed	Summary of Oral Case
19.1 Safeguarding of dredging depth	
Update on matters relating to the safeguarding of future navigational water depths	<p>The Applicant provided an update on matters relating to the safeguarding of future navigational water depths requested by the Port Authorities. The Applicant confirmed that there are three areas where future safeguarding of water depths has been proposed by the Ports, and that allowance has been made for an over-dredge tolerance. The Applicant stated that the current intention is for these arrangements to be secured through Protective Provisions (PPs) within the DCO. Draft PPs have been issued to both relevant Port Authorities, as well as to London Gateway Port Limited, for their review.</p> <p>The Applicant noted that PPs offer a structured mechanism for agreement with named bodies and confirmed that this is the intended approach. It was further noted that the wording of the current draft PPs reflects the established wording used in other Development Consent Orders concerning marine environments.</p> <p>In response to submissions from the Port of London Authority (PLA), the Applicant confirmed that these points will be considered further, and that the Applicant will continue discussions with the PLA.</p> <p>Regarding the Maritime and Coastguard Agency (MCA) requirement for a maximum 5% reduction in navigable depth, the Applicant confirmed that this requirement is already secured within the Deemed Marine Licence (DML).</p> <p>The Applicant concluded by stating that all comments and issues raised during the discussion have been carefully noted and that a clear strategy will be put in place to address them.</p> <p>Action Point 89: Updated navigation and installation plan (NIP) to be provided, to include additional geographical area(s) of interest requested by the Maritime and Coastguard Agency (MCA) and matters relating to vessel management for the entire cable route (not just the defined areas of interest). Alternatively provide a standalone vessel management plan for the entire offshore scheme.</p>

Item discussed	Summary of Oral Case
	<p>Action Point 92: Provide update on securing future dredging depths through the dDCO requirements and DML condition(s) in consultation with the relevant stakeholders.</p>
<p>Update in relation to Five Estuaries Wind Farm.</p>	<p>The Applicant confirmed that Figure 3.1 in [AS-104] is consistent with other documentation submitted into the Examination. The Applicant stated that there is agreement on the broad areas shown and expressed confidence that this aligns with the position established across the Five Estuaries Project, where similar approaches have been adopted.</p>
<p>19.2 Cable exposure during operations</p>	
<p>Safeguard navigational water depths</p>	<p>The Applicant confirmed that commitments are already secured within the REAC regarding cable depth lowering, as set out in the project description.</p> <p>In responding to the Port of London Authority (PLA) and related points, the Applicant explained that the Protective Provisions (PPs) include measures to safeguard navigational water depths during both construction and maintenance. These provisions also cover any remedial works that could affect water levels. The Applicant emphasised that it is firmly in its own interest to undertake any necessary remedial works promptly, so as not to leave cables exposed or vulnerable.</p> <p>The Applicant stated that it will continue to work collaboratively with the Port Authorities to ensure that these commitments are appropriately secured and that the PPs reflect the requirements for maintaining safe and effective navigation.</p>
<p>19.3 Cable joints</p>	
<p>Cable joints</p>	<p>The Applicant confirmed that there are no planned joints within areas of safeguarded water depths. This position remains subject to ongoing engineering assessment, but the work undertaken to date provides confidence in being able to avoid cable joints in these locations. The Applicant will provide a further update at Deadline 4.</p> <p>In response to points raised by London Gateway Port (LGP), the Applicant stated that LGP’s position is clear and that, in principle, there is no disagreement. While some relevant provisions are already included within the REAC, the Applicant acknowledged that these may not go far enough and confirmed a willingness to continue discussions to ensure matters are appropriately addressed.</p> <p>The Applicant also emphasised the importance of ensuring a balanced set of controls, avoiding unnecessary duplication while maintaining appropriate safeguards.</p>

Item discussed	Summary of Oral Case
	<p>Action Point 90: Applicant to provide update on avoiding planned cable joints in the areas of interest, taking into account the Port of London Authority’s (PLA) view that it needs to be secured through a condition on the DML and that the REAC is not sufficient.</p> <p>Action Point 93: Provide an update on whether REAC SN22 provision should be secured in the dDCO/DML</p>
19.4 Cable crossings	
Cable crossings	<p>The Applicant confirmed that the principle of the 5% rule is secured within the Deemed Marine Licence (DML). The key consideration is that, should the Applicant reach the 5% threshold, this would trigger a discussion with the Maritime and Coastguard Agency (MCA). The objective is to ensure that safeguarded water depths are maintained; achieving this may, in some circumstances, require exceeding the 5% rule, subject to agreement. The Applicant confirmed that this approach would be secured in writing and that the mechanism is already secured through the DML.</p> <p>Within the hierarchy of requirements, the Applicant noted that the MCA seeks to limit the height of the structure above the seabed, and that this principle is already reflected in the draft wording, including provisions relating to cable crossings.</p> <p>Regarding the future GridLink crossing, the Applicant explained that a mechanism is being developed to ensure the protection of safeguarded water depths. The Applicant has met with GridLink and is working collaboratively through co-engineering discussions, including refinement of the proposed crossing location. A potential solution includes locating the crossing in deeper water to ensure safeguarded levels are maintained; the Applicant confirmed that this deeper alignment would remain within the Order Limits.</p> <p>The Applicant noted that an emerging clause within the Port of London Authority (PLA)’s Protective Provisions provides a specific mechanism for the GridLink crossing. This clause is being refined depending on which party constructs its infrastructure first. The Applicant stated that the emerging wording already reflects what the PLA is seeking, and that, if required, a Crossing Agreement between the Applicant and GridLink could be secured either within the emerging clause or within the draft Order.</p> <p>Action Point 94: Provide an update on safeguarding location for crossing with Gridlink. Provide an update on discussions with Gridlink including as to whether this should be through a cable crossing agreement or whether an area needs to be safeguarded as an area of interest to provide adequate certainty.</p>

Item discussed	Summary of Oral Case
	<p>Action Point 97: Provide an update to the 3.5 Consents and Agreements Position Statement [APP-010] in relation to including cable crossing agreements in the appropriate section of the document (table 2.1 or section 1.5).</p> <p>Action Point 99: Provide an update to the 3.5 Consents and Agreements Position Statement [APP-010] in relation to including cable crossing agreements in the appropriate section of the document (table 2.1 or section 1.5).</p>
Cable crossing agreements	<p>The Applicant clarified that, although the point raised was not included within the table in the Consents and Agreements Position Statement [APP-010], it is addressed within the wider document. The Applicant committed to reviewing this further and confirmed that the matter has not been excluded, but that additional work will be undertaken to ensure the position is set out clearly and transparently.</p> <p>Action Point 94: Provide an update on safeguarding location for crossing with Gridlink. Provide an update on discussions with Gridlink including as to whether this should be through a cable crossing agreement or whether an area needs to be safeguarded as an area of interest to provide adequate certainty.</p>
19.5 Vessel management plans	
Ongoing discussion with the Maritime and Coastguard Agency	<p>The Applicant confirmed, for clarity, that it is in ongoing discussions with the Maritime and Coastguard Agency (MCA) regarding the relevant requirements. As part of this engagement, the Applicant is updating the Outline Navigation and Installation Management Plan and confirmed that an updated version will be submitted at Deadline 4.</p>
19.6 Safety zones	
Safety zones	<p>The Applicant confirmed, in response to points raised by PLA, that it will consider the matters highlighted and provide an updated position at Deadline 4.</p> <p>Action Point 96: Provide an update to the REAC in relation to safety zones, in response to the PLA's request at DL3 for improved commitment in terms of communication.</p>
19.7 Exclusion zones	
Exclusion zones	<p>The Applicant confirmed that it is actively considering the commitment raised and will take the matter away for further review and confirmation.</p> <p>Action Point 95: Provide an update to the REAC to include exclusion zones.</p>

Item discussed	Summary of Oral Case
19.8 Cable burial risk assessment	
Cable burial risk assessment	<p>The Applicant explained that the Cable Burial Risk Assessment (CBRA) was commissioned prior to receipt of the integrated report. The Applicant confirmed that the current CBRA incorporates the geophysical data and has been tied back to the BGS geological mapping data (in lieu of the supplementary geotechnical data) to ensure consistency and accuracy. Based on the work undertaken to date, the Applicant expressed confidence that no material change to the CBRA is anticipated.</p> <p>The Applicant confirmed that it has been engaged in discussions with the relevant port authorities and the Maritime and Coastguard Agency (MCA). In relation to the sunk area of interest, a newly identified area highlighted by the MCA, the Applicant noted that active discussions with the MCA are ongoing.</p> <p>The Applicant further acknowledged the MCA’s requirements and confirmed that updates on the outcome of these discussions will be provided in writing.</p>

15. Applicant's Summary of Case on Item 15.0: Socio-economics and tourism

Table 15.1 The Applicant's Summary of Oral Submissions on Item 15.0: Socio-economics and tourism

Item discussed	Summary of Oral Case
15.2 Tourism accommodation capacity	<p>The Applicant acknowledged the comments made by both councils and noted the findings of the accommodation study completed to date, confirming that these will be reviewed in due course as part of ongoing engagement.</p> <p>The Applicant explained that the assessment of cumulative accommodation impacts considered peak demand across multiple types of accommodation, including hotels, bed and breakfast establishments, and private rented (PR) properties. The assessment demonstrates that, even at peak construction demand, there is significant available capacity for both construction workers and tourists. This cumulative assessment includes the peak workforce associated with the Sizewell C (SZC) project and breakfast establishments, and private-rented (PR) properties. The assessment demonstrates that, even at peak construction demand, there is significant available capacity for both construction workers and tourists. This cumulative assessment includes the peak workforce associated with the Sizewell C (SZC) project.</p> <p>The Applicant confirmed that the cumulative assessment accounts for:</p> <ul style="list-style-type: none">• hotel availability• Bed and breakfast accommodation-and-breakfast accommodation• Private rented accommodation-rented accommodation• peak tourism demand• peak construction demand across all schemes, including SZC <p>On this basis, the Applicant concluded that sufficient accommodation capacity exists across the study area to meet cumulative demands.</p> <p>In response to questions about the private rental sector, the Applicant clarified that the study did not undertake detailed rental-cost analysis, as this fell outside its scope. However, based on the capacity work completed, the</p>

Item discussed	Summary of Oral Case
	<p>Applicant remains confident that the private rental sector has sufficient capacity to supplement hotel and B&B stock where required.</p> <p>If alternative scenarios arise, such as changes in market behaviour or additional accommodation pressures, these would need to be examined separately based on updated evidence.</p> <p>The Applicant emphasised that the scale of the Proposed Project’s workforce is substantially smaller than that of SZC. The Proposed Project is expected to have a peak workforce of approximately 320 workers for a single day, before dropping to around 80 workers for the majority of the construction period. SZC, by contrast, has a peak workforce of approximately 7,000 workers, supported by dedicated project accommodation.</p> <p>The Applicant confirmed that its assessment already considers peak construction activity cumulatively, including SZC, tourism peaks, and other relevant schemes. The conclusion remains that sufficient capacity exists, with the private rental sector able to act as a flexible buffer if required.</p> <p>The Applicant clarified that hotel price analysis did not form part of the accommodation capacity assessment. The study is based on the availability and quantity of accommodation rather than cost. The Applicant emphasised that the purpose of the assessment is to determine capability to absorb workforce and visitor demand, not to analyse potential market pricing effects.</p> <p>Action Point 101: Respond to requests for there to be monitoring and adaptive management at the post construction phase in terms of tourism impacts, including accommodation availability and demand, and how this could be secured.</p>

15.1 Effects and potential reputational impact on the tourism industry of Suffolk and Kent as a result of the proposed development

Impact on tourism industry, including tourist accommodation	<p>The Applicant confirmed that it continues to engage actively with the relevant authorities and is working closely with the appointed contractor as the project progresses through its next stages.</p> <p>In response to points raised regarding accommodation (including questions on hotel room costs for construction workers) the Applicant explained that matters such as attitudinal surveys, post-consent monitoring, and the potential for adaptive management form part of ongoing and evolving discussions with the local authorities. These mechanisms will be explored collaboratively as monitoring needs become clearer.</p> <p>The Applicant noted that East Suffolk Council (ESC) is commissioning its own studies. Once these are available, the Applicant will take them into account as part of its iterative approach to monitoring and mitigation. The Applicant reiterated that both councils have been informed that the Applicant will be in contact to discuss possible monitoring approaches, although specific expectations from the councils are not yet known. The Applicant emphasised a shared intention to work collaboratively to identify which forms of monitoring would be most useful</p>
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Item discussed	Summary of Oral Case
	<p>and what factors such monitoring should address. As the monitoring strategy develops, adaptive management will be incorporated where appropriate.</p> <p>The Applicant confirmed that, outside the examination process, its two main works contractors have signed up to social value commitments. These include intentions to source subcontractors and suppliers locally wherever feasible, recognising that some highly specialist work packages may necessarily fall outside the local supply chain. The Applicant also confirmed that community engagement events will be held at appropriate project stages to support awareness of local employment and business opportunities.</p> <p>Regarding community benefit, the Applicant reaffirmed its earlier position: although community benefit is not a material consideration in determining the DCO, the Applicant is nonetheless actively considering potential community benefit initiatives. Discussions with local authorities and community stakeholders are ongoing to help identify appropriate local priorities.</p> <p>In response to questions on the potential use of surveys, the Applicant stated that it considers the assessment undertaken to date to be robust. The Applicant recognised that surveys can provide useful insight but also highlighted the methodological challenges associated with them. These include:</p> <ul style="list-style-type: none"> • achieving a representative sample • avoiding leading or biased questions • correctly attributing perceived impacts • identifying an appropriate control area • ensuring that primary data meets a satisfactory standard of robustness <p>The Applicant stressed that ensuring methodological reliability requires substantial effort, and that any future surveys would need to be carefully designed and justified to be meaningful.</p>
Kent and Suffolk Technical Notes	<p>The Applicant referred to the Technical Notes prepared for both Kent and Suffolk, explaining that, based on the findings of those documents, there is limited empirical evidence indicating that the proposals would lead to a reduction in visitor numbers or a consequential decline in economic activity within the affected areas. The Applicant noted that these conclusions are consistent with monitoring undertaken at Hinkley Point, where no material adverse impacts on visitor numbers were identified; indeed, the observed data suggested the possibility of increased activity rather than a downturn.</p> <p>The Applicant reiterated that its own assessment aligns with these findings: there is limited evidence to suggest that visitor numbers would fall as a result of the project. The Applicant emphasised that the conclusion does not rely solely on the survey that was undertaken. Instead, the survey formed only one element of a wider evidence</p>

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	<p>base, which included multiple sources of information used to ensure that conclusions were drawn from a balanced, proportionate, and robust assessment.</p>
<p>15.3 Skills and Employment Plan and labour market effect</p>	
<p>Skills and Employment</p>	<p>The Applicant confirmed that it has not committed to preparing a dedicated skills or employment plan within the DCO. The Applicant explained that this approach reflects both the scale of the project and the nature of the anticipated construction workforce, which is relatively modest, equivalent to approximately 86 full-time equivalent (FTE) roles per annum at peak, reducing to around 67 FTE roles per annum thereafter. On this basis, the assessment concludes that no likely significant effects arise in relation to construction employment.</p> <p>Given this scale, the Applicant stated that it does not consider a DCO-secured skills plan to be the most efficient mechanism. Instead, the Applicant believes there is greater value in supporting wider regional-level initiatives outside the DCO process. Such initiatives could focus on:</p> <ul style="list-style-type: none"> • understanding regional labour and skills needs • identifying where project activity might support broader labour-market objectives • working with appropriate partners to align interventions with existing local and regional skills programmes <p>The Applicant emphasised that these wider regional interventions are likely to be more proportionate and more beneficial given the nature and scale of the development.</p> <p>Reflecting on these points, the Applicant agreed that regional-level approaches could inform how any skills- or employment-related support is shaped and committed to giving this further consideration as part of ongoing dialogue with relevant stakeholders.</p> <p>Action Point 104: Outline the worst-case level of rental accommodation levels that may be required for workers in Suffolk and Kent for Sea Link, considering the cumulative number of other development workers that may also require accommodation.</p> <p>Action Point 105: Provide a skills and employment plan, which shall include a local education/training strategy, or provide a timetable for its submission.</p>

16. Applicant's Summary of Case on Item 16.0: Health and wellbeing

Table 16.1 The Applicant's Summary of Oral Submissions on Item 16.0: Health and wellbeing

Item discussed	Summary of Oral Case
16.1 Core working hours, in relation to effects on traffic, health and wellbeing, and noise	
Core working hours	<p>The Applicant explained that the challenge in removing or altering the core working hours lies in the time required to obtain the necessary approvals, particularly given the need for scheduling flexibility in light of constraints associated with other major infrastructure projects. The Applicant advised that imposing more restrictive hours would likely have a detrimental effect on the construction programme, which such flexibility is intended to avoid. The Applicant reiterated that it has already committed to restricting HGV movements and piling activities at weekends, but that the core working hours, as applied on other National Grid projects, remain necessary to meet the programme and operational demands.</p> <p>In response to concerns raised regarding bank holidays, particularly given their importance to the UK tourism sector, the Applicant explained that this issue had been considered as part of the last round of questions. The Applicant noted the proximity of the works to Network Rail assets, including existing constraints and possession periods in Kent and considerations around Benhall Bridge in Suffolk. For this reason, the Applicant did not explicitly exclude bank holiday working.</p> <p>The Applicant clarified that there is no intention to routinely work on bank holidays, but that retaining flexibility is required.</p> <p>When asked whether bank holiday working could be subject to agreement with relevant parties, the Applicant confirmed that it would take this point away and provide a further response.</p> <p>Action Point 106: Applicant to confirm whether bank holiday working could be by agreement with the local planning authority rather than permitted within set hours (as currently included in the dDCO). This is given that the applicant has suggested that bank holiday working would be unlikely and it is also</p>

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possible that necessary works on bank holidays could be programmed in advance with local authority agreement.

17. Applicant's Summary of Case on Item 20.0: Cumulative effects

Table 17.1 The Applicant's Summary of Oral Submissions on Item 20.0: Cumulative effects

Item discussed	Summary of Oral Case
Theme	
20.1 Intra and inter-project cumulative effects	<p>The Applicant confirmed that it is currently reviewing information published as part of National Grid Ventures' (NGV) LionLink statutory consultation. Environmental Impact Assessment (EIA) topic leads are examining the material to identify whether any updates are required for Sea Link documents, including in relation to in-combination effects for the Habitats Regulations Assessment (HRA). Given the volume of information, the Applicant advised that outputs are likely to be provided at Deadline 5, with a confirmation of timescales and intentions to be provided at Deadline 4.</p> <p>On cumulative visualisations, the Applicant confirmed that cumulative representative viewpoint visualisations showing both the Sea Link and LionLink converter stations are being prepared and will be submitted at Deadline 4.</p> <p>The Applicant also confirmed that, in response to points raised regarding LionLink consultation documents referring to the expansion of bays at the substation, the Applicant stated that it will review the information available and confirm the extent of visual material that has been published.</p> <p>Action Point 107: Update relevant Sea Link cumulative and in-combination assessments based on the new information released for LionLink, including but not limited to the Environmental Statement, Habitats Regulations, Marine Conservation Zone and WFD assessments.</p> <p>Action Point 108: Note confirming timescales for producing the updated cumulative assessments referred to in the previous action point.</p>
Categorising the significance of effects	<p>Responding to points raised by Thanet District Council (TDC) on committed developments the Applicant confirmed that, in parallel with the ongoing consideration of LionLink, it is 'casting the net' again for the cumulative assessment search area, identifying projects within a 20km study area. This includes reviewing scoping reports, Environmental Statements, and any other available information. The Applicant noted that while a</p>

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number of emerging developments have limited information available at this stage, where information exists, it will be included. A technical note will be prepared to supplement the cumulative information already submitted.

Turning to the question of determining whether significant combined effects should be described as moderate or major, the Applicant stated that a structured exercise had since been undertaken involving a workshop with topic leads to re-consider the intra-project cumulative assessment. This included consideration of individual properties within 300m of the works. This assessment, supported by GIS analysis, identified no residential property that would experience a significant intra-project cumulative impact.

It was emphasised that this exercise does not replace the original assessment but adds clarity. If significant cumulative effects were to arise, they would be more likely to fall at the moderate end of the significant spectrum, rather than major.

The Applicant then explained that community-level effects have also been considered conceptually. While individual properties were reviewed, the EIA does not typically consider individual private interests. At a community scale, any effect would likely be capped by the highest effect experienced by an individual residential property receptor, as community-level assessment represents an amalgamation, not an additive combination of effects. The Applicant confirmed that it stands by the conclusions of the submitted assessment.

The Applicant further reiterated that the assessment of intra-project cumulative effects necessarily involves professional judgement across multiple disciplines. While the Applicant does not expect major cumulative effects, it acknowledged that the current assessment cannot entirely rule out the potential for significant effects, due to the inherent complexity of combining professional judgements across topics.

In response to a query about how the Secretary of State (SoS) should interpret cumulative effects in the absence of quantification, the Applicant stated that the SoS should treat these effects as potentially significant. The Applicant clarified that it would not describe these effects as “major”, but rather as significant, but if a level of significance were to be ascribed, it would be more likely to fall within the “moderate” range. Clarification was also given to indicate that this does not reflect any lack of robustness in the assessment, but rather the absence of clear guidance on how to combine effects from different environmental disciplines. Different projects take different approaches, and the Applicant’s method represents a reasoned synthesis of professional judgements.

The Applicant committed to taking this point away to explore whether greater certainty can be provided regarding the magnitude of significant cumulative effects.

Action Point 109: Cumulative visualisations to be prepared using information now available for LionLink. This will include the LionLink converter station. Provide clarification as to whether this will include the

Item discussed	Summary of Oral Case
	<p>additional bays to Friston substation required for LionLink as set out in their statutory consultation documentation.</p>
Precautionary principle	<p>The Applicant responded to the points raised by other parties, noting that it will review the implications of the assessment in light of the observations and emphasised that the key issue is understanding how different effects interact. As a result, the Applicant considered that applying the precautionary principle would not represent the correct approach in this context. The Applicant clarified that it does not and would not adopt a mathematical method for combining effects. Instead, any such assessment is based on a collective professional judgement drawn from a multidisciplinary team.</p>
Inter/intra effects	<p>The Applicant confirmed that it will provide written responses to these matters offering the following clarifications:</p> <ul style="list-style-type: none"> • Noting ongoing confusion between inter project and intra project cumulative effects, the Applicant outlined the distinction and explained that professional judgements are combined in different ways depending on the type of cumulative effect under consideration, with an example of tourism effects not being an intra project cumulative matter, but rather a quantifiable impact in its own right. • The Applicant reiterated that it is not lacking evidence. The assessment follows a robust process, but quantification is not always technically or methodologically appropriate when combining, for example, landscape and noise effects. The Applicant’s ongoing work continues to indicate that, where significant effects may occur, they are more likely to fall within the “moderate” range, and this position will be explained further in the Deadline 4 submission. • The Applicant emphasised the need to distinguish between environmental impact and harm. The Environmental Statement submitted identifies potential significant environmental impacts but does not necessarily ascribe levels of harm. <p>Action Point 110: Update list of committed developments in inter-project cumulative assessments and provide supporting note to assessment approach.</p> <p>Action Point 111: Provide further justification for the applicant’s approach to quantification of magnitude/degree of significance of effects in cumulative (intra-project) assessments and how the various effects interact with each other.</p>
Other projects	<p>The Applicant addressed queries regarding Helios, noting that the Helios website does not include plans, and while the Applicant has attended meetings with the promoter it cannot release information that has not been publicly disclosed by Helios itself. The Applicant added that knowing the direction of AC cable routes alone is</p>

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	<p>insufficient for assessment purposes; meaningful assessment would require information such as traffic figures and detailed construction parameters.</p> <p>The Applicant further noted that, in the Judicial Review findings for EA1N and EA2, Justice Lang concluded that insufficient information was available regarding Nautilus and EuroLink (now LionLink) to factor them into assessment. The Applicant stated that the same position applies here, given the current absence of necessary detail.</p> <p>The Applicant noted that updated information for LionLink has become available late in the process, but confirmed that now that the material is available, it is being given due and timely consideration.</p>
REAC commitments	<p>In response to points raised by ESC regarding potential REAC commitments, the Applicant confirmed that it will take these comments away for further consideration, explaining that, as part of its evolving approach to mitigation (in the context of intra-project cumulative effects) it has already identified additional measures, including the role of the Applicant's own transport coordinators engaging with counterparts on other relevant projects. The Applicant understands that such coordination is already occurring between Sizewell C (SZC) and Scottish Power Renewables (SPR) projects and confirmed that it would seek to collaborate with these teams where appropriate.</p> <p>The Applicant noted that any refinement of REAC commitments, particularly in terms of wording or formalisation, would require further engagement with EDF and SPR through the Statements of Common Ground (SoCG) process. The Applicant committed to reviewing ESC's latest submissions, including their responses to written questions, to determine whether further measures could be appropriately secured.</p> <p>The Applicant acknowledged that certain aspects of the intra-project cumulative effects relate to topics such as traffic and transport and landscape and visual impacts and stated that it would consider whether additional mitigation could be applied to lessen those effects where feasible.</p>
Future cabling at Pegwell Bay	<p>Regarding future cabling at Pegwell Bay the Applicant confirmed that there are currently no National Grid Electricity Transmission (NGET) plans for further cables at Pegwell Bay.</p> <p>The Applicant explained that within the Coordination Document, several possible routing scenarios have been presented to illustrate how infrastructure could be arranged in the future.</p> <p>The Applicant confirmed that it is in active discussions with LionLink but emphasised that it cannot seek Compulsory Acquisition (CA) powers for equipment belonging to another developer, as each project is a separate undertaking. However, the Applicant continues to engage constructively with LionLink to discuss route options, impacts, and wider coordination opportunities.</p> <p>The Applicant reiterated that the submitted application is legally robust and policy compliant, and that there is no inadequacy in the Environmental Impact Assessment (EIA). The Applicant noted that the evolution of issues</p>

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raised throughout the examination is entirely expected and confirmed that it will respond to each point raised through the appropriate examination channels.

The Applicant highlighted its commitment around inter-project cumulative effects, highlighting the key design principles, for coordination of a shared masterplan in Suffolk to support effective integration and cumulative understanding across relevant developments.

The Applicant also outlined the breadth of its coordination activities, noting that it is:

- in close and ongoing coordination with SPR on landscape masterplanning, and associated design matters;
- actively engaged with LionLink, including attending joint consultation events;
- regularly meeting with SZC and Helios, as well as Suffolk and Essex Water, as part of a wider co-ordination group.

These activities form part of the Applicant's broader approach to project-to-project collaboration, ensuring that relevant inter project relationships, particularly around Friston and the wider area, are fully understood and managed.

18. Applicant's Summary of Case on Item 21.0: The draft Development Consent Order

Table 18.1 The Applicant's Summary of Oral Submissions on Item 21.0: The draft Development Consent Order

Item discussed	Summary of Oral Case
<p>21.1 Article 10 – The effect that article 10 would have with respect to the interface with existing consents, such as the Scottish Power Renewables (SPR) East Anglia 1 and East Anglia 2 DCOs and future consents, such as LionLink. How the relevant planning authorities would see articles 10 and 56 operating in practice including, for example, the discharge of requirements.</p>	<p>In response to the ExA's request to be taken through Articles 10 and 56 and how they would operate in practice, the Applicant provided the following explanation.</p> <p>The applicant explained the purpose and practical operation of the proposed article is designed to address legal risks arising from the <i>Hillside</i> judgment, which dealt with the compatibility of two planning consents, noting that although the article provides a legal mechanism, the intention is that it should not need to be relied upon in practice, because the Applicant is proactively engaging with Scottish Power Renewables (SPR) and LionLink to avoid physical incompatibilities between schemes. This liaison is intended to prevent conflicts and ensure compatibility, such that Article 10 need not be relied upon.</p> <p>Adding further clarification, Article 10 protects the Sea Link DCO from being rendered legally unimplementable if another planning permission is granted and built out within the Order limits. Following the <i>Hillside</i> decision, a later permission, if physically incompatible with an earlier one, can invalidate the earlier consent. The article therefore ensures that, after the extensive DCO examination process, the Sea Link consent cannot be undermined by subsequent development that would otherwise create an inconsistency in law.</p> <p>The Applicant then summarised Article 56, explaining that it presents a safeguarding mechanism modelled on precedents from other major infrastructure projects (e.g. Crossrail, Thames Tideway and Bramford to Twinstead) whereby once the Proposed Project is built out, any planning application within its red-line boundary must be referred by the local planning authority to the Applicant, who can then advise on matters such as safety and engineering considerations. While the LPA may take this into account the obligation goes no further than enabling informed decision-making.</p> <p>Recognising that there are multiple projects in this area, the Applicant further emphasised the necessity of these protections to avoid the risk of the Proposed Project becoming incapable of delivery and the combination of</p>

Item discussed	Summary of Oral Case
	<p>Articles 10 and 56 together act as important safeguarding mechanisms, allowing development to be built as consented and local decision-making to remain fully informed.-making remains fully informed.</p>
<p>Can the applicant confirm that, because this project is brought into the 2008 Act via a section 35 direction, it is excluded from Article 10(1)(a) but could fall within Article 10(1)(b), and clarify the implications of that interpretation for how Article 10(1) operates?</p>	<p>Responding to the ExA’s query following discussion with the parties present regarding Article 10(1) and its practical operation, the Applicant explained that the purpose of Article 10(1) is to address circumstances in which an undertaker delivering an NSIP-scale scheme may seek to obtain a Town and Country Planning Act (TCPA) planning permission for certain elements of the scheme (e.g. for programme reasons – example of Twinstead substation on the Bramford-Twinstead DCO scheme). The Applicant noted that where development is carried out pursuant to a separate TCPA permission, Article 10(1) ensures that such development does not put the Applicant in breach of its DCO.</p> <p>In addition, the Applicant clarified that references sometimes made to NSIP or section 35 terminology relate to the wider statutory framework for development of national significance, and that Article 10(1) reflects the need to ensure consistency within that framework. The Applicant noted that SPR’s DCOs do not include an equivalent provision due to the timing of the <i>Hillside</i> decision and confirmed that this is something it will consider further when preparing its response. Furthermore, the Applicant agreed to discuss suitable wording for Article 10 that all parties can be comfortable with.</p> <p>Action Point 114: Consider and provide a response to the position that SPR do not have an equivalent to article 10 in their DCOs.</p> <p>Action Point 115: All parties (applicant and councils) to meet/liaise to agree suitable wording of article 10 which all parties are content with, with an update on progress and any agreement submitted.</p>
<p>Points raised on Article 10, raised by London Gateway Port</p>	<p>Responding to further points on Article 10, raised by London Gateway Port (LGP), the Applicant explained that the issues raised return to a consistent underlying point: any future development or change must go through the appropriate regulatory process, and it is not within the Applicant’s gift to alter or circumvent that process. If LPAs consider that a planning application or modification should not be approved, they would refuse it.</p> <p>On matters related to Article 10, the Applicant confirmed that it is liaising with the relevant authorities and would welcome any proposed drafting changes being provided as early as possible, in order to support preparation of material for Deadline 4.</p> <p>The Applicant explained that these processes necessarily involve the local planning authority, as that authority would be responsible for determining applications in the future that may be inconsistent with the Sea Link DCO. Engagement on these matters is therefore occurring outside the hearing as well, given the number of intersecting regulatory considerations.</p>

Item discussed	Summary of Oral Case
<p>21.2 Article 11(2), article 14(4), article 15(2) and (5)(b), article 17(1)(b), article 20(3) and (4), article 22(5), article 50(2) and article 55(1) with respect to the words “unreasonably withheld or delayed” and the 35-day decision period</p>	<p>Action Point 116: All parties (including NGV, SPR and Manston airport) from onshore of offshore existing or potential future consent to comment on article 10.</p> <p>Responding to views expressed by the LPAs, the Applicant acknowledged that, in their decision on the Bramford-Twinstead project, the Secretary of State (SoS) found similar provisions to be unacceptable but noted that in the decision taken on the Yorkshire Green project, the SoS reached a different conclusion, accepting the relevant drafting approach. The Applicant emphasised that these decisions demonstrate that the SoS may take different views depending on the context, evidence and justification presented.</p> <p>Addressing the point raised regarding the volume of applications LPAs may need to determine, the Applicant noted that Planning Performance Agreements (PPAs) are already in place to ensure that LPAs have sufficient resources. The Applicant recognised, however, the wider resource pressures faced by councils and that the Applicant is committed to ensuring sufficient resource for LPAs for the Sea Link project.</p> <p>The Applicant explained that the rationale for including a deeming provision relates, in part, to avoiding unreasonable delay. The Applicant does not expect applications submitted under the DCO to be unexpected or procedurally complex; accordingly, there may be instances where an application can be lawfully determined within days rather than the standard proposed statutory period of five weeks, subject to proper planning judgement. For this reason, the Applicant considered the inclusion of the proposed drafting to be justified.</p> <p>The Applicant clarified that the deeming provision does not operate automatically. The drafting in the DCO provides that a formal notice must be issued to the determining authority to remind them of the relevant timescale and provide a final opportunity for determination. This includes built-in protections for the authority. The Applicant indicated that, in practice, the appropriate period—currently proposed as 35 days — is justified by reference to programme requirements, including the Government’s target to deliver critical infrastructure by 2030. The Applicant also noted that, where necessary, agreement could be reached with the determining authority to extend the period in circumstances where additional time is reasonably required.</p> <p>The Applicant further highlighted that the provision allowing for derogation beyond 35 days has precedent across a number of DCOs.</p> <p>Building on this, the Applicant explained that the deeming provision does not override circumstances where consent may be unreasonably withheld. The Applicant acknowledged that East Suffolk Council (ESC) had expressed a preference for no deeming provision at all but noted that deeming mechanisms are not unusual and indeed appear widely within the Town and Country Planning Act (TCPA) regime, for example in relation to telecommunications masts and agricultural buildings. The policy rationale is the same: where proposals are appropriate and policy-compliant, unnecessary delay should be avoided.</p>

Item discussed	Summary of Oral Case
	<p>In responding to the points raised by Suffolk County Council (SCC), the Applicant reiterated that the purpose of the proposed mechanisms is to avoid unnecessary delay in the consenting process. The Applicant explained that, where a consent is unreasonably withheld, and no deeming provision exists, the Applicant would remain reliant on the standard appeal process, which itself could introduce significant delays. The Applicant therefore considered the inclusion of a deeming mechanism to be an important safeguard, as it provides a degree of influence on ensuring that a Council does not place the Applicant in a position where it is forced into an appeal simply to maintain programme certainty.</p> <p>Action Point 117: Applicant to respond to councils’ DL3 submissions regarding the 35-day decision period at DL4.</p> <p>Action Point 119: Confirm which documents are submitted in outline and set out details of the relevant planning authorities and consultees (such as the EA) in a table within the explanatory memorandum.</p>
<p>21.3 Schedule 3 Requirement 6 and the submission and approval of plans.</p>	<p>The Applicant confirmed that the table requested by the ExA to show which authority will discharge each management plan will be provided at Deadline 4. The Applicant explained that it has been considering how best to provide certainty without inadvertently identifying the wrong authority on the face of the Order. For this reason, the Applicant intends to include the table within the Explanatory Memorandum, while retaining the terms such as “relevant planning authority” and “discharging authority” within the drafting of the DCO itself to preserve flexibility and accuracy (particularly in light of prospective changes arising from local government reorganisation proposals).</p> <p>Turning to Outline Management Plans, the Applicant noted that Requirement 6 sets out which management plans must be in accordance with an outline version and which do not yet have outline versions. The Applicant clarified that only a small number of plans currently lack outline forms and confirmed that further information on the position of these documents would be provided at Deadline 4. Final versions of these documents will be provided for approval post consent.</p> <p>Responding to points raised by the Environment Agency and LPAs regarding discharge of requirements, the Applicant referred to precedent from the Bramford to Twinstead DCO. Whilst clarifying that the circumstances in that project were different, the draft DCO sought to certify certain management plans as final versions, but it was concluded throughout the examination that the documents did not contain sufficient detail to justify their certification as final documents and that further approvals would still be required. As a result, the documents were instead treated as outline plans, followed by a later approval process. The Bramford to Twinstead DCO Requirement 4 (Management Plans) requires that final versions of management plans are submitted for approval and that these plans should be ‘substantially in accordance with’ the outline plans. The Sea Link draft DCO starts from the position that was imposed by the Secretary of State on the Bramford to Twinstead DCO, using the</p>

Item discussed	Summary of Oral Case
	<p>wording in the made Bramford to Twinstead Order. There was no suggestion in the Bramford to Twinstead Examination that the outline plans submitted by National Grid were insufficient as outline plans, or that the wording ‘substantially in accordance with’ was unacceptable; instead the debate was whether the plans were sufficient to be final plans without further approvals post consent. The Sea Link DCO is therefore consistent with the approach recommended by the Examining Authority on Bramford to Twinstead and the wording in the made Order. The outline plans for Sea Link are sufficiently detailed; generally providing a similar or greater level of detail than was provided in the Bramford to Twinstead project.</p> <p>The Applicant noted that drainage strategies have already been submitted, and it is now considering to what extent these could be certified as outline plans within the DCO. For materials and waste, the Applicant confirmed that it will take these points away for further review and refinement.</p> <p>Addressing further matters, the Applicant explained the use of the term “substantially in accordance” in the context of the two-stage discharging authority mechanism, noting that this approach allows for the appropriate exercise of planning discretion by the discharging authority. The Applicant confirmed that it will take away the question of why “substantially” has been used, noting that the answer is linked to the rationale for the two-stage approach, and will provide further clarification in writing.</p> <p>Action Point 121: Consider whether there is need for the word ‘substantially’ in accordance with, for requirements.</p>
Article 51	<p>Responding to questions on Article 51 and its interaction with the REAC, the Applicant explained that Article 51 provides the overarching general power in relation to felling and lopping of trees, shrub, shrubberies, hedgerows or important hedgerows, while Commitment 05 of the REAC, which relates specifically to ancient and veteran trees, acts as a control mechanism that “plugs into” and constrains the exercise of that broader power. The Applicant emphasised that this layered approach ensures both flexibility and appropriate environmental protection.</p> <p>In relation to Commitment A02 (Dangerous Trees) of the REAC, the Applicant clarified that a tree survey has been undertaken, including an assessment of the condition of relevant ancient and veteran trees and the nearby trees located close to the proposed construction access route. While the Applicant does not currently deem any such trees to be dangerous, it acknowledged that the status of trees must continue to be monitored.</p> <p>The Applicant confirmed that requirement 8 provides for submission of the Arboricultural Method Statement which will determine whether there are any trees that need to be removed or pruned, and that this will be subject to approval by the relevant planning authority. In response to queries regarding tree species, the Applicant noted that the majority of ancient and veteran trees in the localised area are oak, with one horse chestnut located adjacent to the River Fromus.</p>

Item discussed	Summary of Oral Case
	<p>The Applicant confirmed that it has no concerns with the points raised by the ExA regarding how commitments A02 and A05 work together and is willing to refine the wording accordingly.</p> <p>Action Point 122: Applicant to strengthen wording of requirements 5 and 6 to ensure that the dDCO requirements explicitly cover both the operational and maintenance periods.</p> <p>Action Point 123: Applicant to develop wording in consultation with the local authorities in relation to Article 51 and REAC provisions A02 and A05 to provide certainty that retention of ancient and veteran trees is robustly controlled.</p>
Noise design parameter	<p>The Applicant confirmed that it will take this matter away for further consideration by the relevant technical specialist.</p> <p>Action Point 124: Consider whether a specific noise design parameter is required in relation to the converter and substation sites, equivalent to requirement 12 of the EA1 North DCO.</p>
Cumulative noise controls	<p>The Applicant confirmed that it will take this matter away for further consideration by the relevant technical specialist.</p>

19. Applicant's Summary of Case on Item 10.0: Design

Table 19.1 The Applicant's Summary of Oral Submissions on Item 10.0: Design

Item discussed	Summary of Oral Case
10.1 Adequacy of design controls including in relation to converter stations, substations, pylons, lighting	
Level of detail	<p>The Applicant confirmed that on the level of detail provided within the design and environmental information, it considers the level of detail is appropriate and proportionate for this stage of the DCO process, highlighting that National Policy Statement EN 1 (paragraph 4.7.6) and National Policy Statement EN-5 (paragraph 2.4.3) are clear that an applicant may have limited control over the physical appearance of electrical infrastructure; which must in the first instance be designed to operate safely and securely. This establishes the limits of what can be controlled by relevant planning authorities or other consultees during detailed design.</p> <p>The Applicant explained that it has invested significant time in design development, including appointing an architect from the outset to assist in understanding which design elements can be influenced and which are inherently constrained by engineering requirements. To assist the Examination, the Applicant displayed a diagram of the converter station layout alongside illustrative layout drawings, explaining the functions of different coloured structures, along with the aspects (e.g. height) that are dictated by the equipment they house and clearance requirements between equipment and roof structures. Aspects such as colour, roofline profile, and architectural treatment can be controlled, however, the electrical equipment externally situated cannot be altered, meaning the Applicant's ability to modify external layouts is inherently limited.</p> <p>The Applicant also directed the ExA to the illustrative visualisations, including the comparison submitted at REP1 296, which show how the converter station could realistically appear based on indicative layouts, and which comply with the Design Principles and Requirement 3 of the draft DCO. The Applicant emphasised that these illustrations showed more accurately what the converter station as proposed would look like, in comparison to the visualisations shown in other parts of the hearing that had shown the maximum parameters over the full limits of deviation. The Applicant explained that the visualisations showing maximum parameters showing a scale of development that was significantly worse than could be developed on the site, presenting a worse than worst case scenario, and should be used only to understand the maximum parameters.</p>

Item discussed	Summary of Oral Case
	<p>In response to a query from TDC regarding the concrete platform and design evolution, the Applicant noted that the Design Approach Document is not a secured document. Rather, it describes the process undertaken to reach the current design and how the design principles may evolve over time. It is therefore not secured in the same way as other certified documents.</p> <p>The Applicant also responded to a query about amending the specificity of wording—'will or may' in the Design Approach Document. The Applicant confirmed that the change in wording was intentional and followed ground investigation and further detailed design work.</p> <p>Action Point 128: Provide updated wording for requirement 3 to reflect the applicant's commitment made to allow relevant planning authorities control over Kent substation layout, design and scale.</p> <p>Action Point 129: Provide response to requests for rewording of requirement 3 to give relevant planning authorities greater control on the design of the converter stations, substations, pylons, River Fromus bridge, lighting etc.</p> <p>Action Point 130: Consider whether future engagement with the independent Design Review Panel can be secured through the dDCO, to include the panel rather than just the chair.</p>
<p>River Fromus Bridge – agreement of height</p>	<p>The Applicant confirmed that it remains in active discussions with the EA regarding the wording of the requirement for the height of the bridge. This is currently being reviewed by the EA's legal team. The Applicant notes and welcomes the EA's suggestion during the hearings that the Applicant submits the wording of the requirement as currently proposed, given the time taken for the EA's legal team to review, with conversations to continue in the background between the two parties.</p> <p>Action Point 126: Provide wording for securing the River Fromus bridge design as a requirement in the dDCO.</p>
<p>Design of pylons</p>	<p>The Applicant explained that two different pylon design options were considered in Kent, focusing on both the number of pylons required and their visual appearance. As part of this assessment, the Applicant confirmed that it would not introduce T-pylons into an existing line of lattice-pylons as this would be inappropriate in design and landscape terms. The preferred approach is to utilise a taller pylon design, resulting in fewer pylons overall, reduces the engineering impact on the floodplain, and maintains sufficient height over the railway.</p>
<p>Lighting</p>	<p>The Applicant explained that detailed lighting specifications for the converter station and substation compounds are not yet available at this stage but would be driven by the security and safety requirements of the electrical infrastructure. However, the Applicant referred to the relevant design principles, which include a commitment that lighting will be designed and managed to avoid light spill beyond the site boundary and to minimise effects on the surrounding environment (Design Principle N.4). The Applicant also confirmed that there are controls over both</p>

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	<p>construction and operational lighting as far as is required to mitigate environmental impacts in the Register of Environmental Actions and Commitments (commitments H04, B26, B38, B39 and B58) and the Code of Construction Practice (commitment GG21).</p>
<p>Coordination with other projects</p>	<p>A question was raised regarding whether there is an intention to create a coherent visual identity across the project's infrastructure in Suffolk and Kent. The Applicant confirmed that there is no overarching requirement for a unified architectural identity. Instead, the design approach has been informed by site-specific considerations. The architectural and landscape teams have visited each location and developed treatments that respond to local environmental context, ensuring that each asset integrates appropriately within its surroundings rather than following a standardised aesthetic.</p> <p>The Applicant explained what is meant by “coordinated” design in the context of Friston (Kiln Lane) Substation under Scenario 2. The Applicant confirmed that there has been extensive and long-standing coordination with SPR over a period of several years. The Applicant explained that the design team developing the detailed design of Friston (Kiln Lane) Substation under the SPR consents is the same team leading on the development of Sea Link, with the same project director and engineering lead for both.</p> <p>The Applicant noted that the principal challenge arises because four separate projects are coming forward over an extended period: East Anglia TWO, East Anglian ONE, Sea Link and LionLink. Despite the staggered timescales, the Applicant confirmed that there is no intention for the design of Friston (Kiln Lane) substation to differ between these consent processes. The same underlying electrical design, layout principles, and architectural approach will apply across all relevant applications.</p> <p>With regard to the level of design detail, the Applicant noted that the information available now for Friston (Kiln Lane) substation significantly exceeds the level of detail that was available when it was consented under the SPR DCOs. That earlier level of detail was considered acceptable for the SPR projects. The detail and certainty provided on the design of Friston (Kiln Lane) substation is greater than was available under the SPR consents and therefore offers a clearer design basis. The Applicant clarified that a substation differs materially from a converter station: the majority of substation infrastructure comprises external electrical equipment, which has limited scope for architectural treatment, and has a maximum height that is not much lower than the substation building. The associated substation buildings sit behind this equipment and play a secondary visual role. Consequently, when referring to “the design” of the substation, this is primarily a reference to the electrical design, which remains identical across the coordinated projects and is not flexible.</p> <p>The Applicant confirmed willingness to adopt the same external cladding approach previously agreed with SPR, reassuring those present that there is no intention to deviate from the appearance already established and consulted upon under the SPR projects.</p>

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<p>LionLink and converter stations – joint design approach, and how would this be secured?</p>	<p>Finally, the Applicant confirmed that the design has been developed in a manner that allows for future modifications without affecting the overall site masterplan, ensuring that the substation layout remains coherent, futureproofed, and capable of accommodating subsequent nationally significant infrastructure within the same overarching framework.</p> <p>Action Point 125: Develop a joint design approach with LionLink to cover above ground works and landscaping and consider how this can be secured to ensure coherent landscape and design vision for the site as a whole.</p> <p>Action Point 127: Provide additional detail regarding the design of Friston sub-station and how that would be secured in the dDCO to reflect the SPR consent and details.</p> <p>The Applicant clarified the intended joint design approach between the various projects interacting at the site of the Suffolk converter station, explaining that the architect leading the Sea Link design also works on the LionLink project. The masterplan presented in the Sea Link application documents has been taken forward and incorporated into the LionLink consultation materials. This allows for a consistent and coordinated approach should Sea Link proceed on its own, while also enabling future integration as subsequent projects, such as LionLink and formerly Nautilus, come forward. The Applicant expressed confidence in this “baton-passing” approach and stated that the design work is compatible across the different project timelines.</p> <p>Responding to further questions on landscape treatment, the Applicant explained that the primary mechanism for securing landscaping is through the Outline Landscape and Ecological Management Plan (oLEMP) and the final Landscape and Ecological Management Plan (LEMP), which will be approved by the relevant planning authority. While the Design Principles document contains some landscaping principles, it is therefore not necessary to duplicate controls by also securing landscaping design through the Design Principles.</p> <p>The Applicant confirmed that close working is taking place with SPR and NGV about the designs in both locations, albeit that the Sea Link DCO cannot impose requirements on LionLink.</p> <p>The Applicant explained that the project is not at detailed design stage. Responding to a comparison to an application under the Town and Country Planning Act regime where a higher level of design detail is typically submitted, the Applicant highlighted how Development Consent Order projects differ, however, there is no intention to construct a generic industrial-style building, and that the illustrative layouts and visualisations within the application documents give a more appropriate indication of the anticipated appearance than the visualisations that depict maximum parameters.</p> <p>The Applicant also confirmed that no temporary or permanent buildings are proposed on the Pegwell Bay hoverport.</p>

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Addressing questions on the substation, the Applicant reiterated that design coordination is essential because elements of the substation design remain subject to separate discharge processes under SPR's consent. The Applicant stated that it does not wish to commit to detailed design features where those details have not yet been formally approved under the existing SPR consent.

The Applicant noted that the appropriate level of detail is already secured through the submitted application documents. For example, considerations around external cladding and roofline treatments can be committed to at this stage, but it would be inappropriate to hard-fix detailed design elements that may need to align with decisions still to be taken under the earlier SPR consent. The Applicant indicated it would give further consideration to how such commitments may be framed, while noting that amending DCOs can be challenging, and therefore any commitments must be carefully drafted.

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