

The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.91 Applicant's Comments on Change Request (CR1) Relevant and Written Representations

Planning Inspectorate Reference: EN20026

**Version: A
February 2026**

nationalgrid

Page intentionally blank

Contents

1.	About this Document	1
1.1	Introduction	1
2.	Applicant's Comments on Selected CR1 Relevant Representations and Written Representations	3
3.	Applicant's Thematic Comments on CR1 Relevant Representations and Written Representations	43
	Table 2.1 Applicant's Response to Relevant Representation and Written Representation of East Suffolk Council [REPA-016]	3
	Table 2.2 Applicant's Response to Relevant Representation and Written Representation of Suffolk County Council [REPA-031]	14
	Table 2.3 Applicant's Response to Relevant Representation and Written Representation of Thanet District Council [REP3A-034]	31
	Table 2.4 Applicant's Response to Relevant Representation and Written Representation of Historic England [REP3A-021]	34
	Table 2.5 Applicant's Response to Relevant Representation and Written Representation of Network Rail Infrastructure Limited [REP3A-029]	36
	Table 2.6 Applicant's Response to Relevant Representation and Written Representation of Ward Hadaway LLP on behalf of Northumbrian Water Limited [REP3A-036]	37
	Table 2.7 Applicant's Response to Relevant Representation and Written Representation of Kent Wildlife Trust [REP3A-002 & REP3A-023]	38
	Table 3.1 Applicant's Response to Relevant Representations and Written Representations that raise Change 1 - Change to access at the former Hoverport, Pegwell Bay, Kent	43
	Table 3.2 Applicant's Response to Relevant Representations and Written Representations that raise Change 2 - Change to works plans at Friston (Kiln Lane) substation, Suffolk	47
	Table 3.3 Applicant's Response to Relevant Representations and Written Representations that raise Change 3 – The Henge, Suffolk	48
	Table 3.4 Applicant's Response to Relevant Representations and Written Representations that raise Change 4 – Benhall Railway Bridge, Suffolk	49

1. About this Document

1.1 Introduction

1.1.1 The Sea Link Project (hereafter referred to as the 'Proposed Project') is a proposal by National Grid Electricity Transmission plc (hereafter referred to as 'National Grid') to reinforce the transmission network in the South East and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as accommodating additional new interconnection with mainland Europe.

Background

1.1.2 On 16 September 2025 [AS-138] the Applicant submitted a Notification Letter to the Examining Authority (ExA) setting out details and background to five proposed changes to the Proposed Project:

1.1.3 **Change 1** - Change to access at the former Hoverport, Pegwell Bay, Kent;

1.1.4 **Change 2** - Change to limits of deviation for Friston (Kiln Lane) substation, Suffolk;

1.1.5 **Change 3** – Change to the Order Limits east of Friston to provide flexibility in relation to heritage feature, Suffolk;

1.1.6 **Change 4** - Benhall Railway Bridge, Suffolk; and

1.1.7 **Change 5** - Increase in area for maintenance of a new hedge to south of B1119.

1.1.8 The ExA's Rule 9 Letter [PD-011] dated 25 September 2025 acknowledged National Grid's intention to submit a request for changes to the application and confirmed that *"The ExA is therefore satisfied that the proposed changes, whether considered individually or taken together, would not be so substantial as to amount to a materially different project from that which was applied for"*.

1.1.9 The Applicant voluntarily carried out a limited non-statutory consultation over a period of 31 days commencing on 7 October 2025 and closing at 23:59 on 7 November 2025. The targeted consultation included local authorities, prescribed consultees, persons with an interest in the land affected by the proposed changes (Section 42(1) (a) to (d) parties and a select group of households. On 26 November 2025 the Applicant submitted the formal **Change Request** including a **Change Request Consultation Report** [CR1-069] that summarises the consultation exercise.

1.1.10 Following consideration, the ExA decided to accept all five of the proposed changes for examination on 5 December 2025 [PD-015] and a Relevant Representations period opened between 9 December 2025 and 19 January 2026 in response to the change request.

Relevant Representations Received

1.1.11 The Applicant has read and reviewed all the Written Representations received in response to the Change Request. A total of 211 Representations were received during the RR period and were published on 23 January 2026. The Applicant has also

reviewed a further 21 Relevant Representations published on the Planning Inspectorate website during January 2026.

Structure of this Document

- 1.1.12 This document is submitted for Deadline 4 of the Examination and provides the Applicant's responses to the representations received in respect of the Change Request. The Applicant has responded to selected RRs as follows:
- Table 2.1: The Applicant's Detailed Responses to the Representations of East Suffolk District Council **[REP3A-016]**;
 - Table 2.2: The Applicant's Detailed Responses to the Representations of Suffolk County Council **[REP3A-031]**;
 - Table 2.3: The Applicant's Detailed Responses to the Representations of Thanet District Council **[REP3A-034]**;
 - Table 2.4: The Applicant's Detailed Responses to the Representations of Historic England **[REP3A-021 and REP3A-022]**;
 - Table 2.5: The Applicant's Detailed Responses to the Representations on behalf of Network Rail Infrastructure Limited **[REP3A-029]**;
 - Table 2.6: The Applicant's Detailed Responses to the Representations submitted on behalf of Northumbrian Water Limited **[REP3A-036]**;
 - Table 2.7: The Applicant's Detailed Responses to the Representations submitted on behalf of Kent Wildlife Trust **[REP3A-023]**.
- 1.1.13 The Applicant has also provided a response to the issues raised in relation to each Change Request as follows:
- Table 3.1: Issued Raised in relation to Change Request 1;
 - Table 3.2: Issued Raised in relation to Change Request 2;
 - Table 3.3: Issued Raised in relation to Change Request 3;
 - Table 3.4: Issued Raised in relation to Change Request 4;
- 1.1.14 No individual representations were submitted in relation to Change Request 5 and, as such, the Applicant has not provided a separate response. The Applicant considers that the substantive issues relevant to Change Request 5 are already addressed within the comments submitted by Suffolk County Council and East Suffolk Council, and the Applicant's detailed responses to those representations therefore serve to address any matters arising.
- 1.1.15 The Applicant has not responded to the Representations of Dover District Council **[REP3A-013]** ('Dover District Council has no comments in relation to National Grid Electricity Transmission's change request') or Great Yarmouth Borough Council **[REP3A-020]** ('*No comments from Great Yarmouth Borough Council Strategic Planning Department*'). Similarly, the Applicant has also not provided a direct response to Representation of UKHSA **[REP3A-035]**: '*We have no additional comments to make at this stage and the additional information supplied does not cause any change to our previous response.*'
- 1.1.16 The Applicant's Responses to the Representations are set out below.

2. Applicant’s Comments on Selected CR1 Relevant Representations and Written Representations

2.1.1 The Tables below comprise the Applicant’s response to selected CR1 Relevant Representations and Written Representations.

Table 2.1 Applicant’s Response to Relevant Representation and Written Representation of East Suffolk Council [REPA-016]

Reference	Topic	Applicant’s Response
Change 1 – Change to access at the former Hoverport, Pegwell Bay, Kent		
2.1	As Change 1 concerns the Kent Onshore Scheme, ESC defers to the Kent Local Planning Authorities.	This is noted by the Applicant.
Change 2 – Change to limits of deviation for Friston (Kiln Lane) substation, Suffolk		
3.1-3.4	<p>ESC has reviewed the documents submitted by the Applicant as part of CR1, including the Change Request Report [CR1-052], which provides a description of, and rationale for, Change 2.</p> <p>ESC notes that the Applicant has adjusted the limits of deviation for the proposed new substation at Friston (Kiln Lane) to align with those consented for the East Anglia ONE (North) (‘EA1N’) and East Anglia TWO (‘EA2’) offshore wind farm projects (‘the SPR Consents’). Appendix B to the Change Request Report [CR1-052] provides a map showing the current and proposed limits of deviation for the substation.</p> <p>ESC understands that the discrepancies between these plans arose due to a decision on whether to construct a Gas Insulated Switchgear (‘GIS’) or Air Insulated Switchgear (‘AIS’) substation (the latter requiring a larger footprint than the former) not having been made at the date of submission of the applications for the SPR Consents. As a result, the SPR Works Plans identified a larger area for the substation in case it was decided to build a larger AIS substation, rather than a GIS substation which has now been selected by National Grid.</p> <p>As part of the detailed design process for the Friston (Kiln Lane) substation under the SPR Consents, the proposed location for the substation is within the works area for the SPR Consents, but not entirely within the limits of deviation shown on the Works Plans for the Sea Link project.</p>	Agreed, this is correct.
3.5 – 3.7	In Section 2.3 of the Change Request Report [CR1-052], the Applicant has	Agreed, this is correct.

Reference	Topic	Applicant's Response
	<p>supported its change request by suggesting that a number of benefits would arise if the limits of deviation shown on the Works Plans for Sea Link and for the SPR Consents were aligned. These include:</p> <ul style="list-style-type: none"> • reducing the complexity of plans for the site to aid interpretation; • providing reassurance to the local community that National Grid does not aim to produce a different design to that being progressed under the SPR Consents; • aiding the development of consistent plans showing, for example, landscaping and drainage around the substation; and • avoiding complications in the unlikely event that SPR begin but do not complete construction at the site. <p>ESC welcomes the fact that the Applicant is attempting to achieve a greater degree of clarity and consistency around the proposals for the substation at Friston, and recognises at least some of the benefits of the change, as outlined above.</p> <p>ESC understands that the change would only provide greater flexibility over the specific location of the substation, with its size remaining as previously proposed.</p>	
3.8	<p>Paragraph 2.3.6 of the Addendum to Volume 6 Environmental Statement [CR1-055] notes that the draft DCO was updated at Deadline 1 [REP1-106] to reduce the maximum height of the proposed substation from 18 m (as assessed in the Environmental Statement ('ES')) to 16 m to align it with the SPR Consents. However, it is stated that 'no change to the height of the proposed Friston (Kiln Lane) Substation, as assessed within the ES (i.e. 18 m), is proposed as part of this change' and so 'the original EIA and this assessment have considered a worst case scenario and in reality the substation will be smaller than as assessed'. ESC has reviewed Table 3.3 of [CR1-055] and on the basis of the above is satisfied that Change 2 would not introduce any new or different significant environmental effects to those reported in the ES.</p>	Comment noted.
3.9	<p>ESC notes the Applicant's statement at Paragraph 2.3.14 of the Change Request Report [CR1-052] that 'the change would make no difference to the drainage proposals for the site' as 'there is sufficient space within the Sea Link Order limits for National Grid to deliver the drainage that is currently being progressed to discharge requirements on the SPR consents and National Grid does not intend to deliver a different approach to drainage on the site as a whole compared to that being discussed with SPR'.</p>	Comment noted.
3.10	<p>During the consultation on the proposed changes carried out by the Applicant prior to submitting the Change Request, ESC queried, in light of concerns raised by the ExA, whether the new Limits of Deviation do in fact align with those shown on the SPR Works Plans. It is noted that the Applicant has addressed this issue in Paragraph 2.3.19 of the Change Request Report [CR1-052]. ESC has undertaken an exercise to compare the Limits of Deviation shown on Drawing No. DCO/S/WK/PS/0402 of the updated Sea Link Works Plans [CR1-007] and those shown on Drawing No. EA2-GEN-DASPR-73 of the East Anglia TWO Works Plans ([REP11-004] of the East</p>	Comment noted.

Reference	Topic	Applicant's Response
	<p>Anglia TWO Examination Library) and is satisfied that there is alignment between the two plans.</p>	
3.11 – 3.12	<p>ESC has reviewed the Addendum to Volume 6 Environmental Statement [CR1-055] submitted as part of CR1. To the extent that environmental topics fall under ESC's remit, ESC is satisfied that Change 2 does not introduce any new or different likely significant environmental effects. ESC defers environmental topics that fall outside its remit to the relevant statutory body (e.g. SCC for Water Environment, Geology and Hydrogeology, Traffic and Transport, and Flood Risk Assessment).</p> <p>In summary, ESC notes Change 2 and agrees that it will provide greater consistency and clarity for all parties. ESC would, however, in this context sound a cautionary note, to stress that the SPR Consents must be taken as the starting point for the Project's proposed embedded mitigation under a Scenario 2 connection, especially given the sensitivity of the location and its very clear impact on local communities.</p>	Comment noted.
Change 3 – Change to the Order Limits east of Friston to provide flexibility in relation to heritage feature, Suffolk		
4.1-4.3	<p>ESC has reviewed the documents submitted by the Applicant as part of CR1, including the Change Request Report [CR1-052], which provides a description of, and rationale for, Change 3.</p> <p>As set out in the 'Notification of Applicant's Intention to Submit Request for Proposed Changes to the Development Consent Order Application' letter [AS-138] dated 16 September 2025 ('the Notification Letter'), the Applicant initially proposed to amend the Order Limits to introduce a 30 m buffer between the amended Order Limits and a potential Neolithic hengiform monument feature recorded during trial trenching completed in July 2025. This would require additional land take to enable the underground cable to be routed around the feature.</p> <p>During the consultation on the proposed changes carried out by the Applicant prior to submitting the Change Request, ESC noted its support for Change 3 in order to ensure that the potential discovered Neolithic henge is avoided.</p>	Comment noted.
4.4	<p>ESC notes that Change 3 has been revised since the publication of the Notification Letter, in light of further geophysical survey of the landscape completed in October 2025. The Addendum to Volume 6 Environmental Statement [CR1-055] submitted as part of CR1 states that the surveys indicated that the possible henge feature was actually 'a D-shaped enclosure rather than a henge', and engagement with Historic England and Suffolk County Council's ('SCC's') Archaeologist concluded that the feature was only of regional, not national, significance, and was not of schedulable quality. ESC welcomes the Applicant's commitment in Paragraph 2.4.10 of the Change Request Report [CR1-052] to undertaking further evaluation trenching to better understand the enclosure and the surrounding archaeology.</p>	Comment noted.
4.5	<p>As a result of these findings, the amended Order Limits now include the area of the enclosure to retain the option to route the cable route and haul road through the enclosure. ESC understands that the Order Limits in this area have been widened in response to requests from heritage stakeholders for the asset to be excavated should the option of routing the cable and haul</p>	The Applicant can confirm that ESC's understanding is correct.

Reference	Topic	Applicant's Response
	road through the enclosure be selected, allowing information about it to be recorded.	
4.6	It was also identified through the geophysical surveys that there are potential archaeological features of interest to the west of the feature, but not to the east. ESC therefore welcomes the Applicant removing the extension of the Order Limits to the west of the enclosure which was initially proposed in the Notification Letter. This means that the only option to avoid the feature would be to re-route the cable to the east of the enclosure, which has been enabled by the extended Order Limits to the east introduced by Change 3. ESC understands that this approach is supported by Historic England and SCC's Archaeologist. Appendix C to the Change Request Report [CR1-052] provides a map showing the current and proposed order limits in the area.	Comment noted.
4.7	ESC noted in response to the consultation on the proposed changes carried out by the Applicant prior to submitting the Change Request that the Applicant needed to assess the potential for Change 3 to introduce any new or materially different significant effects or pathways on topics other than heritage, including ecology and arboriculture, and if required, to secure suitable mitigation. ESC therefore welcomes the submission by the Applicant of an Addendum to Volume 6 Environmental Statement [CR1-055] as part of CR1.	Comment noted.
4.8	To the extent that environmental topics fall under ESC's remit, ESC is satisfied that Change 2 does not introduce any new or different likely significant environmental effects.	It is understood the comment is made in relation to Change 3 (Change to the Order Limits east of Friston to provide flexibility in relation to heritage feature) rather than Change 2 as stated. Comment is noted
4.9	ESC acknowledges that the widening of the Order Limits may require the removal of additional field boundary vegetation compared to that originally identified in the ES. However, given the provisions for hedgerow replacement in the Outline Landscape and Ecological Management Plan (OLEMP), it is understood that the resulting effects will be temporary. Tree and hedgerow protection requirements can be adaptable and are covered by the agreed Arboricultural Impact Assessment provisions. ESC is therefore satisfied that the removal of additional vegetation as a result of Change 3 will not give rise to any new or different likely significant environmental effects.	Comment noted.
4.10	ESC also notes the Applicant's conclusion that Change 3 may result in a small changes to the BNG metric calculation, but agrees that these changes can be addressed in the detailed design BNG assessment.	Comment noted.
4.11	Whilst the Applicant has identified that Change 3 would result in additional human receptors falling within the construction dust study area, ESC agrees with the Applicant's conclusion that this does not change the conclusions of the ES with respect to Air Quality, as the mitigation measures already proposed in the ES chapter are for high-risk sites.	Comment noted.
4.12 – 4.13	ESC notes the Applicant's conclusion that Change 3 may bring construction works closer to some nearby noise sensitive receptors on Snape Road. Notwithstanding the fact that ESC accepts that this should not alter the conclusions of the ES chapter, ESC remains dissatisfied with a number of aspects of the Applicant's approach to assessing and mitigating noise and vibration effects. As a consequence, these concerns equally apply to any effects on noise sensitive receptors on Snape Road. ESC's concerns are set	The Applicant notes these comments. As noted by East Suffolk Council, their comments are not specific to the location of Change 3 but to the Proposed Project generally and have been previously raised in their Application Document Local impact reports (LIR) from any local authorities [REP1-128] . The Applicant therefore refers to the responses provided in Application Document 9.35.2: Applicant's Comments on Local Impact Report from East Suffolk Council [REP2-027] .

Reference	Topic	Applicant's Response
	<p>out in Section 7.4 of its Local Impact Report ('LIR') [REP1-128] and are not repeated here, but the ExA will note that they include the proposed overall working hours, a lack of detail provided with respect to mitigation, reliance on 7 temporal restrictions, and the Applicant's proposed approach to the use of s.61 Control of Pollution Act applications.</p> <p>ESC defers environmental topics that fall outside its remit to the relevant statutory body (e.g. SCC for Water Environment, Geology and Hydrogeology, Traffic and Transport, and Flood Risk Assessment).</p>	
4.14	<p>ESC also requested in response to the consultation on the proposed changes carried out by the Applicant prior to submitting the Change Request that the results of survey work are reported during the course of examination. ESC therefore welcomes the Applicant's submission of a Geophysical Survey Report [CR1-057] and whilst ESC defers comments on this Report to SCC's Archaeological Service and Historic England, ESC would expect the Applicant to submit further survey results for consideration by all parties as investigations progress.</p>	<p>Comment noted.</p> <p>A draft interim report detailing the findings of the evaluation trenching undertaken to examine the area of Chage 3 in Winter 2025/26 was shared with Historic England and SCC in January 2026. The final interim report is being submitted at Deadline 4 (see Application Document 9.114 Sea Link Suffolk Phase 3 Archaeological Evaluation Interim Report submitted at Deadline 4). The final report will be submitted before the end of the examination process.</p>
Change 4 – Benhall Railway Bridge, Suffolk		
5.1	<p>ESC has reviewed the documents submitted by the Applicant as part of CR1, including the Change Request Report [CR1-052], which provides a description of, and rationale for, Change 4.</p>	<p>Comment noted.</p>
5.2	<p>As set out in the Notification Letter [AS-138], the Applicant initially proposed to amend the Order Limits to include Benhall Railway Bridge, land along the highway to the east and west of the bridge between the A12 and Grays Lane/Forge Close, additional land to the east of the B1121, and a small stretch along the railway line. This would have provided the Applicant with three potential options for addressing the weight limit constraints posed by Benhall Railway Bridge, namely:</p> <ul style="list-style-type: none"> • Option 1: Installation of a 'mini-bridge'; • Option 2: Minor works to repair the bridge; or • Option 3: Installation of a semi-permanent overbridge structure. 	<p>Comment noted.</p>
5.3	<p>An outline planning application for the erection of up to 41 dwellings (ESC application reference: DC/21/2503/OUT) was approved on 28 October 2025 on the field to the east of the bridge. During the consultation on the proposed changes carried out by the Applicant prior to submitting the Change Request, ESC advised that it will be for NGET to liaise with the landowner of the site to seek an appropriate solution regarding any proposed use of that land and the timing of doing so in the context of its proposals for Benhall Bridge.</p>	<p>Comment noted.</p>
5.4	<p>ESC notes that the Applicant has engaged with the landowner to determine whether use of the site by NGET would be feasible. ESC understands that the Applicant's CR1 no longer includes this additional land within the amended Order Limits, as the landowner would object to use of this area for a compound due to the potential for this to delay progression of the site for housing. Furthermore, as the site is allocated for housing in the Suffolk Coastal Local Plan, use of the site for a temporary construction compound would have an adverse effect on the delivery of the Council's five-year</p>	<p>Comment noted.</p>

Reference	Topic	Applicant's Response
5.5	<p>housing land supply. As a result, the previously considered Option 3 of installing a semi-permanent overbridge structure has been discounted by the Applicant, as this would require use of that site for a crane to lift the bridge into place. Appendix D to the Change Request Report [CR1-052] provides a map showing the current and proposed order limits in the area.</p> <p>The Applicant states at Paragraph 2.5.14 of the Change Request Report [CR1-052] that 'National Grid was in discussions with East Suffolk Council to understand the position with this application and was similarly commencing discussions with the landowner on a potential land agreement and the status of the application; but East Suffolk Council had been unable to provide National Grid with guidance on the status of the application.' This statement is unfortunately somewhat misleading and, in the circumstances, unhelpful. For clarification, the ExA should note that the actual order of events was that the Applicant contacted ESC's Case Officer for Sea Link on 4 September 2025, seeking information with respect to application DC/21/2503/OUT. ESC's Sea Link Case Officer subsequently sought details from the Case Officer for the application, and informed NGET on 26 September 2025 that 'the application is being prepared for committee determination before the end of the year, and that as an allocated site, it is one that will be recommended favourably'. It follows, therefore, that ESC was, in fact, able to 'provide National Grid with guidance on the status of the application', albeit this was not received by the Applicant prior to its submission of its Notification Letter (noting this was less than two weeks following the Applicant's first enquiry to ESC).</p>	Comment noted.
5.6	<p>It is noted that the Applicant states in Paragraph 2.5.21 of the Change Request Report [CR1-052] that the availability of the adjacent land is not necessary for the delivery of Option 1 (installation of a 'mini-bridge' within the highway boundary), nor Option 2 (minor works to repair the bridge). Nevertheless, the Applicant acknowledges at Paragraph 2.5.6 of the Report that, for Option 1, 'reduced highway closure durations may have been possible if this adjacent land was available, and it would potentially avoid the bridge being transported to and from an off-site location between uses'.</p>	Comment noted.
5.7	<p>ESC considers that had the Applicant proactively sought to address the weight limit constraints of Benhall Railway Bridge as soon as the issue became apparent during the pre-application stage, a solution may have been achievable. Whilst ESC defers to SCC as the Local Highway Authority regarding whether Options 1 and 2 are indeed feasible without the availability of the adjacent land now consented for residential use, ESC is concerned that the Applicant's initial reluctance to address this problem has resulted in a potential increase in anticipated disruption for a community that is already experiencing significant delays and disturbance due to the construction of Sizewell C and other Nationally Significant Infrastructure Projects ('NSIPs') in the District. These are serious concerns which ESC (and SCC as the Local Highway Authority) have both previously raised with the Applicant in project meetings on numerous occasions prior to this Change Request response being submitted and do strike at the potential prematurity of this project.</p>	<p>The Applicant disagrees with this point. The Applicant has always maintained that overcoming a weight limit on a structure during Abnormal Indivisible Load (AIL) deliveries is a business-as-usual activity with detailed planning being required post consent. National Grid moves transformers and other heavy vehicles around the highway network on a regular basis, including regularly replacing transformers at existing substations, an activity that requires no consent. The weight limit on Benhall Bridge is not considered to be a significant or unusual constraint; nor one that requires significant further information at the application stage. The number of vehicles over the weight limit that would need to traverse Benhall Bridge to access the converter station is very low.</p> <p>It should be noted that the condition of the local and national highway networks changes over time, and a survey is required prior to AIL deliveries (post consent) to develop final solutions, including routing of vehicles and any measures necessary to traverse the highway (including measures at structures with weight limits). In this context, it is not necessary or helpful to undertake detailed route assessments at the application stage. Indeed, a lot of the information provided to the Applicant by SCC on the condition of structures on the local highway network has been provided as part of surveys of structures undertaken by Sizewell C, with these surveys appropriately being undertaken post-consent or by SCC as part of their ongoing assessment of their network and structures.</p>

Reference	Topic	Applicant's Response
		<p>The Benhall Bridge dimensions are such that it can be crossed with a mini overbridge, with no need for the bridge to be included in the Order limits to install this overbridge and no need for third party land. In the extremely unlikely event that this solution is not feasible, then an alternative solution could have been sought, such as routing the small number of vehicles over the weight limit via the cable haul road. Again, this option would not have required any changes to the application and could be dealt with post DCO-consent via consents for ALV movements and the final Construction Traffic Management Plan. The application, as originally submitted, would have been possible to construct as proposed.</p> <p>The Applicant has discussed the issue on numerous occasions with ESC and SCC prior to submission of the application, post submission and during the Examination; there has therefore been no reluctance to discuss the issue. As part of these meetings, comments were made by ESC and SCC that the bridge was not in the Order Limits, with this considered to be an issue. Comments were also raised on whether, as an alternative approach, the Applicant could repair the bridge rather than install an overbridge. The Applicant agreed to explore this option because it would deliver additional enhancements to the area by repairing part of the local highway network and remains committed to exploring this as the preferred option provided it is possible to deliver within a reasonable cost and timeframe. In good faith, the Applicant therefore added the Benhall Bridge and the Network Rail land to the Order Limits in order to address comments from ESC and SCC and make it easier to deliver bridge repairs. The Applicant has also undertaken significant additional work to provide reassurance to ESC and SCC that the mini-bridge solution is feasible; going beyond the work that would normally be undertaken at this stage of the project due to the particular concerns raised by the Councils. The Applicant has also been working with Network Rail and SCC to secure the consents necessary to survey the bridge; in order to increase the certainty of works required and increase the likelihood that repairs can be undertaken rather than the other options.</p> <p>The Applicant strongly disagrees that the efforts made to deliver additional benefits as part of the Proposed Project indicates any prematurity with the application. The Applicant also disagrees that there was any reluctance from the Applicant to address the issue; it remains the case that these are business as usual solutions to traversing the Benhall Bridge with further work undertaken to try to reach agreement rather than because the Applicant agreed it was necessary. The Applicant is disappointed with the lack of acknowledgement of the efforts the Applicant has made to address concerns and deliver additional benefits as part of the change request.</p>
5.8	<p>Whilst noting the Applicant's somewhat belated attempts to address what are long-standing and serious concerns of both ESC and SCC regarding the feasibility of the use of Benhall Railway Bridge for access to the converter station site, ESC still remains extremely concerned by the considerable level of disruption and disturbance to the local community which this aspect of the project will inevitably create.</p>	<p>The Applicant disagrees with ESC conclusion that Change 4 would cause a considerable level of disruption and disturbance. No new or different likely significant environmental effects have been identified as a result of Change 4 as described within Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]. This is acknowledged by ESC in paragraph 5.10 of their submission.</p> <p>The closures associated with a mini-bridge would be limited in number and duration, with access to properties maintained.</p> <p>In terms of the bridge repair option, the Benhall Bridge is an existing highway asset, the maintenance of which is the responsibility of the Local Highway Authority, SCC. Should any party, including the local highway authority, wish to repair the asset, the impacts of those activities would be the same as if they were undertaken by the Applicant. Indeed, if the Local Highway Authority does not have funding to repair the bridge, over time further deterioration could result in more significant works being required and more significant road closures required in the future for repairs. The disruption caused by fixing the bridge is therefore not necessarily avoided by the Applicant not undertaking the repairs and indeed could be greater without the Applicant undertaking these works.</p>

Reference	Topic	Applicant's Response
		<p>In addition to providing funding to the local highway network by undertaking repairs, repairing the bridge would also prevent the need for future closures for the installation of mini-bridges for other projects, such as Lionlink, in the long-term reducing the impact on the local highway network.</p> <p>The 'extreme concern' expressed over the solutions offered by the Applicant is somewhat surprising in the above context.</p>
5.9	<p>Furthermore, in light of the above, ESC does question where the Applicant is proposing to site the temporary construction compound now that the adjacent land consented for residential use cannot be included in the revised Order Limits. ESC understands that Option 1 'could be completed entirely within the highway', but Option 2 'would require establishment of a temporary compound' (see Paragraphs 2.5.6 and 2.5.8 of [CR1-052]). Whilst ESC acknowledges that Schedule 1 of the DCO [CR1-027], if made, would permit the Applicant to establish site construction compounds anywhere within the Order Limits, subject to assessment of effects, ESC requests an explanation from the Applicant as to its intentions in this respect and in particular comprehensive details as to where it proposes to site the compound so as to be able to provide ESC with confidence that Option 2 is deliverable in both practical and environmental terms.</p>	<p>The Applicant is confident there is sufficient room in the Order Limits for the compound required and that works have been assessed in the Environmental Statement. The requirements for bridge works can be met by a compound on the Saxmundham Converter Station site, with the impacts of a compound in this area already been assessed.</p> <p>A compound for the mini-bridge option would only be storage of the mini-bridge itself. The environmental impacts associated with this use would be extremely limited, being the storage of a bridge and loading it on vehicles for installation for the small number of closures required. In theory, the mini-bridge could be delivered for each closure and not stored on site at all, but this would mean it would need to be transported further on the network for each occasion so would be inefficient.</p> <p>In terms of repairing the bridge, again, the need for a compound would be very limited both in terms of the duration and nature of works, limited to the storage of equipment and materials.</p> <p>For both options workers could use welfare facilities installed at Saxmundham. Welfare facilities would be present at a compound at the Saxmundham Converter Station site for other works and used by workers at the bridge so would not require additional space.</p> <p>There could also be an option to lease land closer to the bridge should this be beneficial and offers have been made to the Applicant for this. However, these are additional options and would only be explored if the land could be obtained by negotiation and any additional consents sought as far as necessary, given that land would be outside the Order limits.</p>
5.10	<p>ESC has reviewed the Addendum to Volume 6 Environmental Statement [CR1-055] submitted as part of CR1. To the extent that environmental topics fall under ESC's remit, ESC is satisfied, subject to its comments above, that Change 4 should not introduce any new or different likely significant environmental effects.</p>	<p>Comment noted.</p>
5.11	<p>The additional land required for construction activity around Benhall Railway Bridge will potentially lead to some minor self-seeded tree removal. ESC considers that this will only have a very localised impact on visual amenity, but not to any significant extent. ESC is, therefore, satisfied that Change 4 does not give rise to any new or different likely significant visual effects.</p>	<p>Comment noted.</p>
5.12	<p>ESC agrees with the Applicant that both Option 1 and Option 2 would not affect the setting of the nearest listed building (Grade II listed Benhall Cottage) due to the distance between them, the intervening vegetation, and the scope of the works.</p>	<p>Comment noted.</p>
5.13	<p>ESC also notes the Applicant's conclusion that Change 4 may result in a small changes to the BNG metric calculation, but agrees that these changes can be addressed in the detailed design BNG assessment.</p>	<p>Comment noted.</p>

Reference	Topic	Applicant's Response
5.14	As noted for Change 3, whilst the Applicant has identified that Change 4 would result in additional human receptors falling within the construction dust study area, ESC agrees with the Applicant's conclusion that this does not change the conclusions of the ES with respect to Air Quality, as the mitigation measures already proposed in the ES chapter are for high-risk sites.	Comment noted.
5.15	ESC acknowledges the Applicant's conclusion that Change 4 may bring construction works closer to some nearby noise sensitive receptors on Shotts Meadow to the northeast and Whitearch Park Residential Park Homes to the south. In this context, as noted for Change 3, ESC remains dissatisfied with a number of aspects of the Applicant's approach to assessing and mitigating noise and vibration effects, as set out in Section 7.4 of its LIR [REP1-128]. These concerns apply equally to any effects on noise sensitive receptors on Shotts Meadow and Whitearch Park Residential Park. ESC requires further detail with respect to the Applicant's proposed mitigation before it can be confident that the works can be properly controlled so as to avoid significant adverse effects on these receptors.	<p>The 'construction' works required at Benhall Bridge would be very limited, confined to works to install and then remove a mini-bridge in the highway or the impacts associated with the Applicant repairing part of the local highway network. In either case the works themselves would largely be within the existing highway at a point where the highway crosses the railway line. In this context, the works would not be nearer to Whitearch Park Residential Park than the existing highway is.</p> <p>With regards specifically for noise, please see response to 4.12 – 4.13 above.</p>
5.16	It is noted that the proposed works will, if approved, require temporary closures of the B1121 and the Applicant acknowledges that there is the potential for new severance impacts between residents and community facilities, businesses, and open spaces. ESC defers to SCC, as the Local Highway Authority, with regards to the Traffic and Transport assessment, but will expect any adverse impacts to be minimised and mitigated, particularly given the widespread disruption already facing the local community as a result of other NSIPs in the area.	<p>Further to the above, if Option 1 (mini-bridge) is adopted, then this will be planned to be implemented at weekends in order to minimise disruption. If Option 2 (repair the bridge) is adopted, then this will be implemented early in the programme (late 2026, or in 2027), reducing the likelihood of this overlapping with the peak construction phases of EA2 (early 2026), EA1N (2028), Sizewell (2028/2029) and LionLink (2029/2030). The works at Benhall Bridge (both options) will also be scheduled to avoid periods when main construction traffic movements associated with the Proposed Project are required. HGVs associated with the Proposed Project will not be diverted through Saxmundham. Lastly, it is reiterated that the temporary closure of the Benhall Railway bridge and associated diversion of Baseline traffic would only be in place for a short-term limited duration of either 45 days (Option 1) or 28 days (Option 2) to minimise any impacts. Local access will be retained meaning that not all Future Baseline traffic flows will be redistributed, which is how traffic impacts were assessed for robustness. Therefore, the Applicant maintains that the Benhall Bridge works are unlikely to alter the Proposed Project's interactions with other developments and that no further cumulative assessment work is required in this regard.</p> <p>The Applicant is engaged with SCC Highways in order agree measures within Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041] to further minimise any potential impacts during the Benhall Bridge works.</p>
5.17	ESC defers environmental topics that fall outside its remit to the relevant statutory body (e.g. SCC for Water Environment, Geology and Hydrogeology, Traffic and Transport, and Flood Risk Assessment).	Comment noted
5.18	Subject to the concerns expressed above, should Option 2 be deemed feasible in terms of practicability and environmental assessment by the Applicant and relevant stakeholders, including SCC as the Local Highway Authority, ESC acknowledges that this option would provide a permanent solution for access to the co-located converter station during the construction and operation of any future consented projects.	Comment noted.
Change 5 – Increase in area for maintenance of a new hedge to south of B1119		
6.1 to 6.2	ESC has reviewed the documents submitted by the Applicant as part of CR1, including the Change Request Report [CR1-052], which provides a description of, and rationale for, Change 5. 6.2 ESC understands that the Applicant has widened the strip of land south of the B1119 to provide the necessary space to maintain the existing concrete drain that lies adjacent and	Comment noted.

Reference	Topic	Applicant's Response
	parallel to the road, and to enable National Grid to maintain the planting if not maintained by the landowners. Appendix E to the Change Request Report [CR1-052] provides a map showing the current and proposed order limits in the area.	
6.3	ESC welcomes this change being made in response to engagement with the landowner and recognition of the concerns raised regarding the potential for the drain to become blocked and the road to become flooded if it was not possible for the ditch to be maintained from the field to the south.	Comment noted.
6.4	As set out in Paragraph 6.3.8.9 of ESC's Local Impact Report [REP1-128], ESC had hoped that this change would also address its concerns about the size of the Order Limits to the north of the converter station site and whether they were of a sufficient size and extent capable of accommodating the necessary mitigation planting along the B1119 required to screen views of the converter station from the north/northeast. The ExA should be aware that ESC is proposing wholesale revisions to the B1119 and Fristonmoor Lane planting such that it incorporates more than just hedgerows but includes multi-species tree belts to achieve genuinely effective screening. However, Change 5 would instead only achieve improved maintenance access for the hedgerow and ditch. In light of this, ESC considers this change to be a missed opportunity and, in its response to the consultation on the proposed changes carried out by the Applicant prior to submitting the Change Request, asked the Applicant to increase the Order Limits south of the B1119 to accommodate this additional planting. ESC is disappointed that the Applicant has not acted upon this feedback – which raises serious concerns as to the practical effectiveness of the landscaping now proposed.	Cross sections were prepared in response to WQ1 1LVIA8 (Application Document 9.73 Applicant's Responses to First Written Question [REP3-069]), which illustrated the widening of the Order Limits along part of the B1119 for improved maintenance of the drainage ditch and hedgerow/tree planting. Whilst the Applicant considers that the existing proposals of the hedgerow and hedgerow tree planting remain proportionate and appropriate, the Applicant recognises the concerns identified by ESC and consequently is committed to provide an enhanced belt of planting where there is land available within the widened Order Limits, subject to limitations around existing services and final areas required for maintenance of planting and the drainage ditch along the southern edge of the B1119. This will provide an enhanced belt of planting within the existing context of the layered vegetation network in the surrounding landscape. Figures 1, 2 and 3 within the Suffolk oLEMP have been updated to reflect this enhanced belt of planting (see Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan – Suffolk submitted at Deadline 4).
6.5	Although the Sea Link project is a Nationally Significant Infrastructure Project, the detrimental and adverse impacts are focussed on and felt by the local communities forced to host or live with the Project if consented. It is absolutely critical that adequate landscape mitigation planting is provided so as to reduce the very clear and obvious landscape visual impacts that will be created by the project. Such planting should be a mix of native tree and shrub species to create a multi-tiered tree belt, ideally at least 10m wide. Tree and shrub 12 species should reflect local landscape character and growing conditions. The B1119 sits at an elevated location when looking south and east across the proposed co-located converter station site on land east of Saxmundham. The new development will be both very visible and intrusive and this location demands comprehensive landscaping. ESC fails to understand why the Applicant has refused to provide the screening landscaping which is patently required.	The importance of 'good design' and the mitigation hierarchy have been inherent in the iterative process of design and assessment throughout the pre-application process. For responses to requests for additional planting refer to Application Document 9.90 Applicant's Response to January Hearing Actions Points submitted at Deadline 4 and enhanced planting provision along the B1119 as referred to in point 6.4 above.
6.6	ESC has reviewed the Addendum to Volume 6 Environmental Statement [CR1-055] submitted as part of CR1. To the extent that environmental topics fall under ESC's remit, ESC is satisfied that Change 5 does not introduce any new or different likely significant environmental effects.	Comment noted.
6.7	The revised Order Limits include additional land from Redhouse Christmas Tree Farm in Sternfield, and any Christmas trees planted within the revised Order Limits will be removed as necessary to facilitate maintenance of the hedgerow and ditch along the B1119. It follows, therefore, that there will inevitably be a potentially adverse impact on the current business, specifically	The Applicant notes concerns raised with regards to Change 5 in Application Document 9.76.3 (B) Change Request Consultation Report [CR1-069] . Considering the limited extent of land required, together with the minor scale and infrequent nature of the works at Redhouse Christmas Tree Farm, the Applicant considers that the business would have sufficient capacity to accommodate this impact without resulting in a significant adverse effect. The Applicant will liaise with the business owner in order to minimise impacts on the business.

Reference	Topic	Applicant's Response
	<p>impacts on the planted Christmas tree stock. ESC understands from the Consultation Report [CR1-069] that the business owner has raised concerns, and so ESC considers that the views of the business owner should be considered in determining whether or not Change 5 would result in any new or different likely significant effects on the business compared to those set out in the submitted DCO application.</p>	<p>It should be noted that ESC is simultaneously requesting the Order limits to be widened along the B1119 to accommodate additional planting and a permanent Public Right of Way (see paragraph 6.4 above); which would require compulsory acquisition of additional land or higher classes of rights and affect adjacent landowners; whilst arguing that the impacts of the widening as a result of Change 5 on a business (Christmas Tree Farm) should be considered for a field further along the B1119. The Applicant has taken a careful and proportionate approach to environmental mitigation and enhancement in the context of a project where the majority of land is being acquired compulsorily, with careful consideration of the impact on existing land uses. In this case, the strip of land is considered necessary to deliver the landscape planting along the B1119 and maintain the existing ditch. The existing ditch needs to be maintained both to ensure adequate drainage of the Christmas Tree Farm field and of the highway; an issue highlighted to the Applicant by the landowner of the Redhouse Christmas Tree Farm. The Applicant has not sought to impose a higher class of rights or widen the strip further than is necessary.</p>
6.8 -6.9	<p>ESC also notes the Applicant's conclusion that Change 5 may result in a small changes to the BNG metric calculation, but agrees that these changes can be addressed in the detailed design BNG assessment.</p> <p>ESC defers environmental topics that fall outside its remit to the relevant statutory body (e.g. SCC for Water Environment, Geology and Hydrogeology, Traffic and Transport, and Flood Risk Assessment).</p>	Comment noted.
Conclusion		
7.1	<p>ESC has reviewed the Applicant's CR1 (comprising documents [CR1-001] to [CR1-068]). Subject to the comments made above, ESC is satisfied, to the extent that environmental topics fall under ESC's remit, that CR1 should not give rise to any new or different likely significant environmental effects compared to those reported in the ES.</p>	Comment noted
7.2	<p>In particular, however, ESC remains dissatisfied with a number of aspects of the Applicant's approach to assessing and mitigating noise and vibration effects, as set out in Section 7.4 of its LIR [REP1-128]. The Applicant notes in the Addendum to Volume 6 Environmental Statement [CR1-055] submitted as part of CR1 that new or different likely significant adverse effects are not predicted as a result of CR1, 'particularly with the implementation of best practicable means'. This is not a satisfactory response and ESC continues to request actual detail as to what the Applicant proposes in terms of "best practicable means" mitigation which is a term too often used as a means to avoid the provision of practical detail. Without this information ESC cannot be confident that the proposed works can be controlled so as to avoid significant adverse effects.</p>	Refer to detail responses above to the points raised in this conclusions section.
7.3	<p>In addition, ESC wishes to reiterate its concerns regarding the disruption that the Applicant's options to address the weight limit constraints of Benhall Railway Bridge would cause for the local community. ESC considers this disruption could have been meaningfully reduced had the Applicant sought to address the issue at an earlier stage and, for the reasons stated above, is not satisfied with the position as currently presented by the Applicant.</p>	
7.4	<p>Finally, ESC is extremely disappointed that the Applicant has failed to use the opportunity presented by Change 5 to extend and enhance its landscape planting along the B1119 to increase the Order Limits south of the B1119 to accommodate multi-species tree belts along the B1119 and Fristonmoor Lane planting to achieve genuinely effective screening</p>	

Table 2.2 Applicant’s Response to Relevant Representation and Written Representation of Suffolk County Council [REPA-031]

Reference	Topic	Applicant’s Response
3	Change 2 – Changes to Limits of Deviation at Kiln Lane (Friston) Substation	
3.1	The applicant has proposed an extension of the limits of deviation for Work 1B (the consented Kiln Lane substation in Friston) to align with the area which was presented for the same substation under consented the East Anglia One North and Two DCOs. The change includes an amendment to Work 4 (Suffolk temporary work compounds) to reflect the change to the substation area.	No response required.
General Comments		
3.2	The Council generally welcomes the alignment of Kiln Lane substation under this application through Scenario 2 with that which was consented under the SPR EA1N and EA2 DCOs. Alignment of the Limits of Deviation of the substation with SPR’s reduces confusion and uncertainty amongst communities over competing consents for the same piece of infrastructure.	No response required.
3.3	Aligning the Limits of Deviation should also facilitate a more effective approach towards landscape mitigation of the substation as SPR’s proposals can now be more easily be incorporated into the Applicant’s proposals. The Council reserves further comment on this matter once the Applicant’s proposals are put forth.	
3.4	However, the environmental implications of the change such as in terms of landscape and vegetation must be adequately considered as detailed below.	
Landscape and Visual		
3.5	The Council has concerns that the final location of the substation at Friston could result in additional vegetation loss, by affecting H558S* as well as H557S* (Sheet 04 of Tree Protection Plan [CR1-064] and queries why both hedges are currently shown as fully removed.	As detailed within paragraph 6.1.3 b in Application Document 6.10 Arboricultural Impact Assessment [REP-294] . “Tree loss is assessed as a reasonable worst case (Rochdale Envelope) (excluding the retention of all veteran and ancient trees and those other trees which are specifically identified to be retained on the Tree Protection Plans in Appendices E and F) to allow flexibility in the final alignment of the Proposed Project within the Limits of Deviation and Order Limits as relevant.” Paragraph 6.3.1 goes on to state “Where practicable the detailed design will be further developed to avoid or minimise impacts to trees. The final level of arboricultural impacts will be assessed and recorded as part of an Arboricultural Method Statement which will be secured via DCO Schedule 3 Requirement 8 (Application Document 3.1).” (see Application Document 3.1(F) Draft Development Consent Order [REP3-006]).
3.6	Any additional vegetation loss will need to be documented and mitigated or compensated as required.	As detailed within Application Document 3.1(F) Draft Development Consent Order [REP3-006] , Schedule 3, Requirement 8 details the requirement for an Arboricultural Method Statement detailing the final extent of tree loss, which must be approved by relevant planning authorities in advance of the commencement of any stage of the authorised development. Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk submitted at Deadline 4 outlines mitigation measures in relation to vegetation loss.
3.7	The impacts of the degree of flexibility and subsequent uncertainty on mitigation planting required as part of the delivery of other projects in this location (SPR substation) need to be fully documented and assessed.	The revised lateral Limits of Deviation (LoD) at Kiln Lane substation ensures that the co-ordinated landscape mitigation of the Friston substations can be realised. This is reflected in Figure D-1 of Appendix D submitted in response to 1LVIA15 (Application Document 9.73.1 Applicant’s Responses to First Written Questions – Appendices [REP3-070]). This reflects the Kiln Lane substation within the revised lateral LoD and demonstrates

Reference	Topic	Applicant's Response
		that the Proposed Project does not materially affect the landscape mitigation in either the SPR consents or their submitted landscape masterplan. Figure D-1 has been updated to reflect the potential additional interaction of Lion Link and is presented in Application Document 9.90 Applicant's Response to January Hearing Action Points CAH1 ISH2 - Deadline 4 , submitted at Deadline 4. In addition, the Applicant has updated Figure 5 of Application Document 7.5.7.1 (B) Outline Landscape and Ecological Management Plan – Suffolk submitted at Deadline 4. Further details are also provided with respect to AP50 within Application Document 9.90 Applicant's Response to January Hearing Action Points also submitted at Deadline 4.
Lead Local Flood Authority		
3.8	The LLFA does not object to the proposed change.	Comment noted.
4	Change 3 – Minor Change to the Order Limits South East of Friston, Suffolk	
4.1	The Applicant has proposed to adjust the proposed Order Limits along the route of the new underground cable to the southeast of Friston to provide additional flexibility for the route to minimise the impact on archaeological assets.	No response required.
Archaeology		
4.2	At Friston, a significant monument has been defined during archaeological evaluation works. Although initially thought to be a Neolithic Hengiform monument of national significance and therefore of Schedulable quality, requiring a change in the Order Limits in this area to achieve preservation in situ, following the completion of additional geophysical survey work, the interpretation of this monument has now changed. It is believed, based upon the form and finds evidence from the evaluation, to be a later Bronze Age D-shaped enclosure. Although still a significant monument, following advice from Historic England it is no longer believed that this would meet the criteria for scheduling and therefore SCCAS would not continue to advise the need to avoid this monument entirely to achieve preservation in situ and mitigation through excavation would now be acceptable.	Comment noted.
4.3	However, given the potential to contain settlement evidence and other remains, SCCAS would advise that a partial excavation of just the central portion of this feature would not be appropriate or in line with best practice and this monument would therefore need to be subject to a programme of enhanced mitigation to enable it to be mitigated in full if not going to be completely avoided by the route. The original Order Limits (prior to Change 3) would not allow for this meaning an expansion of the Order Limits is necessary to facilitate full excavation of the enclosure and any associated internal and external remains. This would, however, only need to be a localised expansion. The proposed change would also allow for both options to be retained should the final routeing be decided post-consent. SCCAS, therefore, does not object to the expansion of the Order Limits in line with the areas proposed in Change 3.	Comment noted.
4.4	SCCAS are pleased that geophysical survey and trial trenched evaluation has now been completed for these new areas (the additional geophysical survey report has now been submitted and SCCAS are happy to approve	The Applicant notes the response from Suffolk County Council.

Reference	Topic	Applicant's Response
	<p>this document, and although the additional trial trenched evaluation report is pending, SCCAS have monitored the results of this work in person in the field). Although some additional archaeological remains have been defined in this new area to the east of the D-shaped enclosure and mitigation through excavation will be required in this section of the cable corridor, there is a suitable alternative route which would avoid the enclosure entirely and not impact upon any archaeological remains of national significance.</p>	<p>As an update, the draft interim report detailing the findings of the evaluation trenching undertaken to examine the area of CR3 in Winter 2025/26 was shared with Historic England in January 2026. The final interim report is provided within Application Document 9.114 Interim Phase 3 Archaeological Report – Suffolk submitted at Deadline 4, and the final report will be submitted before the end of the examination process.</p> <p>The interim report concludes that no archaeological remains of national significance have been identified in the area covered by Change 3 of CR1 as depicted in Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055].</p> <p>An updated Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be submitted before the end of examination, and this will incorporate updates and comments from stakeholders including Historic England. This will include an option for Preservation <i>in situ</i> as well as full excavation.</p> <p>An updated to Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be submitted before the end of examination, and this will incorporate relevant updates associated with this change and take account comments from stakeholders including Suffolk County Council.</p>
Landscape and Visual		
4.5	<p>The Council notes that the change is likely to result in additional loss of field boundary hedgerows, as is indicated on Sheet 05 of the Tree Protection Plan [CR1064]. SCC welcomes that the existing trees along Snape Road are shown as being retained (this is also referred to in Table 3.6 Review of other Volume 6 assessment conclusions as a result of Change 3, [CR1-055]). However, SCC is concerned that this may need to be revised, once visibility splay requirements are being considered, and seeks reassurance that these trees can in fact be retained. Any additional vegetation losses will need to be documented and mitigated.</p>	<p>Application Document 6.10 Arboricultural Impact Assessment [APP-294 and APP-295] and Application Document 9.76.5.9 Change Request Appendix I Tree Protection Plans Suffolk Onshore Scheme [CR1-064] detail the likely reasonable worst case (Rochdale Envelope) extent of tree loss from the Proposed Project. However, the final extent of tree loss will be confirmed at the detailed design stage and the Applicant will seek to further reduce and/or avoid tree related impacts where possible. The final extent of tree loss will be detailed within the Arboricultural Method Statement which is to be provided under Requirement 8 within Schedule 3 of the Application Document 3.1 (F) draft Development Consent Order [REP3-006] and this document will require approval from the relevant planning authority prior to the commencement of the authorised development.</p>
Public Health		
4.6	<p><i>Air Quality</i></p> <p>SCC acknowledges the Applicant's conclusion that the proposed change to the Order Limits does not alter the outcome of the construction dust assessment, given that the mitigation measures identified in the Environmental Statement are already based on a high-risk scenario. However, noting that the revised Order Limits may result in works being closer to human receptors, SCC expects that dust levels will be actively monitored in accordance with the relevant management and monitoring plans, including [AS-129]. Where monitoring identifies dust levels approaching or exceeding relevant benchmarks or legal targets, effective and timely mitigation measures should be implemented to minimise potential impacts on nearby receptors.</p>	<p>The Applicant can confirm that monitoring of dust levels and any necessary mitigation will be undertaken in accordance with Application Document 7.5.6.1 (C) Outline Air Quality Management Plan – Suffolk [REP3-052].</p>
4.7	<p><i>Noise and Vibration</i></p> <p>SCC notes the Applicant's position that, whilst the proposed change may bring construction works closer to some noise sensitive receptors on Snape Road, significant adverse effects are not anticipated due to separation distances and the application of best practicable means.</p>	<p>The Applicant can confirm that noise and vibration monitoring and mitigation will be undertaken in accordance with Application Document 7.5.8.1 (B) Outline Construction Noise and Vibration Management Plan – Suffolk [AS-131].</p>

Reference	Topic	Applicant's Response
4.8	<p>Nevertheless, given the potential for works to be located closer to residential receptors depending on final siting within the proposed order limits, SCC expects that noise and vibration effects will be monitored in accordance with the commitments set out in [AS-109] and [AS131]. Appropriate mitigation should be implemented where monitoring indicates exceedances of thresholds or where impacts are greater than predicted, to ensure the protection of residential amenity and health.</p> <p><i>Health and Wellbeing</i></p> <p>SCC considers Applicant's conclusion that there would be no new or different likely significant effects on health and wellbeing would benefit from further explanation. Whilst the Applicant describes the change as being of a "minor nature", the extension of the Order Limits has the effect of bringing construction activities closer to additional human receptors. From a public health perspective, this warrants clearer consideration of potential pathways to health effects, including exposure to construction noise, vibration, dust, and associated stress or disturbance. SCC therefore recommends that the Applicant set out how health and wellbeing considerations have been reviewed in light of the revised receptor distances, including confirmation that existing mitigation and monitoring measures remain sufficient to protect health, and that appropriate mechanisms are in place to respond to any unanticipated effects during construction.</p>	<p>The Applicant acknowledges SCC's comment regarding the revised Order Limits being adjacent to new human receptors not previously assessed within the ES, and further explanation of how health and wellbeing considerations have been reviewed is provided below.</p> <p>The health and wellbeing assessment adopts a structured, evidence-led approach in accordance with IEMA Guide to Effective Scoping of Human Health in EIA (IEMA, 2022) and IEMA Guide to Determining Significance For Human Health In Environmental Impact Assessment (IEMA, 2022)., drawing on information from relevant technical chapters, including landscape and visual, noise and vibration, air quality, traffic and transport, and socio-economics. The health and wellbeing study area is based on the extent and characteristics of the Proposed Project and the communities directly and indirectly affected, with impacts beyond this area also captured through reliance on the findings of the above supporting technical chapters, each of which applies an appropriate topic-specific study area. As such, newly affected receptors within the revised Order Limits are appropriately captured.</p> <p>Accordingly, the health and wellbeing assessment considers a wide range of health determinants which are relevant to mental health, quality of life and amenity (for example changes in landscape and visual amenity, noise, and access to infrastructure and open space) as well as physical health (for example associated with air pollution and access to healthcare facilities). The amended Order Limits do not introduce new or different likely significant environmental effects compared to those reported in the ES, with no new impact pathways relevant to health and wellbeing introduced.</p> <p>Specifically, it is understood that air quality and noise impacts would remain within expected limits, with existing mitigation measures secured through the DCO, including best practicable means for noise and dust control measures for high-risk dust-generating activities, considered sufficient. In addition, the landscape and visual assessment concludes that no new or different likely significant effects would arise, and therefore no new effects on amenity relevant to health and wellbeing would be introduced. In relation to access, the temporary closure of PRoW E-137/026/0 has been assessed and is not expected to give rise to significant adverse effects on health and wellbeing. Mitigation secured through the updated Outline Public Rights of Way Management Plan (Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-047]) would maintain access to the wider PRoW network via alternative routes, supporting continued opportunities for physical activity, mental wellbeing and community connectivity.</p> <p>The existing mitigation is secured through the DCO, and includes but is not limited to, Application Document 9.83 outline Code of Construction Practice [REP3-076], Application Document - 7.5.3 (B) Outline Onshore Construction Environmental Management Plan [AS-127], Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk [CR1-041], Application Document 7.5.8.1 (B) Outline Construction Noise and Vibration Management Plan – Suffolk [AS-131], Application Document 7.5.6.1 (C) Outline Air Quality Management Plan - Suffolk [REP3-052], and Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-079]. These measures are designed to control construction impacts, manage disturbance, maintain access, and minimise effects on the environment and local communities. The mitigation framework is adaptive and implemented proportionately in locations where revised Order Limits introduce new receptors. This existing mitigation measures, as set out in the respective ES chapters, have been reviewed in light of the revised Order Limits and is considered to be appropriate, including for newly</p>

Reference	Topic	Applicant's Response
		affected receptors and vulnerable groups (such as children, the elderly, and individuals with pre-existing health conditions).
		Overall, considering the absence of new or materially different impact pathways, the nature of the proposed change, and the mitigation secured through the DCO, there would be no new or different likely significant environmental effects on health and wellbeing arising as a result of the proposed change.
5	Change 4 – Benhall Railway Bridge	
5.1	The Applicant has proposed to extend the order limits to include land along the B1121, including the Benhall Railway Bridge and a small area along the railway line, into the Order Limits. The change is proposed to provide certainty on the consenting route for works to allow the transport of Abnormal Indivisible Loads (AILs) over the bridge and enable works to undertake repairs should this be the best solution.	No response required.
General Comments		
<i>Lack of adequate exploration of alternatives</i>		
5.2	The Council continues to have concerns regarding the feasibility and acceptability of using the B1121 and the Benhall Railway Bridge as an access route for construction traffic (in particularly Abnormal Indivisible Loads (AIL) movements). If an acceptable solution cannot be identified, the Applicant will be unable to construct the project. The Council has discussed this issue with Applicant on many occasions and urged them to consider further changes to the project, in addition to or as alternatives to Change 4, including potentially increasing the order limits elsewhere to accommodate an alternative access route, if the preferred route via the B1121 is not deliverable. Such alternative routes could utilise, in part, the Sizewell Link Road to provide access to the converter station site from the north (instead of via the B1121 from the south).	<p>The Applicant has extensively considered alternative accesses and discussed these on numerous occasions with SCC. The Applicant would suggest that the issue in this case is not that the Applicant has not considered alternatives, but that SCC would prefer an alternative access to be used. This is a valid position for SCC to take, just as it is a valid position for the Applicant to have incorporated the selected access in the project, but it does not suggest that the Applicant's exploration of alternatives has been inadequate.</p> <p>The Applicant considers that the Proposed Project is deliverable as proposed, and that AIL movements can be accommodated and that, if required, overbridging is an adequate and feasible solution. The Applicant refers to Application Document 9.112 Benhall Railway Bridge - Crossing Feasibility Study submitted at Deadline 4 which provides further detail to address the comments raised by SCC and other interested parties over the use of the Benhall Railway Bridge. The need for an AIL vehicles to navigate a bridge with a weight limit is not unusual and there is no aspect of the Benhall Bridge that suggests business as usual solutions cannot be incorporated to traverse the bridge.</p>
5.3	The Council understands that the Applicant is considering two options regarding utilising the Benhall Railway Bridge, acknowledging it has a weight limit of 46 tonnes. These options consist of the temporary installation of a mini-bridge for each AIL movement (Option 1) and the repair of the existing bridge (Option 2).	The Applicant does not consider it likely that a new bridge is required or that it would be proportional for this to be included in the Sea Link project in the extremely unlikely event that it was necessary.
5.4	The option of constructing a new bridge should also be explored by the Applicant and provision should be considered in the revision of the Order Limits to allow for this option should it be required. It is possible that constructing a new bridge may be more feasible than repairing the existing bridge and a more resilient solution than temporary overbridging when considering the need of Lion Link and any future projects requiring access to the converter station site. The Council recommended that the Applicant consider and explore this option during pre-examination engagement as additional land to the north would likely be needed to implement this solution.	
<i>Lack of detail on proposed options including feasibility and associated impacts</i>		
5.5	The Council cannot comment at this stage on the feasibility of any options for bridge repair or replacement on account of a lack of detail.	See the Application Document 9.112 Benhall Railway Bridge - Crossing Feasibility Study submitted at Deadline 4.

Reference	Topic	Applicant's Response
	<p>Likewise, the Council considers that the potential adverse impacts of both options have not been satisfactorily assessed.</p> <p>The Council requires further detail of the options sought by the Applicant to demonstrate their feasibility and show that vehicular access to Whitearch Residential Park won't be affected. This detail is also needed to validate the Applicant's assessment and claims in [CR1-055] that no likely significant effects will occur as a result of the change.</p>	<p>A full assessment of likely significant effects that could result from the two bridge options is provided within Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]. The assessment is in line with that provided for the rest of the Proposed Project and proportionate to the changes introduced.</p> <p>The Applicant met with Whitearch Residential Park several weeks ago to assure them that they will have access to their park, and emergency vehicles will be able to access their park at all times during the works on the bridge. This commitment is also now included in Application Document 7.5.1.1 (C) Outline Construction Traffic Management and Travel Plan – Suffolk submitted at Deadline 4.</p>
5.6		
5.7	<p>The Council has particular concern around the potential impacts on residents of Whitearch Residential Park in terms of connectivity for pedestrians and the associated health and wellbeing impacts, potential impacts from noise and vibration and a lack of detail on how the taxi/shuttle service will be implemented including its frequency and whether users will have to incur any cost. Further detail on these concerns is given in this section.</p>	<p>The Applicant acknowledges SCC's comments regarding the potential impacts on connectivity and access which may affect health and wellbeing. A full response has been provided against these concerns against Reference 5.43 to 5.52.</p>
5.8	<p>There is concern around the removal from the Order Limits of the additional parcel of land to the east of the bridge between the notification of the Applicant's intention to submit the change request [AS-138] and the subsequent submission (as detailed in [CR1-052]). Paragraph 2.1.40 of [AS-138] states that Option 2 requires a nearby construction compound and that the additional land is included "to enable consideration of this option". Therefore, the Applicant's position in [AS138] appears to be that the additional land is required for Option 2 to be implemented. Paragraph 2.1.38 also states that additional land would reduce adverse effects arising from Option 1.</p>	<p>Option 2 comprised 'minor works to repair the bridge'. The Applicant looked to include the option for bridge repairs on the understanding that this was SCC's preferred solution, but had only begun to consider the works required in a preliminary way when the change notification was submitted. The Applicant's preferred solution had previously been the installation of a mini-bridge and this remains a viable solution. Following further consideration of the works likely to be required for a bridge repair it was confirmed that a compound was not necessary for these works given that the road would need to be closed (whilst maintaining access to all properties) while works were undertaken, providing space for working within the highway. It is also noteworthy that there will be a compound very close by at Saxmundham converter station, which if need be can be used for welfare facilities for staff working at the bridge. There is also the option of obtaining land voluntarily near the bridge should this option be preferred. Given the numerous options for a compound, it was not considered necessary or proportional to seek compulsory acquisition powers over the adjacent land for this purpose; particularly once that land was no longer necessary for retention of the semi-permanent bridge option and in the context of a consented housing project on the site.</p>
5.9	<p>However, paragraph 2.5.21 of [CR1-052] states that additional land is not necessary for the delivery of Option 2. No further detail is given explaining why this is the case nor how Option 2 would be delivered without the additional land. Without these details, the Council cannot be assured that the works needed to deliver Option 2 will be feasible within the Order Limits even if the bridge were in a state where repair is possible.</p>	
5.10	<p>The Applicant should, therefore, explain why the additional land was previously required to consider and deliver Option 2, and why it is now not considered necessary by detailing how the works could be undertaken without additional land. To be clear, SCC did not request for the additional land to be included in the Order Limits; rather, the Council merely raised concern about whether the Applicant could deliver repairs, reconstruction or temporary overbridging within the limits of the public highway.</p>	
5.11	<p>The Council considers that, out of the two options, Option 2 should be preferred on account of its comparative benefits in terms of delivering highway improvements and long term resilience for access to the site which would avoid the need for future repeated closures. The Council</p>	<p>This is noted by the Applicant. The Applicant has incorporated text to indicate this is the preferred solution into the Construction Travel Plan and Traffic Management Plan</p>

Reference	Topic	Applicant's Response
	holds this position with the caveat that the extent of works needed to repair the bridge is not yet known and any residual impacts of these works must be considered.	
5.12	The benefits of Option 2 are recognised by the Applicant in paragraph 2.1.39 of [AS138]. Moreover, paragraph 6.2.49 of the coordination document [APP-363] details the potential for coordination over site access between Sea Link and Lion Link due to the benefits of both schemes using the same access route in terms of minimising adverse environmental impacts.	This is noted by the Applicant The Applicant cannot provide a commitment regarding which option is most suitable until the planned survey is carried out. The specifics of this survey are being discussed with both SCC and Network Rail, and the outcome of the survey will determine the final option with regards to Benhall Railway Bridge.
5.13	As recognised by the Applicant, delivering Option 2 is subject to the extent of the works required and the potential impacts on the railway line below the bridge. However, it is not clear that, were these hurdles to be overcome and agreement with SCC and National Rail reached, there will be a preference for Option 2 to be delivered. The Applicant should, therefore, commit to Option 2 as the preferred option unless overriding considerations related to feasibility, impacts on the railway line and other residual impacts dictate otherwise.	
5.14	There should be provision to avoid the possibility of the scenario where the works are feasible and agreement between relevant stakeholders is/would be reached to implement Option 2 but Option 1 is nevertheless implemented. The Council considers the cited benefits and lower long-term reduction in required closures of the bridge, minimising adverse traffic and transport impacts for this access route, to warrant such a provision. Otherwise, the number of closures from Option 1, which requires a longer overall duration of closure than Option 2 from Sea Link alone, would effectively double due to the need for Lion Link to also transport AILs over Benhall Bridge. Similar concerns exist over other future projects connecting to Kiln Lane substation requiring their own AIL movements in addition to any additional AIL movements required during the operational phase of Sea Link.	
	<i>Archaeology</i>	
5.15	SCCAS has no objection to the proposed changes to the order limits, however any new scheme areas will need to subject to a programme of archaeological assessment, in this instance trial trenched evaluation, followed by mitigation as appropriate, prior to any pre-commencement or construction works.	As noted within Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055] , both of the bridge options will not require ground disturbance and therefore there is no likelihood of buried heritage assets being impacted and further mitigation measures are unnecessary.
	<i>Ecology</i>	
5.16	The Council has concerns regarding the proposed change due to the potential impacts on bats, birds and badgers that could result from any works from the additional land included within the order limits.	Comment is noted. The Applicant understands this is primarily regarding any scrub removal alongside the railway line below the existing bridge. Table 3.7 of Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055] identifies that scrub on the rail embankment is suitable for badgers, and this will require further survey prior to works commencing. The Applicant notes that it could be suitable for other wildlife but overall, the assessment within the ES remains unchanged since all likely affected receptors are already identified as a receptor in the ES chapter, and no further mitigation is considered necessary at this stage until further surveys have been undertaken, and the precise details of the works to the bridge and any need for rail embankment access are confirmed. It should be noted there may be no need for railway embankment access or vegetation removal and any vegetation on the embankment removed for construction would be reinstated post-construction.

Reference	Topic	Applicant's Response
5.17	It is essential that new areas of habitat which will be impacted by the works are assessed for bird, bat and badger interest and appropriate mitigation measures drafted. The vegetation on either side of the railway line has high potential to be used as a migration/foraging corridor and this needs to be fully assessed, even if the bridge has low potential to be used as a bat roost.	See above comment in response to 5.16.
5.18	The proposed works should also be assessed in terms of their potential impacts on the nearby Benhall Green Meadows County Wildlife Site, which is designated for its marsh grassland habitat.	No connecting impact pathway has been identified between the works comprised in Change 4 and Benhall Green Meadows County Wildlife Site, including hydrologically, assuming the application of the standard mitigation measures already included within Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-079] . Benhall Green County Wildlife site is over 500 m east of the land upon which the works comprised in Change 4 would be delivered at its closest, on the opposite side of Benhall Green.
5.19	Change Request Addendum Section 1: SCC Ecology are in agreement with the statement in paragraph 1.5.2. It is essential further surveys for bats and badgers are carried out within the vicinity of Benhall Bridge. A survey to assess the habitat suitability for Dormice should also be undertaken given the two records of dormouse nests in the local area.	Noted. These will be undertaken pre-construction once the extent of vegetation removal is confirmed.
5.20	REP01-47 – regarding surveys for bats at Benhall Bridge. The impact of the proposed vegetation removal at this location on migrating/foraging bats needs to be fully assessed given the vegetated embankments along the railway line in this area have moderate-high potential to be used as a migration/foraging route.	See above comment in response to 5.16.
5.21	Section 3.6 – increase in area for the maintenance of a new hedge south of the B1119 – SCC Ecology have no comments on this particular section of the addendum.	This is noted by the Applicant.
<i>Emergency Planning</i>		
5.22	Emergency Planning continues to have a concern at the cumulative effects of the various NSIPs on the ability of the Emergency Services to respond effectively to an incident at Sizewell B. Any changes to the access route to the converter station site or upgrades or temporary overbridge options to the Benhall railway bridge must be accompanied by a traffic survey to consider the implications and potential impacts, particularly delays or disruption on the A12 or B1119 which are used by the Emergency Services to approach Sizewell B station.	See comment below in response to 5.32.
<i>Highways</i>		
5.23	If works are proposed at the Benhall Bridge, the Council concurs that the Order limits would need to be extended to include the necessary land, but it does have concerns as to whether suitable works to improve the Bridge are feasible within the revised Order limits as currently proposed.	The Applicant notes this response. The change request incorporated additional land at Benhall Bridge. The applicant has confirmed its proposed approach to the repairs within Application Document 9.112 Benhall Railway Bridge - Crossing Feasibility Study which is submitted by the Applicant at Deadline 4.
5.24	If the bridge is to revert to its existing state, no loads greater than 46 tonnes would be able to access the onshore infrastructure including the converter station site during the operational phase without further closures for further mini-bridge installations.	The applicant notes this response. The applicant would carry out an AIL survey prior to any required delivery during the operational phase which would assess all structures and any requirements at the time would be taken into account during the transportation of the load.

Reference	Topic	Applicant's Response
		<p>There also remains the possibility that the main works contractors, following appropriate AIL surveys, identify an abnormal load route that does not interact with the Benhall Rail Bridge at all. Such a route is identified in Figure 6.4.7.3 Abnormal Load Routing Plan – Suffolk Onshore Scheme in Application Document 6.4.2.7 ES Figures Suffolk Traffic and Transport [App-243], with further detail provided in Application Document 7.5.1.1 Construction Traffic Management Plan and Application Document 9.112 Benhall Railway Bridge - Crossing Feasibility Study which is submitted by the Applicant at Deadline 4.</p>
	<i>Need for further detail on the change and its effects</i>	
5.25	<p>SCC notes that details of any temporary bridge have not been shared with the authority beyond a limited set of 'feasibility option' slides so SCC cannot comment on its acceptability nor on the assessment of the impacts such as access to Whitearch Residential Park. SCC is concerned that the lack of detail inhibits any review by it as highway authority or other by interested parties and that any future decision making will be fettered by powers granted to the Applicant in the DCO.</p>	<p>The Applicant has provided further information in the Application Document 9.112 Benhall Railway Bridge - Crossing Feasibility Study which is submitted by the Applicant at Deadline 4.</p> <p>The applicant has committed in the CTMP to ensure that Whitearch Residential Park access is maintained at all times during the works. No further work is considered necessary in this context.</p>
5.26	<p>Without sight of the details of the temporary bridge SCC cannot comment further on this matter other than to repeat concerns about the geometry of the site and the structure which make such an installation challenging.</p>	<p>The Applicant notes this response.</p> <p>Application Document 9.112 Benhall Railway Bridge - Crossing Feasibility Study is submitted by the Applicant at Deadline 4.</p>
5.27	<p>As the weight limit includes all AILs in terms of weight (i.e. STGO 1 to 3 and special order movements) SCC would ask that all vehicles exceeding 44 tonnes have been identified by the applicant as these include cranes and low loaders that fall into the STGO1 or 2 categories by weight.</p>	<p>The Applicant notes this response.</p>
5.28	<p>SCC challenges some of the statements made by the Applicant on page 32 of the Applicant's Consultation Report [CR1-069]. The Applicant states that "there is a weight restriction placed on the bridge indicating it would not be suitable for very heavy Abnormal Indivisible Load (AIL) vehicles". It should be noted that the restriction is for all vehicles exceeding 46 tonnes so includes most STGO1 to 3 and special order movements, not just the very heaviest AILs.</p>	<p>The Applicant understands this context and confirms that all work on the Benhall Bridge has been carried out in full understanding of this restriction. The 46 tonne weight limits has been accurately described by the Applicant in submitted documents, including, for example, Ref 4 in Document 9.34.1: Applicant's Comments on Relevant Representations Identified by the ExA; paragraph 2.5.2 in Application Document 9.76.2 Change Request Report; and paragraph 2.5.3 of Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement.</p>
5.29	<p>A similar issue applies to the information given to the Applicant by the Council regarding the condition and weight restriction of the bridge. Whilst the current weight restriction is relatively new, the Applicant was previously made aware of the prior weight restrictions on the bridge at several points during the Council's preapplication engagement including in response to the project's Statutory Consultation (see paragraph 8.49). It was made clear at the time that the previous restrictions would inhibit AIL movements and that uncertainties over the bridge's condition meant it posed a significant risk to the project should it be relied upon for AIL access.</p>	<p>The Applicant similarly does not consider there is any issue or misunderstanding on this point. For example, on page 5 in Application Document 9.34.1: Applicant's Comments on Relevant Representations Identified by the ExA the Applicant stated:</p> <p><i>'It should be noted that while the Benhall Railway Bridge was understood to have a weight restriction throughout the development of the Proposed Project, the statutory consultation feedback from SCC put this restriction at STGO 2 (80 tonnes). The report which qualitatively restricted the bridge to STGO 1 (46 tonnes) was not undertaken until December 2024 or issued to the Applicant until January 2025. While the Applicant does not consider that a STGO 1 weight restriction is insurmountable (for the reasons set out above), the Applicant does feel that positive and proactive engagement has been undertaken with SCC since that time.'</i></p> <p>The Applicant does, however, disagree that the condition of the bridge is a significant risk. The Applicant continues to work to reassure SCC on this point, with the latest information on this presented in Application Document 9.112 Benhall Railway Bridge - Crossing Feasibility Study submitted by the Applicant at Deadline 4.</p>

Reference	Topic	Applicant's Response
5.30	The Applicant has provided an Approval in Principle (AiP) to undertake investigation of the bridge. SCC are in the process of commissioning its highway consultant to review the AiP.	Agreed, the Applicant welcomes his response from SCC
5.31	SCC's preference would be repairs to or reconstruction of the Benhall Rail Bridge subject to the disruption to local residents, road and rail users not being considered unacceptable.	The Applicant notes this response and has incorporated further information into the outline Construction Traffic Management and Travel Plan – Suffolk submitted at Deadline 4 to provide reassurance to SCC that this will be the preferred option the Applicant will pursue.
<i>Cumulative effects</i>		
5.32	The Addendum to the Environmental Statement [CR1-055] is insufficient in highways terms particularly in terms of cumulative impacts. Table 3.7 states that “the proposed change is unlikely to alter the Proposed Project’s interaction with other developments”. Little detail is given to justify this statement which the Council strongly disagrees with. In the same document, the Applicant goes on to assess the impacts of closure of the Benhall Railway bridge in terms of redistribution of traffic. This will inevitably interact with cumulative developments due to their use of the A12 and other assessed receptors.	<p>The Applicant acknowledges that there will be some interaction between redistributed Baseline traffic and also construction related vehicles associated with other cumulative developments during the closure of the Benhall Railway bridge. However, Table 3.9 of Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055] shows that redistributed Baseline traffic is only expected to result in a small adverse magnitude of change on the B1121 Main Road North (east of the A12, to the north of Saxmundham). Otherwise, a negligible or beneficial magnitude of change (the latter due to a reduction in Baseline traffic on certain parts of the network following the bridge closure) is expected across the remainder of the network, including the A12 and the A12/B1119 junction. Therefore, there is not expected to be the potential for significant cumulative effects as a result of redistributed baseline traffic when combined with cumulative traffic of other cumulative schemes.</p> <p>Further to the above, if Option 1 (mini-bridge) is adopted, then this will be planned to be implemented at weekends in order to minimise disruption. If Option 2 (repair the bridge) is adopted, then this will be implemented early in the programme (late 2026, or in 2027), reducing the likelihood of this overlapping with the peak construction phases of EA2 (early 2026), EA1N (2028), Sizewell C (2028/2029) and LionLink (2029/2030). The works at Benhall Bridge (both options) will also be scheduled to avoid periods when main construction traffic movements associated with the Proposed Project are required. HGVs associated with the Proposed Project will not be diverted through Saxmundham. Lastly, it is reiterated that the temporary closure of the Benhall Railway bridge and associated diversion of Baseline traffic would only be in place for a short-term limited duration of either 45 days (Option 1) or 28 days (Option 2) to minimise any impacts. Local access will be retained meaning that not all Future Baseline traffic flows will be redistributed, which is how traffic was assessed for robustness. Therefore, the Applicant maintains that the Benhall Bridge works are unlikely to alter the Proposed Project’s interactions with other developments and that no further cumulative assessment work is required in this regard.</p> <p>The Applicant welcomes further discussions with SCC Highways on this matter including consideration of additional measures for inclusion within Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk submitted at Deadline 4 to further minimise any potential impacts during the Benhall Bridge works. As discussed during the transport thematic meeting with SCC Highways on 22 January 2026, this could include the potential for a temporary speed limit reduction on the A12 corridor between and including the A1094, B1121 Main Road (south) and B1119 junctions during the Benhall Bridge works, to alleviate SCC’s concerns relating to road safety. Whilst this would not be included in the DCO as necessary mitigation, this could be implemented with agreement of the Local Highway Authority outside of the Order Limits.</p>
5.33	The Council has particular concerns around the potential interactions from Change 4 with Lion Link, EA1N, EA2 and Sizewell C which should be fully captured in the cumulative effects assessment with appropriate mitigation explored. Firstly, each of these projects will use the A12 for their construction traffic which will interact with the diversion route proposed by the Applicant as shown in [CR1-011]. An increase in traffic using the A12/B1119 junction, along with the traffic arising from cumulative developments may cause increased delay through fewer opportunities for gaps to pull out into. This is more concerning in terms of	See the above response.

Reference	Topic	Applicant's Response
5.34	<p>road safety where drivers may become impatient and take greater risks at the junction which poses significant safety concerns when factoring in the higher concentration of HGVs arising from cumulative developments. It is essential for these effects to be assessed, and the mitigation hierarchy followed.</p> <p>Lion Link proposes to use the same access route as Sea Link as set out in the project's Statutory Consultation documents. Under Option 1, the Lion Link applicant would most likely have to either use a mini-bridge or repair the bridge which means further closures would be required. However, under Option 2, no further closures would be required as the bridge would be in a suitable condition for AIL deliveries. This means that the adverse impacts arising from closures of the bridge will be felt for a much longer duration under Option 1 especially when considering the potential for future projects to use this access route. The Applicant's cumulative effects assessment should be updated to reflect this.</p>	<p>The Applicant acknowledges that if Option 1 (mini-bridge) is adopted for the Proposed Project, then it is likely that this option would also need to be adopted for LionLink when this scheme progresses. However, there is not forecast to be additional significant cumulative effects, as it is similarly expected that the mini-bridge will be planned to be implemented at weekends in order to minimise disruption. The Applicant will also co-ordinate with LionLink so that main construction traffic movements associated with Sea Link will avoid any periods when the mini-bridge is required for LionLink. Therefore, no further cumulative assessment work is required in this regard.</p> <p>In terms of co-ordination, the Applicant is committed to co-ordinating with third party schemes to minimise cumulative effects. Meetings have been held with LionLink representatives, which will continue going forward, and a draft Statement of Common Ground has been prepared for continued collaboration. This co-ordination will be formalised as part of the CTMTP which is secured by Requirement 6 of the DCO. This will include a commitment to employ a Transport Coordinator who will work and co-ordinate with other projects.</p> <p>The CTMTP will be updated by the Contractor at detailed design (to discharge Requirement 6 once the relevant detail is available). This will include further details on co-ordination, meetings to review construction programmes and the likelihood/ duration of peak construction phases overlapping, and to consider additional mitigation if necessary; such as careful programming to minimise the likelihood (or duration) of multiple peaks coinciding including when Benhall Bridge works are being carried out, without delaying works/ delivery of the Proposed Project.</p>
5.35	<p>There is also potential for non-HGV traffic from cumulative developments such as EA1N, EA2 and Sizewell C to use the B1121 as an access route. These movements would have to be diverted during closures of the Benhall Bridge which should also factor into the Applicant's cumulative effects assessment.</p>	<p>Whilst there is some potential for non-HGV traffic associated with EA1N, EA2 and Sizewell C to use the B1121 Main Road via the Benhall Bridge as an access route, Appendix B of Application Document 9.26 Traffic & Transport Cumulative Assessment (Suffolk) [REP1-110] shows that there is only expected to be a maximum of 67 daily non-HGV movements for EA1N, 67 daily non-HGV movements for EA2 and 273 daily non-HGV movements for Sizewell C on the B1121 Main Road, east of the A12 (S-RL5). Therefore, this is not expected to form a main route for any of these cumulative schemes.</p> <p>Furthermore, if Option 1 (mini-bridge) is taken forwards, then this will be planned to be implemented at weekends in order to minimise disruption. If Option 2 (repair the bridge) is adopted, then this will be implemented early in the programme (late 2026, or in 2027), reducing the likelihood of this overlapping with the peak construction phases of EA2 (early 2026), EA1N (2028), Sizewell C (2028/2029) and LionLink (2029/2030). The temporary closure of the Benhall Railway bridge and associated diversion of Baseline traffic will only be in place for a short-term limited duration of either 45 days (Option 1) or 28 days (Option 2) to minimise any impacts. Local access will be retained meaning that not all Future Baseline traffic flows will be redistributed as assessed. Therefore, the Applicant maintains that the Benhall Bridge works are unlikely to alter the Proposed Project's interactions with other developments and that no further cumulative assessment work is required in this regard.</p>
<i>Concerns on updated assessment in [CR1-055]</i>		
5.36	<p>The Council is concerned that the Applicant's assessment does not accurately capture the likely effects under a worst-case scenario. The diversion route is shown as going via Saxmundham and the A12/B1119 junction [CR1-011]. SCC has noted concerns about safety at this junction and congestion / safety at the Saxmundham crossroads such as in paragraph 11.122 of [REP1-130]. It is unclear how this receptor is forecast to experience less traffic in [CR1-055] when the B1121 is closed</p>	<p>See responses above. To confirm, the works at Benhall Bridge (both options) will be scheduled to avoid periods when main construction traffic movements associated with the Proposed Project are required. HGVs associated with the Proposed Project will not be diverted through Saxmundham. The Applicant welcomes further discussions with SCC Highways on this matter including consideration of additional measures for inclusion within Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041] to further minimise any potential impacts during the Benhall Bridge works.</p>

Reference	Topic	Applicant's Response
	as more vehicles would likely have to use the B1119 A12 exit to access areas otherwise reached using the B1121 which would mean increased use of this signalised junction. This concern is amplified when considering the need for any traffic from cumulative developments using the B1121 to be diverted and the other concerns on cumulative effects detailed by the Council above.	For reference, the B1121 Main Road/ B1119 Church Street signalised junction is expected to experience a slight reduction in Future Baseline traffic movements when the proposed road closure on the B1121 Main Road is in place, due to the redistribution of traffic onto other routes such as the B1121 Main Road to the north of Saxmundham and the A1094 between the A12 and the B1121 Aldeburgh Road junction. This is highlighted by the traffic flow diagrams held in Application Document 9.76.5.11 Change Request Appendix K Traffic Flow Diagrams [CR1-066] .
5.37	It is unclear if the Applicant will be intending that construction traffic using the River Fromus Bridge will be using this diversion when the temporary bridge is being installed or in place and if these additional movements have been included in accessing the junctions and the route.	As set out above, the works at Benhall Bridge (both options) will be scheduled to avoid periods when main construction traffic movements associated with the Proposed Project are required and HGVs associated with the Proposed Project will not be diverted through Saxmundham. Nonetheless, the Traffic and Transport assessment within Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055] considers peak construction traffic for the Proposed Project in combination with redistributed Future Baseline traffic in order to provide a robust approach.
	<i>Suitability of diversion routes for non-motorised users (NMU)</i>	
5.38	SCC notes that if the road is closed diversion routes for pedestrians, wheelchair and cyclists are impractical due to their length. At present no mitigation is proposed to resolve this matter. Nor details of the duration that access will be denied.	The Applicant has addressed this matter within Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055] , which includes specific measures relating to the closure of Benhall Bridge. The embedded mitigation comprises keeping the remainder of the PRoW open, installing signage to advise users of the closure/ works and making a shuttle/ taxi service available to residents of Whitearch Park Residential Park Homes. This is secured within commitment TT11 in Application Document 7.5.3.2 (C) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP3-078] . During the period of works specific to the bridge, it will be necessary to close the bridge route for non-motorised users for safety reasons. The route will be re-opened as soon as the bridge specific works are completed. Engagement between the Applicant and SCC is ongoing with regard to ensuring that essential access is provided.
	<i>Consideration of alternative routes</i>	
5.39	SCC notes that the Applicant discounted the use of the route which would leave the A12 at Yoxford and utilise the new Sizewell Link Road (SLR) due to concerns that the SLR and associated level crossing works would not be completed in the time for the Sea Link converter station works. The latest information SCC has is that the construction of the SLR will commence during Q1, 2026 with completion towards the end of 2027.	Please see Applicant's response to AP3 in Application Document 9.90 Applicant's Response to January Hearing Action Points CAH1 ISH2 – Deadline 4 submitted at Deadline 4.
	<i>Inclusion of additional land at Benhall</i>	
5.40	Contrary to the Applicant's statement in paragraph 4.2.12 [CR1-052], SCC did not request inclusion of additional land at Benhall. It is not the authority's role to instruct applicants on what land they do or do not require to be included within the order. The authority did raise concerns about whether the applicant could deliver repairs, reconstruction or temporary overbridging within the limits of the public highway. These remain.	A large number of meetings and correspondence has taken place between the Applicant, SCC and ESC, with both SCC and ESC frequently expressing 'concern' that Benhall Bridge was not included in the Order limits and suggesting that it should be included. Indeed, SCC notes earlier in this response that: <i>'If works are proposed at the Benhall Bridge, the Council concurs that the Order limits would need to be extended to include the necessary land, but it does have concerns as to whether suitable works to improve the Bridge are feasible within the revised Order limits as currently proposed.'</i> The Applicant is somewhat surprised by this comment in the context of correspondence to date but accepts SCC's position.

Reference	Topic	Applicant's Response
Landscape		
5.41	SCC welcomes the documents 9.76.5.7 Change Request Appendix G Tree Survey Report Schedule Extract Suffolk Onshore Scheme [CR1-062] and 9.76.5.9 Change Request Appendix I Tree Protection Plans Suffolk Onshore Scheme [CR1-064], but notes that the tree identifiers in the drawings differ from those in the tree survey table (for example T1176* on the drawing could not be found in the table, only T1176S*). It would be helpful, if the 'S' could be explained, as it is not currently listed in the Key to Abbreviations & Terms Used in the Survey.	<p>The use of S and K suffixes in tree tags are to differentiate between trees surveyed within Suffolk Onshore Scheme (S) and Kent Onshore Scheme (K) as detailed further in paragraph 3.5.5 of Application Document 6.10 Arboricultural Impact Assessment [REP-294].</p> <p>The absence of suffixes for new tree survey information included within Application Document 9.76.5.7 Change Request Appendix G Tree Survey Report Schedule Extract Suffolk Onshore Scheme [CR1-062] is an errata and will be rectified in a subsequent version of this document to be submitted at Deadline 5. For example, trees T1176* and T1176S* are the same trees.</p>
5.42	Any vegetation losses will need to be documented and mitigated.	As detailed within Application Document 3.1(F) Draft Development Consent Order [REP3-006] , Schedule 13, Requirement 8 details the requirement for an Arboricultural Method Statement detailing the final extent of tree loss, which must be approved by relevant planning authorities in advance of the commencement of any stage of the authorised development. The Suffolk outline Landscape and Ecological Management Plan (Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan – Suffolk submitted at Deadline 4 outlines mitigation measures in relation to vegetation loss.
Public Health		
<i>Air Quality</i>		
5.43	SCC acknowledges the Applicant's conclusion that the proposed changes at Benhall Railway Bridge introduce additional sensitive human receptors to the construction dust and traffic study areas, but that the overall conclusions for these topics are "not significant" and "no potential for any new or different likely significant effects" respectively. Noting the revised Order Limits may increase proximity of works to residential properties, including Shotts Meadow, Mill Lane and Festival Close, as well as residential park homes and locations subject to current planning applications which do not appear to have been considered, it is suggested that the increased proximity warrants clearer consideration and justification to support the conclusions.	The Applicant acknowledges SCC's comments regarding the proximity of the proposed works at Benhall Railway Bridge to residential receptors. The applicant has addressed this matter within Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055] , where it is acknowledged that the revised Order Limits introduce additional sensitive human receptors into the construction dust and construction traffic study areas. The receptors referred to have been considered within the assessment, which concludes that, notwithstanding the increased proximity, effects would remain not significant. This conclusion is based on the short-term and temporary nature of the works, the limited duration of road closures, and the implementation of mitigation measures consistent with a high-risk dust site, which represents the most precautionary level of control.
5.44	Given the proximity of these receptors, and the sensitivity of residential park homes due to their construction type, SCC expects that dust and air quality impacts will be closely monitored in accordance with the relevant management plans, with a clear mechanism for the prompt implementation of additional mitigation should monitoring identify elevated levels or sustained impacts. SCC also notes the reliance on annualised traffic flow assessments, from a public health perspective, reassurance would be strengthened by confirmation that short term, localised air quality impacts arising from repeated temporary road closures and diversions have been adequately considered for nearby residents.	<p>The Applicant notes SCC's comment regarding residential park homes. The Applicant confirms that air quality monitoring and mitigation will be undertaken in accordance with Application Document 7.5.6.1 (C) Outline Air Quality Management Plan - Suffolk [REP3-052]. Monitoring will enable early identification of any elevated or sustained impacts, with a clear mechanism in place to implement additional mitigation measures promptly, where required, to minimise any effects on nearby residents.</p> <p>In relation to traffic-related emissions, the Applicant notes SCC's concern regarding reliance on annualised traffic flow assessments. As set out in Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055], the assessment also considered the short-term and localised effects associated with repeated temporary road closures and diversions. The redistribution of traffic during closure periods was examined and compared against the Environmental Protection UK and Institute of Air Quality Management screening criteria, demonstrating that changes in traffic flows would remain below thresholds at which air quality effects would be expected to be significant. The temporary nature of the closures, together with their limited overall duration, further reduces the potential for sustained adverse effects on local residents.</p>
<i>Noise and Vibration</i>		
5.45	SCC notes the Applicant's position that the proposed change would not alter the conclusions of the ES in respect to noise and vibration, despite	The Applicant can confirm that noise and vibration monitoring and mitigation will be undertaken in accordance with Application Document 7.5.8.1 (B) Outline Construction Noise and Vibration Management Plan – Suffolk

Reference	Topic	Applicant's Response
	construction activities being brought closer to noise sensitive receptors at Shotts Meadow and Whitearch Park Residential Park Homes. Whilst it is acknowledged that best practicable means should "reduce effects", SCC remains concerned that residential park homes represent a particularly vulnerable receptor due to likely lower acoustic insulation and increased susceptibility to vibration impacts. SCC also notes that sites referenced in current planning applications do not appear to have been included within the assessment of affected receptors.	submitted at Deadline 4. Mitigation will be determined following detailed construction noise and vibration assessments, which are committed to via commitment NV03 of Application Document 9.83: Outline Code of Construction Practice [REP3-076] .
5.46	Given the proximity of receptors and the potential duration and intermittency of bridge works, SCC expects that noise and vibration monitoring will be undertaken proactively, with mitigation measures escalated where impacts exceed appropriate thresholds or cause prolonged disturbance. Particular attention should be given to night time, early morning or weekend working, which may have disproportionate effects on health, wellbeing and residential amenity.	Comment is noted and agreed. Given the nature of the works, it is anticipated that they would be undertaken through a Section 61 consent through consultation between the contractor(s) and East Suffolk Council. The Section 61 agreement would detail specific mitigation measures, and any monitoring proposals as part of the noise and vibration management process.
<i>Health and Wellbeing</i>		
5.47	SCC notes that the Applicant acknowledges the revised Order Limits are adjacent to residential properties not previously assessed in the ES, but concludes that no new or different likely significant environmental effects on health and wellbeing are anticipated. SCC considers that this conclusion would benefit from further explanation.	The Applicant acknowledges SCC's comment regarding the revised Order Limits being adjacent to residential properties not previously assessed within the ES. A full response providing further explanation is provided above (<i>Ref 4.8</i>).
5.48	The extension of the Order Limits brings construction activity closer to additional receptors, including residential park homes and communities not previously assessed, and therefore introduces new exposure pathways for potential health effects associated with noise, vibration, dust, traffic disruption, restricted/reduced access to social and green infrastructure (including healthcare) and stress. SCC is also concerned that the assessment does not appear to account for nearby sites referenced in current planning applications, which may represent future residential receptors during the construction period.	<p>The Applicant acknowledges SCC's comments regarding the proximity of the revised Order Limits to additional receptors not previously assessed within the ES. A response to this matter has been provided above (<i>Ref 4.8</i>).</p> <p>In relation to nearby sites referenced in current planning applications, these do not form part of the baseline within the health and wellbeing assessment. This has been undertaken on the basis of existing receptors. Should such sites come forward and become occupied, they would be under the application of DCO-secured mitigation and controls and would not give rise to new or different likely significant effects on health and wellbeing.</p> <p>Overall, while the proposed change brings works closer to additional receptors, it does not introduce new impact pathways or alter the effects previously assessed. On this basis, there would be no new significant effects on health and wellbeing arising as a result of the proposed change as reported within Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055].</p>
5.49	SCC recommends that the Applicant clearly sets out how health and wellbeing impacts for newly affected receptors have been assessed in light of the proposed revised Order Limits. This should include a clear explanation demonstrating if and why existing mitigation measures are considered sufficient and how the needs of vulnerable groups, such as residents of park homes, older people and those with existing health conditions have been taken into account.	The Applicant acknowledges SCC's comment regarding adequacy of mitigation and consideration of vulnerable groups in the assessment of the amended Order Limits. A full response providing further explanation is provided above at paragraph 4.8.
5.50	SCC acknowledges the additional mitigation proposed in relation to the temporary closure of PRoW E-137/026/0, including signage, partial route retention and the provision of shuttle or taxi services for residents of Whitearch Park Residential Park Homes. The Applicant should clarify how frequent these services will be available and that users will not have to pay to use the services due to the disruption caused by the Applicant's works.	The Applicant will provide these services free of charge to the residents and the frequency and or availability of these services will be discussed with the residents once the program is finalised.

Reference	Topic	Applicant's Response
5.51	<p>SCC reiterates that temporary loss or disruption of PRowS, footways, bus stops and local access routes can have disproportionate health and wellbeing impacts, particularly for residents who rely on walking, wheeling or public transport for daily activities, physical activity and social connectivity. This is particularly relevant for residents of Whitearch Residential Park. These considerations are not captured by the Applicant's consideration of potential additional effects [CR1-053] in terms of the effects of these closures on the residents' physical and mental health and wellbeing. Nor has consideration been given to the impact of disruption on groups which may be particularly vulnerable to these impacts due to a higher reliance on the affected footway to access green and social infrastructure such as older residents</p>	<p>The Applicant acknowledges SCC's comments regarding the potential for temporary disruption to PRowS, footways, bus stops and local access routes to affect health and wellbeing.</p> <p>These pathways are considered within the Health and Wellbeing under the determinant of <i>Transport modes, access, connections and physical activity</i>. Assessment draws on evidence from the Traffic and Transport ES Chapter (Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]), which concludes no potential for significant adverse effects to arise, with the additional embedded mitigation identified to be secured as part of measures TT11 and TT12 in the updated version of Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk submitted at Deadline 4. The Health and Wellbeing Assessment also draws on Application Document 6.2.2.10 Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005] conclusions, which also anticipates no new or different likely significant effects as a result of the proposed change with the additional mitigation identified owing to the absence of significant change in access patterns or severance between residents and community facilities, businesses and open spaces.</p> <p>As such, no potential adverse impacts on journeys made by active travel modes, which could impact health and wellbeing are anticipated. This considers existing mitigation measures which have been reviewed in light of the revised Order Limits and is considered to be appropriate, including for newly affected receptors and vulnerable groups (such as children, the elderly, and individuals with pre-existing health conditions). No additional health-related effects are anticipated</p>
5.52	<p>SCC therefore expects that disruptions are minimised as far as reasonably practicable and that mitigation measures are actively promoted and monitored to ensure they are accessible, reliable and effective for those most affected. Particular consideration should be given to older residents and those with limited mobility.</p>	<p>This comment is noted by the Applicant.</p>
Public Rights of Way (PRow)		
5.53	<p>As addressed in 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-053] paragraph 3.5.41 onwards, SCC broadly concurs with the assessment as long as adequate community engagement with regards to the temporary closures and diversions occurs in reasonable time prior to works and adequate signage is in place and SCC PRow have prior notification of closures. Consideration should be given to the impacts on residents of Whitearch Residential Park arising from closures of the footway and PRow as their pedestrian connectivity is likely to be the most affected by the closures. The alternative routes do not appear to cause a significant impact on most PRow users.</p>	<p>The Applicant acknowledges agreement regarding the assessment as set out in Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]. With regard to embedded mitigation, engagement is proposed within Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk submitted at Deadline 4 and Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk submitted at Deadline 4. As previously stated, access to Whitearch Residential Park is set out within Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055] and within commitment TT11 in Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078].</p>
6	Change 5 – Increase in Area for Maintenance of a New Hedge to South of B1119, Suffolk	
6.1	<p>The applicant has proposed to widen a strip of land to the south of the B1119, near Fristonmoor Lane to allow more space to plant the proposed new hedge and the ditch. The proposal includes changing the type of access rights to this area to allow long term maintenance of the drain from the field.</p>	<p>Comment noted. No response required.</p>
6.2	<p>The new hedge is part of landscape and visual mitigation to screen views of the converter station from the north/northeast and help reinstate historic hedgerow planting.</p>	

Reference	Topic	Applicant's Response
6.3	The Council's response to Change 4 is detailed by service area below.	
Archaeology		
6.4	SCCAS have no objection to the planting of the proposed hedgerow at the converter station site, however, no ground disturbance should take place within areas defined as requiring archaeological mitigation as part of the proposed Lion Link scheme, during associated works, prior to the completion of mitigation work as part of the Sea Link project. The Applicant should collaborate and coordinate accordingly with the promotor for Lion Link for the relevant information.	<p>This comment is noted by the Applicant.</p> <p>Mitigation areas are being developed in consultation with SCCAS and the extent of mitigation within the area of the proposed hedgerow will be agreed as part of these discussions.</p> <p>An updated to Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be submitted before the end of examination, and this will incorporate relevant updates associated with the proposed hedgerow area.</p>
Highways		
6.6	Planting of the proposed hedge adjacent to the B1119 should not adversely impact forward visibility for traffic using this road.	This is acknowledged by the Applicant.
Landscape		
6.7	The Council is unpersuaded that this change goes far enough and proposes that along the B1119, a sufficient corridor should be established to allow space for the hedge and a generous route corridor for a public right of way.	Cross sections were prepared in response to WQ1 1LVIA8 (Application Document 9.73 Applicant's Responses to First Written Question [REP3-069]), which illustrated the widening of the Order Limits along part of the B1119 for improved maintenance of the drainage ditch and hedgerow/tree planting. Whilst the Applicant considers that the existing proposals of the hedgerow and hedgerow tree planting remain proportionate and appropriate, the Applicant recognises the concerns identified by SCC and consequently is committed to provide an enhanced belt of planting where there is land available within the widened Order Limits, subject to limitations around existing services and final areas required for maintenance of planting and the drainage ditch along the southern edge of the B1119. This will provide an enhanced belt of planting within the existing context of the layered vegetation network in the surrounding landscape. Figures 1, 2 and 3 within the Suffolk oLEMP (Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan – Suffolk submitted at Deadline 4) have been updated at Deadline 4 to reflect this enhanced belt of planting. Responses at 5.67 – 5.71 within Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026] and responses 6.10 and 6.11 below should be referred to regarding the provision of a PRow along the B1119.
6.8	More detailed information is required regarding landscape, visual effects and vegetation loss before detailed comments can be provided.	Change 5 will not result in any change in the effects reported in the Landscape and Visual sections of the Environmental Statement submitted with the Application. There is no additional vegetation removal required as part of Change 5 other than the removal of a small section of the Christmas tree plantation.
Public Rights of Way (PRow)		
6.9	The Council is not persuaded that this change goes far enough and proposes that along the B1119, a sufficient corridor should be established to allow space for the hedge, watercourse, and a generous route corridor for a public right of way and maintenance access.	See the response provided above at paragraph 6.7.
6.10	Paragraph 2.6.5 of the Change Request Report [CR1-052] refers to a strip of lands south of the hedge for maintenance purposes. SCC would welcome it, if this could be publicly accessible as a Public Right of Way.	The Applicant's position around a PRow along the B1119 is set out at section B4.2 within Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064] . Whilst a temporary PRow diversion will be provided along the B1119 to mitigate temporary PRow closures, a new permanent PRow will not subsequently be provided as this is not essential mitigation and therefore cannot be secured as part of the DCO.
6.11	However, details have not been provided on whether there is enough room in the Order Limits to accommodate this required width for a new Public Right of Way in this vicinity, nor widths provided on plans to accommodate a new PRow or publicly accessible route, despite these being requested repeatedly in preapplication engagement. In the	The Applicant has agreed to deliver enhancement measures relating to access where the rights already being sought over land would also allow for permissive access to be granted. The locations where this is proposed are

Reference	Topic	Applicant's Response
	<p>absence of this detail. the Council continues to recommend that more width is required or plans are produced to show an adequate width to accommodate for a new PRow to enable pedestrians and cyclists to be able to travel alongside the B1119 off-road at this location, as SCC PRow considers this to be essential mitigation.</p>	<p>the permanent access route from the B1121 to the Saxmundham Converter Station site, and access around the proposed woodland planting around the Saxmundham Converter Station</p>

Table 2.3 Applicant’s Response to Relevant Representation and Written Representation of Thanet District Council [REP3A-034]

Reference	Topic	Applicant’s Response
1	One of the five changes relates to the Kent element of the Project and therefore whilst the other four changes are noted, we will only comment on proposed Change 1: Change to access at the Hoverport, Kent.	Response noted.
2	<p>The Examining Authority (ExA), in their letter dated 5th December 2025, has considered Change 1 and made the following comments:</p> <p><i>“This change proposes to extend the order limits to provide the applicant with flexibility in the access route that vehicles will use across the hoverport to access the intertidal area at Pegwell Bay. The change will increase the area of the order limits at the hoverport to ensure that encroaching saltmarsh can be avoided. The applicant states that this change would not increase the area used for construction of the proposed development as the vehicles would only use one route across the hoverport (and likely one of the existing ramps); nor would it change the number or types of vehicles accessing the intertidal area. The change would also not introduce any new development or works to the hoverport.”</i></p> <p>The Change Request: Addendum to Volume 6 Environmental Statement concludes that there would be no new or materially different likely significant effects on the environment from the proposed changes, either alone or in combination.</p> <p>The Council notes that the Applicant intends to undertake surveys to assess the environmental implications of refining the route of the Sea Link Project.</p>	Response noted.
3	The applicant highlights that the saltmarsh is a dynamic habitat and can change as a result of natural coastal events, therefore, the existing saltmarsh may be subject to change across the construction and operation. The applicant considers it beneficial for the ecology of Pegwell Bay for there to be flexibility in the location of the access to respond to the conditions at the time. This flexibility is stated to ensure that National Grid can access and exit the intertidal area safely while still committing to not impacting the saltmarsh. The inclusion of a wider area is not indicated by National Grid that they will utilise a wider area than proposed previously. A preconstruction saltmarsh survey would seek to identify the extent of the saltmarsh habitat to confirm the entry and exit points to the intertidal area during construction so that no impact to saltmarsh occurs.	Response noted.
4	The Construction Environmental Management Plan (CEMP) Appendix B Register of Environmental Actions and Commitments (REAC) considers the impact on saltmarshes and confirms that in terms of the hoverport, the locations and widths of access routes across the mudflats will be defined post consent and will be informed by a pre-construction saltmarsh habitat survey. The Council notes that the REAC will be secured by Requirement 6 as Appendix B to the CEMP.	Response noted.
5	Having regard to the Pegwell Bay Construction Method Technical Note Version B issued in December 2025 (REP2-011), the Council notes the type of construction plant and vehicles outlined to use the construction access from the hoverport and the confirmation that no construction plant or vehicles will be stored on the hoverport. It is noted that vehicles would use the	Response noted.

Reference	Topic	Applicant's Response
	construction access up to four times a day (depending on tides) and there may be a requirement for up to 40 movements per day at peak times.	
6	As highlighted above, the access route has not yet been determined and the Council is concerned that the ramifications of using (the identified) vehicles to travel over the site (and in the number proposed) are not fully understood. Survey work has not been undertaken for the project regarding the condition of the surface and having regard to the historic use of the site (contamination from previous maintenance areas on the site), it is not clear what the potential impacts on controlled waters may be from use of the land. As such, mitigation (if required), and the suitability of any such mitigation cannot be determined and assessed, at this stage.	<p>It is recognised that the hardstanding at the Hoverport is in variable condition. As explained within Application Document 9.89 Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 2 submitted at Deadline 4, 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.</p> <p>Commitment GG06 of the Application Document 9.83 Outline Code of Construction Practice [REP3-076] includes for a precondition survey to be undertaken of the working areas. The wording of this commitment will be updated to specifically include the hoverport location for Deadline 4a. This will help to inform the development of the defined access routes across the Hoverport and identify the need for any additional mitigation measures such as track matting or surface repairs which will be used to protect both vehicles and the surface.</p> <p>Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065] and the supporting Application Document 6.3.3.5.A ES Appendix 3.5.A Preliminary Contamination Risk Assessment [APP-169] recognises the Hoverport as a potential source of contamination. However, based on the commitment described above, and also those below, it is considered that there is a low risk of any adverse impacts on controlled waters from the use of the Hoverport for access, and significant effects are not considered likely.</p>
7	<p>Contamination is generally addressed through the REAC document and the comments are noted. In terms of potential contamination of the water environment from fuels, oils and chemicals, it is unclear what mitigation would be in place to avoid impacts from fuel spillage and prevention of site runoff on the Hoverport site specifically, in regard to vehicles travelling over the surface, and associated risk given the condition of the surface.</p> <p>The Council considers that further details in relation to mitigation to avoid contamination of the water environment using the hoverport access should be included in the Onshore Construction Environmental Management Plan (CEMP), with an updated REAC provided prior to determination of the Development Consent Order.</p>	<p>Application Document 9.83 Outline Code of Construction Practice [REP3-076] secures mitigation to avoid contamination of the water environment. Several measures are relevant to vehicles using the Hoverport site and include:</p> <ul style="list-style-type: none"> – GG14 with regard to use and storage of fuels, oils and chemicals storage; – GG15, which will control rainfall runoff to prevent intentional discharge of site runoff to ditches, watercourses, wetland habitats, drains or sewers without appropriate treatment and agreement of the appropriate authority; – GH08 which secures that a protocol will be developed for dealing with any unexpected contamination that is encountered; – GG24, stipulating that an Incident Response Plan will be developed by the contractor for the construction phase, prior to works commencing and thereafter complied with. It will outline procedures that will be implemented in case of unplanned events, including but not limited to site flooding and pollution incidents; and – GG28 that will ensure equipment is readily available on site to clean any spillages, and that spillages are dealt with as soon as reasonably practicable after the event. <p>The combination of these measures provides for robust controls, such that further measures, specific to the Hoverport, are not considered to be necessary.</p>
8	The impact on the former hoverport with regards to ecology has been considered within the CEMP Appendix B Register of Environmental Actions and Commitments (REAC). This states that to ensure ecological interest features of the former hoverport are not affected during construction a pre-construction botanical survey will be undertaken to map vegetation stands of particular significance to protect and an access route will subsequently be marked out which avoids these stands, along with dense stands of other vegetation. It is noted that a suitable qualified ecologist will be on site to supervise and guide the marking out of the access route.	Comment noted. No response required.

Reference	Topic	Applicant's Response
9	Should the survey work undertaken at the hoverport indicate that all routes would result in the diminishment of significant botanicals, the Council queries whether the access route would be determined on a hierarchical basis and if so what the criteria would be. The Council seeks confirmation that the findings of survey work would be shared and wider consultation with the relevant bodies, beyond the qualified ecologist present on site, undertaken if necessary, to determine the most appropriate access route to minimise ecological harm.	In commitment B70 of Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078] the Applicant has committed to consulting Thanet District Council on the chosen route through the hoverport and anticipates that this will also involve sharing the ecological baseline reports that inform the choice. Given the inspection of the area so far, and the photographs submitted into Examination (see Application Document 9.73.1 Applicant's Responses to First Written Questions – Appendices [REP3-070]), it is considered unlikely that no clear route would be identified through the site, since several options exist using unvegetated tarmac and concrete. Until the data are collected it is not possible to state how a hierarchy of options would be determined, or to devise criteria.
10	In terms of recreation, the applicant states that not all of the new area will be used for access purposes and as such impacts on recreational receptors using this area will be minimised, whilst the proposed change does not bring the works significantly closer to any other environmental receptors and therefore does not result in any new or different significant environmental effects. The Council has outlined its concerns previously with regards to the impact of the proposed development on tourism and recreation and these comments remain valid.	The Applicant notes this comment and the Council's concerns regarding impacts on tourism and recreation. The assessment of impacts on socio-economics, recreation and tourism are set out in the ES in Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism [REP1A-007] . The assessment concludes that the Proposed Project is unlikely to result in any significant adverse effects.
11	The Council also notes that the proposed change to access at the hoverport results in National Grid seeking to gain right of access to more land via the compulsory acquisition process. Discussions concerning the potential acquisition of land within the Thanet District are ongoing and it is noted that the Council will have further opportunities to respond to the proposed changes. The Council will be represented at the Compulsory Acquisition Hearing (CAH1) on Tuesday 27th January 2026. The Council would welcome the opportunity to comment on any updated submissions from the applicant in due course.	Response noted.

Table 2.4 Applicant’s Response to Relevant Representation and Written Representation of Historic England [REP3A-021]

Reference	Topic	Applicant’s Response
n/a	<p>Changes 1, 2, 4 & 5</p> <p>We can confirm that we have been consulted by the applicant on the proposed changes to DCO and we have provided pre-application advice, as outlined in the Change Request Consultation Report [CR1-070]. Historic England can therefore confirm that we have no comments to offer in relation to proposed changes 1-2, and 4-5, as these amendments to the Project will not result in changes to the magnitude of impact on the historic environment.</p>	<p>The Applicant notes the response from Historic England.</p>
n/a	<p>Change 3</p> <p>We have the following comments to make on change 3, which is specifically related to historic environment and proposes to adjust the boundaries of the project to allow for appropriate mitigation of the newly identified archaeological remains.</p> <p>Geophysical Survey report [CR-057] outlines the results of the additional non-intrusive survey work undertaken in the area where phase 2b of trial trench evaluation [AS-136] identified archaeological feature interpreted as a neolithic henge. Geophysical survey of the wider area surrounding the feature provided additional data which allowed better understanding of the remains. The archaeological site was re-interpreted on the basis of its morphology as a G-shaped enclosure of possible Late Bronze Age.</p> <p>Historic England considers that this re-interpretation is reasonable in light of the new data. The identified archaeological site is a non-designated heritage asset with archaeological interest. It is of likely regional importance, as assessed in an Addendum to Volume 6 Environmental Statement [CR1-055]. The negative effect on this asset resulting from implementation of the Project, depending on the exact mitigation measures, could be significant.</p> <p>Addendum to Volume 6 Environmental Statement [CR1-055] outlines that two options for mitigation of archaeological remains in the change 3 area are being considered: re-routing of the cable and haul road corridor to the east to avoid impact on the G-shaped enclosure; and archaeological excavation of the entirety of the G-shaped enclosure to allow for the original route of the cable and haul road.</p> <p>We note that further intrusive evaluation work is proposed in the area during the winter 2025/26 to confirm the interpretation of geophysical anomalies and to characterise adjacent areas. The obtained data will be used to inform archaeological mitigation strategy. This is welcome; however, the results will likely not be available before conclusion of the examination of the DCO for the project.</p> <p>Historic England would expect to be consulted by the applicant in the event of the further evaluation identifying additional archaeological remains which could be considered to be of national importance or if new data would lead to re-interpretation of known remains.</p>	<p>The Applicant notes the response from Historic England.</p> <p>As an update, the draft interim report detailing the findings of the evaluation trenching undertaken to examine the area of Change 3 in Winter 2025/26 was shared with Historic England in January 2026. The final interim report is being submitted at Deadline 4 (see Application Document 9.114 Interim Phase 3 Archaeological Report – Suffolk submitted at Deadline 4). The final report will be submitted before the end of the examination process.</p> <p>The interim report concludes that no archaeological remains of national significance have been identified in the area covered by Change 3 as depicted in Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055].</p> <p>An update to Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] will be submitted before the end of examination, and this will incorporate relevant updates associated with Change 3 and take account of comments from stakeholders including Historic England. This will include an option for Preservation in Situ as well as full excavation.</p> <p>In relation to the comment “<i>We have recommended in our relevant representation that the wording of the DCO Requirement 14 [CR1-27] be changed to ensure that Historic England would be a named party in relation to further consultation</i>”, the Applicant can confirm that the DCO wording has been updated to include Historic England as a named party (see Application Document 9.7 (D) Applicant’s Schedule of Changes to the Draft Development Consent Order [REP3-056]).</p>

Reference	Topic	Applicant's Response
	<p>The process of further consultation and the implementation of the mitigation measures will need to be appropriately secured in the revised Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]. The document should be amended, however as the impact is on a non-designated heritage assets of likely regional significance we will defer to the LPA and their expert and specialist advisors to provide detailed advice.</p> <p>We have recommended in our relevant representation that the wording of the DCO Requirement 14 [CR1-27] be changed to ensure that Historic England would be a named party in relation to further consultation. This is in order to manage assessment and mitigation, particularly post consent. This is particularly relevant for this area where the results of the evaluation will not be known at the time of the examination and therefore the mitigation strategy would be established post consent.</p>	
n/a	<p>Summary</p> <p>Historic England acknowledges that the proposed changes to the Sea Link DCO, will provide the project with necessary flexibility to respond to the results of the surveys and to address the stakeholder's feedback. We consider the changes would be reasonable within the scope of the project.</p>	The Applicant notes the response from Historic England.

Table 2.5 Applicant’s Response to Relevant Representation and Written Representation of Network Rail Infrastructure Limited [REP3A-029]

Reference	Topic	Applicant’s Response
n/a	<p>Among the proposed amendments, the main one of significance for NR is Change 4: Benhall railway bridge, Suffolk. These changes introduce land into the Order limits including the Benhall Railway overbridge proposing two potential options for strengthening works on the bridge either:</p> <ol style="list-style-type: none"> 1. the installation of a mini bridge; or in alternative 2. conducting minor works to fix the bridge. <p>Although it is understood that the bridge itself is owned by Suffolk County Council, this bridge sits over operational railway track and as such, any works conducted to the bridge itself or in the vicinity of the railway could have implications for the railway including potential closures and temporary possession.</p> <p>As indicted in NR’s response to Examiner’s Questions dated 9 January 2026, any such closure would be essential to ensure safe access for investigations of the bridge, installation of a mini-bridge (if it over sails the railway) and any required bridge strengthening works. Further, any activities within 10 meters of the NR boundary fence and over the railway corridor would necessitate possession of the railway lines, thus leading to their closure during the works. These closures would pose a clear detriment to safe and efficient running of the railway, as well as potential service impacts.</p> <p>It has also been considered that closure of the highway which goes over the bridge could place additional service pressures on level crossings within the area if road traffic is diverted.</p> <p>Furthermore, NR would require the applicant to enter into a Basic Asset Protection Agreement (BAPA) with NR’s Asset Protection team in order to facilitate the necessary works and possession requirements. 1</p> <p>Finally, NR’s consent to any and all such works on this bridge would be necessary before proceeding, to ensure sufficient controls to preserve the safety of the railway.</p> <p>Network Rail is continuing to review the Change Request documentation and proposals and will continue to work constructively with the Applicant to clarify any issues raised. Accordingly, Network Rail reserves the right to produce additional and further grounds of concern and its effects of this Change Request on Network Rail's assets are available.</p>	<p>The Applicant is in discussions with Network Rail over these issues, as set out in Applicant’s Response to January Hearing Action Points CAH1 ISH2 - Deadline 4. An updated version of Application Document 9.56 Draft Statement of Common Ground with Network Rail [REP1-092] will be submitted at a future deadline.</p>

Table 2.6 Applicant’s Response to Relevant Representation and Written Representation of Ward Hadaway LLP on behalf of Northumbrian Water Limited [REP3A-036]

Reference	Topic	Applicant’s Response
1.1.1.	<p>On 5 December 2025, the Examining Authority accepted proposed changes made to the Project by the Applicant (Changes) and invited all interest parties to make representations on the Changes and amended the examination timetable to allow for this.</p> <p>NWL has requested additional details on the Changes in addition to information on the remaining provision within the proposed DCO that may have a serious impact on NWL's assets.</p> <p>To date, NWL has not received the information requested from the Applicant which means that NWL are not able to carry out an assessment on the impact of the Project on NWL's assets. The requested details are also required by NWL to ensure that any requisite amendments to the draft Asset Protection Agreement and Protective Provisions (draft APA/PP's) prepared by NWL can be sought by NWL and agreed with the Applicant as soon as possible. For reference, NWL are awaiting comments on its draft APA/PP's from the Applicant.</p> <p>NWL are concerned at the lack of engagement from the Applicant in relation to the information requested and how that may affect NWL's ability to engage with the examination process and how any potential issues may be addressed.</p> <p>NWL will continue to seek engagement from the Applicant on the Changes and the remaining provision of the DCO to agree any requisite protections to its assets however, we respectfully request the opportunity to make any further representations on the Changes (and related and consequential provisions of the DCO) during the examination period.</p>	<p>Prior to submitting a formal change application to the Planning Inspectorate, the Applicant sought the views of NWL on the then-proposed changes in line with the approach taken during the pre-application phase and at DCO acceptance:</p> <ul style="list-style-type: none"> - 6th October 2025: The Applicant wrote to NWL via 1st Class post at their registered office address with details of the proposed changes - 7th October 2025: The Applicant sent email notification of the proposed changes to two @nwl.co.uk contacts, including that listed on NWL’s website for large developers. An automatic response from NWL acknowledging receipt of this email was then sent back to the Applicant. <p>The Applicant is in discussions with Northumbrian Water on these issues, as set out in Application Document 9.90 Applicant’s Response to January Hearing Action Points CAH1 ISH2 - Deadline 4. An updated version of Application Document 9.57 Draft Statement of Common Ground (SoCG) with Northumbrian Water [REP1-093] will be submitted at a future deadline.</p> <p>The Applicant has shared data with Northumbrian Water, allowing them to undertake a Clash Assessment which the Applicant has reviewed and incorporated updates into the position within the SoCG.</p> <p>The Applicant is also in discussions with Northumbrian Water on the terms of the draft Asset Protection Agreement and Protective Provisions. Comments on these documents were issued to Northumbrian Water on 2 February 2026 and the Applicant received an updated draft from Northumbrian Water on 10 February 2026. The points raised in this draft of the Protective Provisions are being considered and the Applicant will respond to Northumbrian Water. The Applicant is hopeful that agreement can be reached on these documents, and will provide a further update to the Examining Authority at a future deadline.</p>

Table 2.7 Applicant’s Response to Relevant Representation and Written Representation of Kent Wildlife Trust [REP3A-002 & REP3A-023]

Reference	Topic	Applicant’s Response
1	<p>ABSENCE OF ECOLOGICAL BASELINE SURVEYS</p> <p><u>Omission of saltmarsh</u> KWT recognises, in principle, the stated intention behind this Change Request, namely, to provide flexibility to select an access route that avoids encroachment onto saltmarsh habitat and thereby reduce the risk of direct impacts. However, after reviewing Document 2.9.2: Habitats of Protected Species and Important Habitats – Kent, we are concerned as to why saltmarsh has been omitted from the plans. When reviewing this document, in particular plan DCO/K/HA/PS/0810 (sheet 3 of 6), saltmarsh is not a habitat listed under the ‘Legend’ and is not annotated on the plan. As saltmarsh is both a Section 41 Priority Habitat and a qualifying feature of national and international designated sites, its omission from a document explicitly titled “Habitats of Protected Species and Important Habitats” represents a material deficiency in the Applicant’s environmental information. This omission undermines confidence in the Applicant’s ability to avoid impacts in practice and prevents meaningful scrutiny by the Examining Authority (“ExA”) and Interested Parties. Without saltmarsh being accurately mapped and referenced within the relevant plans, there is no clarity that the habitat can be or will be avoided during construction, operation or maintenance.</p> <p><u>Absence of site-specific ecological data</u> The proposed change is being advanced in the absence of any site-specific ecological baseline data for the hoverport, nor any safeguards to avoid significant adverse effects on protected species, Priority Habitats and Priority Species, or the integrity of designated sites.</p> <p>We note that the Applicant has acknowledged that terrestrial invertebrate surveys were not carried out due to lack of access agreement, and no detailed botanical or reptile surveys have been undertaken. Despite this, the Applicant asserts that the use of existing hardstanding means that access can occur without vegetation clearance and without significant ecological effects. KWT strongly disagrees with this position. The former hoverport has been disused for decades and has naturally rewilded, supporting a mosaic of ruderal, coastal and semi-natural habitats. Vegetation, including larval foodplants and rare flora, is known to occur within cracks, margins and thin soil layers across the hardstanding and adjacent areas.</p> <p><u>Likely adverse impacts</u> The absence of formal vegetation clearance does not equate to the absence of habitat loss. Machinery tracking, vibration, compaction and ground disturbance associated with construction traffic have potential to cause significant habitat damage and loss, particularly where protected species rely on rootstock, substrate integrity or undisturbed ground conditions.</p>	<p>The extent of the saltmarsh habitat in Pegwell Bay has been mapped and is included in Figure 6.4.4.2.4 Habitats Present at, and Location of, Trenchless Solution Entry/Exit Points in Application Document 6.4.4.2 (B) Environmental Statement Figures Marine Benthic Ecology [REP1-067]. Information on the saltmarsh habitat is also included in Application Document 6.3.4.2.C ES Appendix 4.2.C Intertidal Surveys 2023 [APP-198]. These intertidal surveys were completed in accordance with best practice to characterise the baseline at the Kent Landfall (Pegwell Bay) for the purpose of completing the impact assessment, the results from which are presented in Application Document - 6.2.4.2 (C) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 4.</p> <p>A site visit/ground survey was undertaken by ecologists in August 2025 (post submission). The purpose of the site visit was to ascertain the potential for saltmarsh habitat to be present along the southwest edge of the former hoverport apron which had been identified in the Application as the potential entry point onto the mudflats. The survey was not a formal Intertidal Habitat Survey. However, photographic evidence obtained from the site visit indicated that there is potential for saltmarsh to be present along the southwest edge of the former hoverport apron.</p> <p>Based on these findings the Applicant made a decision to amend the boundary of the DCO order limits as presented in the Application Document 9.76.2 (A) Change Request Report [CR1-052] and Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055] to include the entirety of the former hoverport apron in order to provide flexibility to select an access route that avoids encroachment onto saltmarsh habitat and thereby reduce the risk of direct impacts. The Change Request was also supported by Application Document 9.76.5.1 Change Request: Appendix A Saltmarsh Technical Note [CR1-056] which provides detailed information on the characteristics of the saltmarsh habitat including the physical processes and controls on its distribution, the location of the proposed project relative to the saltmarsh habitat including information on relevant site designations and the protected status of the habitat (Priority Habitat), background to the presence of the saltmarsh habitat in Pegwell Bay and an assessment of the likelihood of further seaward encroachment of the saltmarsh habitat along the southwest side of the hoverport apron.</p> <p>Acknowledging that there could be potential for further seaward encroachment of the saltmarsh along the southwest edge of the hoverport apron, the Applicant considered it to be more appropriate to complete a detailed saltmarsh habitat survey (as set out in commitment B67 within Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078]) immediately prior to construction (post consent) to ensure that the access route from the hoverport onto the mudflats and routes across the mudflats are informed by the most recent up to date accurately mapped extent of the saltmarsh habitat.</p> <p>Regarding habitats and species on the hoverport itself, Kent Wildlife Trusts’ comments appear to be about the use of the hoverport in general rather than the change specifically. The Applicant has made every reasonable effort to obtain access to the hoverport for the purpose of undertaken ecological surveys, however as previously stated, this was not possible due to the landowner not agreeing land access permission for surveys to be undertaken in the relevant season. However, the fact that surveys have not been possible has been addressed through the precautions in commitment B66 within Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078].</p> <p>The Applicant’s response in Application Document 9.73 Applicant’s Responses to First Written Questions [REP3-069] addresses this matter. Appendix I to the submission REP3-070 includes photographs showing extensive areas of intact tarmac and concrete through the vegetation without needing to track over significant stands and without significant cracks and crevices. Vehicle movements on these areas will not result in significant disturbance to vegetation (or species using that vegetation) off the tarmac or hardstanding. Where (closer to the foreshore) there are areas of broken concrete, these are in a very sparsely vegetated area and trackway will be used to ensure no damage is caused if they cannot be avoided.</p>

Reference	Topic	Applicant's Response
	<p>National Policy Statements (“NPS”) for energy (“EN-1”) (December 2025), paragraph 4.3.3 makes clear that temporary, indirect and construction-phase effects must be fully assessed, including effects arising from access arrangements and construction traffic. Case law confirms that “habitat damage” is not limited to permanent land take or formal clearance. In R (Morge) v Hampshire CC [2011] UKSC 2¹, the Supreme Court recognised that disturbance and degradation of habitat can be sufficient to engage wildlife offences where it affects the ecological functionality relied upon by protected species.</p> <p>Proceeding with a change to the Order Limits without first establishing an adequate ecological baseline is contrary to the precautionary principle, undermines the integrity of the environmental assessment, and conflicts with Regulation 14 of the Environmental Impact Assessment (“EIA”) Regulations and goes against NPS EN-1, which states in paragraph 3.3.77 that:</p> <p><i>“Precise routing and siting decisions will need to be made as project design is refined and in accordance with appropriate surveys and consultations.”</i></p> <p>This requirement reflects established case law that environmental assessment must be based on sufficient, up-to-date baseline information to enable a lawful decision to be taken. In R (Blewett) v Derbyshire CC [2003] Env LR 29², the Court confirmed that environmental information must be sufficient to allow the decision-maker to understand the likely significant effects of a proposal. Where baseline data is absent or materially incomplete, the assessment is inherently flawed.</p> <p>Schedule 4 (3) of the EIA Regulations 2017 requires Environmental Statements (“ES”) to include “a description of the current state of the environmental (baseline scenario)” and an outline of how that environment may evolve without the development. In the absence of any site-specific surveys at the hoverport, this requirement has not been met.</p> <p>As outlined within our Deadline 3, EXQ1 response (8th January 2026), KWT strongly recommends that full ecological baseline surveys including botanical surveys, reptile surveys, invertebrate and targeted invertebrate surveys for protected and Priority Species must be undertaken before any access route is designed or agreed. Additionally, any access route should not be agreed without consultation with, and approval by, relevant statutory and non-statutory bodies such as Natural England, KWT and Butterfly Conservation.</p>	<p>In addition, commitment B66 added to Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078] states that ‘<i>To ensure ecological interest features of the former hoverport are not affected during construction, the following approach will be taken: a) pre-construction botanical survey will be undertaken to map vegetation stands of particular significance to protect, such as orchids or dense stands of dock or wild carrot (the larval food plants of the two rarest invertebrates on site). b) An access route will subsequently be marked out which avoids these stands, along with dense stands of other vegetation. c) A suitable qualified ecologist will be on site to supervise and guide the marking out of the access route</i>’.</p> <p>Commitment B70 within Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078] identifies that Kent Wildlife Trust, Thanet District Council and Natural England will be consulted on the final route to be used through the hoverport.</p>
2	<p>PROTECTED AND PRIORITY SPECIES AT THE HOVERPORT</p> <p>Annual monitoring surveys organised and conducted by Butterfly Conservation and Kent Moth Group, have identified the hoverport as an important ecological habitat for invertebrates, and is known to support a range of protected and Priority Species, including, but not limited to:</p>	<p>See above response. Commitment B66 within Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078] already refers to including survey for rare or notable plants ‘such as orchids’ in addition to larval foodplants. Note that in the Applicant’s response to 1ECOL5 in Application Document 9.73.1 Applicant’s Responses to First Written Questions - Appendices [REP3-</p>

¹ [Morge \(FC\) \(Applicant\) v Hampshire County Council \(Respondent\)](#)

² [Blewett, R \(on the application of\) v Derbyshire County Council | \[2003\] EWHC 2775 \(Admin\) | England and Wales High Court \(Administrative Court\) | Judgment | Law | CaseMine](#)

Reference	Topic	Applicant's Response
	<ul style="list-style-type: none"> ● Fiery Clearwing Moth – fully protected under Schedule 5 of the Wildlife and Countryside Act 1981, with a confirmed breeding colony present. Larvae feed within dock rootstock from August through to the following May and may overwinter for up to two years. Any ground disturbance during this period, including machinery tracking, would constitute habitat loss and would be likely to kill larvae directly. ● Sussex Emerald Moth – also fully protected under Schedule 5, with repeated recent adult records indicating a possible resident breeding population. The species overwinters as a very small larva on wild carrot and ragwort, both of which are present on and adjacent to the hoverport hardstanding. Disturbance of these plants or their root zones during the overwintering period would be highly likely to result in mortality. ● Oblique Striped Moth – Nationally Scarce, with a stronghold along the Sandwich–Pegwell Bay coastline. ● Bright Wave Moth and Rest Harrow Moth – both Red Data Book and Section 41 Priority Species. ● Common Lizards – a protected reptile species known to use the hoverport's disturbed coastal habitats and hardstanding margins. Other species of reptile such as slow worm are likely to also be present onsite. ● Rare Orchids – including Man and Lizard Orchids, which are both Section 41 Priority Species. ● Numerous Micro-Moth species of conservation concern, nationally scarce and Red Data Book species such as <i>Oxypteryx wilkella</i>, <i>Gelechia hippophaella</i>, <i>Acroclita subsequana</i> and <i>Lobesia occidentis</i>. <p>Ground disturbance, even along hardstanding routes, would present a clear risk of killing or injuring these species, or damaging their habitats. For example, clustered dock, curled dock and common sorrel are the larvae foodplant species for Fiery Clearwing Moths. These plant species grow within cracks, margins and thin soil layers associated with hardstanding and ruderal substrates of the hoverport. Any ground disturbance, including machinery tracking, would constitute habitat loss and would be likely to kill larvae directly. As such, a licence would be required from Natural England, and strict seasonal constraints would apply to any works affecting these areas. No such licensing pathway can be defined or secured in the absence of appropriate surveys and detailed mitigation strategies.</p> <p>The current approach taken by the Applicant is inconsistent with established case law on protected species. In <i>Morge v Hampshire CC</i> [2011] UKSC 2, the Supreme Court confirmed that a competent authority must be satisfied, at the point of consent, that a development can be carried out lawfully and without committing offences under wildlife legislation. Where protected species are reasonably likely to be present, as is the case at the hoverport, sufficient survey information must be available to inform that conclusion</p>	<p>070] there are photographs which show clear intact tarmac and concrete routes without significant cracks and crevices.</p>

Reference	Topic	Applicant's Response
	<p>(Prideaux v Buckinghamshire CC and FCC Environmental UK Limited [2013]³).</p> <p>Proceeding in the absence of baseline surveys, and relying instead on future route selection or licensing, represents an unlawful deferral of assessment (Woolley v Cheshire East BC [2009]⁴) and fails to apply the precautionary principle.</p>	
3.	<p>FAILURE TO APPLY THE MITIGATION HIERARCHY</p> <p>NPS EN-1 establishes a clear and binding requirement that environmental harm must be addressed through the Mitigation Hierarchy, with paragraph 4.2.24 stating “<i>Applicants must apply the mitigation hierarchy and demonstrate that it has been applied.</i>” Due to an absence of ecological baseline data for the hoverport, the Applicant cannot assess likely impacts or demonstrate that avoidance has been prioritised. This approach is fundamentally inconsistent with both policy and law.</p> <p>KWT considers that the Change Request does not demonstrate proper application of the Mitigation Hierarchy. Rather than avoiding impacts through early design decisions informed by ecological evidence, the Applicant is seeking flexibility first and assessment later. Avoidance is the first step of the Mitigation Hierarchy. This requires understanding what ecological receptors are present before access routes are defined. Designing an access corridor without knowing where protected species, rare plants or sensitive habitats occur reverses this process and risks embedding avoidable harm into the project design. Failure to apply the Mitigation Hierarchy correctly is not a technical omission but a substantive failure of law. In <i>Champion v North Norfolk DC</i> [2015] UKSC 52⁵, the Supreme Court confirmed that compliance with environmental assessment duties must be approached with substance rather than form. An approach that defers avoidance and assessment until after consent has been granted does not meet that standard.</p> <p>Overall, the Applicant’s approach fails to comply with the Mitigation Hierarchy as required by EN-1 and EN-5 for the following reasons:</p> <ul style="list-style-type: none"> ● Avoidance has not been prioritised or demonstrated; ● Routing and access decisions have not been informed by baseline ecological data; ● Impacts are understated by excluding machinery tracking as habitat loss; ● Mitigation is deferred to post-consent stages rather than secured upfront; and ● There is no certainty that protected species offences can be avoided. 	<p>Please refer to the response provided above regarding the approach taken to acquiring relevant baseline information and commitments made by the Applicant to avoid potential impacts on the saltmarsh and species within the hoverport as set out in Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078]. Surveys were not possible due to landowner access refusals until after the survey season was over. However, photographs have been submitted clearly showing open unvegetated access routes through the site that would not require tracking over vegetation. There is therefore no reason to assume any significant adverse effect would arise or that mitigation (other than careful route selection) would be needed. Commitment B66 within Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP3-078] commits to an ecological watching brief and pre-construction surveys to ensure no significant impact on vegetation and thus no significant impact on invertebrate, reptile or plant populations on site.</p>

³ [Prideaux, R \(on the application of\) v Fcc Environment UK Ltd | \[2013\] PTSR D39 | England and Wales High Court \(Administrative Court\) | Judgment | Law | CaseMine](#)

⁴ [Woolley \(Applicant\) v Cheshire East BC \(Respondent\) \[2009\]](#)

⁵ [R \(on the application of Champion\) \(Appellant\) v North Norfolk District Council and another \(Respondents\)](#)

Reference	Topic	Applicant's Response
	<p>KWT supports, in principle, efforts to avoid impacts on saltmarsh at Pegwell Bay. However, the proposed extension of the Order Limits at the hoverport is premature, inadequately evidenced, and risks facilitating ecological harm rather than preventing it. The absence of baseline ecological surveys fundamentally undermines the Applicant's claim that no vegetation loss or species impacts will occur. Machinery tracking over rewilded hardstanding must be treated as habitat loss, particularly for protected invertebrates and reptiles. Until surveys are undertaken and an evidence-led access route is designed and consulted upon, KWT considers the Change Request to be unacceptable.</p>	<p>KWT therefore urges the ExA to require that:</p> <ul style="list-style-type: none"> • Saltmarsh habitat is clearly annotated on all plans and documents to ensure that no areas of saltmarsh fall within the proposed access route; • Comprehensive ecological surveys of the hoverport are undertaken prior to any approval of revised access arrangements; • Any access route is survey-led, avoids impacts to protected species and their habitats, and is subject to consultation with relevant bodies; and • The Change Request is assessed in line with the precautionary principle and the Mitigation Hierarchy. <p>In the absence of these requirements being met, KWT considers that the Change Request cannot lawfully be accepted, as it would enable construction activities to proceed without sufficient environmental information, contrary to the EIA Regulations, the Mitigation Hierarchy, and established case law. Without these safeguards, the proposed change risks compounding uncertainty, undermining environmental protection, and repeating the mistakes of previous infrastructure projects at Pegwell Bay.</p>

3. Applicant’s Thematic Comments on CR1 Relevant Representations and Written Representations

3.1.1 The tables below comprise the Applicant’s responses to the themes raised in the CR1 Relevant Representations and Written Representations that the Applicant has not provided a direct response to.

Table 3.1 Applicant’s Response to Relevant Representations and Written Representations that raise Change 1 - Change to access at the former Hoverport, Pegwell Bay, Kent

Reference	Topic	Applicant’s Response
1.1.1	Concerns that this is not a minor change. <i>‘Although the Applicant describes CR1 as a “minor” or “non-material” change, it clearly introduces new land take, new rights, and new construction activity in a highly sensitive coastal location. On any ordinary reading, that is not minor.’ [REP3A-101]</i>	<p>This change is a modest extension to the Order Limits to provide National Grid with flexibility over the precise route that vehicles may use across the hoverport to access the intertidal area at Pegwell Bay. The need for this flexibility arises from surveys undertaken in August 2025, which recorded saltmarsh encroaching toward the existing Order Limits and the current ramp used for construction, operations and maintenance access.</p> <p>The Examining Authority has already assessed [PD-015] that the changes, whether considered individually or taken together, would not be so substantial as to amount to a materially different project from that which was originally applied for. Furthermore, the Examining Authority has also concluded that the changes are capable of being examined within the remaining timetable for the Examination and that there is sufficient time available for interested parties to digest, understand and comment upon them.</p> <p>National Grid is committed to avoiding the sensitive saltmarsh habitat at Pegwell Bay. This commitment underpins the design of the landfall, where trenchless techniques are already proposed to avoid direct interaction with the habitat. The amendment to the Order Limits simply enables an alternative access route to the intertidal area should it be required to continue that avoidance.</p> <p>The change does not increase the overall area required for construction within the intertidal zone, nor does it alter the number, type, or intensity of vehicle movements. It also does not introduce any new development or physical works at the hoverport itself. The purpose of the amendment is to preserve environmental protection measures, specifically saltmarsh avoidance, in response to updated environmental information.</p> <p>For these reasons, while the amendment introduces a small adjustment to the Order Limits boundary, it does not alter the nature, scale, or environmental effects of the authorised project. It therefore remains appropriately characterised as a minor change.</p>
1.1.2	Concerns over Apron Cracking <i>‘The hoverport apron’s concrete is cracking, with toxic chemicals starting to escape into the area, including arsenic’ [REP3A-041]</i>	<p>Structural Integrity Assessment of the hoverport hard standing will be undertaken to ensure the size of equipment and lorry loads can be deployed safely across the hoverport. The risk and impact assessments that National Grid has undertaken for the DCO application recognise the potential for a level of contamination, and in the context that the proposed use for the Hoverport is solely for access.</p> <p>National Grid recognises the importance of ensuring that the hoverport hard standing is suitable for the limited construction and maintenance access proposed. The Applicant will include the Hoverport in the highway condition surveys outlined within section 7.4.7 of Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan - Kent (CTMTP) [APP-338]. This assessment is a standard precautionary measure and will ensure that access can be undertaken without giving rise to structural risk.</p>
1.1.3	Concerns over Disturbance of Colliery Spoil and possible leachate <i>‘The use of heavy machinery places pressure on the ground and could lead to erosion or the crumbling of the protective outer concrete layer. If this protection is compromised, these substances could leach into Pegwell Bay, particularly if the site is subjected to repeated heavy industrial use.’ [REP3A-080]</i>	<p>In line with good practice, National Grid’s environmental risk and impact assessments have taken a precautionary approach and recognised the potential for contamination within the hoverport area.</p> <p>Importantly, the use of the hoverport is strictly limited to access across the existing hard standing. No intrusive works, ground disturbance, or new development are proposed at the hoverport as part of the change. This limited and non-intrusive use is itself an acknowledgement of the potential for underlying contamination, and the design has been developed to avoid triggering any release of such material.</p>

Reference	Topic	Applicant's Response
		For these reasons, the concerns raised regarding cracking of the hoverport surface and the risk of releasing "possible leachate" are not supported by the evidence. The proposal incorporates appropriate structural checks, adopts a precautionary environmental approach, and avoids any activity that could disturb ground conditions.
1.1.4	Concerns over a Lack of Ecological Surveys <i>'I have not seen any surveys or research by National Grid on this area, so how can they know how valuable this site is, and what, if any, mitigation they will try to provide for the environmental damage they will do if they do get their way and buy this land?'</i> [REP3A-179]	The purpose of extending the Order Limits is to allow the potential relocation of the access route onto the intertidal mudflats. This is intended to give National Grid more flexibility to avoid sensitive saltmarsh habitats in the upper intertidal area. This extension to the Order Limits allows for flexibility once surveys are complete to identify the route of least impact. In their response to the Change Request Consultation, Natural England confirmed that they are 'content with the change' to access at the former hoverport as 'this change is intended to avoid impacts to saltmarsh habitat, in line with our relevant representation comments.' The same environmental commitments as in the original application would apply to the changed application.
1.1.5	Concerns over Impacts on Flora and Fauna <i>'The old rewilded Hoverport site is a unique haven for wildlife and unexpected rare flora and fauna, such as the rare Lizard Orchid.'</i> [REP3A-080]	The new area of Hoverport added to the Order Limits is mainly concrete. The widening of the access area also allows greater flexibility to avoid open mosaic habitats within the Hoverport compared to the previous design (see measure B66 within REAC [REP3-078]). As such, there would be no new adverse effects on the terrestrial habitats as a result of Change 1 as the access route taken through the Hoverport will be able to keep to hardstanding and avoid any vegetation and tree clearance, although some limited branch pruning of shrubs adjacent to the hardstanding route may be required, depending on extent of further growth prior to construction.
1.1.6	Concerns over Lizard, orchid, sand lizards, bats, migrating & native birds and Seal Disturbance. <i>'Our children have canoed enjoyed watching the colony of seals swimming in the Bay, watched all the beautiful birds waders' rare fauna & flora including the rare Lizard orchid, sand lizards bats, migrating & native birds.'</i> [REP3A-187]	In addition to the original proposal, National Grid has added a new commitment to Application Document 9.84 Register of Environmental Actions and Commitments [REP3-078] , as follows: <i>'To ensure ecological interest features of the former hoverport are not affected during construction, the following approach will be taken: a) pre-construction botanical survey will be undertaken to map vegetation stands of particular significance to protect, such as orchids or dense stands of dock or wild carrot (the larval floodplants of the two rarest vertebrates on site). b) An access route will subsequently be marked out which avoids these stands, along with dense stands of other vegetation. c) A suitable qualified ecologist will be on site to supervise and guide the marking out of the access route.'</i>
1.1.7	Concerns over the Impact on the SSSI <i>'Pegwell Bay sits in an area of SSSI and has cultivated into a wonderful natural nature reserve. It is home to many forms of flora and fauna, with plenty of wildlife and many birds'</i> [REP3A-197]	This commitment provides a greater degree of certainty that effects on the saltmarsh will be avoided than was the case prior to the Change Application. The revised Order Limits include a wider area of the Hoverport frontage and the area of intertidal mudflat immediately adjacent to the Hoverport. Use of the mudflats for construction access to trenchless crossing (HDD) exit pits and during marine cable pull in and cable burial, and during operation and maintenance has already been considered in the assessment presented in Application Document 6.2.4.4 Part 4 Marine Chapter 4 Marine Mammals [REP3-023] . This assessment has been informed by updated noise modelling presented in Application Document 9.49 Seals and Airborne Noise Modelling [REP1-122] . The assessment concludes that potential effects of construction traffic using the mudflats on seals will be negligible. There will be no changes to the type, number or frequency of construction traffic movements associated with the proposed change to the Order Limits. The hoverport site is known to support rare invertebrates, including fiery clearwing moth and Sussex emerald moth, both of which are legally protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). It also contains habitat suitable for reptiles and supports populations of man orchid and lizard orchid. However, the hoverport retains extensive areas of hardstanding that remain unvegetated. For the first stretch the existing track will be used (the habitat of interest being either side of that track) then for the final stretch construction plant will drive across the open unvegetated areas of hardstanding, thus avoiding habitat suitable for orchids, rare invertebrates or reptiles. There will thus be no vegetation clearance, although some pruning back of shrub branches may be needed depending on extent of growth prior to works commencing.
1.1.8	Concern over impact on the Habitats Regulations Assessment REP3A-089 <i>'Habitats Regulations 2017 (Regulation 63): The applicant must demonstrate no adverse effect on European sites. This test has not been met.'</i> [REP3A-089]	No change is required to the HRA or its conclusions as a result of Change 1. The changed application does not introduce construction access to the intertidal zone through the former Hoverport (with associated need to consider impacts on golden plover) as that was already part of the DCO application and therefore it had already been assessed within the HRA. There are no changes to the type, number or frequency of construction traffic movements assumed within the DCO application. The proposed change increases the options available for accessing the intertidal zone while avoiding saltmarsh. Avoidance of impacts on saltmarsh is a core assumption of the HRA (for example, in paragraph 4.3.4) [REP3-028] such that the proposed change ensures compliance with those assumptions. As requested by the Examining Authority, Change 1 was discussed with Natural England on 30 October 2025. In their response to the targeted consultation on the Change Request dated 3 November 2025, Natural England indicated they are content with the proposed change as it is intended to avoid impacts to saltmarsh habitats and it is in line with the comments in their relevant representation.

Reference	Topic	Applicant's Response
1.1.9	<p>Concern over impact on salt marshes</p> <p><i>'The Hoverport site is very fragile and historically the site was deemed a danger to the environment if disturbed. This was due to the Hoverport being built on colliery spoil. The bedrock foundations would be at risk of cracking should heavy machinery be put on it. Which could result in the release of harmful compounds inadvertently damaging the saltmarsh.'</i></p> <p>[REP3A-110]</p>	<p>National Grid acknowledges that the revised Order Limits do not exclude the current area of existing saltmarsh that National Grid proposes to avoid. Saltmarsh is a dynamic habitat and can change as a result of natural coastal events, therefore, the existing saltmarsh may be subject to change across the construction and operation. It is therefore beneficial for the ecology of Pegwell Bay for there to be flexibility in the location of the access to respond to the conditions at the time. This flexibility will ensure that National Grid can access and exit the intertidal area safely while still committing to not impacting the saltmarsh. The inclusion of a wider area does not indicate that National Grid will utilise a wider area than proposed previously. The Applicant will complete a saltmarsh habitat survey to identify the extent of the saltmarsh habitat to confirm the entry and exit points to the intertidal area during construction so that no impact to saltmarsh occurs (B67 of the REAC [REP3-078]).</p> <p>Whilst there is no change to the reported environmental effects, given that the change will ensure avoidance of saltmarsh, the change is considered beneficial from an environmental perspective and is being made to reduce the potential impacts of the project on habitats in Pegwell Bay.</p>
1.1.10	<p>Concerns over an Impact on a Rewilded Environment -</p> <p><i>'Thanet District Council has already refused permission to use the old rewilded Hoverport site, as they realise how valuable it is to the wildlife, local people, businesses, and tourists.'</i> [REP3A-083]</p>	<p>The flexibility that is sought for access to the intertidal area as part of this Change, will ensure that National Grid can access and exit the intertidal area safely while still committing to not impacting the saltmarsh. The inclusion of a wider area does not indicate that National Grid will utilise a wider area than proposed previously. The Applicant will complete a preconstruction saltmarsh survey to identify the extent of the saltmarsh habitat to confirm the entry and exit points to the intertidal area during construction so that no impact to saltmarsh occurs.</p>
1.1.11	<p>Concerns over the loss of public access to the Hoverport</p> <p><i>'I wish to protest that the Rights of Nature and access to this site by members of the public to enjoy this rewilded site, should be valued as much as the business needs of NG.'</i> [REP3A-108]</p>	<p>National Grid has rigorously assessed the Proposed Project's impact on Public Rights of Way, adhering to the mitigation hierarchy by avoiding, preventing, reducing and, if possible, offsetting impacts. National Grid acknowledges that there will be a temporary disruption to footpaths during the construction phase. Where the Proposed Project has a temporary impact on a Public Right of Way (PRoW) during construction, mitigation measures will be put in place. Where there is a permanent impact on a footpath, a suitable diversion will be provided and implemented prior to the closure.</p>
1.1.12	<p>Concern over impact on King Charles III Coast Path and the Contra Trail cycle</p> <p><i>'NG also downplay the impact of construction traffic crossing the King Charles III Coast Path and the Contra Trail cycle route. In reality, they expect vehicle crossings between 4 and 40 times a day, throughout a two-year construction period from 2027 to 2029. That means repeated disruption to well-used public paths for years.'</i> [REP3A-139]</p>	<p>This Change has not altered the conclusions in relation to the King Charles III Coast Path, Cantii Way and the Contra Trail as set out in Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism of the Environmental Statement [REP1A-007].</p> <p>The King Charles III Coastal Path, NCN 15 and The Cantii Way cycle route will be crossed during the construction and operation of the Kent Onshore Scheme by the Trenchless HVDC Cable alignment. This crossing will be underground at depth and will not require land take or access to the routes. As a result, there are no anticipated provisions, diversions or closures.</p> <p>The King Charles III Coastal Path and The Cantii Way are assessed to a very high sensitivity as regularly used and valued national trails. Additionally, the routes are used predominantly for recreation and have limited comparable alternatives available in the local vicinity. The impact of the Kent Onshore Scheme is assessed to be negligible as the routes will not be closed and can continue to be used for their intended purpose without impacting the value of the route or quality of user experience. This results in a permanent negligible effect which is not considered significant.</p> <p>The Contra Trail National Trail from Ramsgate to Pegwell Bay passes along Sandwich Road before joining Footpath TR15. As a result, any impact induced on TR15 will also be experienced on the Contra Trail. The Contra Trail is assessed to have a very high sensitivity as a regularly used and valued national trail that connects routes within the wider PRoW network. As set out above, the existing Pegwell Road foreshore access track will cross TR15 and therefore the Contra Trail. Access would be required for 6 months of the construction period and site fencing and crossing gates will be installed to mitigate interactions between national trail users and vehicles. The impact of the Kent Onshore Scheme on the Contra Trail is assessed to be small in line with the magnitude of impact on TR15. This results in a temporary minor adverse effect which is not considered significant.</p>
1.1.13	<p>Concern over increased Flood risk</p> <p><i>'I am extremely concerned about how the construction project will affect the flood risks of the local area. The UK is now 7% wetter than 40 years ago, with sea levels rising by 1.6cm. We are seeing an increase in flooding on UK shores, not only due to rising sea levels but due</i></p>	<p>The proposed change would help to further reduce potential impact on a hydrologically sensitive saltmarsh habitat. The Manston Airport outfall will not be modified or obstructed as a result of the proposed change, and there would therefore be no related impacts on Pegwell Bay as a receptor, to which the outfall discharges. When compared to the design presented within the ES, there would be no new or different likely significant effects on the water environment as a result of the proposed change.</p>

Reference	Topic	Applicant's Response
	<i>to the degradation of the land's natural defence mechanisms, including salt marshes.</i> [REP3A-159]	
1.1.14	Concern over impacts on Tourism <i>'particularly walkers and cyclists, birdwatchers and seal-spotters. National Grid's existing plans, if approved, will have a severe limiting effect on the local visitor economy, and if CR1 is approved it will exacerbate this, as few tourists will wish to visit a previously unspoilt wildlife area turned massive, noisy construction site. This will have an adverse effect on local businesses - the cafes and bars that cater for these visitors, the campsites and short-term rentals they stay in, the seal-spotting and fishing trips and the much-loved and carefully researched birdwatching tours will all find little or no audience for their offers.'</i> [REP3A-151]	<p>The proposed change does not alter the way that any PRoW, including PRoW TR15 and TR33, are to be crossed and managed on Pegwell Road on the approach to the Hoverport and so there is no change to the assessed impact on these PRoW. Pedestrian access through the Hoverport, where it interacts with the access route for the Proposed Project once this is in use, will be appropriately managed to ensure safe continued access through the works area, with barriers and crossing points implemented as required. Given the limited and localised nature of the proposed changes to the Order Limits and because the proposed change does not alter the nature and frequency of the access required through the Hoverport, the assessment findings remain the same, and there would be no new or different likely significant environmental effects on socio-economics, recreation and tourism as a result of the proposed change.</p> <p>There will be no significant effects on tourism assets arising from construction of the Kent Onshore Scheme. Given that the change relates to the same vehicles travelling over a slightly different part of the hoverport, there would be no change to the assessment as a result of Change 1. The impacts to tourism and local businesses are considered within Application Document 6.2.3.10 Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism of the Environmental Statement [APP-057]. The chapter concludes that there are no anticipated significant effects as a result of the Proposed Project.</p> <p>Pegwell Bay Country Park borders the landfall section of the Kent Onshore Scheme to the south, however the proposed changes to the Order Limits and internal access road near the foreshore would not result in any changes with respect to socio-economics, recreation and tourism. Pegwell Bay Country Park is identified as an open space receptor with potential to be impacted within the ES chapter. This receptor was therefore assessed and it was concluded that the Proposed Project would not give rise to significant adverse effects from a socioeconomics, recreation and tourism perspective.</p>
1.1.15	Concern over the loss of the Hoverport as a space for Recreation <i>'Currently the Hoverport is used daily by large numbers of people for recreation while at the same time supporting a large number of plants, animals.'</i> [REP3A-070]	
1.1.16	Objection to the use of Compulsory Acquisition Powers <i>'Because the change requires new land rights without the consent of affected users, it triggers the Compulsory Acquisition Regulations, which have not been justified as "proportionate" or the "minimum necessary.'</i> [REP3A-057]	<p>The use of the land will not be restricted in any way and public access will not be prevented and therefore the proposed rights will not change the ability of those who enjoy the area to continue to do so.</p> <p>The Statement of Reasons [REP3-012] explains why National Grid is seeking powers to compulsorily acquire land and/or rights over land for the Sea Link project, setting out the justification for both permanent acquisition and temporary possession to enable the construction, operation and maintenance of the proposed scheme. It outlines the extent of land required, the reasons temporary use is necessary, and demonstrates that the powers sought are necessary, proportionate and fully aligned with relevant statutory and policy requirements. As set out in the Statement of Reasons, it is concluded that there is a compelling case in the public interest for granting these compulsory acquisition and temporary possession powers, as further detailed in Chapter 6 of the Statement.</p>
1.1.17	Suggestion that Alternative locations might be used. <i>'There are plenty of alternative nature free sites to utilise'</i> [REP3A-201]	<p>The main alternative to this change would have been to retain the application as it was previously. The location of the saltmarsh was noted by National Grid surveyors but is not recorded in any application documents and previously there was no commitment to avoid the saltmarsh with vehicles crossing the hoverport. However, during construction there would have been a risk that the saltmarsh would have been impacted by vehicles in a way that will be avoidable through this Change Request. As a responsible developer, National Grid is seeking the change to enable the project to be developed in a way that is sensitive to the habitats at Pegwell Bay so this alternative was rejected.</p>
1.1.18	Concerns over the loss of Grade 1 farmland <i>'There will be a substantial loss of Grade 1 farmland which is already being eroded in the South East and especially Thanet with the unchecked building boom which is currently going on.'</i> [REP3A-157]	<p>Following the Predictive Agricultural Land Classification mapping employed as part of the assessment, there is no Grade 1 agricultural land anticipated to fall within the project boundary. Agricultural land grades will be confirmed following the completion of ALC surveys in early 2026.</p>

Table 3.2 Applicant’s Response to Relevant Representations and Written Representations that raise Change 2 - Change to works plans at Friston (Kiln Lane) substation, Suffolk

Reference	Topic	Applicant’s Response
1.1.1.	<p>Concerns that National Grid are seeking to secure limits of deviation in terms of area/footprint for a GIS “substation” which are far larger than those which are permitted under the EA2 and EA1N DCOs. The area shown on the Change 2 work plans as the Proposed Deviation is a similar size (but might be even larger) than that permitted for an AIS substation under the EA2 and EA1N DCOs. [REP3A-018]</p>	<p>This is incorrect. The limits of deviation for Friston (Kiln Lane) substation are now exactly the same in the Sea Link application as those permitted under the EA2 and EA1N DCO; they are not larger. The limits of deviation for Friston substation in the EA2 and EA1N DCOs are not different for an AIS or GIS substation; with the same area shown regardless of the technology used.</p> <p>Whilst the change to the limits of deviation at Friston (Kiln Lane) substation means the substation could be located further east or west than was previously the case in the Sea Link application, this does not mean that the substation would be larger. No expansion to the substation was proposed as part of this change and the dimensions of the substation remains as previously assessed.</p>
1.1.2.	<p>Concern that the hard-won mitigation secured during the EA1N and EA2 DCO examinations should not be diluted, undermined or compromised in any way and that, however consent is achieved, any previously granted mitigation should be implemented as originally agreed. [REP3A-011]</p> <p>These protections were not accidental; they were the result of extensive scrutiny and community effort. SEAS maintains that they must not be weakened, diluted, or reopened through subsequent change requests. [REP3A-032]</p>	<p>National Grid is seeking to align the limits of deviation for the Friston substation in the Sea Link application with those contained within the SPR consents. This alignment enables the two project teams to work more closely together and adopt consistent approaches. Previously, this was more challenging because the substation location consented for SPR lay outside the limits of deviation identified for the same substation within the Sea Link application. Therefore, this change makes it easier for there to be alignment across the projects rather than more challenging. The change did not alter proposals for mitigation and enhancement incorporated into the Sea Link project.</p> <p>Key stakeholders made it clear, through Relevant Representations and informal discussions, that consistent plans are needed to provide reassurance to the local community. Specifically, they want to ensure that National Grid does not intend to develop a different design to the one already consented through the SPR consents. Consistency in plans helps to reduce interpretation difficulties that stakeholders and the Examining Authority (ExA) as highlighted by Section 89(3) letters issued after submission of the Sea Link application.</p> <p>National Grid is sympathetic to these concerns and considers that they can be more effectively addressed if the substation area is made consistent across applications. This alignment would also support the ExA by reducing unnecessary differences between the two scenarios under examination.</p> <p>The differing locations of the substations between the two schemes also presented a complexity in the highly unlikely event that SPR were to commence but not complete construction. Without this Change, National Grid would have been unable to complete the substation under the Sea Link consent without first demolishing any partially constructed substation and re-constructing it in a slightly different location. This scenario underscores the importance of ensuring the substation area is consistent across all relevant applications.</p>

Table 3.3 Applicant’s Response to Relevant Representations and Written Representations that raise Change 3 – The Henge, Suffolk

Reference	Topic	Applicant’s Response
1.1.1.	<p>Concerns that key elements of the project remain insufficiently defined.</p> <p><i>‘Adjustments to construction or operational parameters may appear minor in isolation, but from the perspective of an affected resident they have direct consequences. Noise, traffic, working hours and construction duration shape daily life, yet these elements continue to shift rather than being clearly fixed and assessed as a whole.’ [REP3A-079]</i></p>	<p>Between 2024 and the first half of 2025, National Grid undertook an extensive programme of archaeological evaluation across the Kent and Suffolk onshore areas of the Sea Link project. This included both intrusive trial-trenching investigations and non-intrusive geophysical surveys. Toward the end of this programme, a feature (referred to in this document as the “asset”) was identified within the survey area. Based on initial evidence, the feature appeared to resemble a Neolithic hengiform monument.</p> <p>Following this initial discovery, National Grid commissioned further geophysical surveys around the asset in October 2025. These surveys provided a much clearer and more conclusive understanding of the feature’s nature. The findings indicate that the asset is not a henge monument but is far more likely to represent a livestock enclosure of regional significance. These conclusions have been shared with, and agreed by, Historic England and Suffolk County Council Archaeological Service (SCCAS) regarding both the nature and significance of the asset.</p> <p>It is common for trial trenching for underground cable routes and pipelines to occur after submission of an application, and sometimes after consent has been granted. Therefore, new archaeological information can emerge after an Environmental Statement has been completed. In this case, the identification and confirmation of the asset required National Grid to adjust the Order Limits to allow flexibility to avoid disturbing the feature during construction, ensuring appropriate protection of the asset in line with national policy and stakeholder expectations.</p> <p>The statutory heritage stakeholders (Historic England and the Suffolk County Archaeologist) had advised that avoidance through extending the Order Limits, as proposed above, was their preferred approach so National Grid’s understanding was that this approach was supported by heritage stakeholders. The solution was also discussed with East Suffolk Council (ESC) and Suffolk County Council (SCC), who also expressed the view that this was the most appropriate solution.</p> <p>As set out in Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055], the conclusions of other ES topic assessments and Volume 6 assessments remain unchanged. As a result, no other new mitigation measures are required and the existing measures remain appropriate.</p>

Table 3.4 Applicant’s Response to Relevant Representations and Written Representations that raise Change 4 – Benhall Railway Bridge, Suffolk

Reference	Topic	Applicant’s Response
1.1.1.	Concerns that this is not a minor change. <i>‘The proposed installation of a mini-bridge at Benhall Railway Bridge is a significant change, not a minor one, and should have been included in the initial Development Consent Order application. While the scope of the associated land acquisition suggested in the consultation has been reduced, the impact of the mini-bridge itself remains substantial.’ [REP3A-069]</i>	<p>The Examining Authority has already assessed [PD-015] that the proposed changes, whether considered individually or taken together, would not be so substantial as to amount to a materially different project from that which was originally applied for. Furthermore, the Examining Authority has concluded that the changes are capable of being examined within the remaining timetable for the Examination and that there is sufficient time available for interested parties to digest, understand and comment upon them.</p> <p>National Grid’s previously anticipated solution was to install a ‘mini-bridge’ overbridge structure within the highway boundary that would avoid weight being placed on the bridge abutments to the restricted limits; with the mini-bridge anticipated to be installed on approximately 15 occasions over the 4-year construction period. This solution could be achieved without the area of highway required being included in the Order Limits due to the powers already in the Order and consents to be obtained outside the DCO. However, SCC and ESC raised concerns that Benhall Bridge was not within the Order Limits of the project, stating that the consenting mechanism for those works were not clear. To respond to the concerns raised by SCC and ESC in meetings, consultation and Relevant Representations, National Grid proposed to add the areas of highway required for this solution into the Order Limits for the Proposed Project.</p> <p>As set out in Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055], the proposed change may also introduce short-term localised impacts on landscape and visual, noise and vibration, and air quality, but these would not introduce any new or different likely significant environmental effects to those reported within the ES. The conclusions of other ES topic assessments and Volume 6 assessments remain unchanged. As a result, no other new mitigation measures are required and the existing measures remain appropriate.</p>
1.1.2.	Concern that each AIL movement will require closing the bridge for three full days to install and remove the temporary mini-bridge. <i>‘Because this closure exceeds weekend hours, it will inevitably disrupt weekday traffic, specifically impacting heavy goods vehicles associated with the Sizewell C, EA1N, and EA2 projects. Closure for three days will have a significant impact on local road users at any time. As the junction provides access to Benhall Church and other parts of the village on the west side of the A12 this will severely disrupt the lives of local people.’ [REP3A-122]</i>	<p>Details of any temporary traffic measures required to accommodate AIL movements will be detailed in National Grid’s final Construction Traffic Management Plan (outline CTMP submitted at [CR1-041]), which would be submitted and approved by Suffolk County Council prior to implementation. This commitment is secured with Requirement 6 in the draft DCO [REP3-006].</p> <p>A worst-case scenario of up to fifteen temporary road closures was identified for assessment purposes, and the assessment concluded that no likely significant effects would arise. The Applicant will seek to implement measures to minimise the number of closures to as few as reasonably practicable through combined deliveries, and this will include a consideration of combining multiple AIL deliveries into a single closure.</p> <p>Once detailed design and construction management is complete and the AIL requirements confirmed (including, for example, the ability of suppliers to ship multiple transformers), the Applicant will confirm what the minimum number will be.</p>
1.1.3.	Concern over availability of a suitable mini bridge. <i>‘East Suffolk Communities Energy Partnership consider Examiners should request the Applicant provides evidence that there is a ‘mini bridge’ that can do so as it is imperative to ensuring that the projected heavy AILs can safely oversail the existing railway bridge.’ [REP3A-015]</i>	<p>National Grid has considered its proposals with the suppliers of such bridges and the AIL companies who regularly carry out these works and they have confirmed that they have equipment that can be installed to suit the Bridge crossing required. The Applicant is therefore confident that a suitable mini bridge will be available.</p>
1.1.4	Concern over whether the works are necessary <i>‘undertaking disruptive works at Benhall Railway Bridge. These works appear to be driven solely by the applicant’s preferred access strategy rather than by necessity. I respectfully ask the Examining Authority to scrutinise whether this approach is justified, particularly</i>	<p>The alternative locations for the converter substation were thoroughly assessed in the Development Consent Order (DCO) application, as set out in Environmental Statement Volume 6, Application Document 6.2.1.3 Part 1 Introduction, Chapter 3 “Main Alternatives Considered” [APP-044]. No new information has arisen that would alter National Grid’s previous assessment or the conclusion that the currently proposed access remains the most appropriate option.</p> <p>The main construction route for the Sea Link converter station is proposed to leave the A12 at Benhall, cross Benhall Rail Bridge and continue along the B1121 to a new bellmouth and access road south of Saxmundham. This is the most direct route from the A12 to the</p>

Reference	Topic	Applicant's Response
	<p><i>when a short extension from the Sizewell Link Road would provide a far less damaging and less impactful alternative. Suffolk County Council has already requested that the applicant use the Sizewell Link Road for construction access, and I fully support this position. This route would avoid unnecessary disturbance to sensitive landscapes and heritage assets, reduce impacts on local residents, and remove the need for costly and intrusive infrastructure such as a new permanent access road, a new Fromus bridge crossing, and major interventions at Benhall Railway Bridge'</i> [REP3A-154]</p>	<p>site and avoids the majority of villages and residential areas. It therefore remains the option that minimises potential impacts on local communities while supporting efficient construction.</p> <p>By contrast, access routes via the A12 at Yoxford and along the B1122 do not provide a direct route to the site. These alternatives would substantially increase journey times for every vehicle movement, which would accumulate significantly across the construction period and introduce risks to the overall project programme. They would also require construction traffic to travel further on smaller rural roads and through more villages, increasing potential disturbance to local residents.</p> <p>In addition, the Sizewell Link Road and the Sizewell level crossing works may not be completed in time to support all converter station activities. Using this route would also require construction of an additional temporary stone haul road across agricultural land to connect the Sizewell Link Road and the B1119 ("Additional Haul Road"), at approximately 2.3km in length this haul road would be significant resulting in further environmental effects. For these reasons, the alternatives do not perform as well as the route selected.</p> <p>If an alternative point off the Sizewell Link Road was used this would involve crossing more agricultural land and an additional Rail Crossing of the Sizewell Branch line.</p>
1.1.5	<p>All Options for the Minibridge will cause disruption: <i>'Both Options 1 and 2 will lead to repeated and/or prolonged road closures and this presents a real problem for the local community which is already seriously adversely impacted by road closures for development of SZC and the Scottish Power substations. When the A12 was closed in Benhall over the weekend of 10th/11th January for SZC works at the Friday Street Roundabout, there was chaos on the constrained rural road network with extensive delays and hundreds of vehicles traversing completely inappropriate sideroads. The official A-to-A road diversion did not provide a viable alternative route for local people to follow and it is inevitable that when there are road closures locally, inappropriate sideroads will be used resulting in significant disruption for the local community. This has become a frequent recurrence and there is a limit as to how much can be endured.'</i> [REP3A-011]</p>	<p>Change Request: Addendum to Volume 6 Environmental Statement as shown in Application Document 9.76.5 [CR1-055] supports the confirmed change. This Addendum concluded that the proposed change in isolation and in-combination with other proposed schemes in the area will not change the significance of likely significant effects from traffic from that concluded in the ES. Details of any temporary traffic measures will be detailed in National Grid's final Construction Traffic Management Plan, which would be submitted and approved by Suffolk County Council prior to implementation. Similarly, any temporary closures or diversions of Public Rights of Way would be set out in National Grid's final Public Rights of Way Management Plan, to be submitted and approved by Suffolk County Council.</p> <p>Access to all residential properties will be maintained during highway works at Benhall Bridge, as they would be with any highway works. This includes access to all properties at Whitearch Park. During temporary highway works, vehicular access to Whitearch Park would be limited to an approach from the west via the A12 during the period when the bridge itself is closed, but all properties will remain accessible.</p> <p>There are no planned closures of the A12 in the Sea Link works, these are only closures on the B1121.</p>

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

Registered in England and Wales
No. 4031152
nationalgrid.com