The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.123: Applicant's Responses to Second Written Questions

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About this Document

Purpose of this Document

1.1.1 This document provides National Grid Electricity Transmission plc's responses to the Examining Authority's Second Written Questions (ExQ2) **[PD-021]**, received on 25 February 2026 in relation to the Sea Link Project. It includes responses to all questions directed to the Applicant. In addition, the Applicant has provided responses to certain questions not specifically addressed to the Applicant, where it is considered that doing so would assist the Examining Authority's understanding of the Project or the issues raised.

Project Overview

1.1.2 National Grid Electricity Transmission plc (hereafter referred to as 'the Applicant') has submitted an application for development consent for the Sea Link Project, which proposes to reinforce the electricity transmission network between Suffolk and Kent. The Project comprises the construction and operation of a new high-voltage electricity transmission connection, including underground cables, converter stations, grid supply point substations, and associated infrastructure. It also includes the removal of sections of existing infrastructure and various ancillary works.

1.1.3 The application for development consent was accepted for Examination on 23 April 2025.

1.1.4 A full description of the Project is provided in Chapter 4 of the Environmental Statement: Description of the Proposed Project **[REP1A-003]**.

Structure of the Document

1.1.5 This document is structured to align with the numbering used in the Examining Authority's ExQ2 **[PD-021].** Chapters are numbered accordingly, beginning with '1' and continuing through to Chapter 21. Where the Examining Authority have not asked any further questions for a particular topic, that topic has not been included as a Chapter in this document.

1.1.6 In addition, the following appendices are included in **Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendices**, submitted at Deadline 5,to support the Applicant's responses:

- Appendix A: 2LVIA10 Inter-project Cumulative Effects on the Sub-Factors of the Natural Beauty and Special Qualities Indicators of the National Landscape
- Appendix B: Back-Up Generator Emissions Assessment Update
- Appendix C: Summary of Suffolk Onshore Scheme Designated Assets where Impacts have been Identified as a Result of the Suffolk Onshore Scheme

- Appendix D: Tourist Accommodation Stock by type as presented by ESC and for the Suffolk Onshore Scheme
- Appendix E: Suffolk Coastal Accommodation Analysis to Support REAC Commitment SE05 and Response to Written Question 2SERT4

1. General and Cross Topic Questions (GEN)

1.1 General

Table 1.1 General

Reference	Question to:	Question	Applicant's Comments
2GEN1.	Applicant	**Need** At deadline 3 (DL3) [REP3-144], in issue specific hearing 2 (ISH2) [REP4-156] and summarised in [REP4-238] Suffolk Energy Action Solutions (SEAS) raised concerns in relation to need. SEAS state that there is no need for the proposed development and that any shortfall in capacity could be met through reinforcement of existing infrastructure. In ISH2 the ExA specifically asked the applicant to respond to SEAS [REP3-144] submission [EV6-011]. This has not been done. The ExA accepted a late DL4 submission from the applicant [REP4-236]. At paragraph 1.1.4 of this submission it states, "Some submissions are not responded to again in this document because it is the Applicant's view that all matters raised have been responded to previously, or that no further comments are necessary." The applicant is requested to provide appropriate responses to all submissions. Provide a response to the SEAS submissions detailed above, and any other submissions not already responded to. In the responses either provide a detailed answer or clearly sign post to where this answer can be found using examination library references/page or paragraph numbers.	The Applicant has responded to these questions in **9.129 Applicants Response to ExQ2 2GEN1 and 2GEN2 in respect of Need** submitted at Deadline 5.
2GEN2.	All parties	**Need** The need for the project was explored at ISH1. Several parties have made submissions requesting that the topic of need be discussed again at a future ISH. The ExA reminds all parties that the examination is a predominately written process. Due to the highly technical nature of need as a topic and the necessity for considered responses to questions, the ExA's current view is that it will be most assisted by examining the evidence in writing. To date the ExA has received extensive evidence on the topic of need, both orally and in writing, and is carefully considering the cases of the parties. If any party has any new or additional evidence they believe is important and relevant to the examination of need, we ask that it is submitted for DL5 in order to allow a fair opportunity for all parties to comment on each other's submissions.	
2GEN3.	Natural England (NE)	**Kent landfall** Clarify your concerns about the applicant's screening out of Likely Significant Effects (LSE) pathways to European sites at the Kent landfall, as summarised in Ex1.4.5 of the HRA Report [REP4-057].	

Reference	Question to:	Question	Applicant's Comments
		The pathways described are temporary physical disturbance, underwater sound impacts, permanent loss of benthic habitat and species, and disturbance due to thermal emissions. Confirm which sites, qualifying features and LSE pathways are of concern, and what further detail you consider is needed to address your concerns (if these have not been dealt with by the applicant's responses in [REP4-241].	

1.2 Design, Parameters and other Details of the Proposed Development

Table 1.2 Design, parameters and other details of the Proposed Development

Reference	Question to:	Question	Applicant's Comments
2GEN4.	Applicant	**Design** Demonstrate how the post consent independent design review process would be accommodated in the indicative construction programme in table 4.10 of [REP1A-003].	The indicative construction programme in table 4.10 was an early, key milestone programme to aid the environmental assessment, including providing information on potential sequencing and durations of activities. The timing of the activities in terms of the year and quarter will depend on the timescales for the DCO application; for example, this programme shows the DCO being made in June/July 2026. This would only have been possible with very rapid progression to Examination following submission of the application, which did not occur. This illustrates the indicative nature of a construction programme produced prior to submission of an application. A detailed construction programme is not yet available and the programme in table 4.10 does not provide the granularity to show the different elements of construction at each location; the timing of above ground works within each programme; the programme for processes prior to each stage of works such as the discharge of requirements or how an independent design panel review may fit into this programme. The programme in 4.10 was also prepared prior to there being a requirement of the type now presented in iequirement 3 and was not prepared with timescales in mind for the discharge of this Requirement as now drafted (which is significantly more onerous than previously). iFor all the above reasons, it is not possible to describe the timing of engagement to be undertaken prior to discharge of requirements with any certainty. The Applicant has nevertheless tried to answer this query as far as possible below.iDesign development work has already been undertaken for above ground elements of the project, as demonstrated in the documents submitted with the Application, with these design documents subject to a previous independent design review panel. Contractors have now been appointed for all elements of the project and designs are progressing in parallel with the Examination process. Where possible, engagement would start on the detailed designs during the Recommendation and Decision periods for the Sea Link project so that discussions on the design of the Fromus Bridge, Saxmundham Converter Station and the Minster Converter Station and Substation designs can occur in 2026. Once designs are sufficiently progressed for each element of the project, an independent design review panel meeting could be held to discuss designs. iThe Fromus Bridge is part of the main access to the Saxmundham Converter Station (Work No. 3A) so is one of the first works to be undertaken and is on the critical path for construction works in Suffolk. Work No. 3A is not detailed specifically in the programme in table 4.10, but would be some of the first to be carried out for 'installation' of Saxmundham Converter Station, ideally as soon as land rights and discharge of requirements allow. Discussions on the design of the bridge have been ongoing with local planning authorities during Examination with an aim to accelerate this element of the project; but further

Reference	Question to:	Question	Applicant's Comments
			design discussions will require progression of the engineering design for the bridge, which has not yet occurred. Given the critical path nature of these designs, an independent design review panel meeting would likely be carried out in parallel with engagement with relevant planning authorities prior to submitting documents to discharge the relevant parts of Requirement 3; and timetabled for as soon as plans are available. This would be before the DCO is made or in the period between consent and start of the first works associated with construction of the bridge.iThe installation of Saxmundham Converter Station itself (Work No. 3B) would also start early in the construction programme, but the first works on this area of the site would include works such as site compounds, construction drainage, creating the platform and groundworks. Therefore, works could start on the converter station in parallel with discharge of Requirement 3 on design, including an independent design review panel, reducing the risk of this element of approvals to the construction programme. Requirement 3 has been carefully worded to ensure this can occur. Therefore, whilst ideally a design review panel on the Saxmundham Converter Station would happen alongside the Fromus Bridge, if designs are not ready they may be carried out in parallel with Work No. 3A construction works and the parts of Work No. 3B not subject to Requirement 3. It is not considered necessary for there to be any independent design review of Friston Substation designs given that the Applicant has committed to mirroring the commitments in the SPR DCOs on the elements of design that can be influenced through Requirement 3, which have already been subject to extensive consultation under the SPR DCOs. The above ground elements of Minster Converter Station and Substation would start later in the programme than those in Suffolk due to the more extensive enabling works required at the site. This provides more time for design panel review than for the Suffolk elements of the project; but as the Minster Converter Station and Substation construction are on the critical path for the whole Sea Link project, discharge of requirements and any pre-discussions (e.g. an independent design panel) would be programmed carefully to minimise the risk of discussions delaying the construction programme. Therefore, if possible, the aim would be to progress designs for the Minster Converter Station and Substation, including an independent design review panel and discharge of Requirement 3 in parallel with the same works at Saxmundham. The Applicant would note that the programme for the overall project is challenging and being carefully planned to identify where activities can overlap or be accelerated to reduce the risk of delays. In this context, whilst the Applicant is fully intending to engage an independent design review panel, this commitment has not been incorporated into the requirement because it is considered desirable rather than *necessary* given the previous reviews of design information, limited scope for input to impact designs and approvals by local planning authorities under Requirement 3.
2GEN5.	Applicant	**Detailed design in the dDCO requirement 3** Provide comments on the relevant planning authorities' suggested wording provided at DL4, including any implications for the delivery of the proposed development.	The Applicant provided a new version of Requirement 3 at Deadline 4 in Appendix C to Application Document 9.90 Applicant's Response to January Hearing Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [**REP4-086**]. The comments provided by local planning authorities referenced in this question were also provided at Deadline 4, so did not respond to the significantly amended Requirement 3 provided by the Applicant at the same deadline. The amended requirement provided by the Applicant was then incorporated into a further iteration of the draft Development Consent Order submitted at Deadline 4A **[REP4-217]**. A draft DCO was not due at Deadline 4 or 4A, with the next iteration due at Deadline 5, but the Applicant submitted this early at Deadline 4A so that the proposed changes to requirements submitted at Deadline 4 could be viewed in the context of the wider DCO by all parties. The Applicant has also been seeking to discuss the requirement with the local planning authorities. In particular, a meeting is planned to discuss Design Principles and the requirement with ESC

Reference	Question to:	Question	Applicant's Comments
			and SCC on 11 March 2026 where the Applicant hopes to agree a position between the parties on Requirement 3 as far as possible. Notwithstanding the above, the Applicant has responded to the proposed alternative wording for Requirement 3 provided by local planning authorities below. It is presumed that this question relates to the comments provided on the previous Requirement 3 as articulated in the following documents: • Post Hearing Submission for Issue Specific Hearing 2, Suffolk County Council [**REP4-150**]; • Thanet District Council Action Points from ISH2, Thanet District Council [**REP4-162**]; • Letter on Action Points – Issue Specific Hearing 2, Dover District Council, [**REP4-111**] • East Suffolk Council's response to Action Points arising from Issue Specific Hearing 2 on environmental issued held on Wednesday 28 January to Friday 30 January 2026 [**REP4-119**] The Applicant considers that the version of Requirement 3 in the draft DCO [**REP4-217**] already achieves the key outcomes sought in the alternative versions provided by the local planning authorities by requiring approval of appropriate details for the Converter Stations, Substations and the Fromus Bridge. The changes made by the Applicant respond to the points raised on this by Interested Parties and the Examining Authority, particularly during ISH2. However, the Applicant considers the wording currently provided in the draft DCO provides a better alternative than the versions offered in the above because: • The details in 3(1) and 3(2) in the Applicant's version are more transparent in that they provide more precision on the details that can be influenced through the approval process. In contrast, the local planning authority versions suggest that the scale and layout should be approved, which is not considered appropriate. The scale and sequencing of the proposed development will be primarily dictated by the technical requirements and design of the equipment, located within the limits of deviation specified in the draft DCO and the Works Plans [**REP4-006 and REP4-007**]. The size of the buildings, for example, will be dictated by the size of equipment within them and requirements related to the space between the equipment and the roof, with no flexibility in these dimensions. Given that local planning authorities cannot influence the scale of development and the parameters are already secured, it is not considered necessary or appropriate for the scale to be approved. In contrast, the colour and surface finish of the buildings can be influenced by relevant planning authorities, so are part of the details to be approved in Requirement 3. Increasing the transparency around the elements of design to be approved reduces the risk of abortive discussions over matters where there is limited or no flexibility, in turn reducing the programme risk associated with the additional design approvals incorporated into the draft DCO. • The Applicant has merged the design approval process for the Kent Substation and Converter Station into a single approval rather than treating these as separate works. This reflects the intended approach set out in the Design Principles – Kent [**REP4-225**] and Design Approach Document -Kent [**REP1A-031**] of developing a cohesive site design rather than designing the separate converter station and substation elements. The approach to a cohesive site design is considered to be in line with the approach preferred by local planning authorities in Kent so whilst this approach was not shown in the local planning authority versions of Requirement 3, it is considered likely that the approach the Applicant has taken will be supported on this point. • A further minor amendment has been made by the Applicant to Requirement 3 at Deadline 5 to make it clear that works associated with the Converter Stations and Substations that are not associated with the buildings (e.g. construction of the platform) can proceed prior to agreement of details such as colour of building cladding. This

Reference	Question to:	Question	Applicant's Comments

means details can be approved with a lesser risk to the overall construction programme, as described in the response to 2GEN4.

- The Applicant's view is that designs for the Converter Stations and Minster Substation should adhere to the Key Design Principles (as specified in Requirement 3(1)(a) and 3(1)(b)), but not the Project Level Design Principles (PLDPs) or Overarching Design Principles (ODPs) suggested by local authorities (e.g. see page 109 of [**REP4-150**]). This is because:
    - The wording of the PLDPs and ODPs do not meet the tests for requirements set out in Overarching National Policy Statement for Energy (EN-1), Department for Energy Security and Net Zero, (see January 2026 (NPS EN-1) at paragraph 4.1.17, and predecessor text) as they were not written for this purpose. In particular, the PLDPs and ODPs are not sufficiently precise; leaving significant potential for disagreement on whether requirements have been adhered to. This ambiguity is particularly concerning for a project that has significant opposition from planning authorities who would be discharging the requirements; and because the programme is very constrained, with significant consequences if discharge is delayed by discussions over whether these principles have been met.
    - The PLDPs and ODPs contain commitments that are more appropriately and precisely controlled through other documents. Whilst it was considered useful to include these principles in the Design Principles documents to encourage holistic consideration in design, detailed matters such as design for ecology and drainage are covered in far more detail in the relevant management plans secured by Requirement 6 and, where necessary, precise measures in the Register of Environmental Actions and Commitments (**Application Document 9.84**, updated version submitted at Deadline 5). Separately requiring broader, less precise measures on these matters in Requirement 3 and for the Applicant to demonstrate compliance with them, is unnecessary duplication and more likely to cause confusion than secure good design. Requirement 3 should not duplicate other controls.
    - The Applicant has very limited choice in the physical appearance of transmission infrastructure and functional design constraints limit the ability of the Applicant to vary the appearance (see EN-1 paragraph 4.7.6 and National Policy Statement for Electricity Networks Infrastructure, Department for Energy Security and Net Zero, January 2026 (NPS EN-5) paragraph 2.4.2 and predecessor text). It is therefore considered that the provisions in Requirement 3 already require significant approvals and further requirements to demonstrate compliance with the PLDPs and ODPs is considered unnecessary and inappropriate.
- Including a requirement that specifies adherence with the design details already agreed on Friston Substation under the SPR documents to discharge requirements. This responds to requests from Friston Parish Council and other Interested Parties for details to align with those already discharged by SPR rather than go through a separate design process which may result in a different outcome. Provision is included in Requirement 3 to vary details should it be necessary. This is required because National Grid may need to amend details should SPR decide to amend details in their requirements, or should be required due to, for example, challenges obtaining panels of a particular shade of green. However, the commitment is to mirror the approved details as described.
- Requirement 3(3) on the River Fromus Bridge incorporates requirements both from the local planning authorities and the Environment Agency on design; whereas the local planning authority versions did not incorporate EA comments. It should be noted that the wording of Requirement 3(3) is now agreed with the Environment Agency.

Reference	Question to:	Question	Applicant's Comments
2GEN6.	East Suffolk Council (ESC), Thanet District Council (TDC), Kent County Council (KCC), Suffolk County Council (SCC), Historic England	**Detailed design in the dDCO requirement 3** Provide comments on the applicant's wording in requirement 3 of the dDCO [REP4-217] and whether it would provide adequate controls over the design of above ground elements of the proposed development.	

1.3 Draft Development Consent Order (DCO)

Table 1.3 Draft development consent order (DCO)

Reference	Question to:	Question	Applicant's Comments
2GEN7.	Applicant	**Article 2 (1)** Consider if the drafting of the interpretation of the terms 'authorised development', 'ancillary works' and 'authorised project' could be made clearer by using the wording in The Associated British Ports (Immingham Green Energy Terminal) Order 2025. If not, why not. Review the dDCO to ensure all references to 'authorised development' and 'authorised project' are correctly used. Explain why Schedule 1, Part 2 'Ancillary works' do not list the 'any other works authorised by this Order' as stated in 2(1)(b) – Interpretation "Ancillary works".	The Applicant considers that the effect of the wording used in the Associated British Ports (Immingham Green Energy Terminal) Order 2025 is the same as the wording in the current drafting. As such, the Applicant is happy to adopt the slightly different formulation of words if the ExA considers that it is clearer. The wording has been updated in the draft DCO submitted at Deadline 5. The Applicant has reviewed the references to 'authorised development' and 'authorised project'. The approach taken to Schedule 1, Part 2 and the definition of Ancillary Works is well-precedented and is drawn from Transport and Works Act Orders and the General Model Provisions, which has now been replicated in a number of made DCOs. Part 2 of Schedule 1 lists various works which are known not to constitute development under s32 of the 2008 Act, but the wording 'any other works authorised by this Order' is included as an intentional catch-all for any other works which are authorised by a power of the Order to ensure that there is no doubt that the powers of the Order apply to all works listed in the Order in one way or another.
2GEN8.	Applicant	**Article 2 (1)** The relevant representation (RR) from the Environment Agency (EA) [RR-1586] raised the concern that some pre-commencement activities could be undertaken without the controls that only apply following commencement. In particular, the EA stated that remediation of the site could take place without the onshore or offshore Construction Environmental Management Plans (Requirement 6) being approved or in place. The EA noted that significant environmental effects could therefore not be ruled out. The EA requested that "remediation in respect of any contamination" be removed from the list of pre-commencement operations and that such works be undertaken with controls that apply at commencement (i.e. controls within Requirement 10 apply). Consider removal of the text as suggested by the EA or provide other suitable alternative drafting to satisfy the EA concern.	Requirement 5 of the draft DCO requires that all pre-commencement works are undertaken in accordance with the outline management plans listed in Requirement 6 and the Register of Environmental Actions and Commitments Section 1. The measures included in the plans above have been subject to ongoing discussion with the Environment Agency to ensure they are suitable to address any potentially significant effects associated with either the pre-commencement works or that main works. As such it is not considered necessary to remove "remediation in respect of any contamination" from the list of pre-commencement works. However, the Applicant recognises the Environment Agency's concern on Requirement 10 and has therefore agreed to specify that Requirement 10 applies to pre-commencement operations. This wording has been updated accordingly in the draft DCO submitted at Deadline 5.

Reference	Question to:	Question	Applicant's Comments
2GEN9.	Applicant	**Article 3** Explain the need for article 3(2)(b) when schedule 1 part 1 sets out the works which are part of the authorised development (for which development consent is given in article 3(1)(a)). Amend the explanatory memorandum to ensure it accurately correlates with article 3(3) including an explanation why there is a specific need (for example in the Electricity Act 1989) for such a power to be included in the dDCO.	Article 3(2)(b) deals with the statutory power contained within s37 of the Electricity Act 1989 which enables an electric line to be installed or kept installed. It also deals with the power at s120, paragraph 6 of Schedule 5 and s141 of the Planning Act 2008 which permits provisions in an order granting development consent to include electric lines which are to be installed above ground. The Applicant considers that the provision is well precedented in electricity infrastructure projects and notes its inclusion in the National Grid (Hinkley Point C Connection Project) Order 2016, National Grid (Richborough Connection Project) Development Consent Order 2017 and the National Grid (Bramford to Twinstead Reinforcement) Order 2024.
2GEN10.	Applicant	**Article 5** The Table of Parameters provides the height above existing ground level for the substation and converter station in Kent but elsewhere in the table it refers to height 'above finished ground level'. For improved precision: • Consider using 'existing ground level' for all heights in the table or include detail to clarify where 'finished ground level' is specified. • Ensure only the word "finished" or "finish" is used, and not both, throughout the dDCO. • Add any definitions in relation to above ("existing ground level", "finished/final ground level") as required to article 2 for the avoidance of doubt.	'Existing ground level' will be used for all values in the Table of Parameters in Article 5 (LoD), with the exception of the proposed Friston substation, which will refer to 'finished ground level', being the finished ground levels proposed by SPR pursuant to their DCOs, which the Table of Parameters will specify as being 18.5m AOD. A definition of 'existing ground level' will be added, being the highest existing ground level within the footprint of the lateral LoD provided for the work in question. This is required to ensure that earthworks and drainage detailed design development can be accommodated in all locations in the development of the platforms for the above ground assets. The above amendments have been made to the draft DCO submitted at Deadline 5.
2GEN11.	Applicant	**Article 14** Provide additional clarification within the Explanatory Memorandum to explain why the broader power in article 14(2) is required.	The Applicant will provide additional clarification within the Explanatory Memorandum.
2GEN12.	Applicant	**Article 24** Clarify if decommissioning would require different land to that needed for construction/operation/maintenance and if so, which plots are affected.	The design of the project is such that it would be able to be decommissioned using the Order limits planned for construction, operation and maintenance. Article 24 permits the undertaker to acquire compulsorily so much of the Order land described in the Book of Reference as is required for the construction, operation and maintenance and decommissioning of the authorised project or is incidental to it or required to facilitate it. Therefore, the Applicant has sought the compulsory acquisition powers that would be needed for those activities.
2GEN13.	**Applicant** Local authorities	**Article 49 - Defence to proceedings in respect of statutory nuisance** **Applicant:** Article 49(1)(b) provides for a defence against statutory nuisance in operation and if "the defendant shows that the nuisance— (i) relates to premises used by the undertaker for the purposes of or in connection with the use of the authorised project and that the nuisance is attributable to the use of the authorised project which is being used in accordance with the Construction Noise and Vibration Management Plan". As the outline Construction Noise and Vibration Management Plans [AS-131] and [AS-133] contain no operational noise controls, explain the purpose of this clause and whether additional operational noise controls should be referenced.	The Applicant has considered the benefits of including operational noise limits in the DCOs to provide further reassurance to Interested Parties on this matter, and has added controls into the REAC submitted at Deadline 5. See response to 2NV1 below for further information.

Reference	Question to:	Question	Applicant's Comments
		Local authorities: To comment.	
2GEN14.	Local authorities **Applicant**	**Article 51 - Arboricultural Method Statement (AMS)** **Local authorities:** The applicant's response to ISH2 AP18 [REP4-086] explains that there is no need to amend Article 51 of the dDCO in respect of ancient and veteran trees because any tree works would be detailed in the AMS secured by requirement 8 of the dDCO, which is subject to local authority approval. Requirement 8 does not make explicit reference to ancient and veteran trees. If requirement 8 is the correct mechanism to control effects, should it explicitly make reference to retention of ancient and veteran trees, for example linking to a specific dDCO schedule? **Applicant:** To comment.	The Applicant considers that ancient and veteran trees fall within the wider definition of 'trees' and are therefore already referred to within requirement 8. The Applicant remains of the view that the management plans give sufficient control over ancient and veteran trees. In addition the Applicant has updated commitments A02 and A05 within **Application Document 9.84 Register of Environmental Commitments** to provide further protection to veteran and ancient trees, which require the Applicant to request approval from the relevant planning authority prior to undertaking tree safety works.
2GEN15.	Local Authorities and Environment Agency (EA)	**Article 53** Article 53(2)(b) allows for complete closure of the navigation on health and safety grounds only. 53(3) secures that this is kept to a minimum period. Should additional wording be included to specify what is a reasonable period or any seasonal constraints where closure may be inappropriate. If yes, please include suggested drafting.	
2GEN16.	Sandwich Port and Haven Commissioners (SPHC)	**Article 53** Confirm that SPHC is aware of article 53 of the dDCO [REP4-217] and provide any comments it may wish to make on its implications for the area of the River Stour and Pegwell Bay for which it has responsibility. If SPHC considers that the wording needs to be amended, provide details of suggested changes.	
2GEN17.	Local authorities **Applicant**	**Schedule 3 – Requirements - trenchless landfall** **Local authorities:** In light of interested party (IP) concerns, the sensitivity of the receiving environment (including designated European sites) and notwithstanding the applicant's updated wording in the revised Register of Environmental Actions and Commitments (REAC) [REP4-235], provide draft wording to secure the use of a trenchless landfall technique as a dDCO requirement. The wording should provide for construction and operation/maintenance and may also provide for a minimum depth of burial to address concerns regarding coastal erosion. **Applicant:** To comment or provide its own form of wording.	The Applicant has added a new requirement to the draft DCO on this matter at Deadline 5: *Trenchless Landfall Techniques* 16.—(1) In respect of installation of the landfall aspects of Work No.6, trenchless techniques shall be utilised between the onshore Transition Joint Bay and the exit pits. (2) No exit to trenchless landfall techniques must occur within 50m of saltmarsh habitat within Pegwell Bay (3) No exit to trenchless landfall techniques must occur within 50m of MLWS at Leiston to Aldeburgh SSSI.
2GEN18.	**Applicant** and East Suffolk Water Management Board	**Schedule 15 - Protective Provisions** Confirm if bespoke protective provisions will be included for East Suffolk Water Management Board and if so, provide an update on progress in that respect including the likelihood that this will be resolved during the examination.	The Applicant can confirm that it does not propose to disapply the Land Drainage Act 1991. Subsequently, East Suffolk Water Management Board (ESWMB) will not require bespoke protective provisions as the Proposed Project will remain subject to the requirements of the statutory drainage regime, including ordinary watercourse consent and IDB byelaws. The Applicant is cognisant of the implications of this approach having discussed this matter in a meeting with ESWMB on 17/02/2026.
2GEN19.	**Applicant** and Harwich Haven Authority (HHA)	**Schedule 15 - Protective Provisions** Confirm if bespoke protective provisions will be included for HHA and if so, provide an update on progress in that respect.	The Applicant is still working with Harwich Haven Authority (HHA) to establish if bespoke protective provisions are required. All measures and interests currently proposed by HHA are

Reference	Question to:	Question	Applicant's Comments
			currently secured within 9.12 Outline Navigation and Installation Plan **[REP4-075]** submitted at Deadline 4 and secured within Condition 4 of the dML.
2GEN20.	**Applicant** and Network Rail Infrastructure Limited	**Schedule 15 - Protective Provisions** Provide an update on progress with respect to protective provisions for Network Rail Infrastructure Limited include the likelihood that this will be resolved during the examination.	The Applicant is continuing to pursue engagement with Network Rail Infrastructure Limited but has not yet received comments on its proposed protective provisions. Given the stage in the Examination process, the Applicant has included its proposed bespoke protective provisions in the version of the DCO submitted at Deadline 5. These are not agreed by the NRIL and the Applicant expects a meeting will be needed to discuss the outstanding points. If agreement cannot be reached before the end of the Examination period, the Applicant will be required to make s127 and s138 submissions.
2GEN21.	**Applicant** and Riveroak Strategic Partners	**Schedule 15 - Protective Provisions** Confirm if bespoke protective provisions will be included for Riveroak Strategic Partners in relation to Manston Airport Development Consent Order 2022 and if so, provide an update on progress in that respect including the likelihood that this will be resolved during the examination.	Riveroak Strategic Partners' Relevant Representation stated that Manston Airport Development Consent Order 2022 contains compulsory acquisition powers that overlap with those of the Proposed Project. Sea Link land plot 3/90 overlaps with Manston plots 185 (subsoil acquisition) and 187 (acquisition of rights of access). The Representation acknowledges that it is likely to be the case that the two projects can co-exist. The Applicant has only recently established contact with Riveroak Strategic Partners. Following a meeting on 05/03/2026 to discuss project interfaces, the Applicant has shared relevant plans with Riveroak Strategic Partners who indicated that they would give further consideration to the most appropriate mechanism for securing the protections required.
2GEN22.	**Applicant** and Sizewell C Ltd	**Schedule 15 - Protective Provisions** Confirm if bespoke protective provisions will be included for Sizewell C Ltd and if so, provide an update on progress in that respect.	Following receipt of Sizewell C Ltd's (SZC) Relevant Representation, which stated the possibility of protective provisions being required, the Applicant has been seeking to engage with them. However, this engagement has not been reciprocated, and the Applicant is awaiting feedback from SZC to confirm whether protective provisions are the appropriate mechanism for securing their requirements.
2GEN23.	**Applicant** and East Anglia THREE Limited	**Schedule 15 - Protective Provisions** Confirm if bespoke protective provisions will be included for East Anglia THREE Limited and if so, provide an update on progress in that respect.	The Applicant confirms that bespoke Protective Provisions will be included for East Anglia Three. East Anglia THREE Limited (EA3) has now confirmed their requirement for bespoke protective provisions. EA3 recently issued draft protective provisions to the Applicant to which the Applicant is considering drafting its response.
2GEN24.	Applicant	**Schedule 16 – deemed marine licence (DML)** Paragraph 2(a) has been amended to refer to paragraph 5 rather than paragraph 6 but this appears to be incorrect. Provide clarification and any necessary amendments.	The Applicant confirms this will be updated in the dML for Deadline 5.
2GEN25.	Applicant	**Schedule 16 – deemed marine licence (DML)** Condition 1 of the DML sets out some design parameters. Should it specify the maximum number of cable crossings. If not, why not.	The Applicant understands that the design parameters within Condition 1 of the dML do not need to state the number of crossings. At each crossing, the only additional design parameter, aside from the cables themselves, is the addition of external rock protection. The maximum volume and footprint of the external cable protection for the proposed project is already outlined within this condition, and the number of crossings is very much dependent on the programme of other projects such as Gridlink, Five Estuaries, and North Falls installing either before or after Sea Link. The Proposed Project has factored in and assessed the worst-case scenario for rock that all projects would be installed before Sea Link and would therefore require crossing protection as part of the Proposed Project. This approach is in line with other recently submitted DCOs.
2GEN26.	All parties	**New requirements and conditions** Notwithstanding any questions below, highlight and provide specific wording for any commitments currently included in the	For the Offshore Scheme, the Applicant confirms that it has reviewed and updated bespoke DCO Requirements and dML Conditions included in the REAC, mostly in relation to requests from Shipping and Navigational stakeholders with regards to Areas of Safeguarded Water

Reference	Question to:	Question	Applicant's Comments
		REAC [REP4-235] that you believe should be secured as requirements or conditions on the face of the order.	Depths. These are outlined within the Schedule of Changes (Application Document 9.7) submitted at Deadline 5.
2GEN27.	Applicant	**Offshore design parameters** Should any of the design parameters specified in condition 1 of the DML be replicated as a requirement or within the limits of deviation in article 5. If not, why not.	The Applicant confirms that the design parameters do not equate to limits of deviation and does not consider that the offshore parameters require unnecessary replication in Requirements as they are secured by inclusion in the dML within Schedule 16 of the draft DCO.

1.4 Compulsory Acquisition (CA)

Table 1.4 Compulsory acquisition (CA)

Reference	Question to:	Question	Applicant's Comments
2GEN28.	Applicant	**Class 10 land** The response to action point 12 (AP12) from compulsory acquisition hearing 1 (CAH1) [REP4-086] states that the applicant does not consider the removal of Class 10 plots in the order limits is necessary, however did not provide any explanation as to why the land should remain. The response also acknowledged the ExA concern in relation to Class 10 land and article 27. Given the time left in the examination the ExA invites the applicant to remove the Class 10 plots from the Book of Reference (BoR) and to amend the order limits accordingly. However, if these plots are not removed then provide justification as to why they should remain and alternative drafting of article 27 to ensure exclusion of any Class 10 land from entry and temporary possession (TP).	The Applicant does not consider the removal of Class 10 plots or amending the Order limits to be necessary or appropriate. The Applicant is of the view that the Order limits can remain, noting the stage of the Examination. It is not unusual for there to be changes during an Examination and for there to be 'white land' (Class 10 in the present case) where powers / land rights are no longer sought. This does not in any way undermine the legal position, as the Applicant is expressly not seeking any powers which put the land on a higher footing than land outwith the Order Limits. Class 10 is expressly defined in the Book of Reference as *"Land that is not subject to powers of acquisition nor temporary use"* (Table 1.1). As noted in the Applicant's response to AP12, the DCO only empowers the compulsory acquisition of land or rights "described" in the Book of Reference (Part 5 of the DCO). The second column of Tables 3.1 and 3.2 in the Book of Reference contains a "description" of the land or right to be acquired in respect of each plot. In respect of Class 10 plots, the description is that no land or rights (permanent or temporary) are to be acquired. Further, to provide further reassurance the Applicant has added a commitment to the REAC, Section 1, which states: *'In respect of any land identified in the Book of Reference and Land Plans as Class 10 land (no land rights), the Applicant will not carry out any part of the Authorised Project in respect of that land, save to the same degree that the Applicant could do so pursuant to the Order provisions and powers which prevail outwith the Order Limits (e.g. the survey power in Article 22).'* The Applicant must comply with the REAC Section 1 as set out in Requirement 5 of the draft DCO. In respect of the concern raised about Article 27, the Applicant has addressed this. However, if the ExA remained of the view that further drafting is required, the Applicant suggests the following adjustment to Article 27(1)(a)(ii) of the draft Order, such that it reads: 'any other Order land (which for the avoidance of doubt excludes any land identified in the Land Plans and Book of Reference as Class 10 land) …'. Amending the Order limits would involve amendments beyond the Book of Reference and Land Plans and as such it is undesirable unless necessary. It is not necessary for the reasons set out above.
2GEN29.	William Notcutt Estates Limited	**Suffolk plots 1/1 to 1/5 and 1/7 to 1/11** If you have an outstanding objection to the compulsory acquisition (CA) or TP of land or rights, please provide detail of the reasons for the objection including which plots the objection relates to.	
2GEN30.	Applicant	**Kent plot 2/133** The applicant is seeking to compulsorily acquire Kent plot 2/133 to allow for reinstatement of the construction compound for any future maintenance. This plot is also intended for environmental mitigation post construction. AP13 [EV6-034] asked the applicant to explain how the potential reinstatement of the temporary construction compound in plot 2/133 would interact with landscape mitigation. The applicant responded in [REP4-086] *'The proposed landscape mitigation for plot 2/133 is set out in OLEMP as 'potential early planting' which is defined as 'prior to operation'. The Applicant*	The Applicant can confirm that the land in plot 2/133 is required for the Landscape Mitigation as set out in the OLEMP, and that the plot is therefore not required for a future compound post construction for maintenance or decommission as there is sufficient space within the fenced compound of the Converter Station and Substation development to set up offices and welfare for this purpose.

Reference	Question to:	Question	Applicant's Comments
		does not believe these proposed uses are in conflict as the mitigation would follow construction in this case.' Provide justification that reinstating a construction compound during the lifetime of the development (even temporarily) is appropriate if this land is also required for environmental mitigation. Include explanation how it would be ensured that the mitigation proposed would not be damaged/affected by the reinstatement of a construction compound?	
2GEN31.	Edward Martin Spanton	**Kent plots 3/44, 3/45, 3/49 to 3/51, 3/53 to 3/57, 3/63, 3/77 to 3/80, 3/82, 3/83, 3/87, 4/7 and 4/8** [RR-1410] of Dyas Farms (1988) Ltd listed a Martin Spanton. Please confirm if Martin Spanton is Edward Martin Spanton as listed in the BoR [REP4-021] and, if you have an outstanding objection to the CA or TP of land or rights, please provide detail of the reasons for the objection including which plots the objection relates to.	
2GEN32.	John Robert Collins	**Kent plots 2/23, 2/24, 2/27-2/30, 2/32, 2/36, 2/39, 2/40 to 2/42, 2/88** If you have an outstanding objection to the CA or TP of land or rights, please provide detail of the reasons for the objection including which plots the objection relates to.	
2GEN33.	Kent Wildlife Trust (KWT)	**Kent plots 3/102, 3/104, 3/107, 3/109, 3/110, 5/1, 5/9, 5/10, 5/13, 5/18, 5/26 to 5/29, 5/34, 5/37, 5/38, 5/40 to 5/44** If you have an outstanding objection to the CA or TP of land or rights, please provide detail of the reasons for the objection including which plots the objection relates to.	
2GEN34.	Pippa Southorn	**Kent plots 2/56, 2/65 to 2/67, 2/69, 2/70 to 2/76, 2/78, 2/79, 2/84, 2/107 to 2/109, 2/111 to 2/113 and 2/187** If you have an outstanding objection to the CA or TP of land or rights, please provide detail of the reasons for the objection including which plots the objection relates to.	
2GEN35.	Richborough Estates Ltd	**Kent plots 2/125 and 2/126** If you have an outstanding objection to the CA or TP of land or rights, please provide detail of the reasons for the objection.	
2GEN36.	Struan Robertson	**Kent plots 2/118 to 2/124, 2/127 to 2/130, 2/133, 2/134, 2/137 to 2/143, 2/146, 2/151, 2/155 to 2/184, 2/186, 3/1 to 3/3, 3/6 to 3/11, 3/17, 3/20 to 3/26, 3/29, 3/35, 3/98, 3/98a, 4/1, 4/4 and 4/29** If you have an outstanding objection to the CA or TP of land or rights, please provide detail of the reasons for the objection including which plots the objection relates to.	
2GEN37.	Applicant	**Errata** The Schedule of Negotiations (SoN) [REP4-017], the Land Rights Tracker (LRT) [REP4-077] and the post hearing submission [REP4-084] lists Andrew Johnson as 'Administrator to the Estate of Michael Cotton Garratt'. The BoR [REP4-021] lists Christopher	The Applicant thanks the ExA for this observation and can confirm this Errata point has been picked up in this instance. The BoR and other documents will also refer to the Estate of Andrew Johnson going forward, as we have now had confirmation from the agent that Mr Andrew Johnson has sadly passed too.

Reference	Question to:	Question	Applicant's Comments
		Russell John Domville and Clive Robert Stevens as the administrators. Please clarify who is the administrator for this estate and amend the BoR, LRT or SoN accordingly.	

2. Landscape and Visual

Table 2.1 Landscape and visual

Reference	Question to:	Question	Applicant's Comments
2LVIA1.	NNE	**Suffolk & Essex Coast and Heaths Area of Outstanding Natural Beauty (AONB)** Provide updated comments in response to the applicant's additional information received at DL4, including the. Applicant's responses to ISH2 Action Points [REP4-087], The Planning Statement Addendum [REP4-092] and applicant's comments on responses to ExQ1 [REP4-083]	
2LVIA2.	Applicant	**AONB** Provide an updated assessment of the effects of the proposed development on the setting of the AONB through open trenching, including whether any long-term effects are likely to occur. Consider whether any impacts could be avoided and/or are justified.	An assessment of the setting of the Suffolk & Essex Coast & Heaths National Landscape (SECHNL) was provided within **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]** for each Natural Beauty Indicator as an indirect effect where relevant. Further detail on the effects relating to each Natural Beauty Indicator Sub-Factor, including of the setting of the SECHNL, is provided within Appendix A 1LVIA9 Natural Beauty Indicators and their Sub-Factors of **Application Document 9.73.1 Applicant's Responses to First Written Questions – Appendices [REP3-070]**. The avoidance of temporary and long-term effects arising from the Proposed Project on the SECHNL has been taken into consideration in the siting of the Saxmundham Converter Station which is not considered to affect the setting of the SECHNL. Further information of the effects on the setting of the SECHNL (in response to **Application Document Appendix H3 Natural England's Advice on Suffolk LVIA [REP3-120]**) has been provided within **Application Document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241]**. This response identifies that the effects on the setting of the SECHNL are limited, especially at operation. During construction, effects on the setting would be restricted to intervisibility with the cable laying vessels at sea within the seaward setting to the east of the SECHNL and to the northwest of the SECHNL, where the open trench construction of the HVDC cable corridor would take place through the agricultural landscape. Effects on the natural beauty indicators which influence the setting include: • A temporary effect on the scenic quality of the SECHNL related to offshore views from the coastline; • A temporary effect on the relative wildness of the SECHNL relating to the introduction of elements of uncharacteristic machinery and noise; and • A temporary effect on the relative tranquillity of the SECHNL relating to additional human activity, increased traffic along local roads and machinery. The response within **Application Document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241]** also notes that the limited vegetation removal outside of the SECHNL associated with the HVDC cable corridor is largely temporary and would be limited to typical hedgerow and tree removal set within an agricultural landscape. This removal is not referred to within the assessment on the SECHNL as it is not considered to give rise to effects on the Natural Beauty Indicators. For

Reference	Question to:	Question	Applicant's Comments
			example, in relation to scenic quality, as the vegetation temporarily removed would be limited, the influence on the pattern and composition of vegetation types would not be perceptible. During operation, effects on the setting of the SECHNL would be minimal. The limited boundary vegetation removal within the setting of the SECHNL to the northwest would be reinstated and following recultivation of the agricultural land, the cable corridor would no longer be discernible in the landscape. The Tree Protection Plans (**Application Document 9.76.5.8 Change Request Appendix I Tree Protection Plans Suffolk Onshore Scheme** [**CR1-064**]), confirm that only very small sections of hedgerow and a limited number of trees would be removed within the setting to the northwest of the SECHNL. As noted in **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]** reinstated hedgerows would take comparatively longer to re-establish during the early operational years. The outline Landscape and Ecological Management Plan (oLEMP) (**Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065]**) notes that hedgerow reinstatement would commence within the first available planting season post construction and could be phased depending on the programme of HVDC construction. Permanent tree loss would be restricted due to careful routeing. Where trees cannot be replaced in situ, opportunities for planting nearby within the Order Limits would be explored during detailed design. As during construction, the re-establishment of hedgerows and the limited tree removal would have a limited influence on the pattern and composition of vegetation within the agricultural landscape and therefore on the setting of the SECHNL. In summary, effects on the setting of the SECHNL would be limited at construction and not significant, with no long-term effects resulting from the Suffolk Onshore Scheme. Regarding whether any effects could be avoided and/or are justified, the temporary effects on the perceptual qualities of the SECHNL arising from views and noise associated with construction activity have been mitigated through routeing to reduce visual intrusion, traffic reduction measures and noise reduction measures as far as possible. As noted above, the effects are not considered to be significantly adverse at construction or operation phases of the Proposed Project on the setting of the SECHNL and are justified because they are temporary and almost entirely within an agricultural landscape.
2LVIA3.	Applicant	**Acid grassland enhancement area** Explain the existing habitats on the parcel of land that has been identified for enhancement and explain the management measures that would be required to ensure that the enhancement is successful. A standalone implementation and management plan should be provided. This should include details of baseline pH and effects of the agricultural use of adjacent land on the success of enhancements. Provide an explanation of the pre-commencement management of the area.	The existing habitats on the parcel of land identified for enhancement, are set out within **Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]**. The existing habitat is degraded acid grassland, identifiable by its botanical characteristics including relict acid grassland species. The management measures for successful establishment are detailed within Section 6.13 of the oLEMP (**Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065]**) along with adaptive management and monitoring, all of which is secured under Requirement 6 of the **draft Development Consent Order** submitted at Deadline 5. A response to Natural England's request for a standalone implementation and management plan was provided within **Application Document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241]**. This stated that details on the acid grassland restoration and management are already contained in **Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065]** and would be expanded upon as necessary for the detailed Landscape and Ecological Management Plan (LEMP) to be produced under Requirement 6 of **Application Document 3.1 ((H) draft Development Consent Order** submitted at Deadline 5.

Reference	Question to:	Question	Applicant's Comments
			Therefore, it is considered that in the interests of keeping all habitat creation and management proposals in one place for ease of discharge by the Local Planning Authority and delivery by contractors, there is no need for a production of a separate standalone enhancement area implementation and management plan for the proposed acid grassland area as this is already covered and secured by the LEMP. The baseline pH and effects of the agricultural use of adjacent land on the success of enhancements, has been outlined in Table 15.1 of **Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]**. This explains that the pH of this area does not require testing as the site currently supports degraded acid grassland and has not been recently cultivated. Further information on the adjacent agricultural land use is contained within AP44 in **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]**. This confirms that the fields between the pig sheds to the north and the degraded acid grassland to the south are already used as part of the pig farm operations during a standard farming rotation, alternating with the cultivation of high value crops. Therefore, no change in farming practice is expected. The fact the acid grassland has been able to persist despite these operations, and that its degraded state is clearly due primarily to lack of management (e.g. bracken and gorse encroachment and a tall tussocky sward) indicates that the current farming operations to the north will not hinder ecological improvement of the sward through reintroduction of good management. Regarding the pre-commencement management of the area, the oLEMP (**Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk**) states within Section 5.3 that the acid grassland enhancement land management would commence delivery prior to the loss of acid grassland east of Leiston Road. The Landscape and Ecological Management Plan must be substantially in accordance with the Outline LEMP – Suffolk, which is secured by Requirement 6 within **Application Document 3.1 (H) draft Development Consent Order** submitted at Deadline 5.
2LVIA4.	Applicant	**Acid grassland enhancement** In view of the direct impacts to acid grassland in the National Landscape, what safeguards are there that the enhancement would be delivered as stated. What would be the implications for the proposed development if the acid grassland enhancement were to be managed as such for a longer period, such as 20 years, in case reinstatement is not successful or is compromised?	The oLEMP (**Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065]**) sets out the measures necessary for the successful enhancement of the acid grassland in Section 6.13, along with the required monitoring (Section 7.2), adaptive management monitoring (Section 7.3) and procedures for non-compliance (Section 7.4). Collectively these provide safeguarding measures to ensure the successful enhancement and management of the area to high-quality acid grassland. The oLEMP is secured by Requirement 6 within **Application Document 3.1 (H) draft Development Consent Order** submitted at Deadline 5. The ten-year management period for the acid grassland enhancement area, is a fixed time frame agreed with the landowner. The ten-year management period is considered appropriate for the acid grassland enhancement area, as the enhancement works focus on improving the quality of the existing degraded acid grassland rather than creating new habitat. Enhancing a degraded sward carries lower establishment risk and avoids the longer timeframe typically required for newly created acid grassland to develop into a high-quality habitat which could necessitate a longer management period.
2LVIA5.	**Applicant** NE	**Acid grassland on land west of Leiston Road** **Applicant:** Clarify the areas of existing acid grassland that would be affected by the proposed development and reinstated. Provide further assessment of the complexity of the habitats that would be affected, including the risks of reinstatement and the time taken to reach functionality. Include in this clarification whether works that have already been carried out to the golf course within the order limits have	The areas of acid grassland that would be affected by the proposed development and reinstated, are set out in Table 3.1 in **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**. This includes approximately 2 ha associated with the landfall compound, 1.56 ha associated with the HVDC corridor east of Leiston Road and 4.05 ha associated with the HVDC corridor west of Leiston Road. As noted in **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**, this totals approximately 7.61 ha of acid grassland temporarily affected which

Reference	Question to:	Question	Applicant's Comments
		affected its quality as acid grassland and its reinstatement potential. For example, it is stated that the land has been affected by the golf course extension which has resulted in disturbance and reprofiling. Provide further detail, including a plan, as to the extent to which land within the order limits has been directly affected by the golf course extension. Clarify whether the 4.05ha of land within the extended golf course will be able to be reinstated as acid grassland if it is to be used as a golf course. Clarify how the land within the extended golf club will be restored to a higher quality than its current position. As the area of temporarily affected acid grassland is estimated by the applicant to be 7.06ha in [REP1-120], explain why only 6ha is provided as mitigation/ compensation/ enhancement. **NE:** Paragraph 5.3.1 of the Suffolk outline Landscape and Ecological Management Plan (oLEMP) [REP4-065] suggests that good quality acid grassland is a priority habitat under the Natural Environment and Rural Communities (NERC) Act 2006. Clarify whether the quality of acid grassland affects whether it should be considered a UK Biodiversity Action Plan Priority Habitat, as suggested by the applicant.	would be fully reinstated once construction activity is completed in accordance with the measures set out in **Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065]**. As noted within **Application Document 9.47 National Landscape Section 85 Duty Technical Note** [**REP1-120]**, the grassland is typical of acid grassland, being of relatively low structural diversity, grass-dominated and with relatively few wildflowers. Therefore, a closed acid grassland sward that resembles the original is likely to establish within one to two growing seasons following soil reinstatement, subject to management and monitoring as outlined in **Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065]**. Accordingly, functional acid grassland can expect to have been restored within approximately three years of being cleared. In previously undisturbed locations (i.e. east of Leiston Road) the restored sward may take several further years to mature and become indistinguishable from the grassland around it. Consequently, **Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065]** commits to managing these areas of acid grassland reinstatement for a five-year period, along with adaptive management provisions. Regarding the 4.05 ha of land within the extended golf course, the golf course has already delivered its proposals within and adjacent to the Order Limits which (within the Order Limits) consists primarily of planting trees and gorse within the grassland (which as discussed with Natural England is not 'Priority Habitat' in terms of botanical quality and furthermore has not been classified as acid grassland in the golf course botanical surveys due to its degraded state). The cable route in this area will be restored to the existing condition which will include restoration of acid grassland to a higher quality than its current quality, some scrub species and occasional trees. It is anticipated that this would be a requirement of the golf club, with the restored cable corridor managed for a five-year duration. Further detail, including a plan that shows the extent to which land has been directly affected by the golf course extension is included within Table 15.1 contained in **Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]**. Section 3.2 of **Application Document 9.47 National Landscape Section 85 Duty Technical Note - Accepted at the discretion of the Examining Authority** [**REP1-120]** sets out the justification of the 6 ha parcel of acid grassland enhancement. During the pre-application stage, a site selection process was undertaken to identify potential sites in the SECHNL where acid grassland enhancement could be undertaken. Initially the potential area of acid grassland that would be temporarily affected was approximately 12 ha. As there would be no permanent loss of acid grassland it was determined, using professional judgement, that the area of enhancement should be at least half the size of that temporarily affected. Despite the fact that the area of acid grassland being temporarily affected is now smaller (reduced in size from 12 ha to 7.61 ha as a result of design changes to reduce the effects within the SECHNL), the area of enhancement at 6 ha has not been reduced.
2LVIA6.	Applicant	**Acid grassland enhancement** It is stated that the acid grassland would be a multifunctional enhancement. Clarify what is meant by this term with details of each impact in terms of avoidance, prevention, reduction and offsetting for each impact, as required by the mitigation hierarchy. Explain whether the s85 duty (Countryside and Rights of Way Act 2000) enhancement is in addition to the functions of the land as mitigation or compensation.	The multifunctional enhancement (in response to Natural England's comments in Appendix H3 [REP3-120]) is explained in **Application Document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241].** As is also evidenced in **Application Document 9.47 National Landscape Section 85 Duty Technical Note - Accepted at the discretion of the Examining Authority** [**REP1-120],** the Applicant during a meeting with Natural England on 22 January 2026 requested further clarity on what additional information was required regarding the multifunctional enhancement. This remains an outstanding action point for Natural England to address. As set out within **Application Document 9.87 (A) Applicant's Comments on Responses to First Written Questions [REP4-083]**, the mitigation hierarchy has been complied with

Reference	Question to:	Question	Applicant's Comments
			(avoidance of siting permanent infrastructure within or in the setting of the SECHNL, reduction of effects by use of trenchless construction techniques and limiting the temporary compound and working areas within the SECHNL, followed by their restoration including monitoring), resulting in no significant adverse effects being likely to arise on the SECHNL at any project stage for the Proposed Project alone or at operation cumulatively. A temporary significant adverse cumulative effect is reported during construction and all mitigation options have been explored. The acid grassland enhancement measures are considered to compensate for the short term and temporary significant adverse cumulative effects and provide further enhancement for the SECHNL within the operational phase of the Proposed Project (as set out in Plate 3.1 within **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**). Notwithstanding the Applicant's position regarding the above, the Applicant is continuing dialogue with the National Landscape Partnership with regard to potential projects within the National Landscape which the Applicant could consider supporting in order to meet the s85 duty and the associated level of financial contribution required.
2LVIA7.	Applicant	**Trenchless techniques in AONB** The ExA notes the applicant's response to NE's written representation (WR) in [REP2-034] that horizontal direction drilling (HDD) is not proposed for areas of acid grassland as it would involve extending the duration of works close to Sandlings Special Protection Area (SPA) and Leiston-Aldeburgh. Provide a more detailed explanation as to how the mitigation hierarchy has been applied to the effects on acid grassland as a defining element of natural beauty for the AONB.	As set out within **Application Document 9.87 (A) Applicant's Comments on Responses to First Written Questions [REP4-083]**, the mitigation hierarchy has been fully complied with. This is summarised below with specific reference to effects on acid grassland: Avoidance – no permanent infrastructure is located within the SECHNL, thereby avoiding the permanent loss of acid grassland. A trenchless construction technique from the landfall to the sea further avoids the permanent loss of acid grassland. Reduction – the temporary landfall compound and working areas within the SECHNL have been reduced to the minimum required reducing the temporary impact on areas of acid grassland. The HVDC cable corridor within the SECHNL has been reduced to the minimum required to undertake cable construction and routed to limit incursion into areas of higher quality acid grassland, including by routing along the northern edge of the golf course. Restoration – all areas of acid grassland temporarily affected during construction at the landfall and HVDC cable corridor will be fully reinstated and restored once construction is complete. This is set out in the oLEMP and secured by Requirement 6 of the DCO. Compensation – the additional acid grassland enhancement measures compensate for the short term and temporary significant adverse cumulative effects and provide further enhancement for the SECHNL within the operational phase of the Proposed Project (as set out in Plate 3.1 within **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**).
2LVIA8.	ESC, TDC, KCC, SCC	**Lighting and fencing** Further to your responses to ISH2 Action Point 131, explain whether you consider that relevant planning authorities require control over details of lighting and fencing. If so, provide suggested wording. If not, explain why you consider that there would be adequate existing controls.	
2LVIA9.	**Applicant**, TDC	**Stour Marshes landscape character area (LCA) E1** Environmental Statement (ES) Appendix 3.1B [APP-144] identifies the key characteristics of LCA E1 as including long uninterrupted views across the marshes to the coast. ES Appendix 3.1C [APP-143] identifies that the partial loss of openness and the change to the aesthetic and perceptual aspects of the landscape would be lessened by the context of existing infrastructure.	The Weatherlees Hill wastewater treatment plant extends the pattern of infrastructure which spreads to the north from Richborough Energy Park within Landscape Character Area (LCA) E1: Stour Marshes. The wastewater treatment plant comprises settlement tanks, aeration lanes, kiosks, larger buildings, single storey operational buildings and hard standing areas. It influences the local character sharing characteristics which are similar to the adjacent pattern of energy infrastructure rather than the wider and defining key characteristics of the Stour Marshes landscape. On this basis the wastewater treatment plant can be considered as a detracting feature within LCA E1 rather than contributing positively to the key characteristics and qualities. The geographical extent of this influence

Reference	Question to:	Question	Applicant's Comments
		Provide clarification as to whether the Weatherlees Hill wastewater treatment plant is an existing detracting feature in LCA E1 that indicates that the effect on landscape character would be lessened. The assessment in [APP-143] considers that at year 15 the mature planting around the converter station and substation would reduce the effect from moderate adverse (significant) to minor adverse (not significant). Provide a detailed explanation of how the presence of mature planting would reduce the significance of effects on a landscape characterised by long uninterrupted views.	on landscape character is reduced across the wider Stour Marshes LCA to the west by containment of most of the lower-level built form by surrounding mature vegetation cover. The taller buildings within the western part of the site remain visible particularly when viewed from the north. This is also illustrated at nighttime, when lighting associated with the western part of the wastewater treatment plant is visible set within the wider context of lighting associated with Richborough Energy Park, Discovery Park and road lighting. This context of development that is created within the eastern part of LCA E1: Stour Marshes including Weatherlees Hill wastewater treatment plant and the pattern of existing and consented energy infrastructure provides the immediate context within which the Proposed Development is sited, in a less sensitive part of LCA E1. A key characteristic of LCA E1 (as set out within **Application Document 6.3.3.1.B ES Appendix 3.1.B Landscape Baseline [APP-144]**) is the "*long uninterrupted views across the marshes and Pegwell Bay and into marshes of neighbouring districts*" and for LCA B1 is "*long views over the marshes into Dover and Canterbury Districts as well as sea views from the elevated ground and cliff tops over Pegwell Bay and the English Channel*". As noted in the assessment (**Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]**), the long views across the landscape, including across the former marshes, would have a limited influence due to the siting of the proposed Minster Converter Station and Minster Substation in part of the landscape where mature vegetation cover is a prominent characteristic and proximity to existing built form at Richborough Energy Park which prevents views to Pegwell Bay. The low-lying former marsh landscape does not afford long uninterrupted views to Pegwell Bay and elevation is required to gain views to Pegwell Bay and the English Channel. Within this context in LCA E1, the Proposed Project would not interrupt views to Pegwell Bay, the English Channel or into neighbouring districts where long open views would remain across the Ash Levels (Dover District) and west along the Stour valley towards Canterbury District. The proposed landscape planting (shown on Figure 1 within **Application Document 7.5.7.2 (C) Outline Landscape and Ecological Management Plan – Kent [REP4-067]**, has been designed around the Minster Converter Station and Minster Substation to contribute to reducing perceptual changes arising from the Kent Onshore Scheme on the remainder of LCA E1 and the wider landscape. The landscape planting, once established, would provide a degree of containment to the permanent infrastructure of the Kent Onshore Scheme, ensuring that the overall sense of identity and distinctiveness of the wider former marshland and Wantsum Channel landscape to the west is retained. Establishment of the landscape planting would lessen the alteration of the key characteristics experienced at year 15 in the context of the more vegetated part of the LCA and proximity to the exiting and consented infrastructure. Whilst the planting would not screen the proposed Minster Converter Station and Minster Substation it would soften views, building upon and connecting into the framework of mature vegetation providing structure and separation between the wider former marshland and Wantsum Channel landscape to the west and the site.
2LVIA10.	**Applicant** ESC, SCC, SEAS and other relevant stakeholders	**Cumulative effects on the AONB** **Applicant:** The updated assessment of effects on the sub-factors of the special qualities and natural beauty indicators set out in the Planning Statement Addendum [REP4-092] is welcomed. The cumulative assessment provided in table 4.1 of the National Landscape Section 85 Duty Technical Note [REP1-120] is only in relation to the indicators rather than the sub-factors. Provide a more detailed cumulative assessment in relation to the sub-factors for the natural beauty indicators and special qualities indicators with a greater	An assessment of inter-project cumulative effects on Natural Beauty and Special Qualities Sub-Factor Indicators of the Suffolk & Essex Coast & Heaths National Landscape (SECHNL) is provided in **Appendix A: Cumulative Assessment of Natural Beauty and Special Qualities Sub-Factor Indicators**. This assessment on the sub-factors provides a greater level of detail and should be read in conjunction with the assessment on the Indicators provided within Tables 4.1 and 4.2 within **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**. To note that this has been undertaken for the construction phase of the Proposed Project as once operational the Suffolk Onshore Scheme landfall and HVDC cable corridors would be fully reinstated thereby not giving rise to potential cumulative effects.

Reference	Question to:	Question	Applicant's Comments
		level of detail as to the factors that have led to the conclusions for each indicator and the magnitude of the effect. Where a temporary significant adverse effect is identified, specify the likely duration of the temporary effect and whether any avoidance, mitigation or compensation measures could be identified that would reduce the magnitude of the effects. **ESC, SCC, SEAS and other relevant stakeholders:** Suggest potential mitigation or compensation measures for the likely significant cumulative effects on the special qualities and natural beauty of the AONB, as identified in table 4.1 of [REP1-120].	
2LVIA11.	Applicant	**Outline Landscape and Ecological Management Plan (oLEMP)** Include contingency measures for acid grassland in case reinstatement plans fail or are not achievable within the timeframes stated. This should be reflected in the REAC [REP4-235].	The oLEMP (**Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065]**) sets out the measures necessary for the successful acid grassland reinstatement (Section 4.2, 6.7 and 7.2) which includes contingency measures if the acid grassland reinstatement is not proceeding according to the success criteria agreed with the local planning authority (paragraph 6.7.3 of **Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065]**). The oLEMP is secured by Requirement 6 within **Application Document 3.1 (H) draft Development Consent Order** submitted at Deadline 5. No additional commitment is therefore required within the REAC.

3. Ecology and Biodiversity

Table 3.1 Ecology and biodiversity

Reference	Question to:	Question	Applicant's Comments
2ECOL1.	Applicant	**Duration of ecological effects** Provide further justification for the definitions of duration set out in the ecology and biodiversity chapters and paragraph 2.4.61 of the Habitats Regulations Assessment (HRA) [REP3-028]. In responding, explain how the assessed durations align with paragraphs 5.14 to 5.15 of the Chartered Institute of Ecology and Environmental Management 'Guidelines for Ecological Impact Assessment in the UK and Ireland' 2018.	Paragraph 5.15 of the CIEEM guidelines states that '*Impacts and effects may be described as short, medium or long-term and permanent or temporary. These will need to be defined in months/years.'* This has been done in the ecology and biodiversity chapters and **Application Document (G) Habitats Regulations Assessments Report** submitted at Deadline 5 where it is stated that '*For the purposes of this assessment short-term has generally been defined as less than two years, medium term as 2-10 years and long-term as 10 years and upwards'*. Paragraph 5.14 of the guidelines states that these durations should be defined in relation to ecological characteristics (such as the lifecycle of a species) as well as human timeframes. This has been taken into consideration in defining the durations. For example, regarding habitat loss impacts the durations of impact have been based on the length of time it is expected to take for the relevant habitats to mature sufficiently to be used by the affected species. For example, paragraph 2.9.77 of the Suffolk Ecology Chapter states '*The effect would last for between 1-2 seasons (for easily restored habitats such as ditches) to 5-10 years or longer for sections of hedgerow and woodland, as the works are completed and vegetation recovers.'*
2ECOL2.	Applicant	**Environmental Clerk of Works** Explain why the outline Offshore Construction Environmental Management Plan [REP4-223] now refers to an ecological clerk of works rather than an environmental clerk of works as the skillset of the two roles may be quite different, for example an environmental clerk of works may not have the same depth of ecological knowledge.	The Applicant confirms that it has amended the **Application Document Offshore Construction Environmental Management Plan [REP4-223]** to refer to an Environmental Clerk of Works.
2ECOL3.	Applicant	**Preconstruction surveys** To provide certainty regarding the scope of preconstruction surveys, provide a schedule of proposed preconstruction surveys for inclusion within the oLEMP for Suffolk [REP4-065] and Kent [REP4-067].	A schedule of pre-construction ecology surveys will be included in the Kent and Suffolk oLEMPs at Deadline 6.
2ECOL4.	Applicant	**Increased sensitivity of bird species during the dawn, dusk and night periods** Respond to the Royal Society for the Protection of Birds (RSPB) comments as reported in the draft Statement of Common Ground (SoCG) [REP3-067] that birds may be more sensitive to noise while roosting or during hours of low light (dawn and dusk) and darkness and explain whether this could affect the overall assessment of significance.	Paragraph 2.9.45 of the **Application Document 6.2.2.2 (C) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP4-025]** discusses noise disturbance on the SSSI. While a small part of Leiston-Aldeburgh SSSI east of the former railway line would be subject to noise above 60 dB during compound set up/demobilisation between the former railway and Leiston Road (total duration c. six months), it has been agreed with Natural England that this would not constitute a significant effect due to the very small area affected. The 60 dB threshold agreed with Natural England would apply whenever the works were undertaken and is not restricted to particular times of day. Therefore, the time when the works are carried out would not affect the assessment of significance.
2ECOL5.	NE RSPB Local authorities	**Unexploded Ordnance (UXO)** Explain whether the proposed approach to UXO outlined in the applicant's response to ISH2 AP16 [REP4-086] is sufficient to ensure that potential effects on the designated sites could be appropriately mitigated.	

Reference	Question to:	Question	Applicant's Comments
2ECOL6.	**Applicant** NE	**Ground investigations** **Applicant:** NE appendix J4 [REP4-195] notes that ground investigation works can have significant impacts or adverse effect on integrity (AEoI) and suggests that works would be subject to separate permissions. As the dDCO [REP4-217] schedule 1, part 1, section 2 includes reference to surveys, confirm whether a separate permission would still be required from NE? **NE:** The ExA notes your advice that ground investigations can result in AEoI [REP4-195] but that the applicant confirmed any further ground investigation at Kent landfall would be subject to a separate marine licence from the Marine Management Organisation (MMO), on which NE would be consulted. Are you satisfied that this activity would fall outside of the DCO and therefore that there would be no AEoI of the Sandwich Bay Special Area of Conservation (SAC) from this pathway? The ExA is also unclear as to NE's outstanding concerns about drilling activity for the SAC, as [REP3A-028] does not appear to include advice on this matter. Please clarify NE's outstanding concerns.	A separate SSSI Assent would still be required from Natural England in the view of the Applicant.
2ECOL7.	Applicant	**Hedge gap closures** Provide evidence to demonstrate that it is feasible to close hedge gaps between the proposed Friston Kiln Lane substation and the Saxmundham Converter Station site in light of the proposed 39m working width in this location and if gap closure is not possible, confirm whether this would affect the assessment of significance.	As noted in the oLEMP submitted at Deadline 4 (and by SEAS in paragraph 9.11 of their **Relevant Representations on Ecology and Biodiversity [RR-5210]**) Anglian Water have successfully used Heras fencing covered in camouflage netting infilled completely across gaps to maintain bat flight through gaps in hedges. The most suitable method may vary by location and width of the gap to be closed but given the relative ease of placement and movement, herras fencing with camouflage netting or other shade mesh will be the default method. Since this is relatively easy to introduce and herras fencing and camouflage netting are easy to source, there is no reason to conclude that a 39 m gap (due to the need to install both HVDC and HVAC cables) would be more difficult to close to a maximum gap of 10 m (where the haul route must remain open) than smaller gaps, particularly noting that the fencing will only require movement when the trenching operation is actually taking place through the hedgerow, which is likely to be accomplished in days, and during replanting of the hedgerow.
2ECOL8.	**Applicant** Local authorities	**Benhall bridge works** **Applicant:** Explain what the potential is for the rail corridor at Benhall Bridge to act as a bat commuting corridor and dormouse habitat and whether this would require additional survey and/or mitigation measures? Where relevant provide a commitment in the REAC [REP4-235] or Suffolk oLEMP [REP4-065]. **Local authorities:** It is noted that the extent of pre-construction surveys has been restricted in the revised oLEMP as follows "These surveys will include surveys of breeding and non-breeding birds (particularly nesting Schedule 1 species), bat activity (focussed on locations where failures of automated bat detectors occurred during baseline surveys resulting in fewer than the standard 5 nights of activity being recorded in those locations), riparian mammals, dormice (specifically regarding Area D where an ambiguous record exists from the original survey) and	The rail corridor is highly likely to act as a bat commuting corridor and could potentially serve as dormouse habitat, although dormice are not often found in East Suffolk. However, this value will be primarily dictated by the continuous belts of scrub and trees along the railway embankment. The plans submitted for the Change Request (**Application Document 2.12 Trees and Important Hedgerows to be Removed or Managed Plans (Version 2, change request) [CR1-023]**) show the embankments to lie outside the Order Limits except one small area immediately adjacent to the bridge. This would mean the corridor of habitat would be unbroken. Such an approach would also limit any impact on dormice if any were to be found. Reference to pre-construction surveys of Benhall Bridge for bats and dormice if Option 2 were to be taken forward will be included in **Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065]** and in the **Application Document 9.84 (B) Register of Environmental Commitments (REAC) [REP4-234].**

Reference	Question to:	Question	Applicant's Comments
		badgers." Comment on whether the extent of surveys should be increased.	
2ECOL9.	Applicant	**Reptile trapping and translocation** Update the oLEMP [REP4-065] to allow for discussions with ESC regarding the final approach to mitigation for reptiles, such as trapping and translocation, in areas of acid grassland as suggested in the applicant's response to WR [REP2-034].	**Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065]** updates for Deadline 4 had been intended to capture this point of discussion where it is stated that '*the precise approach to dealing with reptiles will be agreed with the Local Planning Authority prior to vegetation clearance'*. However, the Applicant will make this more explicit for an updated Suffolk oLEMP submitted at Deadline 6.
2ECOL10.	RSPB **Applicant**	**Works affecting North Warren** Provide an update on the discussions regarding access, grazing and vegetation management proposals at North Warren. Also comment on the known distribution of water voles at North Warren in areas of wet grassland and whether any preconstruction survey is necessary in respect of this species close to the HDD compound.	A meeting with RSPB was held on 25th February 2026, where these matters were discussed. No surface works in the reserve are proposed other than possibly trimming back seasonal growth of bushes adjacent to footpaths, in line with current management practice in the reserve. Whether this trimming of seasonal growth would be necessary can only be determined at the time access is required. This specifically relates to tree features H1099S and G82S. A photograph of G82S is shown below to illustrate the trimming of seasonal growth that may be required. The intention would be to ensure the path remained as open as it is currently shown.  In the 25th February 2026 meeting it was stated that during normal HDD works, access to inspect the ground above the route for drilling fluid frac out (by "spotters" and supervisors) will be on foot using existing routes and footpaths to access the land above the drills. In the unlikely event of a frac out, suitable vehicles such as 4x4's or quadbikes will be used to transport equipment on existing routes to the closest point of agreed vehicle access. From the end of the permitted vehicle access, the equipment will be hand carried to the frac out location. The designated vehicle routes will also be used by a tractor and bowser in the event of a frac out, to receive fluid pumped from the frac out location. The vehicle and pedestrian routes and limits of vehicle movements have been provided as part of land agreements with RSPB. Vegetation removal is not required for the vehicle and pedestrian access routes. At the time of access and depending on how the land is being grazed at the time, there may be a requirement for either the person doing the monitoring ('the spotter') to be accompanied by a grazier or RSPB staff, or for temporary electric fencing to be installed over a localised area and for a short duration, in order to keep the spotter safe from cattle. This was discussed with RSPB on 26th February 2026, and it was noted that since RSPB do not graze the site themselves, they would require notice of this so they could liaise with their graziers about arrangements. A new REAC measure has been added at Deadline 5 to address this. The Applicant has not surveyed for water voles in North Warren RSPB reserve since no surface works in the reserve are proposed other than possibly trimming back seasonal growth of bushes adjacent to footpaths, in line with current management practice in the reserve. However, the nearest suitable habitat

Reference	Question to:	Question	Applicant's Comments
			for water voles appears to be approximately 100 m from the nearest surface works (the HDD compound) on the opposite side of the former railway line. This is too distant from the works for any impact on water voles to arise. Therefore, the Applicant does not consider pre-construction surveys are required. The Applicant's Agent issued revised Heads of Terms on 26th February 2026 that addressed the outstanding points. It is believed that the Heads of Terms are agreed between the Applicant's Agent and the landowners agent subject to final approval from the landowner. The landowner is working with the Applicant to agree a Statement of Common Ground which addresses their wider concerns around the project. A meeting is being arranged with the landowner's agent ahead of Deadline 6 and it is anticipated that an agreement can be reached prior to the close of Examination.
2ECOL11.	NE	**Sandlings SPA – acid grassland** The applicant responded to NE's concerns regarding Sandlings SPA in ([REP2-034], table 2.8]). It updated the HRA Report to clarify the impacts to acid grassland within Sandlings SPA and to adjacent functionally linked land. It also confirmed that the acid grassland enhancement was not being proposed as mitigation for loss of functionally linked land for Sandlings SPA and that the assessment did not rely on its provision to conclude no AEoI. NE's Risk and Issues log ([REP4-197], point 20, tab A) shows this matter to still be outstanding. Does NE consider there to be an AEoI to the Sandlings SPA as a result of impacts on acid grassland. If so, provide reasoning.	
2ECOL12.	RSPB Local authorities NE	**Updated wintering bird survey** Comment on the applicant's statement in [REP4-241] that "since the North Warren RSPB Reserve is being treated as a sensitive receptor, the Applicant does not consider that updated information regarding the number and distribution of wintering birds within the Reserve is required, particularly since RSPB have good data for their Reserve."	
2ECOL13.	NE RSPB Local authorities	**Suffolk Wintering Bird Survey Report** Provide any further comments on the assessment of effects on wintering birds, based on the updated Suffolk Wintering Bird Survey Report appendix 2.2.b [REP4-037].	
2ECOL14.	**Applicant** Local authorities RSPB	**Seasonal restrictions - Suffolk** **Applicant:** Section 6.7 of the Suffolk oLEMP [REP4-065] explains that topping/flailing works would be restricted during the bird ground-nesting season (i.e. avoiding March to August). In light of previous amendments relating to the bird breeding season, should this read February to August? **Other parties:** To comment.	The Applicant is content to update this to February to August in a version of **Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065]** to be submitted at Deadline 6, which would cover the eventuality of woodlarks nesting in reinstated acid grassland.
2ECOL15.	SCC **Applicant**	**Seasonal restrictions - Suffolk** SCC [REP4-150] suggests that compound works in Suffolk should not be undertaken in the winter months. Explain whether the applicant's proposed 1 January to 31 March restriction on works as set out in provision O03 of the REAC [REP4-235] satisfies this requirement.	SCC's comment appears to relate to the Suffolk landfall specifically. The Applicant has committed to avoiding noisy works (those which would result in noise levels exceeding 60 dB LAmax) during the woodlark nesting season (February to August) as agreed with Natural England. A prohibition on noisy works during winter as well would effectively render the Suffolk landfall location unusable. Moreover, it is not necessary because as documented in the Suffolk Ecology Chapter **[REP4-025]** and Habitats Regulations Assessment **[REP4-057]** the 60dB LAmax contour during winter will only extend to a small

Reference	Question to:	Question	Applicant's Comments
		The applicant may wish to comment.	extent into those parts of Leiston-Aldeburgh SSSI of importance to non-breeding birds. The Applicant would therefore object to any restriction on noisy works during the winter at the Suffolk landfall as this would affect the ability to construct the scheme and is considered unnecessary. . O03 specifically relates to cable installation at Suffolk landfall (i.e. after the ducts have been installed). This will be done from the seawards end and a restriction on installation (preventing it during 1st January – 31st March) will be in place to protect red-throated diver.
2ECOL16.	Applicant	**Retention of veteran trees** The route of the cable passes within the root protection areas (RPA) of two veteran trees (T447S and T423S). How realistic is it to keep these trees and is it possible to maintain trees over the alignment, given that the applicant is elsewhere seeking planting restrictions over the alignment (for example in dDCO Article 27 [REP4-217])? Noting that large loads and swept paths must dictate access route alignments to some extent, provide evidence of the work that has been done to assess alternative access options around trees T525S and T523S.	These trees and their areas of constraint are located outside of the cable limit of deviation and in accordance with commitment A05 within **Application Document 9.84 (B) Register of Environmental Commitments [REP4-235]** all veteran and ancient trees will be retained. Regarding T525S* and T522S* the Applicant has specifically allowed additional space within the Order limits in this location to accommodate these trees. Avoiding the trees would require the road to be moved north which would result in increasing the radii of the bends on the road alignment, which would be a betterment in terms of vehicle progress along the access road. In addition commitment A10 within **Application Document 9.84 Register of Environmental Commitments** commits to the avoidance of these trees and their area of constraint for the access road.
2ECOL17.	Applicant	**Incursion into veteran tree RPA** Respond to the Forestry Commission's [RR-1660] comment that any incursion into the RPAs of veteran trees would need to be extensively monitored even post-construction.	The Applicant has previously responded to this question within **Application Document 9.34.2 (B) Applicant's Response to Relevant Representations from Statutory Consultees and Bodies [REP2-016]** reference 3.5.3. In accordance with Requirement 8, Schedule 3 within **Application Document 3.1 (G) draft Development Consent Order [REP4-217]** an auditable system of compliance is required. Therefore the trees and their condition will be monitored throughout the construction phase. However, post construction no dedicated monitoring system is proposed for the veteran and ancient trees. Where trees are located within land owned by the Applicant or where they pose a risk to infrastructure constructed as part of the Proposed Project, they will be subject to ongoing management and inspection in accordance with **Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294].**
2ECOL18.	**Applicant** Local authorities	**Deer management** Provide an update on discussions regarding deer management with EDF as referenced in section 6.4 of the Suffolk oLEMP [REP4-065]. The local authorities may wish to comment on the proposed approach.	Discussions with EDF remain ongoing regarding the possibility of extending the deer management for the Sizewell estate to include the Proposed Projects' core planting. As stated in the Suffolk oLEMP [REP4-065] submitted at Deadline 4, the Applicant will continue to discuss this with EDF with a view to agreeing any extension to cover the Proposed Project before planting is undertaken. Therefore, it is not expected this will be resolved before the end of the Examination and the core measures to protect the new planting from deer browsing are in paragraph 6.4.4 of the oLEMP submitted at Deadline 4.
2ECOL19.	**Applicant** EA Local authorities	**Potential ecological opportunities** **Applicant:** Paragraph 1.35 of the 2ECOL25uatic Ecology Survey Report [APP-104] suggests that the River Fromus has poor ecological status due to diffuse and point source pollution and barriers, issues which would be disproportionately expensive to fund. Blue Spaces – Saxmundham [RR-0589] also suggests measures to improve the River Fromus. Does the applicant consider that there is any potential to address some of the identified constraints as part of the applicant's proposed biodiversity net gain (BNG) measures? **EA and local authorities:** To comment.	Poor Ecological Status and the Reasons for Not Achieving Good (RNAG) status refer to the Water Framework Directive (WFD) status of the water body. The RNAG quoted by the Environment Agency include the factors listed - diffuse and point source pollution and barriers to fish passage, which the EA identify as 'disproportionately expensive.' The BNG assessment is independent of the WFD assessment, and has a different methodology based on River Condition Assessment criteria, which focuses on physical river characteristics and does not consider factors such as water quality. While enhancement measures proposed in the BNG assessment would aim to improve the physical river condition (as defined through Modular River Physical (MoRPh) surveys), these would be unlikely to have benefits for wider catchment issues (such as those listed above) that are limiting WFD status of the water body as a whole. Through the BNG assessment, enhancement measures would be sought to enhance the physical condition of the River Fromus locally.
2ECOL20.	Applicant	**Impact of displacement of dog walkers**	The intertidal habitats within Pegwell Bay are already subject to access restrictions preventing use by members of the public. As set out in the Applicant's responses to the LIR [REP2-029] a number of

Reference	Question to:	Question	Applicant's Comments
		TDC's Local Impact Report (LIR) [REP1-132] suggests that works in the hoverport at Pegwell Bay could result in displacement of dog walkers with implications for ecological designated areas in terms of recreational pressure and disturbance. The applicant's comments on the LIR [REP2-029] discusses proposed mitigation but does not explicitly address potential recreational pressure and disturbance effects. Explain how such effects have been taken into account within the HRA and any proposed mitigation measures.	measures are proposed to minimise disruption of recreational activities with the wider Pegwell Bay Country Park and coastal footpaths still available for the public to use. In addition, there are designated areas for dogs within the Country Park. As there will still be adequate recreational space, there is no Since Pegwell Bay is already extensively used for recreation throughout the year (notwithstanding the availability of the former hoverport), the use of the hoverport is not considered to materially impact the existing recreational disturbance baseline and has not therefore been covered in the HRA. **Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-economics, Recreation and Tourism** assesses the impact of the Kent Onshore Scheme on Public Rights of Way (PRoW) and recreational routes, including TR15 and TR33 which cross the old hoverport. There are anticipated to be HGV movements along the existing Pegwell Road foreshore access which would interact with Footpaths TR15 and TR33 for six months of the construction programme. However impacts will be mitigated with the installation of site fencing and crossing gates to separate construction vehicles and PRoW users for the full duration of the construction works at this part of the Site. As a result no significant effects are concluded and there is not anticipated to be a material adverse impact on recreational activity.
2ECOL21.	**Applicant** Local authorities NE	**Impact of pylon base installation** Table 9.23 of Kent chapter 9 noise and vibration [AS-111] identifies use of pad foundations for pylon construction as an example means of achieving 10 to 20dB reduction in noise levels. Should this measure be secured to reduce noise and vibration effects on bird species in Kent?	While the use of pad foundations is a potential additional measure, the feasibility of such a measure will require contractor input concerning (for example) suitability of ground conditions and based on previous works in the area the use of pad foundations is highly unlikely or only likely for a small number of the foundations. Therefore, the Applicant would not be able to make an absolute commitment to using pad foundations (and it is not the only available method to achieve a noise reduction). While this is an example of a feasible measure the actual measures required to achieve the necessary noise levels should be flexible at DCO stage and determined later at detailed design by the contractor. Ultimately, it is the noise level necessary to protect the SSSI that needed to be secured, rather than the precise measures that will be used to meet that level. The noise level is confirmed by measure B23 in **Application Document 9.84 (B) Register of Environmental Commitments (REAC) [REP4-235]**
2ECOL22.	Sandwich Bay Bird Observatory Trust	**Data sets** Sandwich Bay Bird Observatory Trust's WR [REP1-242] suggests that it offered detailed tidal bird survey records to Sea Link's ecological team but was not contacted. The applicant's comments on WR [REP2-034] explained that it drew on the public record for these datasets. Confirm whether the Trust still considers that it holds data that the applicant should have taken into account in its assessment?	
2ECOL23.	Applicant	**Seasonal restrictions for Pegwell Bay and Sandwich Bay to Hacklinge Marshes Site of Special Scientific Interest (SSSI)** Notwithstanding discussions during ISH2: • Applicant: Explain in detail how the construction programme would change if a strict March to August restriction was placed on works within the Sandwich Bay to Hacklinge Marshes SSSI and on the works to install pylon bases in Kent. • Applicant: Recognising that programme constraints may affect restrictions during construction, explain in detail why a seasonal restriction on routine tree height maintenance works at Sandwich Bay to Hacklinge Marsh SSSI could not be planned and implemented during the operation and maintenance phase.	For clarity, although Pegwell Bay is mentioned at the start of the question, it is understood that this question is referring to the Weatherlees Hill part of Sandwich Bay to Hacklinge Marshes SSSI, south of the proposed converter station. The Applicant notes that the final sentence of REAC measure B45 currently states: '*Any works causing noise levels above 60dB Lamax at the boundary of the SSSI, will take place outside the bird breeding season (March to September included)*.' This would apply to pylon base installation as these would exceed 60dB LAmax as modelled. REAC requirement B51 also currently prevents overhead line pylon base installation during October to February. Having reviewed against programme, these two measures would render pylon base installation unachievable as foundation works are programmed to be 40 days per tower. Therefore, measure B51 will be amended to 'November to February' and measure B45 will be amended to 'March to August', thus leaving September and October for pylon base installation. Regarding the construction of the converter station and substation, the extension of the timing restriction in measure B50 from March to June to March to August would elongate the construction programme for the converter and substation by 9-10 months. As critical path activities this would impact the overall programme for the project and push back the operational deadline. The additional constraints would delay earthworks at the converter and substation site and split the foundation works for the converter

Reference	Question to:	Question	Applicant's Comments
			station site over two seasons and delay earthworks and foundations at the substation site, resulting in the overall delay to the project. A wider seasonal restriction on tree height maintenance during operation and maintenance such that none took place during March to August inclusive **can** be accommodated. This change has been made to **Application Document 9.84 (C) Register of Environmental Commitments (REAC)** measure B65 for Deadline 5.
2ECOL24.	Applicant	**Hoverport access** Update the dDCO or environmental control documents to take account of TDC's proposed control measures in paragraphs 1.10 to 1.1.13 of its post hearing submissions including written summaries of oral cases made at hearings the w/c 26 January 2026 [REP4-160],or explain why this is not necessary.	The Applicant can commit to matting or laying tracking over the concrete skirt and pad to avoid direct contact and spread the load, an independent design check will be undertaken should the pre-assessment survey identify any structural limitations that will need to be applied to the use of the access route and the tracking used. The Applicant can commit to undertaking a pre-assessment via non-invasive surveys of the proposed access route. The proposed trackway or matting would isolate the vehicles form the concrete pad removing the need for wheel washing. The Applicant can commit to undertaking monitoring prior to and during the construction phase to assess the hoverport structure and any deterioration thereof and undertaken environmental monitoring. The Applicant can commit to an emergency response plan being produced prior to the commencement of works outlining the monitoring methods, trigger points and response actions that will be undertaken in the event of a contamination event due to the actions of the project. The Applicant confirms that it has included a new commitment (W37) '*The Applicant will prepare a hoverport condition monitoring plan post consent to monitor the condition of the hoverport during construction. This will include measures for identifying and managing any potential contamination risk and will be prepared in consultation with the EA, NE, KWT and TDC'* which is secured within the 7.5.3 (C) Outline Onshore Construction Environmental Management Plan updated and submitted at Deadline 5.
2ECOL25.	Applicant	**Pegwell Bay – remedial action for cable exposure** [REP4-241] responds to NE's concerns about future change in conditions at Kent landfall leading to risk of cable exposure by reference to the Landfall Sediment Modelling Report [PDA-038]. It states that if cable were exposed, remedial action would be carried out to avoid wider scale effects, a situation which is discussed in your response to ISH2 AP75 [REP4-086]. Explain how such activities have been considered in your HRA assessment work or otherwise justify why this is not required.	The Applicant confirms that an update to the dML at Deadline 5 has been completed to revise Condition 13 Cable Protection to the following advice from the MMO and Natural England: *"No cable protection granted by the licence may be deployed within the Sandwich Bay Special Area of Conservation (SAC) after the construction period has ended. Any cable protection to be installed outside of the Sandwich Bay SAC following completion of construction in locations where cable protection was not installed during construction must be deployed within 10 years of completion of construction, unless otherwise agreed by the MMO in writing*". A separate Marine Licence would be sought for any additional rock protection within Sandwich Bay Special Area of Conservation (SAC) after construction period has ended if required. It is important to note that this does not need to be addressed in the HRA for the Proposed Project as this rock protection does not form part of the Proposed Project for which consent is sought as it is considered unlikely to ever be required. In the unlikely event of separate Marine Licence being required this would be accompanied by an activity specific HRA assessment report.
2ECOL26.	**Applicant** NE	**Effects on European sites from release of contaminants and debris** **Applicant:** Respond to NE's concerns about release of contaminants and debris arising from use of the hoverport for access to the intertidal area, including the potential to affect designated sites and their qualifying features. In doing so, present analysis of publicly available evidence from Vattenfall and Thanet Extension projects. Confirm how you propose to mitigate any risks identified from this pathway and update assessment work (ES and HRA) as relevant.	The Thanet Extension project (Vattenfall Wind Power Ltd) identified the former Ramsgate Hoverport site as a potential source of contamination due to the presence of colliery spoil that was used to raise levels at the site, and due to the potential for historical fuel storage at the site. Information from parts of the application indicates that the development boundary was kept away from the hoverport to prevent interactions with any contamination. Kent Onshore Chapter 5 Geology and Hydrogeology **[APP-065]** for the Sea Link project acknowledges that the hoverport represents a potential source of contamination but in the context that the hoverport site is only proposed for access and that there will be no ground disturbance from the project, has concluded (in the change application documents) that it does not represent a likely significant effect. This is based on the presence of hardstanding across the hoverport, which overlies any made ground

Reference	Question to:	Question	Applicant's Comments
		NE: Regarding the new issue [REP4-191] of release of contaminants and debris arising from use of the hoverport to access the intertidal area, confirm which European sites and qualifying features you consider could be subject to likely significant effects. Advise on any potential mitigation the applicant could implement to address this matter, and whether you consider it is possible to avoid an AEoI of the European sites.	and potential sources of contamination. The Project is seeking to prevent any interactions with potential contamination through avoiding ground disturbance and conserving the existing overlying hardstanding barrier – and is committed to undertaking a Structural Integrity Assessment of the hardstanding at the hoverport to ensure it is suitable for the limited construction and maintenance access proposed. This has already been committed to at Deadline 4 and will be included within the highway condition surveys outlined in section 7.4.7 of **Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-338].** Further mitigation such as the deployment of track matting will be used as appropriate. Maintaining the structural integrity of the hardstanding will prevent exposure of any potential sources of contamination (as well as protect vehicles) and therefore significant effects on the environment from contamination at the hoverport, as a result of the Project are considered unlikely. Given this, and the fact **Application Document 6.6 (G) Habitats Regulations Assessment Report** and the Environmental Statement already considers water quality impacts and the measures that will prevent pollution (paragraphs 4.4.16 to 4.4.20), the HRA does not require updating. The Applicant confirms that it has included a new commitment '*The Applicant will prepare a hoverport condition monitoring plan post consent to monitor the condition of the hoverport during construction. This will include measures for identifying and managing any potential contamination risk and will be prepared in consultation with the EA, NE, KWT and TDC'* which is secured within the 7.5.3 (C) Outline Onshore Construction Environmental Management Plan updated and submitted at Deadline 5. This is in new commitment W37.
2ECOL27.	NE	**Lighting of cofferdams** **NE:** Does NE agree with the applicant's response table 3.1 [REP4-241] that lighting of the cofferdam in the intertidal area would not result in AEoI, as it would be focused only on the intertidal area. If not, explain what further assessment NE considers is necessary to assess such disturbance effects as suggested in appendix J3a [REP3A-028].	
2ECOL28.	Applicant	**Vehicle movements within the intertidal area.** **NE:** NE [REP3A-028] noted that no consideration had been given to the disturbance to Thanet Coast and Sandwich Bay SPA birds from vehicle movements within the intertidal area. The applicant stated amendments were made to Version D of the HRA Report [REP2-010], providing clarification on such effects. The ExA notes the noise contours provided in [REP4-051] (figures 6.4.4.5.7 and 6.4.4.5.8) depicting predicted maximum noise levels along an illustrative access route corridor and that additional noise information was included in section 7.3 of the HRA. Can NE confirm whether the information provided now addresses its concerns. **Applicant:** Signpost to where the assessment of disturbance from vehicle movements on SPA features is presented or provide additional assessment information to address NE's concerns.	Vehicle movements, including noise generated, are considered as part of the assessment of airborne sounds and visual disturbance presented in Sections 7.3.41 to 7.3.48 of **Application Document 6.6 (G) Habitats Regulations Assessment Report** submitted at Deadline 5.
2ECOL29.	KWT Local authorities NE	**Hoverport access – reptiles** In light of the acknowledged presence of reptiles within the hoverport, should two stage clearance of any vegetation, or	

Reference	Question to:	Question	Applicant's Comments
		other measure, be secured as a REAC or oLEMP provision and if not, why not?	
2ECOL30.	**Applicant** RSPB	**RSPB further management measures** **Applicant:** At DL3, the applicant stated in its response to first written questions (1ECOL47, [REP3-069]) that it would consider further management measures suggested by the RSPB for the 10ha arable mitigation land for golden plover associated with Thanet Coast & Sandwich Bay SPA. No updates have been made to the oLEMP (section 5.4 [REP4-067]). Does the applicant intend to make such updates? **RSPB:** To comment.	The Applicant can confirm that amendments in response to RSPB's comments were made to the Kent oLEMP submitted at Deadline 4 (**Application Document 7.5.7.2 (C) Outline Landscape and Ecological Management Plan – Kent [REP4-067]).** Several amendments have been made to the bullet points following paragraph 6.10.1 which are in response to recommendations from RSPB: • Reference has been added to 'organic matter (e.g. manure) will also be added to enrich the soil for invertebrates' • Reference has been added to topping, whereas previously 'no topping' was stated: 'Topping of crops will be considered but must be balanced with a need to produce viable crops. Topping will only be used when set-aside cover crops are planted'.
2ECOL31.	Applicant	**Winter bird survey of golden plover area** Confirm whether additional survey data will be made available to the examination for the period November 2025 onwards to provide two full winter seasons of data and if so explain when this would be submitted.	No further survey data will be provided into the Examination regarding wintering bird survey for the golden plover enhancement area. The purpose of the survey was to confirm that golden plovers are in the area but not using the fields to a significant degree on a regular basis. That has been accomplished using the single season of survey undertaken. Since the survey has also confirmed that the fields are not currently managed in a suitable manner (e.g. use of bird scarers) no further wintering bird survey is deemed necessary to confirm that the fields have considerable potential for enhancement for wintering farmland birds and particularly golden plovers.
2ECOL32.	Applicant	**Low frequency and continuous noise impacts** Comment on the potential for low frequency (50Hz) noise and continuous noise from the Minster converter and substation site to affect owl, cuckoo and nightingale as suggested by Thanet RSPB Local Group [RR-4652] and Bird Wise East Kent [RR-0584].	The RSPB Local Group comment states that '*The bird population in this area are already struggling with the increased noise pollution from the battery storage plant, Southern Water's water treatment plant and the 50htz that is likely from this converter station will significantly increase the impact on birds such as owls, cuckoos and nightingales. (Look at Dogger Bank wind farm as precedent.)'.* It is unclear whether the view of noise impacts in the local area mentioned in the RSPB response is based upon empirical data (e.g. pre-construction surveys of both birds and noise levels, compared with post-construction surveys of birds and noise levels) or is anecdotal and is simply assuming the birds are being affected. For example, there is no evidence the Applicant is aware of that breeding birds (including owls, cuckoos and nightingales) avoid sewage treatment works. Owls in particular are more attuned to higher frequency sounds than lower frequency sounds. Large offshore wind farms are an unsuitable comparison for a substation or converter station given the difference in the sound environment. While low-frequency noise can be an issue for birds, assessment criteria were agreed with both Natural England and RSPB in preparation of the DCO application and a 60dB A-weighted threshold was agreed as being a reasonable precautionary measure for assessing disturbance. A-weighted thresholds are the parameter commonly used for noise assessment of impacts on birds as their hearing overlaps extensively with human hearing. While use of A-weighted sound levels does de-emphasise low frequency sounds (as these are less relevant to human hearing), birds are susceptible to sound within the human hearing frequency range and loudness within that range is probably the most important factor in bird disturbance. It is therefore considered a suitable assessment metric.
2ECOL33.	**Applicant** Dover District Council	**Outline Landscape and Environmental Management Plan (Kent)** Paragraph 5.3.3 of the Kent oLEMP [REP4-067] states "We could therefore add this species to the list for which localised control is proposed for Ash Level" The ExA considers that this is not sufficiently definitive. Agree finalised wording with Dover District Council, or explain why it is not necessary.	The Applicant can confirm that this was a copy and paste error from discussions with Dover District Council. The **Application Document 7.5.7.2 (C) Outline Landscape and Ecological Management Plan – Kent [REP4-067]** should have confirmed this species has been added. An update will be made for D6.

Reference	Question to:	Question	Applicant's Comments
2ECOL34.	Applicant	**BNG provision** Noting discussions at ISH2 relating to a unilateral undertaking in respect of BNG, explain how the BNG calculation and provision would be adjusted to account for any changes in the habitat lost as a result of detailed design or construction stage changes to the proposed development.	An Updated BNG assessment is to be completed at detailed design as stated within the draft Heads of Terms (HoTs) *"NGET will submit to the LPAs an Interim Biodiversity Net Gain ("BNG") Assessment* ***upon the completion of detailed design*** *of the Authorised Development, using the methodology outlined in the BNG Report submitted with the application to calculate the predicted biodiversity units at completion of the Authorised Development, compared with its pre-development baseline".* BNG is to be considered throughout the detailed design stage to allow for further application of the mitigation hierarchy. As detailed in the HoTs a final BNG assessment is to be completed *"Upon completion of the Development, NGET will submit to the LPAs a Final BNG Assessment, calculating the biodiversity units upon completion of construction of the Development as compared with its pre-development biodiversity value".* This is to ensure that any changes (either positive or negative with respect to habitat loss or retention) during construction are captured and the Applicant and the Local Planning Authorities can be confident in the delivery of the Proposed Project's voluntary BNG commitment. Discussions with the relevant LPAs are continuing.
2ECOL35.	Applicant	**BNG – accounting for trading rules** Paragraph 2.3.3 of the BNG feasibility report [REP1A-025] states that trading rules are not accounted for. The applicant's draft SoCG with KCC [REP3-038] suggests that applying trading rules would result in an unwieldy BNG requirement. Quantify how applying the trading rules would affect the BNG calculations.	Accounting for the trading rules would not increase the units required to deliver BNG targets for the Proposed Project, as set out below. **Area based habitats** Based on the combined statutory metric calculation, currently only the trading rules for medium distinctiveness habitats are satisfied. There is a shortfall of low distinctiveness habitat units of 45.98 units that can be delivered through the provision of habitats of the same distinctiveness or higher. The Applicant is confident that trading rules for low distinctiveness habitats can be satisfied through the purchase of units of a higher distinctiveness. There is a shortfall of high distinctiveness habitat units of 22.61, these units are attributed to Grassland – Floodplain wetland mosaic and coastal floodplain grazing marsh, located in Kent. High distinctiveness habitats require the same habitat type. The Applicant aims to use the trading rules as a guide for habitats and/or distinctiveness levels for offsite biodiversity gains. However, it should be noted that for this habitat type there is only a permanent loss of 0.04 ha and the unit losses relate to the time lag between the initial temporary impacts and the habitat being reinstated to its baseline condition. As such it is considered that whilst the unit requirement for this habitat type is moderately high there is a non-significant permanent loss of this habitat type. There is a significant shortfall of very high distinctiveness habitat units of 149.29, these are attributed to Grassland – Lowland dry acid grassland, located in Suffolk. Very high distinctiveness habitats require the same habitat type as bespoke compensation. As for habitats of high distinctiveness these unit losses relate to the time lag between the initial temporary impacts and the habitat being reinstated to its baseline condition. There is no permanent loss of this habitat type resulting from the Proposed Project. Furthermore, temporary impacts to acid grassland are being compensated, and will result in an increased area of this habitat type. However, it should be noted that this acid grassland creation and enhancement is not accounted for within the BNG assessment but forms part of the Section 85(A1) enhancement duty. **Hedgerow Units** All trading rules for hedgerow units are satisfied. **Watercourse Units** There is a shortfall of 2.45 ditch units and the Applicant will look to further minimise impacts to ditch habitats through detailed design. Where this is not possible, the Applicant seek to provide habitat of similar ecological value and function. The Applicant will seek to deliver a meaningful contribution to nature recovery through the delivery of voluntary BNG for the Proposed Project. The Applicant aims to use the trading rules as a guide for

Reference	Question to:	Question	Applicant's Comments
			habitats and/or distinctiveness levels for offsite biodiversity gains and is seeking to partner with trusted organisations to deliver off-site BNG habitat with wider environmental and societal benefits. The Applicant will work with partners to identify, develop, manage and monitor sites that provide strategic value to nature. These strategic opportunities may help to deliver wider government objectives set out in its 25 Year Environment Plan to establish a nature recovery network, flood attenuation and carbon storage, and will implement the principles of the Lawton Report (Department of Environment and Rural Affairs, 2010) in providing 'bigger, better, more, joined' sites for nature.
2ECOL36.	Applicant	**BNG – accounting for incoming connections** Paragraph 2.3.20 of the BNG feasibility report [REP1A-025] explains that only a proportion of the landscaping is included in the BNG assessment to account for incoming connections in Suffolk. Provide further detail to explain what provisions have been made in respect of the connections.	Paragraph 2.3.24 of the BNG feasibility report outlines that only a proportion of the total proposed landscape planting has been included within the BNG assessment. This decision was made to account for the potential impact of incoming cable connections over the lifetime of the asset, particularly in areas surrounding the converter stations. The landscaping surrounding the converter stations in both Suffolk and Kent is designed to enhance biodiversity and provide environmental benefits. However, there is a specific risk associated with incoming cable connections, which may be located to the north of the converter stations. To address this risk, only landscaping at the west, east, and south of the converter stations has been included in the BNG assessment. This approach ensures that legally secured BNG habitats are not impacted by potential future development or maintenance activities related to these connections. National Grid has adopted a strategic approach to BNG delivery, ensuring that habitats included in the assessment are located in areas where they would not be disturbed by future development or maintenance activities. Although the landscaping to the north of the converter stations has not been included in the BNG assessment, it is important to note that: • This landscape planting will still take place as part of the overall project design. • It will be managed for the lifetime of the asset to ensure its ecological value is maintained (measure LV03 in **Application Document 9.84 (B) Register of Environmental Commitments (REAC) [REP4-235]** . • However, it will not be legally secured under a conservation covenant or similar agreement, as it is excluded from the BNG assessment due to the risk of future disturbance from incoming cable connections. By excluding areas at risk of disturbance from the BNG assessment, National Grid ensures that the habitats contributing to the BNG target are legally secured and remain undisturbed for the required 30-year period. This approach aligns with good practice principles for BNG delivery, prioritizing long-term ecological integrity and compliance with legal requirements.
2ECOL37.	Applicant	**BNG parameter line** Explain whether the parameters line should be amended to include: • The revised order limits due to the change request. • The proposed construction compound adjacent to the Lord of the Manor/A299-Sandwich Road roundabout. • The acid grassland enhancement area. Or explain why this is not necessary.	The BNG parameters line will be updated to encompass any changes to the design of the Proposed Project as it moves into detailed design. This will be captured within the detailed design BNG assessment for any changes including those noted within the ExQ 2ECOL37. **Acid Grassland** The acid grassland enhancement **(7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk (Appendix A – Figure 6))** has not been included within the BNG assessment submitted to support the DCO application. Areas of acid grassland which are to be temporarily impacted **(6.12 (C) Biodiversity Net Gain Feasibility Report (Appendix B))** as a result of the Proposed Project have been captured within the submitted BNG assessment, this includes the reinstatement of this habitat. Management and monitoring of the reinstated acid grassland is presented in the Suffolk oLEMP. Whilst the acid grassland enhancement would provide habitat units and as such would reduce the number of units the Proposed Project required to achieve its voluntary BNG target, the decision to exclude this from the BNG assessment was driven by the fact this area is not being secured for a 30 year period, and the costs of managing the habitat for 30 years not being proportionate to the number of units it could potentially deliver towards the BNG target for the Proposed Project. This decision was also

Reference	Question to:	Question	Applicant's Comments
			driven by an aim to contribute to landscape scale nature restoration through provision of large areas of habitat creation and enhancement through the BNG delivery for the Proposed Project. The area of acid grassland mitigation would provide a stepping stone habitat and increase species diversity, but it is the Applicant's view that there is potential for the delivery of more ambitious measures as part of the Proposed Project. As such the Proposed Project does not intend to include the area of acid grassland enhancement within future iterations of the BNG assessments (to be undertaken at detailed design and post construction). However, the Applicant can confirm that the acid grassland enhancement will be delivered and the conclusions of Document 9.47 National Landscape Section 85 Duty Technical Note still remains as there will be a no likely significant effect on the AONB (resulting from temporary impacts to acid grassland) and there will be an overall increase in the extent and quality of acid grassland habitat as a result of the Proposed Project.
2ECOL38.	Applicant	**BNG - veteran trees within the parameter lines** The baseline habitat figures in appendix B of the BNG Feasibility Report [REP1A-025] do not include all of the veteran trees that would appear to overlap with the BNG parameter lines (for example T103S, T107S, T135S, T129S. T393S, T841S, T842S, T861S. T862S, T938S, T940S, T941S), explain why certain trees and not others are shown in the plans.	On 4th March 2026 a review of the GIS data set confirmed that all ancient and veteran trees within the BNG parameters line had been included within the BNG assessment (**6.12 (C) Biodiversity Net Gain Feasibility Report (Appendix B)**). As the Tree Constraints Plan (**Application Document 9.76.5.8 Change Request Appendix H Tree Constraints Plans Suffolk Onshore Scheme [CR1-063]**) and the BNG Baseline and Post Development plans are presented at different scales and show different boundaries it is difficult to compare the two plans, but the applicant can confirm that they are consistent. Further to this, commitment A05 within **Application Document 9.84 (B) Register of Environmental Commitments [REP4-235]** commits to the retention of all ancient and veteran trees within or immediately adjacent to the Order limits. As irreplaceable habitats have no biodiversity unit value within the metric (as they require bespoke compensation agreements to offset losses) the inclusion of ancient and veteran trees that are outside or within close proximity to the BNG parameters line would not impact the results of the BNG assessment.
2ECOL39.	Applicant	**REAC provision A03** Provision A03 of the REAC [REP4-235] includes the tailpiece "Works within 5 m of any part of a retained tree should only occur if they cannot be avoided", explain how this commitment would be enforced.	This commitment is related to the construction phase of the Proposed Project, during which the methodology for all construction works near to trees will be detailed within the Arboricultural Method Statement (AMS) required pursuant to Requirement 8, Schedule 3 within **Application Document 3.1 (G) draft Development Consent Order [REP4-217]**. This document will require approval by the relevant planning authority prior to the commencement of any part of the authorised development. This is further secured via Requirement 8(2) (c) which requires an auditable system of compliance. This would likely be secured via Arboricultural Site Monitoring (frequency of visits to be determined with the relevant planning authority, but visits are generally undertaken by an Arboriculturist once a month) which is generally followed up with a technical note that is issued to the relevant planning authority to evidence compliance with the AMS.
2ECOL40.	Applicant	**REAC provision GG21** Provision GG21 of the REAC [REP4-235] states that construction lighting will be of the lowest levels necessary to safely perform each task and will reduce intrusion into properties and habitats. Explain how the requirements of the Bat Conservation Trust (BCT) would be integrated into the construction lighting requirements (e.g. in terms of bulb specifications etc).	BCT/Institute of Lighting Professionals Guidance (GN08 Bats and Artificial Lighting) is mainly written from the point of view of operational lighting. However, Step 3 of BCT guidance is '*avoid lighting on any key habitats*'. For the Proposed Project, this specifically means ensuring lighting at construction compounds is directed away from woodland and, if necessary, includes a separation buffer in discussion with lighting engineer and ecologist. This is consistent with the BCT guidance, which states that '*an ecologist will be best placed to set the size of such a buffer zone according to the species present and good design principles recommended under industrial documents such as the Institution of Lighting Professionals' GN01: The Reduction of Obtrusive Light'.* Paragraph 4.2.9 of BCT guidance (part of Step 4) and its subsequent bullet points discusses appropriate luminaire specifications. These will be used by the contractors to identify the appropriate lighting for each compound in liaison with the project ecologists. BCT guidance also provides advice on positioning of lighting columns which would also be taken into account: Paragraph 4.30 states that '*Column mounted luminaires can be located so that the rear shields are adjacent to habitats, or narrow optics selected that direct light into the task area where needed'.*

Reference	Question to:	Question	Applicant's Comments
2ECOL41.	Applicant	**REAC provision B07** Should REAC provision B07 [REP4-235] (and the associated oLEMP provision) include reference to monitoring of implementation by the Ecological Clerk of Works?	An Ecological Clerk of Works will need to supervise implementation of all REAC measures relating to terrestrial onshore ecology, so it is not considered necessary to specifically name the ECoW in each measure.
2ECOL42.	Applicant	**REAC provision B12** Should REAC provision B12 [REP4-235] contain explicit provision for monitoring trees in their out of ground phase as suggested by the SCC LIR [REP1-130].	**Application Document 9.84 (B) Register of Environmental Commitments (REAC) [REP4-236]** provision B12 has been amended for Deadline 5 to include reference to monitoring trees in their out-of-ground phase.
2ECOL43.	Local authorities	**REAC provision B14** The REAC [REP4-235] explains that a precautionary method would be followed "when undertaking vegetation clearance potentially suitable for dormice". Comment on whether this provision should specify particular locations or the process for establishing 'potentially suitable' vegetation.	
2ECOL44.	Local authorities EA	**REAC provision B18** Confirm whether provision B18 of the REAC [REP4-235] provides sufficient detail to provide certainty regarding eel mitigation measures. Is any additional construction mitigation for eel required during eel migration periods in addition to the measures identified in the REAC for Minster Marshes and if not, why not?	
2ECOL45.	Applicant	**REAC provision B23** Provision B23 of the REAC [REP4-235] proposes noise monitoring to confirm that mitigation measures achieve the required noise thresholds. It states that should these thresholds be exceeded, further measures would be introduced to meet the levels, however it does not specify what the measures would comprise. Can the applicant confirm what further measures would be available to them and make amendments to the REAC accordingly, to ensure certainty of mitigation in respect of the designated sites?	Provision B23 is not explicit on the solution to enable flexibility for the contractor to address noise in the most appropriate way. However, additional measures available include, but are not limited to: raising the height of fencing above 3 m, installing secondary fencing within the outer noise fence, implementing 'damping' of equipment, deliberately selecting quieter plant, and placing the plant within a housing. This is not a comprehensive list.
2ECOL46.	Applicant	**REAC provision B42** The ExA notes the change to the wording of commitment B42 in the REAC [REP4-235]. Given that the qualifying features of the Sandwich Bay SAC are dune habitat, should the wording also include reference to dune habitat? If so, submit an updated version of the REAC.	The dune habitat at Sandwich Bay SAC does not lie within the Order limits and there is therefore no possibility for the HVDC cables to traverse this habitat.The Applicant therefore does not consider any changes are necessary to B42.
2ECOL47.	Applicant	**REAC provision B53** REAC provision B53 [REP4-235] states that "Larger gaps in hedgerows or woodland belts would be reduced to 10m maximum where practicable during the night by hurdles or similar." Explain what reliance can be placed on this mitigation for the purposes of the environmental impact assessment if it is only 'where practicable'.	For Deadline 5 measure B53 has been reworded to state '*Larger gaps in hedgerows or woodland belts would be reduced to a maximum of 10 m during the night by hurdles or similar. Where practicable, the gap will be reduced to less than 10 m'.*

Reference	Question to:	Question	Applicant's Comments
2ECOL48.	Local authorities NE	**REAC provision B55** Are the local authorities and NE satisfied with the commitment in REAC [REP4-235] provision B55 to "making the lines visible in adverse weather or low light conditions" or should specific reference be made to night time? The ExA has considered the applicant's response to ISH2 AP24 [REP4-086] but considers that based on plain English, 'low light' may not be inclusive of the night period.	
2ECOL49.	Applicant	**Collision risk** **Applicant:** On the basis of the applicant's response to ISH2 AP25 [REP4-086] which explains that earth wires are considered to be responsible for a higher rate of collisions than other parts of the overhead line infrastructure, provide an updated collision risk assessment accounting for the 6m limits of deviation or further justification regarding the applicant's response to first written question 1ECOL09 [REP3-069].	Further to the Applicant's response to first written question 1ECOL09 in **Application Document 9.73 Applicant's Responses to First Written Question [REP3-069]**, and as discussed in the Applicant's response to ISH2 AP25 in **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2)** [REP4-086], flight activity was predominantly associated with birds moving along the River Stour corridor. The pylon towers will be either side of the river with the wires strung over the river between them. Therefore, accounting for the sag in the wires, for the majority of flights, the earth wire would still be located within the broad 15-50 m survey 'risk height range'. In addition, if the 6 m limits of deviation were to be applied, then it is likely that the earth wire positioned at the top of pylon tower would only be out of the broad 15-50 m 'risk height range' immediately either side of the pylon tower. Collisions from the pylons themselves are not considered a risk, as it is assumed that birds will visually detect and avoid these large structures, as well as the airspace immediately around them. In other words, birds are unlikely to fly close to pylon towers and the greater risk of collision would in the central areas between two pylon towers. It is therefore not considered necessary to provide an updated collision risk assessment.
2ECOL50.	NE	**Bird diverters** Appendix K4 [REP4-196] states that NE does not consider there to be any need for additional diverters to be fitted to other lines in the area. Can NE expand on its reasoning for this?	
2ECOL51.	**Applicant** NE, KWT, RSPB	**REAC provision B59** **Applicant:** The applicant's Comments on Other Submissions Received at DL3 and DL3A [REP4-241] suggests that contractor(s) would prepare a HDD landfall Method Statement and Drilling Fluid Management Plan in consultation with NE, KWT and the RSPB "as appropriate". Can the applicant explain what is meant by "as appropriate" in this context. **Other parties:** Comment on this caveat.	The Applicant confirms that REAC provision B59 no longer contains the wording "as appropriate". The term was included in the version of the REAC submitted at Deadline 3 **[REP3-078]** but was not contained in the Deadline 4 version **[REP4-234]** or the version submitted at Deadline 5.
2ECOL52.	NE	**REAC provision B67 - use of low pressure vehicles** The applicant has committed to use of low pressure vehicles across the intertidal area in REAC provision B67 [REP4-235] and further consultation with NE and others regarding routes. Does this alleviate your concerns that further measures should be considered to reduce impacts to intertidal habitats and sediment compaction?	
2ECOL53.	NE, KWT, RSPB	**Frac out effects - Kent** **All parties:** Are the applicant's measures in the REAC [REP4-235] sufficient to manage frac out and exclude AEoI for the Sandwich Bay SAC, Thanet Coast SAC and Thanet	

Reference	Question to:	Question	Applicant's Comments
		Coast and Sandwich Bay SPA & Ramsar site from changes in marine water quality or pollution by drilling fluid. If not, confirm what further commitments you consider are needed. **NE:** With regards to the impacts of frac out, the applicant (table 3.6 [REP4-241]) considers that the HDD location for East Anglia One was a constrained environment with little coastal wave action, which is not comparable with Pegwell Bay. It noted that the saltmarsh in Pegwell Bay is dry 50% of the time and frac-out could be easily removed. Does this alleviate NE's concerns regarding the impacts of frac out on the supporting habitats of the Thanet Coast and Sandwich Bay SPA?	
2ECOL54.	Applicant	**Habitats of Protected Species and Important Habitats Plan – Kent** Update document 2.9.2 Habitats of Protected Species and Important Habitats - Kent (Version 2, change request) [CR1-016] to include the extent of saltmarsh habitat in Pegwell Bay.	**Application Document 2.9.2 Habitats of Protected Species and Important Habitats - Kent (Version 2, change request) [CR1-016]** has been updated for Deadline 5 to include the extent of saltmarsh habitat in Pegwell Bay.
2ECOL55.	Applicant	**Errata** Respond to SEAS RR on Ecology and Biodiversity [RR-5210] paragraph 7.24, which suggests that there are errors in the presentation of the bat survey report (ES Appendix 2.2.I Nighttime Bat Walkover and Static Detector Survey Report the Bat Survey Report [APP-107]), for example plate A.3 and plate A.4 (page 97/98) are described as being different species on different dates, but the graphic is exactly the same for both plates. Where this is confirmed to be an error, provide an updated report ensuring that all errata have been addressed.	Regarding paragraph 7.24 of **SEAS RR on Ecology and Biodiversity [RR-5210]**, and the sonograms in Plate A.3 and Plate A.4 being identical, the Applicant can confirm that Plate A.4 is an erroneous duplicate of Plate A.3. A corrected version of the report has been submitted at Deadline 5. The error in this plate does not affect the assessment because (as the Examining Authority notes in the question) Annex 2.I.2 only presents example sonograms and Plate A.4 is simply intended to present example evidence of the presence of *Myotis* bats.

4. Cultural Heritage

Table 4.1 Cultural heritage

Reference	Question to:	Question	Applicant's Comments
2CH1.	Applicant	**Single heritage asset list** Provide a single list of all designated heritage assets where there is considered to be any level of harm to their significance (including where harm is at the lower end of less than substantial), whether scoped in or out of the ES assessment. This should be in the form of the table at Appendix B (Information in Response to Cultural Heritage Actions (AP53-AP56)) of the Applicant's Response to January Hearing Action Points from CAH1 and ISH2 [REP4-086]. However, please also include a column to consider cumulative impact for each heritage asset.	Please see the table in Appendix C of **Application Document 9.123.1 Applicant's Responses to Second Written Questions - Appendices** submitted at Deadline 5. Appendix C provides the complete list of designated heritage assets impacted by the Suffolk Onshore Scheme whether scoped in or out of assessment in the ES Chapter. The list includes the assets in Friston which were assessed in isolation of the EAN1/EA2 schemes in response to ISH2 as outlined in the **Applicant's Response to January Hearing Action Points from CAH1 and ISH2 [REP4-086]**. This scenario assesses the Suffolk Onshore Scheme under Scenario 2, where Friston Substation would be constructed as part of the Sea Link project, and on the basis that the EA1N and EA2 substations are not yet constructed. This is considered to comprise a worst case assessment as from the south Friston Substation would be largely obscured by the EA1N and EA1 Substations (which are closer to the assets), so a greater effect would result from construction of Sea Link under Scenario 2 than if they wer in situ. This approach is also considered logical as if Scenario 2 has occurred, it is highly unlikely that the EA1N and EA2 substation would be in place. The original assessment already considered the cumulative impacts of the EA1N, EA2 and Friston Substations alongside the other impacts associated with Sea Link at this location. Appendix C also provides an updated assessment of Wood Farmhouse which was delisted since submission of the application. Consultation has been undertaken with ESC via email regarding whether Wood Farmhouse should be viewed as a non-designated heritage asset and what level of heritage value it holds. ESC noted that whilst the farmhouse itself falls short of being deemed a non-designated heritage asset, it is noted in the Historic Environment Record as part of the wider farmstead asset (HER ID: SXM 076) which has some archaeological interest. Due to this archaeological interest, the Applicant and ESC agree that Wood Farmhouse should be assessed as a non-designated asset of negligible value according to the methodology outlined in Table 3.8 in **Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050]**, i.e. '*assets identified on national or regional databases, but which have no archaeological, architectural, artistic or historic value, or assets whose values are compromised by poor preservation or survival of contextual associations to justify inclusion into a higher grade'* As requested, the table in Appendix C also includes a column outlining whether cumulative effects have been identified on these assets. The narrative detail of the cumulative assessment is contained in response to Action Point 55 in **Applicant's Response to January Hearing Action Points from CAH1 and ISH2 [REP4-086]** The level of harm assessed for each designated heritage asset presented in the table in Appendix C indicates that the Suffolk Onshore Scheme will have less than substantial harm at the lower end of the spectrum upon 10 designated heritage assets. Given this, the overarching conclusion of the policy assessment in relation to harm to designated heritage assets from the Suffolk Onshore Scheme, presented in paragraph 7.5.56 of **Application Document 7.2 Planning Statement [AS-057]** remains as previously presented. The Applicant's case remains that the substantial public benefits and need for the Proposed Project, as set out in Section 5 of the Planning Statement, including the delivery of CNP infrastructure to contribute towards meeting national energy security objectives, clearly and demonstrably outweigh the less than substantial harm, at the lower end of the spectrum, to the designated heritage assets expected to experience harm as a result of the Suffolk Onshore Scheme. This also does not change the planning balance assessment presented in Section 9 of **Application**

Reference	Question to:	Question	Applicant's Comments
			Document 7.2 Planning Statement [AS-057] which affords moderate negative weight in the planning balance to the less than substantial harm upon designated heritage assets.
2CH2.	Applicant	**Cumulative impact assessment on certain heritage assets** For those heritage assets where there has been assessed to be no harm from the proposed development (for example Friston House) are there any heritage assets where the cumulative impact of the proposed development together with the other projects in the area would result in a level of harm to the setting and significance of these assets?	Cumulative effects arise where the identified impacts of one proposed scheme combine with the impacts of another proposed development and result in a greater impact to an asset or receptor, over what was assessed as resulting from the original scheme in isolation. In the case of the Suffolk Onshore Scheme, no impacts and no harm have been identified to assets such as Friston House as a result of the Suffolk Onshore Scheme in isolation, and no cumulative effects have also been identified for the Suffolk Onshore Scheme in combination with other developments. Other developments may have individual impacts on assets, which will be assessed in their respective application documents, and they may also have cumulative effects with other developments, but the Suffolk Onshore Scheme will not add to or contribute to any such impacts. This is because the Suffolk Onshore Scheme, as assessed, does not cause an impact to those assets and no harm has been identified, so it cannot add to impacts and harm identified as resulting from other developments.

5. Water Environment

Table 5.1 Water environment

<table>
<tr><th>Reference</th><th>Question to:</th><th>Question</th><th>Applicant's Comments</th></tr>
<tr><td>2WE1.</td><td>Applicant,
SCC, KCC,
EA</td><td>Water environment – joint position statement
Notwithstanding previously submitted documents, representations and statements of common ground, the ExA requires a joint position statement on areas of agreement and differences with respect to meeting the relevant policy requirements in the National Policy Statement (NPS) EN1 regarding:
• Flood risk and assessment
• Compliance with the objectives of the Water Framework Directive
• Sequential and Exception test (in answering clearly set out all reasonings relating to NPS EN1, paragraph 5.8.42)</td><td>The Applicant has collaborated with the EA, SCC and KCC to provide the following joint position statement.
<table>
<tr><th>Matter</th><th>Applicants Position</th><th>Stakeholder Position</th></tr>
<tr><td>Flood risk and assess-ment</td><td>The Applicant has prepared: Application Document 6.8 Flood Risk Assessment [APP-292] which appraised flood risk to and arising from the Project from all relevant sources. Application Document 9.4 Supplementary Environmental Information - Flood risk assessment [AS-099] which appraised the new EA Flood Map for Planning data set published in March 2025 and provided clarification on Project interactions with Flood Zone 3b. Application Document 9.101 (A) Kent Onshore Scheme - Fluvial Flooding from the River Stour [REP4-096] detailing how the Kent Onshore Scheme would interact with the River Stour fluvial floodplain and how any impacts would be mitigated.
At Deadline 5 the following will be submitted: Application Document 9.99 Groundwater Flood Risk at Minster submitted at Deadline 5– responding to the recent EA Groundwater Flood Warning that was issued for Kent and presenting an assessment of risk to the proposed Converter Station site, informed by site specific GI data.
In lieu of an update to Application Document 6.8 Flood Risk Assessment [APP-292, the Applicant has produced</td><td>SCC's current position as Local Lead Flood Authority (LLFA) is that the current Flood Risk Assessment (FRA) does not meet the requirements of an assessment of flood risk.
This has been discussed with the applicant during a meeting held on 12 February 2026, which resulted in the applicant agreeing to resubmit the FRA with the omitted information for the predicted surface water flood risk for climate change from the National Flood Maps for the proposed development area. Should the FRA be updated as requested, the LLFA's outstanding concern will be considered resolved, subject to review.
KCC and the EA have yet to confirm a position on this matter.</td></tr>
</table></td></tr>
</table>

	9.122 Surface Water Flood Risk and Climate Change submitted at Deadline 5 – which presents and interprets information to address Suffolk County Councils request to provide surface water climate change flood maps (also providing information for Kent) In combination, these submissions, which have been informed by all latest available flood risk data provide for a robust assessment of flood risk to and arising from the Project. Measures securing flood risk mitigation and controls are detailed in **Application Document 9.84 (B) Register of Environmental Commitments (REAC) [REP4-234].** These measures will ensure that the Project is safe from flooding over its operational lifetime and will not increase flood risk elsewhere. The policy requirements set out in EN-1 with regard to flood risk and assessment have therefore been met.	

Matter	Applicants Position	Stakeholder Position
Compliance with the objectives of the Water Framework Directive	The Applicant is confident that mutually satisfactory wording of a Requirement regarding design of the Fromus bridge can be agreed. The Applicant is working with the Environment Agency to address outstanding concerns with regard to water quality matters. We are reviewing **Application Document EA submission Comments on any further information/ submissions received by deadline 3 [REP4-185]** and propose to make further changes and additions to commitments within the Register	Suffolk County Council has confirmed that this is not a matter for SCC, as LLFA, to comment on. KCC and the EA have yet to confirm a position on this matter.

	of Environmental Commitments to provide the water quality safeguards that are sought. The Applicant has produced a robust WFD compliance assessment in accordance with relevant guidance and informed by several site-specific surveys. Mitigation measures and controls will prevent waterbody deterioration, and the Project would not impeded implementation of any planned measures and objectives for waterbodies within the River Basin Management Plan. Notwithstanding the ongoing discussions described above, the Applicant has satisfied all the policy requirements in EN-1 with regards to WFD.	

In responding to the matter below it is assumed this should be reference to EN-1 para 5.8.36.

Matter	Applicants Position	Stakeholder Position
Sequential and Exception test	The following is summarised against each bullet point of EN-1 para 5.8.36: • The application is supported by an appropriate FRA See response above • The Sequential Test has been applied and satisfied as part of site selection Flood risk was one of a wide range of factors included in the site selection decision making process. However, the linear nature of the Onshore Schemes, along with the multitude of social and environmental constraints, means that it is inevitable that not all parts of the Proposed Project can reasonably be	Suffolk County Council confirmed that all remaining areas of disagreement regarding the applicant's approach to applying the sequential and exception tests are set out in response to Action Point 86 of ISH2 [REP4-150]. KCC and the EA have yet to confirm a position on this matter

	located within areas at the lowest risk of flooding. • A sequential approach has been applied at the site level to minimise risk by directing the most vulnerable uses to areas of lowest flood risk This approach has been successfully applied, with all operational above ground operational assets (Substations, Converter Stations) situated in areas at low risk of flooding. During construction, high risk flood zones have also been avoided for the most vulnerable temporary works e.g site compounds and the majority of temporary drainage basins (with justification provided for the situation of a small number of basins in areas at higher risk – [see **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086**]. • The proposal is in line with any relevant national and local flood risk management strategy Drainage designs have been prepared in accordance with the National Standards for SuDS as well as local Suffolk and Kent guidance. • *SuDS (as required in the next paragraph on National Standards) have been used unless there is clear evidence that their*	

Reference	Question to:	Question	Applicant's Comments		
				use would be inappropriate; The Project design embeds SuDS to manage operational surface water runoff and is also committed to using suitable SuDS to manage construction worksite runoff. This is secured by REAC commitments W06, W11, W19, W20, W23 and W24. • In flood risk areas the project is designed and constructed to remain safe and operational during its lifetime, without increasing flood risk elsewhere. Operational Project infrastructure in flood risk areas is limited to pylons and drainage outfalls. These are resilient to periodic inundation without damage or operational disruption. Mitigation (compensation storage) and suitable outfall design would prevent flood risk increases elsewhere. • *The project includes safe access and escape routes where required, as part of an agreed emergency plan, and that any residual risk can be safely managed over the lifetime of the development.* The proposed Converter and Substations would be accessed via routes that are not at risk of flooding. During construction, in the limited areas where construction activities would take place with a floodplain (namely pylon works in the	

	Stour floodplain) these work sites would be managed by the Contractor in accordance with defined protocols for a flood emergency, such that residual risks would be low. • *Land that is likely to be needed for present or future flood risk management infrastructure has been appropriately safeguarded from development to the extent that development would not prevent or hinder its construction, operation or maintenance* The Proposed Project would not impede or hinder any future flood risk management proposals or infrastructure. In conclusion, all the policy requirements set out in EN-1 para 5.8.36) have been satisfied. Supplementary details regarding these Planning tests are also provided in **Application Document 7.2 Planning Statement [AS-057]**.	

2WE2.	SCC, EA	**Need to relocate temporary drainage pond out of fluvial flood zone 3 in Suffolk** SCC and EA: Do the parties accept the applicant's response to AP85 [REP4-086], which concludes it is not necessary to relocate the particular drainage pond, or if not why not?
2WE3.	EA, KCC	**Loss of floodplain storage** Do all parties agree with the findings of the Kent Onshore Scheme - Fluvial Flooding from the River Stour [REP4-096]? In answering, can parties specifically have regard to the requirements of NPS-EN1, paragraph 5.8.2 and address: • that floodplain compensation is required to ensure there is no net loss of storage,

Reference	Question to:	Question	Applicant's Comments
		• that there is sufficient space to create the compensation areas within the order limits, and • if it can be appropriately secured through addition of a new REAC commitment?	
2WE4.	**Applicant** SCC	**River Fromus crossing - bridge soffit height** The EA has identified proposed wording for a requirement in response to ISH2, Action Point 77 [REP4-185] to ensure that the River Fromus Crossing does not impact Water Framework Directive macro invertebrates. Can the parties confirm if they are in agreement with the proposed wording, or if not, why not?	On 3 March 2026 the Applicant reached agreement with the Environment Agency on alternative wording for the requirement. This wording is the same as the wording included in the draft DCOs submitted at Deadline 4 and Deadline 5.
2WE5.	**Applicant** EA	**Flood risk assessment - coastal erosion** **Applicant:** Explain why you consider that the response to ISH2, Action Point 84 regarding coastal erosion and its potential to impact flood risk addresses the relevant EA matters raised in [REP4-185]? Address any outstanding matters in your response. **EA:** Confirm if the applicant's response regarding coastal erosion and flood risk as provided in response to ISH2, AP84 [REP4-086] addresses the concerns expressed in this regard or summarise any remaining outstanding issues?	The Applicant confirms that as set out in **Application Document 6.2.4.1 (F) Environmental Statement Part 4 Marine Chapter 1 Physical Environment** submitted at Deadline 5, no likely significant effects have been identified regarding coastal erosion. Therefore, there is no potential for any adverse effects from coastal erosion to impact flood risk, particularly given that the landward HDD exit is on higher ground approximately 800m from the current high water line. This HDD exit is also more than 500m from the landward limit of estimated future erosion envelopes for the year 2105 which is beyond the operational life of the project. In addition to the commitments referred to response to ISH2 AP84 (measures MPE05, SN01 and B68) the Applicant has also committed to the following: • MPE06: Over the operational lifetime of the Proposed project, monitoring of the beach profile and erosion rates is carried out at the Suffolk and Kent landfall site where rock bags are planned to be placed at the Horizontal Directional Drilling (HDD) exit pits • MPE08: Further analysis will be undertaken to consider the potential for coastal erosion over the lifetime of the project in line with the Final Offshore Construction and Environmental Management Plan (CEMP). This information will be used to inform the detailed design of the Proposed Project, to ensure that the risk of future exposure of the offshore burial cables is as reduced as far as practicable. These measures, and MPE05, SN01 and B68, are secured in **Application Document 7.5.2 (C) Outline Offshore Construction Environmental Management Plan** submitted at Deadline 5 and are included in **Application Document 9.84 (C) Register of Environmental Commitments** also submitted at Deadline 5.

6. Geology and Hydrogeology

6.1.1 No questions directed to the Applicant.

7. Agriculture and Soils

Table 7.1 Agriculture and soils

Reference	Question to:	Question	Applicant's Comments
2AS1.	Applicant	**Loss of best and most versatile land (BMV)** In the continued absence of agricultural land classification for the land to be used temporarily and permanently for the proposed development, using worst case scenario, where all the land is grade 1, provide an assessment of the effects of the proposed development in terms of loss of BMV.	The approach to the assessment of impacts on BMV land is set out in **6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils [PDA-019]** and **6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023]**. These documents set out the assessment based on the prediction of Agricultural Land Classification (ALC) grades. This approach was used to provide a greater level of granularity compared to just using the Provisional ALC mapping as a worst-case scenario. The detailed surveys have now been completed and are reported in **9.30 Agricultural Land Classification (ALC) Survey Results – Suffolk** and **9.31 Agricultural Land Classification (ALC) Survey Results** submitted at Deadline 5. The detailed survey data shows that in Suffolk there is 193.7ha of BMV land within the Order limits, which is 4.4ha (2.9%) greater than predicted. In Kent, the detailed surveys show there is 76.5ha of BMV land within the Order Limits, which is 8.5ha (5%) less than predicted. The majority of the Order limits are included for the installation of underground cables and will not result in any loss of BMV land. The detailed surveys confirm that in Suffolk an additional 4.4ha of BMV land lies within the Order limits, and in Kent there is 8.5 ha less BMV land within the order limits (both based on current design). In terms of permanent loss of BMV land, in Suffolk this was predicted to be 11.45 ha and the surveys have confirmed the permanent loss is actually less, at 10.93 ha. In Kent, the permanent loss of BMV land was predicted to be 12.21 ha and the surveys have confirmed the permanent loss is similar, at 12.20ha. These minor differences do not change the assessment outcome as reported in the associated chapters. The total area of BMV land lost is very small in the context of a major infrastructure project because the majority of the project comprises underground and undersea cables that do not result in any loss of agricultural land.
2AS2.	Applicant	**Beneficial effects on BMV land at decommissioning** Explain how the reinstatement of land within the footprint of the decommissioned infrastructure would result in major to moderate beneficial effects when considered in relation to the baseline, as set out in [PDA-019] and [PDA-023].	As stated in **6.2.1.4 (B) Part 1 Introduction Chapter 4 Description of the Proposed Project [AS-018]** there are no plans to decommission the Proposed Project. Whilst most elements of the Proposed Project have lifespans of approximately 40 years (with the exception of pylons which have a typical lifespan of up to 80 years), these lifespans are likely to be extended given the anticipated increase in electricity demand in the future. The design life of the Proposed Project could be extended with regular maintenance and refurbishment of each component. The assessment of decommissioning effects, as presented in **6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils [PDA-019]** and **6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023]** assumes that the Agricultural Land Classification (ALC) grades will be the same as shown in the baseline, with the exception of the footprint of permanent infrastructure which would have been taken out of agricultural use. As such, in the event that the Proposed Project is decommissioned, the baseline at that time would include areas not in agricultural use and which would be brought into use through the reinstatement process.

8. Traffic and Transport

Table 8.1 Traffic and transport

Reference	Question to:	Question	Applicant's Comments
2TT1.	**Applicant** KCC SCC	**Junction modelling** It is understood that some of the junction modelling is set to be submitted at DL6. However, given the remaining time within the examination period after DL6, the ExA requests this information at DL5. If this is not possible then explain why this is the case and update on progress.	The Applicant's position on timescales for providing the junction modelling remain unchanged from the delivery programme recently reported within **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]** which was submitted at Deadline 4 in response to Action Point 59 following Issue Specific Hearing 2. To confirm, the junction modelling within Kent will be submitted at Deadline 5, along with an updated version of **Application Document 6.3.3.7.A ES Appendix 3.7.A Transport Assessment Note [APP-175]** to provide a summary of the junction modelling scope, methodology and results. This will be based on the agreed scope and methodology for the junction modelling, as discussed and agreed with Kent County Council (KCC) Highways on 15 January 2026. The analysis consists of junction modelling for three junctions within the Kent study area, comprising the Sevenscore, Ebbsfleet and Minster roundabouts. It will not be possible to provide the junction modelling results for Suffolk at Deadline 5, as whilst the work is underway, it will take several weeks to complete before the results can subsequently be checked and reported. The junction modelling for Suffolk will therefore be submitted at Deadline 6 as originally planned, along with an updated version of **Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note [APP-122]** to provide a summary of the junction modelling scope, methodology and results. This will be based on the proposed scope and methodology of the junction modelling, as presented to Suffolk County Council (SCC) Highways during in-person meeting on 22 January 2026 and a further meeting recently held on 24 February 2026. This consists of capacity modelling for three junctions within the Suffolk study area; namely the A12/B1121 Main Road junction (south of Saxmundham), the A1094/B1121 Aldeburgh Road junction and the A1094/B1069 Snape Road junction, as these represent the key junctions which will be used by construction traffic associated with the Proposed Project.
2TT2.	Applicant	**Transport cooperation** Provide an update on discussions with EDF, the developers of Sizewell C, about shared transport from Ipswich station and use of Sizewell park and ride locations [REP4-281]. Clarify if any commitments could be secured within this proposed development and if so how. Explain if this would make a significant difference to traffic flows and pressure on junctions in Suffolk?	The Applicant is continuing to discuss the possibility of the use of shared transport from Ipswich and the use of the Sizewell Park and Ride facilities, along with other measures to share facilities with Sizewell C and other developers in the area. The Applicant has yet to conclude these discussions therefore will not be able to conclude whether these solutions would be viable or beneficial to the reduction of local effects. It is therefore not considered appropriate to secure any of these measures in the DCO. The Applicant will continue to explore a number of options for worker accommodation and transport from accommodation to the construction locations and any commitment to a particular solution now may result in unintended consequences. This is particularly due to the nature of the Sea Link project where works will be carried out over a number of different locations simultaneously, and teams may need to move between locations during a day. This makes transport needs very different to those of Sizewell C, where a very large number of staff attend a single location every day. There are also far fewer staff for Sea Link, making shared transport with Sizewell both less of a necessity and potentially less viable (there will need to be a minimum number of Sea Link staff wishing to travel between a park and ride and a particular part of the Sea Link project for the 'ride' service to be a sensible option). The nature of cable construction teams, where they often work in 'gangs' travelling to a site in a van that may contain welfare and equipment, does not necessarily lend itself well to park and ride solutions. The different project programmes and the ongoing review of availability of any future facilities may further mean these solutions are not sensible or viable. Finally, it is not necessarily the case that shared services would reduce the transport effects of the project.

Reference	Question to:	Question	Applicant's Comments
			Should a ride service need to travel to, for example, the landfall point or Friston Substation regularly but only occasionally collect staff, these solutions could result in greater traffic than a solution National Grid could implement alone. It is therefore not considered beneficial for a commitment to be included to shared transport, but for these solutions to be developed in the final Construction Traffic Management and Travel Plan to be discharged under requirement 6 in the draft DCO. Notwithstanding the above, the Applicant will continue to work with Sizewell C and the other developers to consider whether shared use of facilities and transport would be beneficial. In terms of traffic flows, the assessment work within **Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]** is based on the worst-case assumption that all construction workers associated with the Proposed Project would drive directly to the Proposed Project, with average vehicle occupancy factor of 1.5 construction workers per vehicle for the site-based construction staff. This is considered to be conservative worst case assumption given the normal working of National Grid teams and robust given that all staff have been assumed to travel by vehicle (rather than other modes) and that a formal Car Share Scheme will be implemented to match potential car sharers. Should the use of shared transport from Ipswich station or Sizewell park and ride be appropriate and utilised, then this may reduce vehicle trips associated with construction workers within the study area, given that shared transport would accommodate more workers per vehicle than cars or vans. This could in turn reduce the potential impacts of the Proposed Project on junctions within the study area during the AM development peak hour (7am-8am) and the PM development peak hour (6pm-7pm), which represent the hours when construction workers are expected to travel to/ from the Proposed Project. However, this would not be expected to make a significant difference to traffic flows during the AM network peak hour (8am-9am) or the PM network peak hour (5pm-6pm) as construction workers are not expected to travel at these times.
2TT3.	**Applicant** SCC	**Journey time analysis** The ExA requests that SCC and the applicant work together to identify if any journey time analysis should and could be produced within the remaining examination period, such as for the A12 for example. Is there data that SCC has, such as a Strategic Transport Model, which could help with this exercise?	The Applicant acknowledges this request and will consult SCC to determine whether an existing Strategic Transport Model could potentially be utilised to provide further journey time analysis within the examination period. For example, the Applicant could supply SCC with forecast construction traffic flows along the A12 for input to an existing model if this is something that SCC has access to. However, it will not be possible to create a new Strategic Transport Model within the timescales of Examination, nor is this considered necessary. In addition, the ability to utilise an existing model may be subject to third-party agreement with the framework consultants who are custodians of the model. This in turn could present challenges to gaining access to and updating the model, with any delivery timescales being outside of the Applicant's control. Nonetheless, and as a minimum, the junction capacity modelling outputs (see the Applicant's response to 2TT1 above) will provide further details of forecast junction capacity and journey time delays for localised parts of the highway network (at key junctions) including for the A12 at the junction with the B1121 to the south of Saxmundham.
2TT4.	SCC East Suffolk District Council	**Alternative Abnormal Indivisible Load (AIL) route** The applicant has presented an Option 3 [REP4-101] which would avoid use of Benhall Railway Bridge for the transformer AIL deliveries. Provide comments on Option 3 and its route.	
2TT5.	Applicant	**Phasing of Benhall railway bridge works** Can the applicant commit to not undertaking any works which involve Heavy Goods Vehicles (HGVs) traffic for the Suffolk onshore proposals until the Benhall Railway Bridge is strengthened, if Option 1 is chosen?	The Benhall Railway Bridge (which is rated for 46T STGO1 vehicles) can currently accommodate standard HGVs as part of general traffic with no restrictions and does not need to be strengthened in order to accommodate these HGVs or construction related HGVs. In addition, the timing of any remedial works to the bridge would not solely be within the Applicant's control as permissions from SCC and Network Rail would be required. Therefore, preventing standard HGVs from using Benhall Rail Bridge prior to these works would impose an unknown programme restriction to the Proposed Project, elongating the construction programme, and is not required. Furthermore, existing HGVs (not associated with the Proposed Project) would continue

Reference	Question to:	Question	Applicant's Comments
			to use the bridge. Therefore, the Applicant does not consider this commitment to be proportionate or necessary.
2TT6.	Applicant	**Benhall Railway bridge strengthening option** If the option to strengthen the Benhall Railway Bridge is available, can the application confirm this would be the option taken in preference to the other options.	Yes, undertaking proportionate remedial works to the Benhall Railway Bridge is the Applicant's preferred option subject to receipt of the relevant approvals from SCC and Network Rail. This preference is stated in paragraph 7.2.22 in **Application Document 7.5.1.1 (C) Outline Construction Traffic Management and Travel Plan – Suffolk,** which is secured via requirement 6 in the draft DCO. This preference was added to this document following discussions with SCC and ESC on their preferred option.
2TT7.	**Applicant** All County and District Councils	**Caps on HGVs** If there are no caps on HGVs using certain routes, then would there be any enforcement possible for the County or District Councils if it transpired that there were more HGVs using certain routes than anticipated in the ES assessment, including cumulatively with other projects? For the Councils, is there a concern that capping HGV movements may displace them to other more sensitive routes with adverse impacts or that it could elongate the construction programme.	Overarching National Policy Statement on Energy (EN-1) states that: *5.14.15 The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that:… • Control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements.'* The same text is included in the January 2026 version of the same policy statement. The project does not generate substantial HGV traffic and therefore this criterion is not met. It is not necessary or appropriate to secure all assumptions made in an Environmental Statement and the Applicant does not consider the case is made out for the assumptions to be secured in this case. Given that it is not necessary to secure the estimated traffic numbers in the Environmental Statement, it would also not be necessary to enforce them. The Applicant would note that this same issue was debated at the Examination on the Bramford to Twinstead Development Consent Order. This debate is summarised in Section 3 of the Examining Authority's Report of Findings and Conclusions and Recommendation to the Secretary of State for Energy Security and Net Zero, June 2024. The position put forward by SCC on the Bramford to Twinstead project is the same as put forward on Sea Link; both projects are transmission projects partially located in Suffolk. The Applicant would note the Examining Authority's conclusion on this matter on the Bramford to Twinstead project was provided in paragraph 3.15.128, which states: *'As such, while recognising the concerns of parties about HGV movements on sensitive routes, the ExA is satisfied with the proposed checks for compliance and does not consider that HGV movement restrictions or limitations are required';* and in 3.15.139 *'Securing traffic numbers for each access 3.15.130. The Applicant argued against a cap on the number of vehicles per access being secured because it could not guarantee that the assumed level of vehicle usage would not be exceeded, however unlikely that might be. However, the ExA is satisfied that the monitoring and compliance mechanisms built into the CTMP [REP8-018] would provide a suitable checking process for the local highway authorities to identify short term impacts attributed to actual traffic numbers per access exceeding the assumed worst case.'* The Secretary of State did not disagree with the position articulated by the Examining Authority. Whilst every project is different, the Applicant does not see a reason that a different conclusion would be reached for Sea Link than was concluded for the Bramford to Twinstead project.
2TT8.	SCC **Applicant**	**Benhall railway bridge works** Would SCC have control over when the works to Benhall railway bridge would be undertaken (if the strengthening works were to be done); and also, would SCC have control over any diversion routes if the Benhall railway bridge was closed for a time for these works?	As an SCC asset all works to Benhall Railway Bridge would need to be agreed with SCC. The programme of works would also need to be agreed between SCC, Network Rail and the Applicant. The potential diversion routes that existing traffic on the network could use when the Benhall Rail Bridge is temporarily closed are illustrated by Appendix E of **Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]**. SCC will determine which of these diversion routes should be utilised and the Contractor will provide the appropriate signage to direct diverted traffic onto these routes when the bridge is closed. A commitment to provide the appropriate signage will be secured as part of **Application Document 7.5.1.1 (C) Outline**

Reference	Question to:	Question	Applicant's Comments
			Construction Traffic Management and Travel Plan – Suffolk [REP4-061] when this is developed as part of Requirement 6 of **Application Document 3.1 (G) Draft Development Consent Order [REP4-217]** post consent.

9. Air Quality

Table 9.1 Air quality

Reference	Question to:	Question	Applicant's Comments
2AQ1.	Applicant	**SF_6 in switchgear** The applicant's response to first written questions [REP3-069] acknowledges that SF_6 may be required to be used in gas insulated switchgear. Provide information to demonstrate that the requirements of paragraphs 2.9.62 to 2.9.65, 2.10.14 to 2.10.15 and 2.11.17 of the NPS for Electricity Networks Infrastructure (EN-5) have been satisfied.	During the development phase of the Proposed Project, the Applicant carefully considered the design of the required switchgear and the insulating gases that could be used, in accordance with NPS EN-5 paragraphs 2.9.62–2.9.63. From the outset, the Applicant sought to use SF_6-free switchgear wherever feasible and remains committed to reducing the use of SF_6 across the transmission network. The Applicant's reasons why the design of the converter stations and substations could not be conceived entirely to avoid the use of SF_6 -reliant assets, including an explanation of the alternatives considered and why they are technically infeasible or require bespoke components that are grossly disproportionate in terms of cost, is set out below. As the design developed, a decision was taken to use Gas Insulated Switchgear (GIS) switchgear to minimise the footprint of the converter stations and substations. The Applicant has in place a HVDC Converter Framework to procure HVDC converter stations (and related HVAC equipment) which comprehensively covers the global market for the supply of such equipment. The Applicant undertook a competitive call off tender process under the framework (compliant with the Utilities Contract Regulations 2016) to secure a delivery partner capable of providing the required equipment within the programme timescales. The requirements of the procurement clearly stated: *In general, SF_6 shall not be used as an insulating medium where credible alternatives are available…If the non-SF_6 alternatives become available during the project execution, the Contractor shall consider them in conjunction with the Employer.* Three of the four manufacturers on the framework submitted tenders, with the fourth declining to bid. All tenders submitted proposed the use of SF_6 in specific components where the manufacturer was unable to offer a credible alternative. Siemens Energy (SE) was selected as the preferred supplier in compliance with the tender rules on the basis of best overall value and capability to meet the delivery requirements. The availability of SF_6 free switchgear for 400kV AC applications is a recent development, with GIS manufacturers bringing products to market in recent years. This is illustrated by the fact that although there are projects in construction, National Grid has no 400kV GIS substations which are completely SF_6 free in operation. SE is actively developing a clean-air alternative to SF_6 for GIS switchgear (Blue GIS™), and as part of this transition a significant proportion of the components to be installed on the Proposed Project will be SF_6-free. The Applicant is working closely with SE to align with their development programme to maximise the proportion of SF_6-free equipment that can be incorporated within the project timeline, consistent with NPS EN-5 paragraphs 2.10.14 and 2.10.15. For the elements of the Proposed Project where SF_6-free alternatives are not yet proven, commercially available, or deliverable within the required timeframe, procuring bespoke or accelerated-development alternatives would be grossly disproportionate in cost and would introduce significant design uncertainty and delay. This reflects the policy tests in NPS EN-5 paragraphs 2.9.63, 2.9.64 and 2.11.17(ii)(a)–(b). Current market indications show that SF_6-free assets remain approximately 60% more expensive than equivalent SF_6-based equipment; nevertheless, the Applicant has procured SF_6-free assets wherever feasible within the constraints of commercial availability and programme delivery.

Reference	Question to:	Question	Applicant's Comments
			It should also be noted that Friston Substation in Suffolk was procured separately and will utilise SF_6-free GE Vernova switchgear. In line with NPS EN-5 paragraphs 2.9.65 and 2.11.17(ii)(c), the Applicant can confirm that all equipment containing SF_6 will be subject to robust monitoring and control measures consistent with the Fluorinated Greenhouse Gas (F-gas) Regulation and its successors. The Applicant also wishes to note that modern equipment is designed to operate with extremely low leakage rates, meaning fugitive emissions are inherently minimised. Measure CC03 within the updated **Application Document 9.84 (C) Register of Environmental Commitments (REAC)**, submitted at Deadline 5 has been expanded to explicitly incorporate the requirements of NPS EN-5 paragraphs 2.9.62–2.9.65, 2.10.14–2.10.15 and 2.11.17. In addition to demonstrating compliance with the relevant NPS paragraphs, the updated measure now secures a design-stage review of SF_6-free alternatives, requires the Applicant to provide justification where SF_6-reliant assets are unavoidable, and commits to the preparation and implementation of an SF_6 emissions monitoring and control plan compliant with the F-gas Regulation and any successor legislation. The measure also confirms that any SF_6-reliant assets installed will be subject to low-leakage specifications and that, where such equipment is required, the design will, wherever practicable, accommodate the potential for future replacement with SF_6-free alternatives.
2AQ2.	Local authorities **Applicant**	**Appendix A Air Quality Technical Note [REP4-241]** **Local authorities:** Provide comment on the technical note. **Applicant:** Confirm whether the high predicted NO_x process contributions identified in Table A.7 maximum impact scenario could indicate any potential for exceedance of the hourly limit values for NO_2 and if so, what further analysis or mitigation might be required in respect of the Kent or Suffolk converter station sites to address human health issues? Applicant to also re-provide appendix tables A.8 and A.9 with headings that are aligned with columns as the tables are difficult to read as presented.	Following updates to the design, the back-up generators for the proposed substation and converter station within the Kent Onshore Scheme have been re-assessed to determine the setback distance from the Sandwich Bay to Hacklinge Marshes Site of Special Scientific Interest (SSSI) required to ensure effects would not be significant. This re-assessment assumes the generators would operate at least 100 m apart (as set out in **Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendix B**, submitted at Deadline 5). The results presented in the re-assessment supersede those presented in Appendix Tables A.8 and A.9 of **Application Document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241]**. As set out in **Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendix B**, the maximum predicted 1 hour NO_2 concentration over five years of meteorological data, modelled using worst-case assumptions, is below the 200 µg/m³ hourly air quality objective at all locations beyond 185 m from the generators. There are no human receptor locations within 185 m of the Minster Substation or Converter Station Limits of Deviation (LoD) where members of the public would be expected to be exposed for an hour or longer. On this basis, no exceedance of the 1-hour air quality objective is predicted at any human receptor, and no further mitigation is required for the Kent Onshore Scheme. Similarly, at the Saxmundham Converter Station and Friston Substation in Suffolk, there are no human receptor locations within 185 m of the LoD where hourly exposure would occur. Furthermore, only a single backup generator is proposed at each of these sites (a 500 kVA generator at the substation, and a 2000 kVA generator at the converter station), meaning the distance at which the modelled 1 hour NO_2 concentration exceeds 200 µg/m³ would be considerably smaller than the worst-case distances modelled for the multigenerator Kent site. As such, no further mitigation is required for the Suffolk Onshore Scheme. It should be noted that the distance of 185 m is based on the maximum 1 hour concentrations under the most conservative conditions. The UK Air Quality Strategy permits up to 18 exceedances per year of the 200 µg/m³ 1hour NO_2 objective, meaning the assessment is inherently precautionary and further reduces the risk of any relevant exceedance.
2AQ3.	Local authorities	**Outline Air Quality Management Plans (oAQMP)** Are any further changes required to the outline AQMP [REP3-052] and [REP3-054] to take account of the amended order limits as part of the change request?	

Reference	Question to:	Question	Applicant's Comments
2AQ4.	**Applicant** Local authorities	**Operation and maintenance air quality controls** **Applicant:** SCC's LIR paragraph 12.23 [REP1-130] suggests that it is vital for appropriate mitigation to be put in place to minimise operation and maintenance air quality impacts from major works. The applicant's comments on SCC's LIR [REP2-026] simply states that it notes SCC's comments. Provide an appropriate mechanism within the applicant's suite of control documents to control operation and maintenance works emissions or explain why this is not required. **Local authorities:** To comment.	Air quality effects during the operational phase have been assessed as not significant due to the nature of the Proposed Project, as summarised in **Application Document 6.2.2.8 Part 2 Suffolk Chapter 8 Air Quality [APP-055]**. As set out in the project description (see **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project**, **[REP1A-003]**), once constructed the substations, converter stations and cable routes require only infrequent, small-scale maintenance, limited to inspections, testing and minor repairs, none of which generate meaningful dust or emissions. Any more substantial maintenance works would be rare and far smaller in scale and duration than construction, and therefore unlikely to give rise to significant air quality effects. However, in response to SCC's request, the Applicant has now introduced an additional operational phase measure within the updated **Application Document 9.84 (C) Register of Environmental Commitments (REAC)**, submitted at Deadline 5, to ensure that any air quality emissions arising from major maintenance works are appropriately mitigated, where required, in line with the measures proposed in the Onshore Outline Construction Environmental Management Plan (CEMP), as appropriate.
2AQ5.	**Applicant** Local authorities	**REAC provision AQ11** **Applicant:** Update REAC [REP4-235] provision AQ11 to specify a minimum 120m offset from Sandwich Bay to Hacklinge Marshes SSSI consistent with the proposed mitigation in the applicant's updated air quality assessment [REP4-241]. **Local authorities:** Suggest wording for a requirement to ensure that a 120m offset is secured between the generators and the SSSI.	Following updates to the design, the back-up generators for the proposed substation and converter station within the Kent Onshore Scheme have been re-assessed to determine the setback distance from Sandwich Bay to Hacklinge Marshes SSSI required to ensure effects would not be significant. This re-assessment assumes the generators would operate at least 100 m apart (as set out in **Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendix B**, submitted at Deadline 5). The re-assessment determined an offset of 100 m would be required; measure AQ11 has been updated accordingly within the updated **Application Document 9.84 (C) Register of Environmental Commitments (REAC)**, submitted at Deadline 5.
2AQ6.	Applicant	**Errata** Item 3.11.2 of the draft SoCG with KCC [REP3-038] refers to the outline soil management plan rather than the air quality management plan.	This has been updated.

10. Noise and Vibration

Table 10.1 Noise and vibration

Reference	Question to:	Question	Applicant's Comments
2NV1.	Local authorities	**Operational noise and vibration** Suggest draft wording for operational noise and vibration requirements in respect of the detailed converter and substation designs that sets limits for operational noise at specific receptors and a mechanism for agreeing the final acoustic design.	The Applicant considers the following to be suitable requirements for operational noise from the proposed substations and converter stations. These commitments have been added to **Application Document 9.84 Register of Environmental Actions and Commitments at Deadline 5.** For Saxmundham Converter Station (Suffolk) and for Minster Converter and Substation (Kent): *During normal operation of the proposed converter station/substation, the rating level of noise emitted from the development, as determined in accordance with BS 4142:2014+A1:2019, shall not exceed 34 dB $L_{Ar,T}$ at any noise sensitive receptor, when assessed at a position 1 metre from the façade of the receptor (free field equivalent).* *The rating level shall include all applicable acoustic corrections, including (but not limited to) those for tonality, impulsivity, intermittency and any other characteristics identified by BS 4142.* Friston Substation (Suffolk): *During normal operation of the proposed substation, the rating level of noise emitted from the development, as determined in accordance with BS 4142:2014+A1:2019, shall be at least 5dB below background noise levels at any noise sensitive receptor, when assessed at a position 1 metre from the façade of the receptor (freefield equivalent).* *The rating level shall include all applicable acoustic corrections, including (but not limited to) those for tonality, impulsivity, intermittency and any other characteristics identified by BS 4142.* These requirements are separate to commitments NV07 and NV09 of **Application Document 9.84 Register of Environmental Commitments** which seek to achieve operational noise levels as low as reasonably practicable (ALARP).
2NV2.	Applicant	**Control of noise from arrival/departures at sites with 24 hour noise** Explain what additional controls would be employed by the applicant to ensure that noise from contractors working 24 hours (for example for internal fit outs) would be controlled during late night arrival and departures.	A range of measures for the control of disturbance from construction traffic are included in **Application Document 9.84 Register of Environmental Actions and Commitments (REAC), Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan - Suffolk [REP4-061], and Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan - Kent [APP-338]**. It is considered that no additional controls are required for late night arrivals and departures, as the proposed control measures are equally applicable for all time periods. However, core working hours are not proposed to be 24 hours, and Heavy Goods Vehicle (HGV) movements to and from site (associated with activities during core working hours) would be limited to Monday – Friday: 0700 to 1900 and 0700 to 1700 on Saturdays. Night-time arrival and departures would therefore be very limited.
2NV3.	Local authorities	**s61 controls** Suggest an alternative form of wording for the outline Construction Noise and Vibration Management Plan (oCNVMP) s61 controls or a suitable requirement to secure s61 controls for specific construction activities.	
2NV4.	Applicant	**REAC provision NV01**	The Applicant can assist in clarifying the noise reductions in the construction noise assessment presented in the ES as presented in **Application Document 6.2.2.9 Part 2 Suffolk Chapter 9**

Reference	Question to:	Question	Applicant's Comments
		The applicant's noise assessments [AS-109] and [AS-111] have relied extensively on the application of Best Practicable Means to achieve a 10dB reduction for all receptors and set out examples of measures that can achieve reductions in table 9.22 of the chapters. Update REAC [REP4-235] provision NV01 to include reference to securing 10dB reduction from predicted levels, in order to demonstrate that likely significant noise effects and exceedance of the significant observed adverse effect level would be avoided, or explain why this is not necessary.	**Noise and Vibration [AS-109]** and **Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration [AS-111]** as set out below. Detailed construction noise assessments have been undertaken for every noise sensitive receptor (NSR) along the Project based on the available information. They present a relative worst-case outcome based on the worst-case (noisiest) task for each activity, for all works locations (including at limits of deviation (LoD)), without mitigation. Where applicable, the assessment considers activities that may occur concurrently (noting that this would reflect the worst-case tasks for each of those activities). T e outcome of the assessments is therefore considered a reasonable worst-case. These worst-case, unmitigated noise levels are compared against the 65 dB $L_{Aeq,T}$ threshold for potential significant effects during the main 'weekday' working periods. (Works during weekend, bank holiday, and night-time periods are considered separately, relative to lower thresholds). This separates NSRs into two categories: • Those where worst-case, without mitigation construction noise levels are below the threshold; and • Those where worst-case, without mitigation construction noise levels are potentially above the threshold (these NSR are identified as 'hot-spots'). Significant adverse effects are not expected at NSR where worst-case, without mitigation construction noise levels are predicted to be below the threshold. These NSR would, however, still be subject to further detailed assessments by the contractor, as per commitment NV03 of **Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP4-235]**. Mitigation in the form of best practicable means (BPM) would still be employed to reduce potential adverse effects at these locations as per commitments NV01 and NV03 of the REAC, with the Noise and Vibration Management Plan (NVMP) being updated accordingly. NSR where worst-case, without mitigation construction noise levels are predicted to be above the threshold are referred to the 'hot-spots'. These are locations where mitigation is likely to be required to avoid significant adverse effects, relative to the findings of the assessment presented in the ES. In most 'hot-spot' cases a reduction smaller than 10dB would be required to avoid significant effects. It is therefore not the case that mitigation providing at least a 10dB reduction is required to avoid significant adverse effects at these locations. gThese 'hot-spot' locations are where predicted construction noise levels fall between 65 dB and 75 dB. In these situations there is a high level of confidence that noise levels can be mitigated below the 65 dB $L_{Aeq,T}$ threshold to avoid potential significant adverse effects. There are no locations with predicted noise levels exceeding 75 dB $L_{Aeq,T}$, where reductions greater than 10dB would be required to similarly avoid potential significant adverse effects.gThis confidence stems from a number of factors:gThe assessment assumes relatively worst-case plant for source noise levels. If quieter plant were used, noise levels would be lower.gThe assessment assumes the worst-case task for each activity. Noise levels from other tasks that form that activity would be lower.gWhere the assessment assumes multiple activities occurring simultaneously, each task uses the worst-case activity. Where activities do not occur simultaneously, or where the worst-case activity is not taking place, noise level would be lower. • The assessment includes the Limit of Deviation. Where works are located within the LoD, or at the proposed swathes or works location, they would be therefore further from the NSR than assumed in the ES assessment, and noise levels would be lower. • The assessment includes consideration of works at the nearest point to all NSR. As above, where works are located further from NSR, noise levels would be lower.

Reference	Question to:	Question	Applicant's Comments
			• The assessment assumes activities occur over the whole assessment period (but include percentage on-times). If activities occurred over a shorter period, noise levels over the assessment period would be lower. • The assessment has no consideration of site layout or orientation (e.g. locating plant further from NSR). Where site layout and orientation is considered by the contractor(s), noise levels would be lower. • The assessment does not include consideration of alternative methods. Where quieter alternative methods can be used, noise levels would be lower. • The assessment does not include the effects of screening. Where activities are screened from NSR, noise levels would be lower. • The assessment does not include other BPM measures that may be identified by the contractor. Where measures are identified, noise levels would be lower. Based on these points, there is a high level of confidence that construction noise levels in the ES assessment falling in the range of 65 to 75 dB $L_{Aeq,T}$ can be reduced to below 65 dB $L_{Aeq,T}$ during the actual works. Many of the factors identified above relate to refinements to assumptions, rather than the introduction of mitigation. It is likely that many threshold exceedances would not occur (irrespective of mitigation) once assessment assumptions are refined by the contractor(s). That said, mitigation in the form of best practicable means (BPM) would be implemented for all works, whether above the threshold or not. As a final consideration, should the contractor'(s') detailed assessments identify exceedance of the noise level threshold, significant effects would only occur where the temporal criteria for significant effects are also exceeded. In such instances, temporal restrictions would be implemented as part of consideration of BPM, secured via commitments NV01 and NV03 of the **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)** to ensure that threshold exceedances would not be of sufficient duration to cause a significant adverse effect. In summary, for the reasons set out above, the Applicant does not consider that it is necessary for a requirement to be introduced with a specific dB attenuation to avoid significant adverse effects from construction noise associated with the Project.
2NV5.	**Applicant** High Quality Lifestyles Limited (Priory Group)	**Ebbsfleet House and Martins, Ebbsfleet Lane** **Applicant:** Confirm whether the need for any specific mitigation measures in respect of Ebbsfleet House and Martins has been assessed as part of the environmental or equalities impact assessment. In responding, explain what, if any, specific mitigation measures are required. **Priory Group** [RR-2021]**:** Where relevant provide any suggestions for potential mitigation measures, explaining why these are necessary.	No significant adverse effects and no specific measures have been identified to in relation to construction noise or vibration effects at this location. As set out in **Application Document 7.9 Equalities Impact Assessment [APP-362]**, the EqIA did not identify a material equalities impact on this receptor. The nearest works relate to access off Ebbsfleet Road approximately 50 m to the north of these properties. Other than this access, there are no construction activities in the vicinity of these properties with the nearest works being approximately 900 m away. However, BPM would still be employed to reduce potential adverse effects at these locations as per commitments NV01 and NV03 of the **Application Document 9.84 Register of Environmental Actions and Commitments (REAC)**.
2NV6.	Applicant	**oCNVMP** Update the Kent oCNVMP [AS-133] in paragraph 1.3.8 so that TDC is notified of material deviations to the oCNVMP controls within 24hrs or explain why this is not necessary.	The Applicant considers that this is not necessary as the response would be disproportionate in the vast majority of instances, noting that no significant adverse effects from construction noise or vibration are anticipated. Pertinent situations where this would apply would form part of Section 61 applications. These would contain appropriate mechanisms for notifying the local authority to deviations.

Reference	Question to:	Question	Applicant's Comments
2NV7.	Applicant	**Habitats Regulations Assessment – noise figures** Explain why the night noise 3dB change figures for Kent (figure 4 [REP4-057]) mirror the daytime levels, whereas they extend over a significantly greater distance in Suffolk (figure 2 [REP4-057]).	The 3 dB change buffers were set relative to baseline maximum noise levels ($L_{Amax,F,15min}$) measured at each site. Maximum noise levels vary between daytime and night-time at both Kent and Suffolk, with generally higher and more variable values during the day. At Suffolk (using Location S_L2, closest to the proposed converter station), measured maximum levels ranged from: • 39–95 dB $L_{Amax,F}$ during the daytime; and • 33–82 dB $L_{Amax,F}$ during the night-time. At Kent, the corresponding ranges were: • 41–97 dB $L_{Amax,F}$ during the daytime; and • 34–84 dB $L_{Amax,F}$ during the night-time. Given these wide ranges, there is no single fixed maximum noise level against which to apply the 3 dB change criterion. The reference levels were therefore set conservatively. Night-time maximum noise levels show a greater reduction at Suffolk than at Kent. This is because the Kent site is influenced by the nearby A256 Richborough Way, where even a single vehicle in a 15-minute period can generate a relatively high maximum noise level. As traffic increases, the likelihood of a higher maximum level also increases, with the loudest vehicle defining the $L_{Amax,F}$ for that period. As a result, maximum noise levels during the day and night in Kent are broadly similar. In contrast, the Suffolk site is further from major roads, making elevated night-time maximum levels less likely. It should also be noted that non-traffic noise sources are more prevalent during the daytime at both locations. Based on this, conservative reference maximum noise levels were adopted as follows: • Suffolk: – Daytime: 55 dB $L_{Amax,F}$ – Night-time: 45 dB $L_{Amax,F;}$ • Kent: – Daytime: 55 dB $L_{Amax,F}$ – Night-time: 55 dB $L_{Amax,F}$ Measured maximum noise levels regularly exceed these reference values at both sites, meaning the assessment represents a reasonable worst-case scenario. Buffer distances were then defined as the distance within which maximum noise levels could exceed the reference values by more than 3 dB. As the same reference level was used for both daytime and night-time in Kent, the resulting buffer distance is the same for both periods. In preparing this response, it was identified that the 3 dB operational night-time change contour at the proposed Saxmundham converter station (figure 4 in **Application Document 6.6 (F) Habitats Regulations Assessment Report [REP4-057]**)) was set approximate 110 m too large (i.e. more worst-case). However, as this buffer is only used to determine the study area, rather than being the assessment itself, this does not affect the outcome of the assessment either way. It is considered that a revised figure is not required.
2NV8.	TDC	**Piling data** Provide comment on the extent to which the noise levels selected to inform the piling noise assessment in Pegwell Bay are representative of the spreadsheet of data relating to piling noise levels [REP4-088] that has been used to inform the assessment.	

11. Socio-economics, Recreation and Tourism

Table 11.1 Socio-economics, recreation and tourism

Reference	Question to:	Question	Applicant's Comments
2SERT1.	Applicant	**Tourism accommodation figures** Appendix C of ESC's DL4 submission [REP4-184] provides a review of tourist accommodation by the Council's consultants. Provide a full and detailed response to this review. In doing so provide a breakdown of the applicant's accommodation figures and confirm whether this is based on bedspaces or rooms.	The Applicant has reviewed East Suffolk Council's (ESC) Deadline 4 submission [**REP4-184**] and notes that they have undertaken a review of tourism accommodation within a 60-minute drive-time catchment. ESC's analysis appears to measure their catchment from Sizewell C and presents accommodation supply across a range of categories, comprising hotels, guest houses and B&Bs, pubs and inns, wedding venues, self-catering accommodation, camping and caravan sites, holiday parks, and hostels/retreats. ESC provides details of both rooms and estimated bedspaces and aggregates serviced and non-serviced accommodation into overall totals. The submission does not specify the time of day or traffic conditions used to generate the drive-time catchment, the precise GIS methodology applied, or the underlying data source(s) used to identify accommodation stock. **Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** defines its study area as a 60-minute drive-time catchment measured from the Suffolk Onshore Scheme's construction compounds. The approach to developing this study area has been determined in line with research by the Chartered Institute of Personnel and Development (Chartered Institute of Personnel and Development, 2017) and benchmarking against other comparable energy projects. The drive-time polygon for the 60-minute drive-time catchment was generated in ArcGIS Online using the platform's drive-time tool, with input points located at compound access points closest to the public highway network. The model was run for a Wednesday at 09:30am, a standard neutral mid-week, off-peak period avoiding peak commuter congestion and atypical Monday/Friday flows. Polygons from each compound were merged to form a single catchment and applied to the CoStar dataset to extract tourism accommodation supply. The figures as per the ES are based on establishments and rooms rather than bedspaces. This assumption presents a worst case scenario for the assessment as in National Grid's experience it is likely that in reality workers will share rooms. The Proposed Project accommodation assessment focused on serviced accommodation (hotels, b&bs and inns) and did not consider potential capacity within non-serviced accommodation. Rooms were used as the principal metric, as this is a standardised measure reported by CoStar across hotel and serviced accommodation types. At the request of the Suffolk LPAs, the catchment area was extended to include the entirety of Bury St Edmunds, although part of the town was already captured within the original GIS polygon. The Applicant's visitor accommodation supply figures (prior to adjusting for cost and seasonal variation) by accommodation type are presented in Appendix D of **Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendices** against the equivalent ESC figures. There are differences between the figures provided by ESC and the supply of serviced visitor accommodation identified by the Proposed Project. In the absence of details of the methodological approach underpinning ESC's review, the Applicant cannot provide a detailed critique of the information provided, however the Applicant has made the following observations: • Firstly, the origin point for the drive-time differs (Sizewell C versus the Sea Link compounds). While these locations are geographically close, the difference in origin could affect inclusion of settlements at the margins and therefore alter total stock numbers. For example, towns near the edge of the Proposed Project's 60-minute drive time catchment, such as Colchester, Great Yarmouth, and Bury St Edmunds, represent 17, 42, and 15 serviced establishments, providing 723, 1,445, and 518 rooms respectively. A difference in the catchment boundary could therefore affect the total serviced accommodation stock included and inthis particular respect we consider it likely that ESC has underestimated the supply of accommodation available. • Secondly, it is not clear whether ESC has applied the same traffic profile, time-of-day assumption or GIS network methodology, each of which has the potential to materially influence the extent of the 60-minute drive-time polygon.

Reference	Question to:	Question	Applicant's Comments
			• Thirdly, the data source(s) informing the ESC analysis has not been clearly specified. Differences in dataset coverage, accommodation classifications, or update cycles may therefore contribute to the variation in reported hotel numbers. Within serviced accommodation, categorisation differences, such as the treatment of small hotels, inns with rooms, may affect both the total number of establishments identified and the breakdown of accommodation by type. Additionally, the figures provided through ESC's review and the Proposed Project's accommodation analysis reflect definitional and scope variations. For example, ESC includes substantial non-serviced accommodation (e.g. self-catering units, camping and caravan sites, and holiday parks), which were not captured in the Suffolk Onshore Scheme ES assessment. Based on the ESC analysis presented, the ES assessment is potentially underestimating the total available tourist accommodation available within the 60-minute drive-time catchment, given it does not include non-serviced accommodation that could be used by construction workers. The ESC analysis does not change the assessment conclusions in that there are no significant adverse individual and cumulative effects on local accommodation capacity. This is set out on page 49 of Application Document 6.2.2.10 (B) **Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism** and page 182 of **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects** respectively.
2SERT2.	Applicant	**Affordability of accommodation** Given the types of hotels and tourist accommodation in the coastal East Suffolk area, has the affordability of accommodation been considered in the applicant's assessment? If not, provide an updated assessment which does factor in tourism accommodation affordability.	A response to the ExA's request to incorporate affordability into the assessment of accommodation capacity is provided in **Application Document 9.117 Applicant's Response to AP104 from Issue Specific Hearing 2 [REP4-237]** which was submitted at Deadline 4a. Please note, on review, the Suffolk Onshore Scheme peak construction workforce number reported for July 2028 was overstated by 90 workers, as the number reported represented the peak construction workforce for October 2028 rather than the workforce at the peak period of July 2028. This does not impact the assessment conclusions set out in **Application Document 9.117 Applicant's Response to AP104 from Issue Specific Hearing 2 [REP4-237].** Notwithstanding the more technical ES responses on this matter described above, National Grid agree that construction workers will not be utilising the tourist accommodation in the Suffolk coastal area because it is not affordable to workers and there are far lower cost options available. The Applicant has always assumed and planned for a significant proportion of workers who need local accommodation would stay in Ipswich and this assumption was built into the assumptions in the traffic and transport assessment for the project presented in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport **[APP-054]**. It should be noted that cable construction teams working on National Grid transmission projects typically work in 'gangs' who share travel in vans with welfare facilities as they move location across the linear elements of a project. Workers locating at the site locations where there are significant works at a single site (i.e. Saxmundham Converter Station and Friston Substation under Scenario 2) also often co-locate and travel together to site, either in vans or potentially in transport provided for workers where they are located at a larger hotel or campsite. This way of working creates efficiency benefits of workers locating in a single hotel or location, at least in their gangs for cable teams, which creates a preference for larger establishments rather than workers being spread over disparate, more boutique establishments. This is very different to the patterns of workers on, for example, Sizewell C who may travel to a single location every day over a long period of time and establish semi-permanent homes. This reinforces National Grid's intended way of working and assumptions that workers will not locate in hotels frequented by tourists in the East Suffolk Coastal Area. Given the Applicant is confident that the project can be constructed without significant use of tourist accommodation in the Suffolk Coastal area, the Applicant has offered to include a commitment in the REAC to confirm this position. Further information on this commitment is provided in the Applicant's response to 2SERT4.
2SERT3.	Applicant	**Cumulative worker accommodation**	**Peak Cumulative Demand - Suffolk**

Reference	Question to:	Question	Applicant's Comments
		Provide information as to when (within the construction phase) the applicant considers there would be the peak demand for worker accommodation cumulatively and then provide a breakdown of the forms of accommodation that would likely be used at that time for all workers. Furthermore, provide an anticipated percentage and absolute figure of remaining capacity for each type of accommodation modelled for that time.	The Applicant has developed a construction workforce profile for the Suffolk Onshore Scheme, mapping the peaks and troughs of workforce requirements across the construction period. In addition, the Applicant has drawn on construction worker information from cumulative schemes. The Applicant does not have a detailed breakdown of worker phasing across the cumulative construction period. Therefore, a precautionary approach has been adopted which assumes the peak construction workforce from each cumulative scheme will coincide with the peak cumulative demand for the Suffolk Onshore Scheme. On that basis, October 2028 represents the point of peak cumulative demand for construction workers. In practice, given the current phasing for each project, peak cumulative demand is highly unlikely to overlap in this way and hence this analysis is likely to significantly over-estimate the number of workers requiring accommodation at one time. The breakdown by cumulative scheme is presented in Table 11.2. The peak construction workforce has changed since submission of the ES with further information now gathered from the LionLink Interconnector scheme and the Norwich to Tilbury National Grid project. The total cumulative construction workforce is 12,292. The total non-home based (NHB) worker demand for all types of accommodation is 8,728. The total NHB worker demand specifically for serviced visitor accommodation and private rental sector (PRS) accommodation is estimated at 3,915 workers.

Table 11.2 Cumulative Construction Workforce (Suffolk)

Scheme	Peak Construction Workforce	Total NHB Workforce	Total NHB Workforce Requiring Serviced Visitor and PRS Accommodation
Suffolk Onshore Scheme (Sea Link)	327	229	229
Sizewell C	7,900	5,884	2,000
East Anglia ONE North (EA1N)	249	199	199
East Anglia TWO (EA2)	249	199	199
LionLink	669	669	669
Norwich to Tilbury	1,720	1,548	619
Total	**12,292**	**8,728**	**3,915**

Given the level of information available for each of the cumulative schemes varies, the following assumptions apply:

- The Suffolk Onshore Scheme is assumed to have a peak workforce requirement of 327 workers. A 70% leakage rate has been applied to reflect workers residing outside the local catchment area. This results in a peak requirement of 229 NHB workers.
- Sizewell C construction phase spans 2025–2037 and has published annual workforce forecasts. The respective assessment notes a peak workforce of 7,900 and states that 5,884 workers would require local accommodation, of which 2,000 would require serviced visitor or PRS accommodation (following embedded mitigation measures providing purpose-built accommodation and accounting for owner occupied properties) from 2027 onwards. Specifically, from this total of 2000, 40% (800 workers) are

Reference	Question to:	Question	Applicant's Comments

expected to reside in serviced visitor accommodation, and 60% (1,200 workers) are expected to reside in PRS.

- EA1N and EA2 construction is anticipated to span 2025–2028. The assessment estimates for each scheme, a peak workforce per day of 249, with a worst-case estimate of 80% leakage applied indicating 199 workers require local accommodation. The respective assessments state that hotels are assumed as the most likely method that NHB workers would use to book accommodation. In the absence of detailed phasing data, it has been conservatively assumed that the peak requirement of 199 NHB workers per scheme requiring serviced visitor accommodation applies throughout the construction period.
- The LionLink Interconnector construction period is anticipated to span 2027–2032. The respective assessment estimates a peak requirement of 669 workers per day for the scheme. A precautionary approach has been adopted which assumes all of these workers will require accommodation throughout the construction period. Published information indicates this demand is likely to be serviced from hotels and similar serviced accommodation, as well as non-serviced accommodation such as caravan parks and other collective accommodation, albeit detail is limited.
- The Norwich to Tilbury construction period is anticipated to span 2028–2031. The respective assessment estimates a peak requirement of 1,720 workers per day. Published information indicates that 90% (1,548) of this total would be NHB workers. The anticipated breakdown of accommodation for the NHB workers is: 50% in camping or caravan accommodation (774 workers), 40% (619 workers) in PRS or serviced visitor accommodation and 10% would travel into the local area. For the purpose of this assessment, it was assumed that there would be a 50-50 split between demand for PRS and serviced accommodation and that this would apply throughout the construction period.

Baseline Accommodation Supply - (Suffolk)

The Applicant has considered the total available accommodation stock within a 60-minute drive time catchment, comprising both serviced visitor accommodation and the PRS:

- There are 7,071 rooms available in the serviced visitor accommodation sector within a 60-minute drive-time catchment before accounting for seasonal demand. A precautionary approach has been adopted which assumes that only hotels with the lowest CoStar cost classification "economy" have been included as potential accommodation which could be used by construction workers. This equates to 31.2% of the hotel, B&B and inn accommodation stock totalling 2,206.
- Following seasonal adjustment for October (the peak month for construction employment for the Suffolk Onshore Scheme) only 20% of serviced visitor accommodation rooms are assumed to be available, reducing effective serviced visitor accommodation supply to 441 rooms.
- Accommodation capacity within the PRS has been considered to take account of private rented homes in the local authorities falling primarily within the 60-minute drive time catchment, namely East Suffolk, South Norfolk, Ipswich, Great Yarmouth, Broadland, Mid Suffolk, Babergh, Colchester, Tendering, Breckland and Norwich. After accounting for vacancy rates (10%) (English Housing Survey 2020), a precautionary approach was adopted which assumes only 75% of these vacant properties would be available for rent. There are an estimated 9,742 private rented properties that could be available to construction workers (ONS Census 2021 Data).
- This results in a total stock of serviced visitors and PRS accommodation of 10,183 units (Table 11.3).

Table 11.3 Accommodation Supply (Suffolk)Table 11-3 Accommodation Supply (Suffolk)

Accommodation	Establishments	Proportion as a percentage
Affordable Serviced Visitor Accommodation Following Seasonal Demand	441	4.3%
PRS	9,742	95.7%
Total	**10,183**	**100%**

Accommodation Split - Suffolk

In order to allocate accommodation demand for the Suffolk Onshore Scheme, the Applicant applied a proportional split across serviced visitor accommodation and PRS informed by cumulative scheme assessments. At this stage, accommodation types that will eventually be utilised by construction workers can only be estimated. Sizewell C and its published split equates to approximately 60% PRS and 40% serviced visitor accommodation. Given the shared labour market context the Applicant considers this robust and appropriate to apply to the Suffolk Onshore Scheme. The cumulative demand profile by accommodation type shown in Table 11.4.

Table 11.4 NHB Worker Demand – Accommodation Split (Suffolk)

	NHB Worker Demand			
Accommodation	**Serviced Visitor Accommodation**	**PRS**	**Total**	**Alternative Accommodation**
Suffolk Onshore Scheme	92	137	229	*0*
Sizewell C	800	1,200	2,000	*3,884**
East Anglia ONE North (EA1N)	199**	0	199	*0*
East Anglia TWO (EA2)	199**	0	199	*0*
LionLink	669***	0	669	*0*
Norwich to Tilbury	310	310	619	*929****
Total	**2,269**	**1,647**	**3,915**	***4,813***

Note: Figures may not add due to rounding

**Including: 2,400 in purpose-built accommodation campus; 600 in purpose-built caravan park; and 882 in owner occupied properties and 2 unaccounted for.*

*** For EA1 and EA2, hotels are assumed in the respective assessments to be the most likely source of worker accommodation. Therefore, for the purposes of the Suffolk Onshore Cumulative assessment it was assumed all NHB workers for these two schemes would access service-based accommodation.*

**** Whilst published information indicates demand for accommodation is likely to comprise of serviced and non-serviced accommodation, for the purposes of the Suffolk Onshore cumulative assessment it has been assumed that every construction worker on Lion Link will access serviced accommodation.*

*****Including: 774 in camping or caravan accommodation; and 155 commuting into local area.*

The Suffolk Onshore cumulative accommodation assessment focuses on the PRS and serviced visitor accommodation as the sources of NHB worker accommodation. It is recognised that alternative accommodation (including serviced apartments, AirBnBs, and caravan parks) does exist and could potentially provide accommodation for some of the construction workers. In addition, latent accommodation such as spare rooms in owner occupied housing, and new supply entering the market also provides potential accommodation for construction workers. Feedback from Hinkley Point C, for example, has identified around 10% of NHB workers using spare rooms in existing homes. The existence of both alternative visitor accommodation and latent accommodation suggests that the Suffolk Onshore cumulative accommodation assessment underestimates the total available accommodation stock for construction workers.

Residual Capacity – Serviced Visitor Accommodation and Private Rental Sector (Suffolk)

Table 11.5 presents the residual capacity of serviced visitor accommodation and the PRS within the 60-minute drive time catchment assuming worst case peak construction worker cumulative demand for accommodation and worst case accommodation availability (i.e. an underestimate of rooms available). Under this scenario, the figures indicate that whilst total capacity overall (61.6%) remains in the accommodation stock, no capacity would remain within serviced visitor accommodation (however this would be the case even if Sea Link wasn't accounted for), and the PRS would be required to absorb the cumulative demand.

Table 11.5 Residual Capacity at Peak (October) (Suffolk)

Accommodation	Establishments	Cumulative Demand	Remaining Capacity	% Remaining
Affordable Serviced Visitor Accommodation Following Seasonal Demand	441	2,269	0	0%
PRS	9,742	1,647	8,095	83.1%
Overall	**10,183**	**3,915**	**6,268**	**61.6%**

It should be noted that the Suffolk Onshore scheme's peak construction workforce requiring accommodation represents 229 workers and that this peak only lasts one day compared with an average of 115 workers per day in 2028. Therefore, for the Suffolk Onshore scheme alone the peak figures will significantly over-estimate the accommodation require. Estimates for other projects are also likely to be significantly overestimated for most periods for similar reasons. The peak day for Sea Link also represents less than 6.0% of the estimated cumulative demand for serviced visitor accommodation and PRS accommodation which is insignificant when compared with Sizewell C which represents 51.1% of the estimated cumulative demand. Therefore, the constraint on accommodation here is being created by Sizewell C, with Sea Link not considered likely to significantly contribute to the issue.

The analysis presents a precautionary approach in relation to timing and accommodation stock. The cumulative assessment assumes that the peak workforce of all schemes aligns which in practice is unlikely to occur. The accommodation stock applied to this assessment does not account for non-serviced accommodation or latent accommodation and therefore the total available accommodation for workers is underestimated. At Deadline 4, East Suffolk Council provided independent accommodation analysis for the 60-minute drive-time catchment. In comparison with the analysis undertaken by the Applicant for the Suffolk Onshore Scheme, the East Suffolk Council assessment identifies a substantial quantity of non-serviced accommodation, including 5,336 establishments (equating to 20,016 rooms). As this category of accommodation was not included within the Sea Link ES

assessment, this results in a notable difference in the total number of establishments and rooms identified. The inclusion of this additional accommodation stock further demonstrates that there is likely to be greater accommodation capacity available within the study area which could be used by construction workers. Finally, the analysis above does not account for workers sharing rooms. Therefore, in reality, the situation is significantly more positive than is presented by this analysis.

Peak Cumulative Demand (Kent)

The Applicant applied the same approach to determining peak cumulative demand for the Kent Onshore Scheme as explained above for Suffolk. April 2030 represents the point of peak cumulative demand for construction workers at which point total NHB worker demand is estimated at 799 construction workers per day. This represents the point of peak cumulative demand for construction workers.

Table 11.6 Cumulative Construction Workforce (Kent)

Scheme	Peak Construction Workforce	Total NHB Workforce	Total NHB Workforce Requiring Serviced Visitor and PRS Accommodation
Kent Onshore Scheme (Sea Link)	241	169	169
Manston Airport	630	630	630
Total	**871**	**799**	**799**

The Kent Onshore Scheme is assumed to have a peak workforce requirement of 241 workers. A 70% leakage rate has been applied to reflect workers residing outside the local catchment area. This results in a peak requirement of 169 NHB workers.

Manston Airport construction period is anticipated to span four phases from 2019 – 2036. In absence of granular workforce profiling, it has been conservatively assumed that the peak requirement of 630 workers per day applies throughout the construction period, and all require accommodation. It is noted, however, in the respective Environmental Statement that *"Given that the large majority of workers will reside close to the site, it is anticipated that the majority of construction workers will continue to reside within their current locations."*

Baseline Accommodation Supply (Kent)

The Applicant has considered the total available accommodation stock within the defined study area, comprising both serviced visitor accommodation and the PRS:

- There are 10,291 rooms available in the serviced visitor accommodation sector within a 60-minute drive time before accounting for seasonal demand. A pre-cautionary approach has been adopted which assumes that only hotels with the lowest CoStar cost classification "economy" have been included as potential accommodation which could be used by construction workers. This equates to 40.4% of the hotel, B&B and inn accommodation stock which represents 4,162 rooms.
- Following seasonal adjustment for April (the peak month for construction employment) only 23% of serviced visitor accommodation rooms are assumed to be available, reducing effective supply to 957 rooms.
- Accommodation capacity within the PRS has been considered to take account of private rented homes in the local authorities falling primarily within the 60-minute drive time catchment, namely Ashford, Bexley, Canterbury, Dartford, Dover, Folkstone and Hythe, Gravesham, Maidstone, Medway, Sevenoaks, Swale,

Thanet, Tonbridge and Malling and Tunbridge Wells. After accounting for vacancy rates (10%) (English Housing Survey 2020), a precautionary approach was adopted which assumes only 75% of these vacant properties would be available for rent. There are an estimated 12,015 private rented properties that could be available to construction workers (ONS Census 2021 Data).

- This results in a total inventory stock of serviced visitor and PRS accommodation of 12,972 units (Table 11.7).

Table 11.7 Accommodation Supply (Kent)

Accommodation	Establishments	Proportion as a percentage
Affordable Serviced Visitor Accommodation Following Seasonal Demand	957	7.4%
PRS	12,015	92.6%
Total	**12,972**	**100%**

Accommodation Split (Kent)

In order to allocate accommodation demand to the Kent Onshore Scheme, the Applicant has applied a proportional split across serviced visitor accommodation and PRS informed by cumulative scheme assessments. As applied in the Suffolk scenario above, Sizewell C's published split equates to approximately 60% PRS and 40% serviced visitor accommodation and this has also been applied to the Kent Onshore Scheme.

As noted above, the Manston Airport Scheme assumes that the majority of construction workers will continue to reside at their existing home locations. However, for the purposes of a conservative (worst-case) assessment, the peak construction workforce has been treated as NHB. Additionally, the same 40% serviced visitor accommodation and 60% PRS distribution has been applied for modelling purposes. The cumulative demand profile by accommodation type shown in Table 11.8.

Table 11.8 NHB Worker Demand – Accommodation Split (Kent)

	NHB Worker Demand			
Accommodation	**Serviced Visitor Accommodation**	**PRS**	**Total**	**Alternative Accommodation**
Kent Onshore Scheme	68	101	169	*0*
Manston Airport	252	378	630	*0*
Total	**320**	**479**	**799**	***0***

Residual Capacity – Serviced Visitor Accommodation and Private Rental Sector (Kent)

Table 11.9 presents the residual capacity of serviced visitor accommodation and the PRS within the 60-minute drive time catchment assuming worst case peak construction worker cumulative demand for accommodation. Under this

Reference	Question to:	Question	Applicant's Comments
			worst-case scenario, the figures indicate that there is sufficient capacity in the serviced visitor accommodation and the PRS if relied upon to accommodate cumulative peak demand.

Table 11.9 Residual Capacity at Peak (April) *(Kent)*

Accommodation	Establishments	Cumulative Demand	Remaining Capacity	% Remaining
Affordable Serviced Visitor Accommodation Following Seasonal Demand	957	320	637	66.6%
PRS	12,015	479	11,536	96.0%
Overall	**12,972**	**799**	**12,173**	**93.8%**

2SERT4.	Applicant	**Monitoring and adaptive management** Can the applicant commit to monitoring of tourism impacts (including monitoring of worker and tourism accommodation) and potential adaptive management during the construction phase, both for the proposed development and cumulatively with other projects, for Kent and Suffolk in the areas of the proposed works. If so, provide details of what this would entail and how it would be secured. If this is not a commitment that the applicant is willing to make, then explain why this is the case.	There is no evidence suggesting that the Sea Link project will have a significant adverse impact on tourism generally or in terms of specific potential impacts considered. The key concern raised by local planning authorities is whether or not the project will reduce the availability of tourist accommodation, particularly in East Suffolk, with this concern primarily raised due to the incomparable impact of workers for the Sizewell C project on local accommodation and whether the additional impact of Sea Link would worsen this position. This situation is Suffolk specific as the same position with respect to cumulative projects does not exist in the same way in Kent. To provide reassurance that workers will not stay in tourist accommodation in the Suffolk Coastal Area, the Applicant has introduced a new commitment to the REAC (SE05). The Applicant will establish a process to monitor where workers are staying by type of accommodation and location on a quarterly basis. If more than 18 workers are staying within 15km of Aldeburgh in accommodation that would otherwise be utilised by tourists, the Applicant will consider whether there are steps that can be taken to encourage more workers to stay in accommodation less commonly used by tourists to the coast (e.g. accommodation in Ipswich). This could include discussions with other developers in the Suffolk area about shared use of specialist accommodation or encouraging use of accommodation in a larger settlement such as Ipswich or surrounding areas with financial incentives and/ or transport from Ipswich to work locations. The full wording of commitment SE05 and the rationale for the wording is provided in Appendix E. It would not be appropriate for the Applicant to commit to broader monitoring of tourism impacts beyond the specific monitoring of worker and tourism accommodation as described in commitment SE05. The Environmental Impact Assessment for the Sea Link project has comprehensively assessed potential socio-economic and tourism effects and concluded that no significant residual effects are anticipated. Consequently, additional monitoring of wider tourism metrics, which are subject to several external economic factors beyond the Applicant's control, are not easy to assess or establish causation and in the context of the Sizewell C project (which is far more likely to have effects) is not considered proportionate or necessary for this project. The Applicant also considers that it would not be easy to develop a robust methodology to assess the impact of Sea Link on tourism, given the very limited pathways for any impacts and in the context of much larger projects in the area and much more significant economic factors likely to affect tourism. It is considered that worker accommodation is the only area where monitoring and management would provide a meaningful commitment in this context. The wording of this commitment was shared with ESC and SCC for comment on 4 March 2026 but no comments had been received by the time this document was finalised. The Applicant intends to set up a meeting with ESC and SCC to discuss the wording of the commitment and hopes to reach agreement upon it as far as possible by Deadline 6.

Reference	Question to:	Question	Applicant's Comments
2SERT5.	Applicant	**Skills and Employment Plan** It is understood that the applicant is preparing a Skills and Employment Plan for DL6. However, given the remaining time within the examination period the ExA requests this to be submitted at DL5. If this cannot be done, ensure that the draft Skills and Employment Plan is circulated with the County and District Councils prior to submission and incorporate any suggested amendments for DL6.	The Applicant intends to submit the Skills and Employment Plan at Deadline 6 to have the opportunity to engage with local authorities to inform development of the plan. A working draft of the Skills and Employment Plan will be circulated to the County and District Councils in advance of submission, and comments received will be reviewed and addressed prior to submission at Deadline 6.

12. Onshore Cumulative Effects (Intra-Project)

12.1.1 No questions directed to the Applicant.

13. Onshore Cumulative Effects (Inter-Project)

13.1.1 No questions directed to the Applicant.

14. Marine Physical Environment

Table 14.1 Marine physical environment

Reference	Question to:	Question	Applicant's Comments
2PE1.	ESC, MMO	**Pneumatic casing installation** The applicant's response to ExQ 1PE5 [REP2-034] explains that there are currently 'no plans' to use pneumatic casing as part of the trenchless technique installation method and its use has not been included in any noise modelling. However, paragraph 2.2.2 of the outline Cable Specification and Installation Plan (oCSIP) [REP4-090] references temporary casing as part of the installation methodology. Should use of pneumatic casing be excluded from the working methods secured in the dDCO/deemed marine licence (DML) or be subject to some form of control in the event that plans were to change and if not, why not?	
2PE2.	Applicant	**Coralline Crag Technical Note Plate 2.3** The ExA notes that plate 2.3 of the Coralline Crag Technical Note [REP4-102] shows one horizontal alignment intersecting with two boreholes. Confirm whether this is the proposed alignment and if so detail any risks associated with the HDD bore, intersecting boreholes. In addition, the northernmost horizontal alignment is coloured orange, explain why this is a different colour.	The alignment shown is indicative only and will be finalised during detailed engineering of the HDD solution. The AC1 and AC2 points are Alter Course points, where the route direction changes; they are not boreholes and they are not the location of proposed boreholes. The Principal Contractor will select the appropriate locations for any required boreholes. The HDD duct installation process will offset from any boreholes to reduce any risk of encountering the disturbed sediment and reducing the risk of potential fluid migration following the borehole path. The colour difference indicates that the base case proposal comprises of 3 'live' alignments each containing a single cable (2 x HVDC, 1 x FO cable) and one spare duct, schematically shown as orange.
2PE3.	**Applicant** NE	**Appendix D4 – comments on baseline characterisation** NE's Appendix D4 [REP4-191] makes a number of comments regarding the need for robust characterisation of the baseline. The applicant should meet with NE to confirm the exact requirements for any outstanding assessment and either provide the updated assessment information or a technical note justifying why this is not necessary.	The Applicant has sought on several occasions to engage with Natural England to discuss concerns that have been raised regarding baseline characterisation to better understand the concerns raised and agree an approach for addressing the concerns. However, the Natural England technical leads have not been available for these discussions. During the latest meeting with the Natural England case officers (26/02/2026), the Applicant's Physical Environment specialist requested specific advice in relation to completing additional sediment dispersion modelling at both landfalls. This would supplement information presented in **Application Document 6.3.4.1.A ES Appendix 4.1.A Suspended Sediment Modelling [APP-195]**. In absence of receiving any specific advice from Natural England in relation information required to robustly characterise the baseline, the Applicant is progressing the additional sediment modelling in advance of ISH3. An update to **Application Document 6.3.4.1.A (B) ES Appendix 4.1.A Suspended Sediment Modelling** will be submitted at Deadline 6.
2PE4.	NE	**Maximum design scenarios** The ExA notes NE's concerns [REP4-191] about the MDS for construction phase coastal and marine processes impacts as considered in the Marine Chapter 1 Physical Environment [REP4-027] and its advice that these impacts need to be quantified to	

Reference	Question to:	Question	Applicant's Comments
		inform assessment in the HRA [REP4-057]. Confirm if the applicant's updates to [REP4-027] address your concerns about the MDS. If not, advise what further detail is needed. Also confirm whether NE agrees with the applicant's conclusions of no AEoI of Sandwich Bay SAC, Thanet Coast SAC and Thanet Coast and Sandwich Bay SPA & Ramsar site in the HRA Report [REP4-057] for pathways arising from coastal and marine process impacts following the applicant's updates.	
2PE5.	Applicant	**Microplastics** Make provision in the REAC or control documents to ensure that the contractor considers measures to avoid use of microplastics where possible.	The Applicant confirms it will include a commitment in **Application Document 9.92 (B) Outline Cable Specification and Installation Plan** with regards to microplastics and external rock protection. This document will be submitted at Deadline 5.

15. Benthic Ecology

Table 15.1 Benthic ecology

Reference	Question to:	Question	Applicant's Comments
2BE1.	Applicant	**Disposal material impacts** The applicant has confirmed that disposal of all excavated material would be within the order limits [REP4-241], but does this have a potential to adversely impact benthic ecology (species and/or habitats)? Provide details to explain your response.	All material excavated during the construction of the HDD exit pits, including the construction of the cofferdam, at Pegwell Bay will be retained within the cofferdam and used to backfill the exit pits when the HDD works have been completed. Therefore, the impact to benthic ecology will be spatially limited and there is no potential for the excavated sediments to be dispersed across the wider benthic environment by water movements. The excavated material, largely muddy sand, will be placed on top of muddy sand and so whilst the habitat beneath will be buried, the nature of the habitat is not likely to be altered by the temporary storage. Muddy sand sediments are characterised by some porosity and so the potential for any oxygenation depletion of the underlying sediment is considered to be negligible. For potential impacts to species, since the underlying habitat and the excavated material are similar and support infaunal communities of polychaete worms, amphipods and bivalves, rather than fauna living on the surface, most animals are likely to be able to migrate through sediments to avoid any significant disturbance. Less mobile fauna such as bivalves may take longer to migrate towards the surface, which could result in some mortality of individuals, but this is expected to be very limited and not likely to affect bivalve populations or the general faunal community to a significant extent.
2BE2.	Applicant	**Grounded or jack-up barge** At the offshore HDD exit it is explained by the applicant [REP4-241] that a grounded barge or jack-up vessel could be used as marine support. Explain the impacts to benthic ecology of using such vessels?	If required during the HDD construction a jack-up vessel/barge (JUB) would be brought in by sea for positioning at the HDD exit pits at high tide. The use of a JUB is considered unlikely, but possible nonetheless, and the following information on footprints etc. is the absolute maximum design scenario (MDS) should a JUB be required. The JUB will result in area of seabed disturbance from the spud cans on the JUB legs, estimated to be a precautionary area of 50 m^2 at each HDD duct. The spud cans allow the legs of the JUB to penetrate the sediment to anchor the barge and keep it stable during works. The deck of the JUB will sit above the mudflats, resulting in some shadowing but there are no vegetated communities on the mudflat that would be affected by a reduction in light availability. Mudflats can become colonised by a thin film of single celled algae, predominantly diatoms, when the tide is out and there is a good supply of light for photosynthesis. Thus, the shadowing could reduce the diatom cover under the JUB, but with an estimated duration of 60-80 days for the presence of the JUB, the duration is short and the area affected small, particularly within the context of the overall bay. Thus, the impact of any shadowing is considered to be negligible and therefore, not significant. The spud cans will penetrate the sediment to a depth which will be determined by the conditions at the time but will extend beyond a depth where infaunal animals are likely to be found, up to around 20 cm from the mudflat surface. The impact of disturbance to the benthic habitats and faunal living in the sediments from the spud cans will be temporary. Most infaunal animals can migrate away from the disturbance and though there may be some mortality, particularly in relation to animals such as bivalve molluscs, that have hard shells, this is expected to be limited as the area affected is limited. Any impact on benthic habitats and communities will be temporary, localised and small in extent and recovery is expected to occur in the short term

Reference	Question to:	Question	Applicant's Comments
			following the completion of the HDD exit pit construction. The exit pits will be backfilled with the sediment that was removed and stored in the cofferdam. Following this any evidence of sediment disturbance on the surface of the mudflat in that area is expected to disappear over a period of days due to the action of water movement from tides and waves. Impacts to benthic communities will also be temporary and very localised and will recover over timescales expected to be within a period of months to 1-2 years. This is evidenced by the observed recovery of benthic communities at Pegwell Bay, following cable installation for the Nemo Link project which was shown to be very rapid in the Nemo Link Interconnector Year 3 Post-Construction Intertidal Technical Report (CEAPEG0820). The report states that '*following an initial decrease in abundance and diversity in 2018, intertidal communities have been resilient to the physical disturbance resulting from the burial of the cable in 2017. Natural tolerance coupled with fast natural recruitment has resulted in a rapid recovery of faunal communities in 2020'.* Furthermore, the monitoring report also states *'Data collected during the year-one and year-three post-construction surveys showed that the loss of intertidal fauna was localised and temporary, and by 2020 faunal communities and habitats present along the cable route reflect those seen during the baseline survey'.* Should a barge be grounded on the mudflat, there is expected to be a depression on the mudflat once the works are complete. This is expected to be temporary and to recover naturally through the action of the tide and waves. If a jack-up barge is used at the landfall HDD exit location, an offshore Environmental Clerk of Works (ECoW) (secured through **Application Document 7.5.2 (C) Outline Offshore Construction Environmental Management Plan** submitted at Deadline 5) will be appointed during construction to work with the construction team to monitor and assess any mitigation of depressions required at the leg positions at the time. The Applicant has also committed under MPE10 included in **Application Document 7.5.2 (C) Outline Offshore Construction Environmental Management Plan** and Application Document 9.84 (C) Register of Environmental Commitments (REAC), both submitted at Deadline 5, to including measures in the Landfall HDD Management Plan and Landfall Construction Method Statement to reinstate the mudflats following construction through natural processes or (where required) mechanical backfill of excavated areas of seabed. These conclusions agree with the Proposed Projects Benthic Ecology assessment Application Document 6.2.4.2 **[AS-020]** which states '*due to the temporary and limited footprint compared to wider available area of habitat, and the understood ability for infaunal species associated with intertidal mudflat to exhibit rapid recovery to disturbance (McQuillan, et al., 2024; Tillin, et al., 2024), the physical disturbance and/or temporary loss of this habitat is predicted to be of small magnitude..... has been assessed as having a small magnitude which results in a minor effect, which is not significant'.*
2BE3.	NE	**Thanet Coast SAC** The applicant has responded to NE's remarks in relation to the sensitivity of Thanet Coast SAC reef biotopes on page 58 of the updated Part 4 Marine Chapter 2 Benthic Ecology [REP4-029]. Is NE satisfied with this re-assessment with use of a medium sensitivity? If so, is NE content that the proposed development would not have any likely significant effects on the benthic aspects of Thanet Coast SAC?	
2BE4.	NE	**Seabed disturbance – Thanet Coast SAC**	

Reference	Question to:	Question	Applicant's Comments
		The ExA notes that you have raised concerns [REP3-118] about how the applicant has calculated the total area of intertidal seabed disturbance during construction and the potential for this to be underreported, in the context of potential LSE from temporary disturbance to Thanet Coast SAC. Noting that the applicant confirmed that the footprint of seabed disturbance does not intersect with the SAC qualifying features, the ExA requests clarification of your concerns and if these relate to suspended sediment concentration and sediment deposition, which have been separately assessed in the applicant's HRA?	
2BE5.	NE	**Potential effects from temporary disturbance on Thanet Coast SAC** The ExA notes that you have raised concerns [REP3-118] about how the applicant has calculated the total area of intertidal seabed disturbance during construction and the potential for this to be underreported, in the context of potential LSE from temporary disturbance to Thanet Coast SAC. Noting that the applicant confirmed that the footprint of seabed disturbance does not intersect with the SAC qualifying features [REP4-057], the ExA requests clarification of your concerns and if these relate to suspended sediment concentration and sediment deposition, which have been separately assessed in the applicant's HRA?	
2BE6.	Applicant	**Cable protection location** Clarify if is there a possibility that along the 38 kilometre (km) of cable corridor considered as high risk of cable strike (specifically Kilometre Point (KP) 38 to KP 58, and KP 81.5 to KP 96.5) that geological constraints might mean that target cable depths are not achievable and that an alternative to rock backfill would be necessary, such as concrete mattresses for example? Provide details to support your answer.	The Applicant confirms that the locations between KP 38 to KP 58, and KP 81.5 to KP 96.5 have been identified as requiring backfill rock protection, not because of potential uncertainties regarding target depths for lowering or geological constraints in the area, but due to the need for extra protection against anchor strikes because of the busy shipping activity in the area. The Cable Burial Risk Assessment **[PDA-039]** has identified that the target burial depth of 1.5 to 2.5 m between these KP points is very much achievable. Thus, the need for an alternative to rock backfill is highly unlikely and in an area of high shipping activity the potential alternatives are not considered suitable. In particular, concrete mattresses laid at the seabed are unlikely to prove to be a viable alternative to rock backfill within the trench as they are unlikely to provide sufficient protection from anchor strike, given the tonnage of the vessels which traverse these areas generally, and especially within the defined shipping channels. Additionally, concrete mattresses would be more susceptible to snagging risks and so are not considered a suitable alternative.
2BE7.	Applicant	**Cable protection removal** Whilst it is understood that the safety of other sea users is an important factor in choosing the form of cable protection, could removability at decommissioning stage also be a factor in this choice?	The Applicant has submitted **Application Document 9.93 (A) Offshore Decommissioning Technical Note [REP4-091]**. When the Proposed Project reaches the point of decommissioning, evaluation of the available technologies and best practice guidance at the time of decommissioning will be undertaken to select the most suitable methodology and tools. Dependent on requirements at the end of asset life, the redundant cables could either be recovered for recycling (in their entirety, or in parts), or left *in-situ*, if that has less environmental impact. The removability of cable protection can be a factor in the final choice of cable protection used for the Proposed Project in some cases, although engineering and other sea users will also be a key factor in cable protection decisions. In particular, in areas of very high vessel activity and the need to maintain the safety of other sea users. Furthermore, at cable crossings for example, the removability of cable protection may less of a factor in the choice of protection used, if the infrastructure involved in the

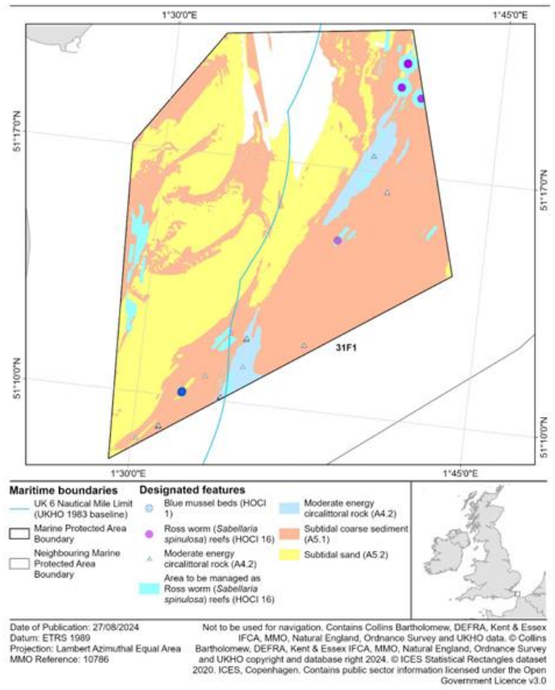
Reference	Question to:	Question	Applicant's Comments
			crossing is likely to be decommissioned at different times. For instance, for any crossed cable either above or below the Proposed Project may still be in commission at the time of the Proposed Project's decommissioning or vice versa. To protect the cable integrity, cable protection may therefore not be removed at crossings locations. However, the type of material used in cable protection can factor in the ability to remove the protection at decommissioning. For example, material linking concrete block mattresses has been observed to fail after a long period of immersion, making the removal of older mattresses during decommissioning problematic, as the equipment that was used to deploy the mattresses cannot be used to recover the mattresses. Additionally, the cable protection used at landfalls may factor in removability more highly in comparison due to the potential of future coastal erosion rates. With these factors in mind, the type and design of cable protection is complex dependent on its need and location. The Applicant has however now updated Application Document 9.92 Outline Cable Specification and Installation Plan **[REP4-090]** to include reference to the 'removability of cable protection'. This has been submitted at Deadline 5.
2BE8.	NE MMO	**In principle monitoring plan for benthic** The applicant states [REP4-241] that given that no likely significant effects had been identified for benthic ecology, and there are no requirements for additional mitigation or any areas of uncertainty/data gaps, no specific offshore receptors have been identified at this stage that would require further monitoring. The applicant therefore considered that an outline in principle(IPMP) is not required for benthic ecology. Do you agree with these points made by the applicant? If not please explain why.	
2BE9.	**Applicant** MMO NE	**Benthic mitigation** Under BE05 and BE06 of the REAC [REP4-235] it is understood that where benthic habitats of principal importance are identified during pre-construction surveys and there is potential for an impact on these habitats, the applicant would prepare a Benthic Mitigation Plan and an IPMP. For NE and MMO: • These commitments state that these plans would be prepared in consultation with the MMO and Statutory Nature Conservation Body (SNCB) but does not require any agreement from MMO and/or a SNCB. Is such agreement on these plans necessary or would a consultation suffice? • If an IPMP records impacts worse than anticipated with the ES assessment, should there be a requirement for adaptive management, and how should this be secured? For the applicant: • Would further post-installation survey work be necessary as part of monitoring if an IPMP were considered necessary?	The Applicant confirms that REAC Commitments BE05 and BE06 are secured within the Outline Construction Environmental Management Plan which is secured within Condition 4 of the dML submitted at Deadline 5. This final Plan would need to be approved by the MMO prior to licenced construction activities starting for the Proposed Project. Furthermore, the Outline Construction Environmental Management Plan (Application Document 7.5.2) has been updated at Deadline 5 to include the following: *The Applicant confirms that it if deemed necessary that a Benthic Mitigation Plan or In-Principle Monitoring Plan is required following pre-construction surveys. This would require approval from the MMO.* The Applicant confirms that if an IPMP were considered necessary following the identification of sensitive benthic habitats of importance – biogenic reef in particular - in the pre-construction surveys, then post-installation monitoring survey work would be considered necessary in consultation with relevant Stakeholders and approved byt eh MMO. Requirements for post-installation monitoring surveys would be informed by the results of the pre-construction survey and the results of the first post-installation survey. Should the first post-installation survey confirm that there are no significant impacts from the construction to important benthic features, then no further monitoring would be needed.

Reference	Question to:	Question	Applicant's Comments
2BE10.	**Applicant** MMO NE	**Final cable route** Is it necessary for MMO and NE to agree on the final proposed cable route prior to installation, including areas of micro-routing where necessary? If so, how would this be secured?	The Applicant does not think that it is necessary, or achievable, for the MMO and NE to agree the final micro sited cable route within the consented Order Limits prior to installation. The final positioning of the cable route within the Order Limits is determined by a number of engineering and environmental factors, which is why for an offshore cable project, a corridor is consented in order to maintain this flexibility during construction. Detailed micro routing decisions due to engineering constraints for example may occur during cable installation activities whereby immediate action to micro route within the consented corridor might be needed. The Applicant confirms that as per the dML condition ***14.***—*(1) The undertaker must submit to the MMO within three months of completion of licensed activities, an 'as built' plan which will display*—e*(a) the location of the cable as laid with specific details of the achieved burial depths,*e*(b) locations of buried and surface-laid cables,*e*(c) the placed location and quantity of rock placement or concrete mattressing used in these licensed activities; and (d) final clearance depths over the protected cables and clumped disused cables.* The assessment of impacts to benthic habitats, as presented in Application Document 6.2.4.2 (D) Environmental Statement Part 4 Marine Chapter 2 Benthic Ecology (Tracked) [REP4-030] was based on a WCS that the cable could be installed anywhere within the corridor, together with analysis of geophysical, geotechnical, drop down video and grab sample data to determine the nature of the benthic habitats present. This assessment found no significant impacts in relation to benthic habitats. However, **Application Document 7.5.2 (B) Outline Offshore Construction Environmental Management Plan [REP4-223]** also includes the Applicant's approach to consultation with stakeholders if benthic habitats of principal importance (qualifying as annex 1 or NERC) are identified during pre-installation surveys (engineering surveys and UXO) and there is potential for an impact on these habitats.
2BE11.	NE MMO	**Baseline benthic surveys** Do the submitted subtidal and intertidal surveys submitted (including, for example, [APP-196] [APP-198], [AS-006], [APP-197]) by the applicant provide sufficient coverage at this stage for the assessment of impacts on benthic ecology?	
2BE12.	NE	**Kent landfall exit pits – Sandwich Bay SAC** Confirm if the applicant's clarifications about concrete mattresses or rock bags at the Kent landfall HDD exit pits have addressed your concerns about potential effects to the SAC from placement of cable protection. If not, explain what further evidence you consider is needed. Also, if the applicant commits to use of concrete mattresses or rock bags in the SAC, does this address NE's concerns as related to HRA?	
2BE13.	NE **Applicant**	**Cable protection restriction in the Sandwich Bay SAC** MMO [REP4-126] have requested amendments to the wording of schedule 16, DML condition 13 in the dDCO [REP4-217] to prevent placement of cable protection in the SAC after the end of the construction period. **NE:** What is your opinion on this request from MMO? Do you advise that there could be LSE of the SAC in the absence of such a commitment? **Applicant:** What is your response to MMO's request for amendments? If your position is that such a restriction is not required, explain why with reference to relevant precedent.	The Applicant confirms that an update to the dML at Deadline 5 has been completed to revise **Condition 13 Cable Protection** to the following based on advice from the MMO and Natural England: *"No cable protection granted by the licence may be deployed within the Sandwich Bay Special Area of Conservation (SAC) after the construction period has ended. Any cable protection to be installed outside of the Sandwich Bay SAC following completion of construction in locations where cable protection was not installed during construction must be deployed within 10 years of completion of construction, unless otherwise agreed by the MMO in writing*".

Reference	Question to:	Question	Applicant's Comments
2BE14.	Applicant	**Clarification regarding permanent cable protection** The ExA notes that there appear to be inconsistencies across application documents about the requirement for permanent cable protection at the Kent landfall. For example, the HRA Report ([REP4-057], paragraph 4.3.41) states that there would be cable protection at the HDD exit pits during operation but the Outline Offshore Invasive Non-Native Species Management Plan ([REP1-027], table 1.3) states there would be no permanent cable protection at Kent landfall. **Applicant:** Confirm what it is proposed in the Sandwich Bay SAC and ensure that all documentation reflects the proposal. **NE:** Do you consider that it is necessary to secure in the DCO that cable protection used at the HDD exit pits within the Sandwich Bay SAC would be restricted to concrete mattresses or rock bags to avoid LSE?	Application Document 7.5.12 (C) Outline Offshore Invasive Non-Native Species Management Plan submitted at Deadline 5 has been updated to amend requirements for cable protection at the trenchless crossing exits during operation to ensure that these align with other ES Chapters including **Application Document 6.2.4.1 (F) Environmental Statement Part 4 Marine Chapter 1 Physical Environment** submitted at Deadline 5; **Application Document 6.2.4.2 (D) Environmental Statement Part 4 Marine Chapter 2 Benthic Ecology [REP4-029]**; and **Application Document 6.6 (G) Habitats Regulations Assessment Report** submitted at Deadline 5.
2BE15.	NE	**Margate and Long Sands SAC** Confirm if you agree with the applicant's conclusion [REP4-057] of no AEoI of Margate and Long Sands SAC from the LSE pathway of suspended sediment concentrations and subsequent sediment deposition during construction. If not, explain your outstanding concerns.	
2BE16.	Applicant	**Effects on Goodwin Sands Marine Conservation Zone (MCZ)** The updated MCZ Assessment ([REP4-059], paragraph 1.5.29) confirms that the Goodwin Sands MCZ sandbanks are morphologically resilient based on experience from recovery after dredging, and that the low-lying nature of any remedial rock berms placed adjacent to the MCZ would mean that coastal processes are highly unlikely to be affected. The ExA also notes that NE ([REP4-197], E49, E34) continues to have concerns about potential effects from placement of cable protection and the evidence provided to demonstrate there would be no disruption, and that it cannot advise that hindrance of the conservation objectives can be ruled out. Respond to the following: • Confirm if you have undertaken any modelling or if there is any other relevant precedent from comparable projects to support your position that the low-lying nature of the rock berms would not affect coastal processes? • Do the maximum parameters of the potential cable protection specified at paragraph 1.5.26 of [REP4-059] need to be secured in the DML or other control document? If not, why not? • The ExA notes the applicant's response as to why monitoring is not required in [REP4-241]. Given NE's ongoing advice [REP3A-027] that residual concerns should be monitored at the MCZ and that it is not satisfied by the evidence provided that there would be no disruption to coastal processes, the ExA is concerned that contrary to your position there are gaps and uncertainties that do require monitoring. The ExA requests further justification for your position.	Modelling of the effect of cable protection on the seabed has not been undertaken. The limited height above the seabed and limited extent of cable protection berms (maximum height 1 m with 1:3 slope) will ensure that any effect on sediment transport will be highly localised and short-term. ABPmer has undertaken an independent review of monitoring data from similar marine developments, primarily related to offshore windfarms, and has found no evidence of cable protection elsewhere within UK waters affecting regional sediment transport rates or pathways. This is most likely due to the vastly different scales at which natural processes operate relative to the scale of cable protection in both horizontal and vertical dimensions. Whilst there may be a short-term period of re-adjustment before patterns of sediment movement are re-established, no long-term changes in regional sediment transport patterns are therefore expected to occur following installation of cable protection. The Applicant has sought on several occasions to engage with Natural England to discuss concerns that have been raised regarding baseline characterisation to better understand the concerns raised and agree an approach for addressing those concerns. However, the Natural England technical leads have not been available for these discussions. Two offshore survey campaigns, one in 2021 and one in 2024, and one intertidal survey campaign (both landfalls) in 2023 have been completed to characterise the baseline conditions of the Offshore Scheme. All surveys have been completed and analysed by survey specialists and professionals with no data gaps or uncertainties identified across the Offshore Scheme. The Applicant has applied the mitigation hierarchy at the Goodwin Sands MCZ and has avoided routing into this site in its entirety. There is therefore fundamentally no direct loss of benthic habitat or even direct temporary direct disturbance to benthic habitats within the MCZ from the Proposed Project. Goodwin Sands is a large, dynamic and constantly changing area of sand and coarse sediments. It is recognised as a "closed sediment system," meaning the sandbanks are a largely self-contained, finite, and a dynamic entity where little sand enters or leaves. Despite historical dredging, the total volume of

Reference	Question to:	Question	Applicant's Comments

sediment in the system has historically remained relatively stable. While considered "closed" regarding the input and output of sediments, the system is not static; it is characterised by active, shifting sandbanks and ongoing sediment migration. The placement of any low-lying external cable protection adjacent to this site will therefore have a minimal impact on the sediment processes within the Goodwin Sands system. Furthermore, in terms of in-direct effects from cable installation, the benthic fauna associated with this MCZ generally have a low sensitivity to moderate, temporary smothering from suspended sediments due to the naturally high energy and shifting nature of the sandbanks which dominate this site. Additionally, the Proposed Project runs adjacent to the north western boundary of the Goodwin Sands MCZ (DEFRA 2018). The 2019 feature maps for the MCZ below show that the sensitive mussel beds and ross worm habitats are shown to be located in areas east and further south of the designated site.



The 2021 and 2023 survey campaigns for the Proposed Project support this feature map findings as no *Sabellaria* reefs or Annex 1 mussel beds were found. In particular, the first survey undertaken in 2021, before the corridor was finalised, included a short section through this north western section of the Goodwin Sands MCZ, as detailed in Application Document 6.3.4.2.A ES Appendix 4.2.A Benthic Characterisation Report (Original Report) [APP-196]. Out of the MCZ protected features only subtidal sands were identified. Some juvenile mussels were observed in grab samples, but no mussel beds were observed in either the geophysical or the DDV data collected.

Subtidal sand and subtidal coarse sediments occur throughout the site, and the distribution of subtidal sand is particularly concentrated in the west of the site, inshore of 6 nm, where it makes up the Goodwin Sands themselves. Blue mussels occur in

Reference	Question to:	Question	Applicant's Comments
			the south of the site, inshore of 6 nm (MMO Stage 3 Site Assessment: Goodwin Sands MPA). With this in mind, the Applicant concludes that there are no significant impacts concluded for the Goodwin Sands MCZ, and no residual environmental concerns adjacent to this MCZ to be monitored by the Proposed Project. With regards to the maximum parameters in the dML, the footprint and volumes of cable protection are already secured within Part 2 Conditions, 1 **Design Parameters.** However, Application Document 9.92 Outline Cable Specification and Installation Plan **[REP4-090]** has also been updated at Deadline 5 with further specific information of typical cable protection parameters based on the information presented within the Project Description **[REP1A-003]**.
2BE17.	Applicant	**Locally sourced or environmentally benign materials** The ExA notes your commitment to using locally sourced or environmentally benign materials in grout bags where possible in the REAC ([REP4-235], BE04). Explain why this is caveated to where possible, and confirm if this can be amended to refer to local sediment where such protection is placed adjacent to the MCZ as requested by NE [RR-3920].	The Applicant confirms that environmentally benign materials are readily available for cable protection within the industry supply chain. However, some materials may not have a local source by way of only being found in some offshore environments, hence the 'where possible' caveat included within the REAC. For material to be placed anywhere adjacent to the MCZ the intention is not to remove local sediment from the MCZ or near the MCZ. There is the potential for an increased adverse environmental impact on the MCZ if any material was proposed to be extracted from this site. In comparison, using environmentally benign material which already exists within the supply chain will have less of an impact on the features of the Goodwin Sand MCZ. Furthermore, the use of environmentally benign materials within the industry supply chain is very much a tried and tested best practice method for subsea cable protection. Goodwin Sands MCZ is approximately 2.6 km from the cable crossing point at KP 113.1 (Nemo Link), and 260 m from the Thanet cable crossing point at KP 107.6. The Cross Ledge Sandbanks are approximately 3 km from KP 113.1 and 8 km from KP 107.6 (**Application Document 6.4.4.1 (D) Environmental Statement Figures Marine Physical Environment [REP4-049] -** Figure 6.4.4.1.11 Offshore Seabed Surficial Geology).
2BE18.	NE	**Outline Cable Specification and Installation Plan [REP4-090]** The oCSIP [REP4-090] sets out the applicant's proposals for handling boulder clearance along the offshore cable route if needed. Advise if the proposed methods would be suitable for boulders cleared adjacent to the MCZ. If not, confirm what measures would be required and why.	
2BE19.	NE	**Implications for MCZ conservation objectives** The Risk and Issues Log ([REP4-197], E52 and E55) raises concerns about hindrance of the conservation objectives for various MCZ. The ExA understands that this is primarily about Goodwin Sands MCZ but notes that NE also refers to Thanet Coast and Kentish Knock East MCZs. Confirm if the applicant's response in [REP4-241] about the absence of direct effects dues to distance between the sites/ protected features and offshore cable addresses NE's concerns about Thanet Coast and Kentish Knock East MCZs. If not, confirm which protected features and impact pathways NE remain concerned about. Provide any advice on mitigation that could be used to address these matters.	

17. Marine Mammals

Table 17.1 Marine mammals

Reference	Question to:	Question	Applicant's Comments
2MM1.	Applicant	**Effects on seals at Goodwin Sands** In the applicant's response to the ExA's first written question reference 1MM1 it is stated that cable installation vessels can only operate in the area close to Goodwin Sands at high tide where water depth is sufficient for the cable lay and other vessels and that this will be part of the project design secured through the cable specification and installation plan (CSIP). The oCSIP has been provided [REP4-090]. Provide clarification as to where the minimum depth of water where cable installation may be undertaken by vessels is secured.	The Applicant submitted Application Document 9.92 Outline Cable Specification and Installation at Deadline 5 **[REP4-090]**. Paragraph 4.1.2 of this document states '*Cable installation vessels will operate in areas where water depth is sufficient for the cable lay and other vessels*'.
2MM2.	Applicant	**Technical Guidance** Update table 4.18 footnote of ES Part 4 Chapter 4 Marine Mammals [REP4-031] to reflect that the NMFS Acoustic Technical Guidance update (Version 3.0) is not in draft form any more or under consultation; it was finalised on October 24,2024 with the publication of a Federal Register notice (89 FR 84872), as set out in the MMO's comments in [REP4-126]. Update [REP4-031] to reflect the guidance with a qualitative commentary on the potential differences.	The Applicant has rerun the modelling using the updated NMFS 2024 guidance and updated the marine mammal chapter [Application Document 6.2.4.4 (H) Part 4 Marine Chapter 4 Marine Mammals] accordingly. The Applicant confirms that the impact assessment ratings, following updates for the new thresholds, has not changed. For clarity, a comparison of the thresholds is also included below, which shows that most changes are a reduction in the thresholds at which an effect occurs (which is an increase in the dB threshold number). The biggest change, is a reduction in SEL thresholds for harbour porpoise (VHF hearing group), a reduction in SPL thresholds and an increase in the SEL thresholds for seals in water from non-impulsive sound sources. Note, the thresholds for airborne sound in relation to seals have not changed.

NMFS 2018 Thresholds

Sound type	Hearing range	Impulsive				Non-impulsive	
Metric		PTS		TTS		PTS	TTS
Functional Hearing Group		SPL	SEL	SPL	SEL	SEL	SEL
LF	7 Hz - 35 kHz	219	183	213	168	199	179
HF	150 Hz - 160 kHz	230	185	224	170	198	178
VHF	275 Hz - 160 kHz	202	155	196	140	173	153
PW	50 Hz - 86 kHz	218	185	212	170	201	181
PA (Southall, 2019)	N/A	144	138	138	123	154	134

NMFS 2024 Thresholds

Sound type	Hearing range	Impulsive				Non-impulsive	
Metric		PTS		TTS		PTS	TTS
Functional Hearing Group		SPL	SEL	SPL	SEL	SEL	SEL
LF	7 Hz - 36+ kHz	222	183	216	168	197	177
HF	150 Hz - 160 kHz	230	193	224	178	201	181
VHF	200 Hz - 165 kHz	202	159	196	144	181	161

Reference	Question to:	Question	Applicant's Comments

PW	40 Hz - 90 kHz	223	183	217	168	195	175
PA (Southall, 2019)	42 Hz - 52 kHz	162	140	156	125	154	134

Following the Applicant's review of the new NMFS guidance (NMFS, 2024) a refinement of the modelling in relation to sub-bottom profiling has also been undertaken. This was amended to address the narrow beam width of the acoustic source for the SBP which significantly reduces horizontal propagation of sound. This has not been factored into the modelling previously, but has now been done for submission at Deadline 5. This amendment removes the significantly overestimated auditory injury zone of influence for all mammals, but particularly for the harbour porpoise.

For completeness and consistency, the Applicant has also updated Application Document 6.2.4.4 (H) Part 4 Marine Chapter 4 Marine Mammal and Application Document **6.6 (G) Habitats Regulations Assessment Report with the updated guidance in relation to effective deterrent ranges (EDR) from JNCC (JNCC, 2025b).**

2MM3.	NE, Joint Nature Conservation Committee (JNCC)	**Peak abundance and density estimates** NE's risk and issues log [REP4-197] requests further information from the applicant regarding the seasonality of the peak abundance and density estimates. The applicant provided further narrative on the implications of the use of the Winter SCANS 2025 harbour porpoise abundance data in Revision D of the HRA Report [REP4-057]. It concluded in response to 1MM7 [REP3-069] that the revised baseline did not change the overall outcomes of the assessment as the numbers estimated to be disturbed were still significantly lower than the threshold criteria for impacts to harbour porpoise SACs. Do the JNCC and NE agree with this conclusion?	
2MM4.	NE	**Underwater noise modelling** NE's concern regarding the underwater noise modelling [RR-3920] is unresolved in the DL4 risk and issues log [REP4-197]. The applicant in [REP2-014] confirmed that modelling used the standard NMFS/NOAA acoustic tools, as detailed in [REP4-031]. Can NE confirm whether this resolves its concerns, and if not do the concerns regarding modelling have implications for the HRA?	
2MM5.	JNCC	**Southern North Sea Special Area of Conservation (SNS SAC)** With regards to conservation objective 3, the applicant has calculated that <0.01% of that habitat of the SNS SAC could be affected by the proposed development and considers that the impact pathways relating to effects to prey species can be screened out in response to 1MM12 [REP4-083]. The MMO has also confirmed that further to consultation with the Centre for Environment, Fisheries and	

Reference	Question to:	Question	Applicant's Comments
		Aquaculture, it agrees with the applicant's conclusion of no likely significant effects. Further to this explanation, does the JNCC agree with the applicant's conclusions of no likely significant effects to harbour porpoise of the SNS SAC as a result of impacts to prey species?	
2MM6.	JNCC	**Outline Marine Mammal Mitigation Plan (oMMMP)** The JNCC [RR-2635], [REP1-210] made several comments on the oMMMP. The applicant has made several revisions to the oMMMP, the most recent being [REP4-069]. Can the JNCC confirm whether it is satisfied with the revisions made?	
2MM7.	JNCC	**Collision risk** Further to the applicant's response in table 3.8 of [REP2-016] is the JNCC satisfied that compliance with International Regulations for Preventing Collisions at Sea 1972 (International Maritime Organisation, 1972) is sufficient to ensure slow vessel speeds and reach a conclusion of no likely significant effects to marine mammals for vessel collision risk?	
2MM8.	Applicant	**In-combination assessment in the Report to Inform HRA** [REP4-057] The in-combination assessment considers the potential for impacts of the proposed development to interact with each identified project on a one-by-one basis. Can the applicant calculate the sum total area from which the harbour porpoise could be displaced, using the latest effective deterrent ranges. The assessment needs to be supplemented to enable the consideration of potential in-combination effects at a site or conservation objective level.	In the first instance, the Applicant directs the ExA to updates made to assessments of the effect of underwater sound in marine mammals, in both the marine mammal chapter (**Application Document: 6.2.4.4 (H) Part 4 Marine Chapter 4 Marine Mammals)** and the HRA (**Application Document 6.6 (G) Habitats Regulations Assessment Report**), to reflect new or updated guidance since the original DCO application, Thus, assessments now consider the updated JNCC guidance (JNCC, 2025b) regarding EDR distances for sub-bottom profiling (SBP) in relation to harbour porpoise, which have been reduced from 5 km to 3 km. The assessments have also been updated to reflect the NMFS 2024 guidance with the new underwater sound thresholds as detailed in the Applicant's response to 2MM2 above since not updating for all revised guidance would introduce some inconsistency. The modelling has been redone in order to determine the new zones of influence based on the revised thresholds. In relation to the HRA, the updated area of the Southern North Sea SAC (SNS SAC) that could be disturbed is now smaller, at 1.14% of the total area of the SAC and the number of harbour porpoise potentially affected by disturbance is 0.4% of the UK portion of North Sea Management Unit for this species. The SNS SAC is thought to support 17.5% of the UK North Sea Management Unit (https://jncc.gov.uk/our-work/southern-north-sea-mpa/). Therefore, the proportion of the SAC population that could be affected by disturbance from the Proposed Project is 2.18%. This change reflects the reduction in threshold criteria for harbour porpoise in the NMF, S2024 guidance. For noise disturbance within an SAC designated for harbour porpoise, noise disturbance within an SAC from a plan/project, individually or **in combination**, is considered to be significant if it excludes harbour porpoises from more than: 1. 20% of the relevant area of the site in any given day, or 2. an average of 10% of the relevant area of the site over a season. The Applicant has reviewed the HRA documentation for the other projects that have been considered within 6.2.4.11 (B) Part 4 Marine Chapter 11 Inter Project Cumulative Effects. Of these, the most significant in terms of underwater sound effects are the offshore windfarm projects – Five Estuaries and North Falls OWF - as these will use impact piling during wind turbine construction. For example, in the first HRA document submitted for the Five Estuaries examination (available here: https://nsip-

Reference	Question to:	Question	Applicant's Comments
			documents.planninginspectorate.gov.uk/published-documents/EN010115-000181-5.4%20Report%20to%20Inform%20Appropriate%20Assessment.pdf, the project was estimated to result in disturbance to, in combination with other projects, a total of over 86% of the Southern North Sea SAC. This significant total area was the result of several proposed offshore windfarm projects involving impact piling that are located within the SNS SAC. Offshore windfarm construction produces a significant intensity of underwater sound from impact piling that will occur over an extended period of time of many months such that the area affected over a season can easily exceed the SAC threshold above. The noisiest activity undertaken for the Sea Link project is the operation of the SBP which has a much lower EDR compared to piling (e.g. 5 km vs 26 km for SBP and monopiles respectively, though these JNCC, 2020 EDR values have now been revised to 3 km vs 20 km (JNCC, 2025b). Of particular note regarding Sea Link SBP is that whilst it does occur within 70 km of the cable corridor that crosses the SNS SAC the sound source is always transiting and will be present within the Southern North Sea for a matter of days. The likely speed of travel for SBP operations is between 3 and 6 knots. Assuming the lower speed of 3 knots it would take only 13 days for the geophysical survey vessel to pass through the SNS SAC. Thus, with such a small area of SAC affected in any given day, and the time spent in the SAC significantly shorter than a season, the overall contribution of the Sea Link Project to the SAC is several orders of magnitude smaller than the offshore windfarms. Thus, any in-combination calculations will be dominated by offshore wind farm generated disturbance. The Applicant has also reviewed the DCO Examination documentation, particularly in relation to the Five Estuaries project (2025 No. 1376). Through the examination process Five Estuaries introduced some significant mitigation measures to minimise underwater sound impacts, such that the ExA for this project were then 'satisfied that an AEoI from the Project alone or in-combination can be excluded beyond reasonable scientific doubt for the harbour porpoise of the SNC SAC [see UK Governments Habitats Regulations Assessment for an Application Under the Planning Act 2008 Five Estuaries Offshore Wind Farm. December 2025. Available from: https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010115-002033-HRA%20report%20from%20SoS.pdf], after the commitment to additional mitigation measures to minimise sound effects during piling. Considering this in-combination assessment includes nine offshore windfarms located within the Southern North Sea SAC, this reflects the significant contribution to the underwater soundscape as a result of impact piling, which results in high intensity impulsive sounds that have a much greater potential for impacts to harbour porpoise. However, with additional mitigation measures, which includes a commitment to the use of noise mitigation systems (NMS) any in-combination effects have been ruled out and the addition of a very short period of SBP activity from the Sea Link project in not considered to change this finding due to the difference in scale. The Applicant has reviewed the latest Five Estuaries Report to Inform Appropriate Assessment (https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010115-001945-C3-010%20-%205.4%20Report%20to%20Inform%20Appropriate%20Assessment%20(RIAA)%20-%20tracked%20-%20Five%20Estuaries%20Offshore%20Wind%20Farm%20Ltd%20-%20responses%20to%20letter%20dated%2021%20August%202025%205.pdf) and the new measures adopted, particularly the potential to reduce sound levels from the use of NMSs, but there are no updated underwater sound modelling results The report also states that the new measures ensure that the daily 20% and seasonal 10% thresholds with respect to the SNS SAC are not exceeded. Thus, it has not been possible to determine the reduced area of effect from the Five Estuaries windfarm to be able to undertake a summation of all potential areas of disturbance within the SNS SAC. Considering the difference in the scale of effect any calculations would be totally dominated by areas of disturbance created by windfarm impact piling. Even where cable construction for Sea Link were to occur at the same time as both the Gridlink cable project (a distance of 23 km within the SNS SAC) and Lionlink (138 km through the SNS SAC) the total area affected is only 2.6% of the total SNS SAC and is not significant from a cumulative/in-combination perspective as the combined effect is significantly below the JNCC threshold of 20% of the SAC subject to disturbance.

Reference	Question to:	Question	Applicant's Comments
			The Applicant also notes that these kind of calculations are typically required in relation to offshore windfarms, but are not proportionate for an interconnector project. Underwater sound produced during cable construction does occur but is minor in comparison to that resulting from impact piling, and with such a short period of SBP profiling occurring within the SNS SAC from the Sea Link project, the Applicant considers that it is disproportionate to undertake the total SAC area calculations of the type undertaken for the Five Estuaries and other offshore windfarm projects. The Applicant refers the ExA to recent planning applications for very similar interconnector cable projects, including Eastern Green Link 1 (see: https://www.easterngreenlink1.co.uk/document-library), Eastern Green Link 2 (https://marine.gov.scot/sites/default/files/d8.2_environmental_appraisal_report_-_appendix_8.2_habitats_regulations_assessment_report_redacted_0.pdf, where such calculations, which are completely dominated by the impacts from offshore windfarms, were not required.
2MM9.	NE	**Updates to risks and issues log** The applicant has provided updates at previous deadlines including to ES Part 4 Chapter 4 Marine Mammals [REP4-031] in response to NE's comments. Provide an update to the risks and issues log for marine mammals indicating whether the issues have been resolved and if so reference the document that has resolved them.	
2MM10.	Applicant	**Errata** Paragraph 4.7.47 of [REP4-031] refers to three surveys but four have been carried out. Correct and check chapter to ensure accuracy.	Paragraph 4.7.47 has been corrected in **Application Document 6.2.4.4 (H) Part 4 Marine Chapter 4 Marine Mammals** submitted at Deadline 5. The chapter has been checked and no further amendments needed.

18. Marine Ornithology

Table 18.1 Marine ornithology

Reference	Question to:	Question	Applicant's Comments
2MO1.	**Applicant** NE	**Red-throated diver (RTD) displacement** **Applicant:** The applicant confirmed in table 3.1 [REP4-085] that a quantification exercise is underway to assess the implications of vessel movements on RTD of the Outer Thames Estuary SPA. Submit the quantification exercise at DL5. The exercise should interpret findings against conservation objectives, as requested by NE (table 1, [REP4-193]). **NE:** Comment on any progress with assessments.	In their Deadline 4 submission [REP4-193], Natural England specifically requested that the Applicant calculate the proportion of 'bird (Red-throated Diver) days' lost, based on the methods set out in Reach et al. (2013). Natural England have been unable to provide a copy of the method and it is not publicly available, so the Applicant is trying to source a copy from the original authors. Once the Applicant has sourced a copy of the method specified by Natural England then the Applicant will update **Application Document 6.2.4.5 Part 4 Marine Chapter 5 Marine Ornithology** and **Application Document 6.6 (D) Habitats Regulations Assessment Report** for submission at Deadline 6.
2MO2.	**Applicant** NE MMO	**Red-Throated Diver Protocol** **Applicant:** Should the RTD protocol be updated to: • Reflect the need to restrict non-emergency operational and maintenance activities to NE and the MMO for the full duration of the seasonal restriction? • Confirm mitigation for the decommissioning phase? **Other parties:** Comment.	As outlined within Application Document 6.2.1.4 Description of the Proposed Project **[REP1A-003]** cable system installation is designed such that a regular maintenance regime is not required to maintain the integrity of the link. DTAS (Digital Temperature and Acoustic Sensing) HVDC status monitoring via fibre optic cable (innovative in-situ monitoring of cable via near real-time temperature and acoustic monitoring which can inform of changes to the cable by intrusive contact as well as variations in depth of burial dependant on thermal changes on the baseline conditions) will be undertaken remotely over the project lifetime. Further to DTAS monitoring where anomalies are identified, inspection surveys may be required to observe and identify any potential changes to the as 'built status' of the cable. This may include visual (GVI), where visibility and sensors allow, bathymetric and depth of lowering (cable tracker) data to compare against the baseline survey data. This would involve up to two conventional vessels (i.e. crewed) at any one time, with the most likely scenario of one vessel undertaking surveys. During the lifetime of the asset the type of vessel may change from crewed to autonomous. With regards to these inspection surveys, the applicant will plan these activities so they fall outside of the seasonal restriction period 1st November - 31st March with regards to the Outer Thames Estuary (OTE) Special Protection Area (SPA). The Applicant is therefore able to accept the restriction to non-emergency operational and maintenance activities (i.e. routine monitoring as described above) within the OTE SPA. However, to ensure the safety of other sea users, the Applicant is unable to commit to this seasonal restriction for any emergency inspections and repairs (i.e. cable exposure and cable fault) which may be identified during the operational lifetime. The confirmed approach to decommissioning will be detailed within the final Offshore Decommissioning Plan submitted to the Secretary of State for approval approximately 2 years prior to decommissioning commencing. This will be subject to agreement with the relevant authorities based on further and more refined surveys and assessments performed prior to decommissioning in line with the relevant legislation and guidance in place at that time. The approach will be based on an assessment of relative net environmental benefit, taking into consideration the in situ ecological value of the offshore components alongside other factors such as navigational safety, available technology and the feasibility of recycling. Further consents as required, including marine licensing, will be sought at the time of decommissioning and will factor in the- assessments carried out. The Applicant has updated the Red-Throated Diver Protocol in line with the above at Deadline 5.

Reference	Question to:	Question	Applicant's Comments
2MO3.	NE **Applicant**	**2km buffer from Outer Thames Estuary SPA** **NE:** Noting that RTD numbers are likely to decrease substantially towards the boundary of the SPA, provide further justification for applying a 2km buffer for vessels outside the SPA as requested in [REP4-193]. **Applicant:** To comment.	The Applicant will review Natural England's response to this matter when available and respond accordingly.
2MO4.	Applicant	**Offshore surveys** At DL2, the applicant (table 2.3, G2 [REP2-014]) stated that there would be regular monitoring surveys along the installed cable route which may be carried out using ASVs or autonomous underwater vehicles. At DL4, the applicant (1MO7 [REP4-083] and AP23 [REP4-087]) stated that there would not be a requirement for offshore vessel to undertake regular monitoring, with a focus on the reliance of land based Digital Temperature and Acoustic Sensing (DTAS) monitoring. The outline cable specification and installation plan [REP4-090] refers to DTAS monitoring. However, it also refers to 'surveys' of unspecified nature. In the absence of commitments to no offshore vessel monitoring during the overwintering period, how can no AEoI be assured?	The Applicant is able to accept the restriction to non-emergency operational and maintenance activities (i.e. routine offshore surveys outlined within 2MO2 above) within the Outer Thames Estuary SPA which would avoid disturbance to Red-throated Diver during the period 1st November-31st March, ensuring no potential for Adverse Effect on Integrity on this site.
2MO5.	**Applicant** NE KWT	**Disturbance to bird species foraging within Pegwell Bay** **Applicant:** Explain whether the estimates of the areas disturbed by construction activities within Pegwell Bay in the Maximum Design Scenario take into account disturbance due to noise and lighting effects in table 5.16 of Marine Chapter 5 [REP2-003]. Confirm whether table 5.16 accounts for use of bog matting within the intertidal area? Provide a comparison of the total area and percentage of foraging habitat that would be temporarily lost in Pegwell Bay during construction activities compared with the extent available. The ExA notes that the HRA still refers to 0.02km^2 disturbance when assessing effects on Thanet Coast and Sandwich Bay SPA and Ramsar, in contrast to [REP2-003] and [REP4-029] which use 0.072km^2. Taking into account any adjustments required by this question, provide an updated HRA [REP4-057] that reports consistent areas. **Other parties:** The MDS for temporary disturbance at Kent landfall, appears consistent with details in the Pegwell Bay Construction Method Technical Note [REP4-229], and concludes a minor and not significant effect. Are you satisfied that the correct area of intertidal seabed disturbance has been used as the basis for assessment of indirect effects to prey in the HRA? Also explain whether any additional mitigation is required to offset this effect.	The areas presented in Table 5.16 of **Application Document 6.2.4.5 (C) Part 4 Marine Chapter 5 Marine Ornithology [REP2-003]**, refer to the physical area of habitat impacted by the Maximum Design Scenarios. Areas subject to noise and visual disturbance and the relevant ornithological features within those areas are discussed and assessed in the relevant sections of the impact assessment. As stated in **Application Document 9.13 (B) Pegwell Bay Construction Method Technical Note [REP2-011]** there may be a requirement to install temporary road plates (steel sheet piles and steel support waling and struts) or bog mats at locations where the former hoverport access corridor crosses the Nemo and Thanet cables. This would be to provide protection for these cables during construction and to minimise the potential for any disturbance to the ground around the cables. Detailed requirements are not known at this stage. As set out in Commitment B68 the Applicant will prepare a Landfall Construction Method Statement which will include final details of the construction access route and requirements for ground protection mats. This commitment is secured through **Application Document 7.5.2 (C) Outline Offshore Construction Environmental Management Plan** and **Application Document 9.84 (C) Register of Environmental Commitments (REAC)** both submitted at Deadline 5. The use of bog matting hasn't specifically been included in Table 5.16 as the detailed of its need and extent is not yet known. However, as it is likely to only be required in specific areas such as the crossing of the Thanet and Nemo cables, in the context of the wider intertidal mudflats described below, it is unlikely to contribute to significant reduction in prey availability or foraging habitat. The Applicant has amended **Application Document 6.6 (D) Habitats Regulations Assessment Report** at Deadline 5 to reflect the 0.072 km^2 referred to in the Marine Ornithology and Benthic Ecology chapters for the temporary disturbance of intertidal mudflat. In the context of the wider intertidal mudflat (foraging) resource within Pegwell Bay this represents 0.592% of the overall foraging resource available (based on 12.14825 km^2 of mudflat habitat as derived from the Thanet Coast and Pegwell Bay Ramsar site information sheet).

Reference	Question to:	Question	Applicant's Comments
2MO6.	Applicant	**Pegwell Bay – key roost locations** Provide a plan indicating the 'key roost locations' and their offset distances from the works areas (for example for golden plover), as referred to in paragraph 7.3.48 of the HRA [REP4-057]. The applicant may wish to draw on information from the Nemo LinkES.	The Applicant has updated **Application Document 6.4.4.5 (E) Environmental Statement Figures Marine Ornithology** – Figures 6.4.4.5.7 and 6.4.4.5.8 to show key roost locations in Pegwell Bay and their distances from the works area (limits of deviation).

20. Shipping and Navigation

Table 20.1 Shipping and navigation

Reference	Question to:	Question	Applicant's Comments
2SN1.	Applicant	**Outline Cable Specification and Installation Plan** In relation to UXO in section 3.3 of the oCSIP [REP4-090] it is stated that a detailed UXO survey is planned to be carried out in 2025. Provide clarification as to whether that has now been carried out and update [REP4-090] as required.	The Applicant confirms that Paragraph 3.3.4 within **Application Document 9.92 (B) Outline Cable Specification and Installation Plan** (CSIP) has been updated to align with the updated UXO survey programme. This document will be submitted at Deadline 5.
2SN2.	Applicant	**Outline Navigation and Installation Plan (oNIP)** Section 3.12 of the oNIP [REP4-075] refers to freespan clearance and its remediation. There is no reference to freespan clearance in the Navigational Risk Assessment (NRA) [REP4-047] or ES Part 4 Marine Chapter 7 Shipping and Navigation [REP4-035]. Clarify whether this is an additional risk that has not previously been assessed. If so, provide updated documents such as the NRA and Shipping and Navigation chapter. Has freespan clearance and its remediation also been considered in relation to other topics such as commercial fisheries, benthic ecology or marine physical environment?	The reference to "freespan clearance" in the oNIP (**Application Document 9.12 Outline Navigation and Installation Plan [AS-104]**) was added at the request of the Port of London Authority in their Written Representation reference 10.4, where they requested that "it should be confirmed if any freespan clearance is proposed" in the oNIP (please see **Application Document 9.79 Applicant's Comments on Written Representations [REP2-034]**). The Applicant understands this to refer to the concept of freespans i.e. sections of the cable which may be laid on the seabed uncovered by protection. **Application Document 6.2.1.4 (D) Part 1 Chapter 4 Description of the Proposed Project [REP1A-003]** states that route preparation would involve clearance activities to ensure the installation corridor is clear of boulders, dropped object debris and other obstacles. Removal of out-of-service cables would be required, along with boulder/debris clearance using either grapnels or ROVs and grabs. The Applicant confirms that there are no planned freespans for the Proposed Project. The primary method of cable protection is lowering the cable below the seabed. If during operation any section of the cables were detected as being exposed, the Applicant would act to remediate this. This would be part of standard maintenance procedure during the operational phase outlined within Section 6 of **Application Document 9.92 (B) Outline Cable Specification and Installation Plan** which has been updated and submitted at Deadline 5. Therefore, the only way that the concept of freespan would arise is in an operational scenario and that the Applicant would remediate it immediately. Remediation been assessed across all topics for the Offshore Scheme, and there is no assessment gap in relation to freespan.
2SN3.	Applicant	**Cable Burial Risk Assessment (CBRA) and oCSIP** Does the CBRA need to be updated following the production of the oCSIP and [REP4-093] for consistency in terms of the additional depth of lowering needed? Furthermore, the MMO has indicated in its DL4 submission [REP4-126] that deeper cable burial may need to be considered between KP 96.343 and KP 113.83. Is this a matter that is already under consideration?	The Applicant has amended the dML Condition 4-(1)(a) to state the Outline Cable Specification and Installation Plan (CSIP) must be informed by a cable burial risk assessment. Application Document 3.1 has been updated and submitted at Deadline 5. The Applicant will update **Application Document 9.21 Sea Link Cable Burial Risk Assessment [PDA-039]** (CBRA) post consent based on the additional requirements to deeper burial which have emerged from Stakeholders during the DCO process, which were not communicated prior to DCO, such as the need for additional lowering in the Areas of Safeguarded Water Depth (**Application Document 9.96 (A) Water Depth Baseline Study – Shipping and Navigation Technical Note [REP4-093]**), and the consideration of deeper cable burial in the interval proposed by the MMO in their written post January hearing submissions (see **[REP4-126]**). Additional geophysical data shall have been acquired during the UXO survey, which will further inform the updates to the CBRA, specific to the planned installation corridor, especially with regard to seabed morphology, in the areas of mobile sediment, for example. This data will not be available until after closure of the examination period.

Reference	Question to:	Question	Applicant's Comments
2SN4.	**Applicant**, Maritime and Coastguard Agency (MCA), Port of London Authority, London Gateway Port Ltd, HHA, and other relevant stakeholders	**Vessel management plan (VMP)** Following the submission of the updated oNIP [REP4-075], provide an update as to whether a VMP is still required and if not explain why not.	The Applicant has provided an updated version of **Application Document 9.12 (B) Outline Navigation and Installation Plan [REP4-075]**, in order to incorporate the comments received from the MCA, Port of London Authority and London Gateway Port in their Written Representations. The MCA stated that they may be able to accept the NIP without the need for a further VMP, if the NIP were updated in order to cover additional Areas of Interest. This has now been implemented in the updated NIP provided at Deadline 4. The Applicant also notes that London Gateway Port also takes the view that an additional Vessel Management Plan (VMP) is not necessary.
2SN5.	MCA, United Kingdom Hydrographic Office (UKHO)	**Force majeure** Considering Trinity House comments on the dDCO [REP4-205] in relation to 'force majeure', MCA and UKHO to provide comments on whether they consider that they should be within scope of condition 9(1) of the dDCO.	
2SN6.	Applicant	**Errata** Correct the plate numbers and submit an amended version of Water Depth Baseline Study – Shipping and Navigation Technical Note [REP4-093] as the plate numbers are incorrect.	The Applicant will provide an updated version of **Application Document 9.96 (B) Water Depth Baseline Study – Shipping and Navigation Technical Note** at Deadline 5.

21. Commercial Fisheries

Table 21.1 Commercial fisheries

Reference	Question to:	Question	Applicant's Comments
2CF1.	Applicant	**Fishing over cables** Clarify whether there would be post-construction restrictions on fishing over cables, if so provide details of the extent and consider the implications for inter-project cumulative effects in [REP1A-009].	The Applicant can confirm that there will not be any permanent post construction restrictions on fishing over cables. However, temporary restrictions may be implemented in specific locations where cable repairs are required. The extent and duration of these restrictions will be dependent on the nature of the repair and remedial works required. This information is not currently known as repairs are unplanned events. The Proposed Project has been designed specifically to minimise the requirement for any future repairs through achieving target depth of burial along the entire length of the Offshore Scheme route. **Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]** identifies a potential requirement for five repairs over the 40 - 60-year lifespan of the Project. The Applicant can confirm that given there will be no post construction restrictions on fishing over cables there are no implications for the inter-project cumulative assessment presented in **Application Document 6.2.4.11 (B) Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [REP1A-011].** In accordance with guidance from the European Subsea Cables Associations which advises that '*it is unsafe to fish over subsea cables, whether buried or unburied, or potential areas that could present a risk of snagging, such as associated external cable protection*' National Grid does not promote the overfishing of buried assets. Therefore, while no restrictions will be placed on fishing over cables, and in accordance with Commitment CF03 **Application Document 7.5.2 (C) Outline Offshore Construction Environmental Management Plan** submitted at Deadline 5 and **Application Document 9.92 (B) Outline Cable Specification and Installation Plan** any cable crossings and/or rock protection berms will be designed to minimise the risk of snagging, it is a decision of individual fishers whether they choose to fish over the cables. In accordance with commitment GM02 (**Application Document 7.5.2 (C) Outline Offshore Construction Environmental Management Plan** submitted at Deadline 5) As-built locations of cable and external protection will be supplied to UK Hydrographic Office (UKHO) (Admiralty), The Crown Estate and Kingfisher (KIS-ORCA). The following conditions are also included in the dML: ***14**.—(1) The undertaker must submit to the MMO within three months of completion of licensed activities, an 'as built' plan which will display—* *(a) the location of the cable as laid with specific details of the achieved burial depths,* *(b) locations of buried and surface-laid cables,* *(c) the placed location and quantity of rock placement or concrete mattressing used in these licensed activities; and* *(d) final clearance depths over the protected cables and clumped disused cables*.
2CF2.	Applicant	**Post installation surveys** Section 8.9 of [REP1-007] refers to potentially significant effects on access to fishing grounds, particularly for bottom drift netters due to cable protection and the potential snag risk. It is stated that in order to further mitigate against this occurrence, regularly scheduled surveys will be undertaken at areas of mobile substrate along the cable route to monitor the	The Applicant confirms that commitment to post installation monitoring (CF05) is currently secured within **Application Document 7.5.2 (C) Outline Offshore Construction Environmental Management Plan** and **Application Document 9.92 (B) Outline Cable Specification and Installation Plan** submitted at Deadline 5, both of which are secured by Condition 4 of the DML.

Reference	Question to:	Question	Applicant's Comments
		continuing levels of protection to the cable provided by burial in the seabed. It is stated that depth of burial surveys will be conducted at 12 and 24 months to monitor the integrity of the cable and subsequently schedule future surveys, maintenance works and inform mitigation planning moving forward. Explain how this mitigation would be secured in the DCO/DML. While REAC CF05 refers to post installation surveys it does not secure the mitigation.	
2CF3.	Applicant	**Mitigation** Provide a response to Eastern Inshore Fisheries and Conservation Authority's (EIFCA) suggestion that a seasonal pattern of construction activity could mitigate effects on the fishing industry [RR-1422]	Recognising the concerns of the EIFCA the Applicant has committed to a number of measures to minimise the potential for restricted access to fishing grounds and displacement during cable works. These measures are secured in **Application Document 9.85 (A) Outline Fisheries Liaison and Coexistence Plan [REP4-081]** and **Application Document 7.5.2 (C) Outline Offshore Construction Environmental Management Plan** submitted at Deadline 5 and include: • CF01 – appointment of a Fisheries Liaison Officer (FLO) and fisheries working grounds to ensure effective dissemination of information and open dialogue with the fisheries industry • CF02 - communication of timings of any temporary exclusions from fishing grounds through Notice to Mariner and other methods including kingfisher bulletins • CF03 – design of cable protection berms and crossing to prevent snagging risk • CF04 – Inclusion of a procedure for the claim of loss, damage, relocation or removal of fishing gear in the FLCP • CF05 – post installation surveys to confirm final as-built cable route (coordinates), depth of lowering and any potential areas of snag risk • CF06 – procedures for ongoing consultation with the fishing industry regarding cable protection design • CF07 – communications with other Projects in the area with regarding to planned timing and locations of other marine works in the area • CF08 – minimising the amount of time the cable is unprotected and exposed to interactions with anchors and fishing gear during construction. The Applicant has already committed to a seasonal restriction within the Outer Thames Estuary (OTE) SPA where cable installation can only occur between 01 April and 31 October (Commitment O03 in **Application Document 7.5.2 (C) Outline Offshore Construction Environmental Management Plan** submitted at Deadline 5 and **Application Document 7.8 (B) Red Throated Diver Protocol** submitted at Deadline 5. Further seasonal restrictions within this period will present a significant challenge to delivery of the project. Based on the commitments set out above, and set out in **Application Document 9.85 (A) Outline Fisheries Liaison and Coexistence Plan [REP4-081]** the Applicant considers that further seasonal restrictions to mitigate potential disruption to fishing activities are not required and would be difficult to deliver due to the varying seasonality of different target species.
2CF4.	Relevant stakeholders including National Federation of Fishermen's Organisations (NFFO), Felixstowe Ferry Fishermen's Association, Thanet Fishermen's	**Updated comments** Provide comments on the updated version of ES Part 4 Marine Chapter 8 Commercial Fisheries [REP1A-009] and ES Appendix Commercial Fisheries Technical Report [REP1-007] and the applicant's responses to selected representations in [REP2-022] table 6.14. Include in your comments consideration of the adequacy of the baseline data gathering and forecast	

Reference	Question to:	Question	Applicant's Comments
	Association (TFA), Kent and Essex Inshore Fisheries and Conservation Authority (KEIFCA), Whitstable Fishermen's Association (WFA), EIFCA, Southwold Fishermen's Group (SWG)	methods, adequacy of the assessment of potential effects and adequacy of the proposed mitigation or compensation measures.	
2CF5.	Relevant stakeholders including NFFO, FFA, TFA, KEIFCA, WFA, EIFCA, SWG	**Outline Fisheries Co-Existence and Liaison Plan (FCLP)** Provide comments on the oFCLP [REP4-081].	
2CF6.	Applicant	**oFCLP** ES Part 4 Marine Chapter 8 Commercial Fisheries [REP1A-009] relies on mitigation in the FCLP [REP4-081] to mitigate likely significant effects in relation to static gear. The ExA expects all necessary mitigations to be outlined in the FCLP unless they are secured elsewhere. Clarify how all the mitigations referred to in [REP1A-009] are secured. Explain whether provision will be made in the oFCLP [REP4-081] for removal of static gears present within any areas of proposed surveys and construction or maintenance activities. If so, how much notice will be given to fishers prior to removal. Explain how much notice will be given between the dissemination of information regarding routes and timing of works so that fishers will have time to plan their routes and minimise any potential impact to their fuel costs. Explain how the oFCLP [REP4-081] makes provision for removed, relocated or damaged gear claims.	The Applicant confirms that all mitigation in relation to Commercial Fisheries are secured within Section 4 of **Application Document 9.85 (A) Outline Fisheries Liaison and Coexistence Plan [REP4-081]** and **Application Document 7.5.2 (C) Outline Offshore Construction Environmental Management Plan** submitted at Deadline 5, and secured by Condition 4 of the DML. Mitigation CF04 secured within **REP4-081** states: A procedure for the claim of loss, damage, relocation or removal of fishing gear will be included in the Fisheries Liaison and Coexistence Plan (FLCP). The Applicant will consult with fisheries stakeholders on the procedure for compensation as part of the preparation of the Final FLCP. This is in line with the agreed approach of securing these measures within the final FLCP which has been applied to other recent National Grid cable projects such as Eastern Link 1 and Eastern Green Link 2. Notice periods for surveys, construction and maintenance activities will be agreed with fishers as part of the finalisation of the FLCP and will be communicated / disseminated to fishers through Notice to Mariners and Kingfisher Bulletins. Where co-operation agreements are put in place (for compensation payments) relevant notice periods will be included in these agreements.
2CF7.	Relevant stakeholders including NFFO, FFA, TFA, KEIFCA, WFA, EIFCA, SWG	**Cumulative effects** Consider whether the applicant's assessment of cumulative effects with other developments on commercial fisheries is adequate in table 11.24 [REP1A-011]. If you consider that it is not adequate, explain what additional information or assessment is required. Do you consider that additional mitigation is required, if so what mitigation measures are sought?	
2CF8.	Relevant stakeholders including KEIFCA	**Cockle harvesting** Explain if you consider that the potential effects in relation cockle harvesting in Pegwell Bay have been adequately assessed and mitigated in terms of disturbance of cockles and the impact on the fishery	

Reference	Question to:	Question	Applicant's Comments
		and potting and netting activities. If not, specify what additional information is required.	
2CF9.	Applicant	**Baseline data** Explain the approach taken in [REP1A-009] to baseline data on vessels less than 15 metres in length, and the reason for no site-specific marine traffic survey data.	Detailed information on the commercial fisheries baseline, including with reference to vessels under 15 m in length is provided in **Application Document 6.3.4.8.A (B) Environmental Statement Appendix 4.8.A Commercial Fisheries Technical Report [REP1-007].** The Applicant notes that some of the publicly available fisheries data used in the assessment includes information for all size of vessels (including under 15 m vessels) (i.e. MMO surveillance sightings and MMO landings data by ICES rectangle) and that the information publicly available for smaller vessels was complemented by the undertaking of consultation with local fishers. This is noted in paragraph 8.4.1 of [**REP1-007**] which states the following *"In addition to the review of publicly available information, the commercial fisheries baseline has been informed through the collection of information from local fishers active in the commercial fisheries study area. As discussed in the previous section, there are limitations with the publicly available fisheries data, particularly with regard to vessels in the smaller length categories as these are not currently satellite tracked (i.e., not included in the VMS dataset). In order to inform this report, consultation has been carried out with relevant UK and non-UK commercial fisheries stakeholders. Consultation is on-going and will continue after submission of the Environmental Statement (ES). A list of the consultation undertaken to date is given in Table 8.2"* The Applicant also notes that traffic survey data has been included as part of the application. This includes information on all types of vessel traffic, including commercial fishing vessels, and is presented in **Application Document 6.4.4.8 (B) ES Figures Marine Commercial Fisheries** which has been updated for resubmission at Deadline 5 to correct an error in Application Document 6.4.4.8.4 Surveillance Sightings Data (2013-2022) by A) Nationality, B) Fishing Method, and C) AIS Showing Average MW Fishing Hours per km2 per Month (2021) where the AIS data in Figure C had not printed correctly and was not visible.
2CF10.	Applicant	**Effects on under 10 metre fleet** Provide a detailed response to the comments from Southwold Fishermens Group [RR-5068] as to whether effects on prime fishing grounds and their subsequent period of recovery and the particular circumstances affecting the under 10 metre fleet in terms of adaptation have been adequately considered in [REP1A-009]. If necessary provide an updated assessment in [REP1A-009].	The Relevant Representation by the Southwold Fishermen's Group [RR-5068] is provided below: *As commercial fishermen working within the area of the project, we are concerned the impact that this will have on our livelihoods. The project is intended to disturb some of our prime fishing grounds, which we know from experience takes a long while to recover. We are mainly an under 10 metre fleet, therefore travelling long distances to clear ground is not possible.* As stated in **Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries [REP1A-009]** paragraph 8.7.17 consultations were held with local fishers from coastal communities active within the Study Area. This included consultation with several fishers from the Southwold Fishermen's Association (**Application Document 6.3.4.8.A (B) Environmental Statement Appendix 4.8.A Commercial Fisheries Technical Report [REP1-007]** – Table 8.2). Southwold harbour is in ICES Rectangle 33F1 and lies approximately 10 miles north of the Offshore Scheme. It has the second highest annual landings in 33F1 (£217,084.23) after Lowestoft (£471,899.04) (based on MMO landings data 2018 to 2022) and 7th highest landings of all ports and harbours in the Offshore Scheme Study area (including ICES rectangles 31F1 and 32F2) **Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries [REP1A-009]** – Table 8.13**.** As identified in [**REP1-007**] vessels less than 10 m length in the Study Area are generally potting vessels (mainly targeting whelks, with some lobster and crab) or gillnetting vessels. The Southwold Fishermen's Association have 12 UK registered vessels under 10 m in length (**[REP1-007]** – Table 8.8). Given that most fixed and drift nets are deployed across ICES Rectangles 31F1 and 32F1 (**[REP1A-009]** paragraph 8.7.32) most of the Southwold <10 m are considered most likely to be potting vessels rather than gillnetting vessels. In accordance with standard practice, the assessment focuses on vessel sizes and gear types rather than assessing impacts on individuals or fishermen's groups and organisations. Based on this approach the Applicant can confirm that the impact assessment **([REP1A-009]** has considered

Reference	Question to:	Question	Applicant's Comments
			potential effects of the Proposed Project on all vessels (less than and more than 10 m length) and all gear types. This includes the Southwold Fishermen's Group fleet of vessels that are less than 10m in length. The assessment concluded that for all static gear fisheries (including potting vessels and gillnetting) potential effects of temporary loss of fishing grounds, without mitigation, would be of moderate significance which is considered to be significant in EIA terms (**[REP1A-009]** – Table 8.15). This conclusion was reached in recognition that local static gear fisheries have smaller operational ranges and therefore have the potential to be temporarily excluded from fishing grounds where they overlap the Offshore Scheme. However, with the mitigation/commitments outlined in response to 2CF3 above and as set out in **Application Document 9.85 (A) Outline Fisheries Liaison and Coexistence Plan [REP4-081]** and secured through **Application Document 7.5.2 C) Outline Offshore Construction Environmental Management Plan** submitted at Deadline 5 potential effects on static gear fisheries and smaller vessels (10 m fleet) including the Southwold Fishermen's Group are reduced to minor and not significant. Regarding the Southwold Fishermen's Group's concerns around the recovery of fishing grounds, an assessment of indirect effects on commercial fisheries as a result of impacts on the ecology of commercial species was also included in **Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries [REP1A-009].** This assessment was informed by information presented in **Application Document 6.2.4.3 (B) Part 4 Marine Chapter 3 Fish and Shellfish Ecology [AS-022]** which concluded that potential effects of the Proposed Project on fish and shellfish including direct habitat loss and disturbance, would be of negligible to minor significance and therefore are not significant in EIA terms. Based on these conclusions, in accordance with standard practice, no specific mitigation has been identified for fish and shellfish as no significant effects are predicted. Based on the response above, and information already presented in **Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries [REP1A-009]** no further updates to the chapter are required.
2CF11.	Applicant	**oFCLP** Include the oFCLP [REP4-081] in Schedule 19 of the dDCO as a certified document or explain why it is not appropriate to include it.	The Applicant confirms that **Application Document 3.1** has been updated at Deadline 5 to include the Outline FCLP as a Certified Document.
2CF12.	Applicant	**Indirect effects** Provide a response to the concern raised by Eastern Inshore Fisheries and Conservation Authority (EIFCA) [REP1-150] that compensation for lost access to fishing grounds may result in increased fishing effort elsewhere with potential effects on fish and shellfish populations, on features of Marine Protection Areas and on fishers operating in those areas.	As noted by the Applicant in **Applicant Document 9.79 Applicant's Comments on Written Representations [REP2-034]** a commitment to evidence-based compensation is set out in **Application Document 9.85 (A) Outline Fisheries Liaison and Coexistence Plan [REP4-081]** and secured through **Application Document 7.5.2 C) Outline Offshore Construction Environmental Management Plan** submitted at Deadline 5. The final approach to evidence-based compensation payments will be agreed in consultation with the fishing industry post consent as part of the finalisation of **Application Document 9.85 (A) Outline Fisheries Liaison and Coexistence Plan [REP4-081].** The commitment from the Applicant is to compensate fishers who are legitimately unable to fish due to restricted access to their regular fishing grounds during construction of the Proposed Project. In order to secure compensation fishers will be required to provide evidence (to be set out in a finalised version of **Application Document 9.85 (A) Outline Fisheries Liaison and Coexistence Plan [REP4-081])** to demonstrate that they do fish in grounds that will be directly affected by the Proposed Project, have fished in that location for a set period of time and are unable to readily fish alternative grounds (e.g. static gear fisheries)**.** If compensated fishers chose to continue fishing elsewhere having received a compensation payment that is a decision made by those individual fishers. The Applicant is not in position to prevent a fisher from continuing to fish. The importance of the evidence-based criteria is to ascertain those fishers that are dependent on impacted grounds for their livelihood and are not able to readily fish elsewhere. However, the Applicant is not a position to stop compensated fishers fishing elsewhere should they chose to.

Reference	Question to:	Question	Applicant's Comments
			In terms of potential impacts on the MPA, the Applicant acknowledges the EIFCA concerns that displaced fishers could chose to fish elsewhere including within Marine Protected Areas. As noted on the EIFCA website Conservation - Eastern IFCA over 96% of the Eastern IFCA district has a marine protected area designation. The section of the Offshore Scheme (northern section from Suffolk Landfall to offshore waters beyond Felixstowe) is located entirely within the Outer Thames Estuary SPA and partially within the Southern North Sea (SNS) SAC (**Application Document 6.4.4.2 (B) Environmental Statement Figures Marine Benthic Ecology [REP1-067]).** Any of the fishers that fish along this section of the Offshore Scheme (within the Eastern IFCA district) and receive compensation due to restrictions to their fishing grounds are therefore already actively fishing in a Marine Protected Area. If they chose to fish elsewhere they are likely to still be within a Marine Protected Area. The Applicant does acknowledge that fishers from elsewhere along the Offshore Scheme (outside the Eastern IFCA district) may choose to temporarily relocate to alternative grounds that overlap a Marine Protected Area. However, as set out in **Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries [REP1A-009]** due to the transient nature of the cable installation works and limited scale of the works (one single cable trench), any loss of access to fishing grounds will be short term and temporary in nature (weeks rather than months). Furthermore, fishers that are most likely to be eligible for compensation include static gear vessels that are less than 10 m which have limited ability to readily relocate to alternative grounds. The likelihood of smaller vessels from along the southern section of the Offshore Scheme (where there are fewer designations) relocating to the northern section of the Offshore Scheme is low and due to the short-term temporary nature of the relocation is unlikely impact on the Marine Protected Area.
2CF13.	Applicant	**Displacement** Clarify whether consideration has been given to the effects of additional steaming that may result from displacement of commercial fishing activities. If not, provide an updated version of [REP1A-009].	The potential effects of temporary restricted access to fishing grounds and displacement of commercial fishing activities have been assessed in **Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries [REP1A-009].** This included consideration of operational ranges (which takes into account steaming distances) for different fisheries in determining the sensitivity of the different fisheries to potential displacement. Mobile fisheries have low sensitivity to displacement (section 8.9.29 **[REP1A-009]** due to having widespread presence, large operational ranges and transient nature (both taking into consideration steaming) and ability to switch gear types (**Application Document 6.3.4.8.A (B) Environmental Statement Appendix 4.8.A Commercial Fisheries Technical Report [REP1-007]** whereas static fisheries are identified as having smaller operational ranges (section 8.9.23) **[REP1A-009]** and are therefore considered to be more sensitive to reduced access to fishing grounds and displacement as requirements to relocate to alternative fishing grounds outside their operational range (and associated increased steaming). Impacts of displacement on both mobile and static fisheries are considered to be limited due to the transient, short term and temporary nature of cable installation activities (weeks rather than months). However, the Applicant has committed to compensating fisheries that are required to remove gear or relocate to alternative grounds during cable installation (**Application Document 9.85 (A) Outline Fisheries Liaison and Coexistence Plan [REP4-081]** and secured through **Application Document 7.5.2 C) Outline Offshore Construction Environmental Management Plan** submitted at Deadline 5). This will include consideration of increased steaming times (in relation to relocation). The Applicant can confirm that no further update to **Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries [REP1A-009]** is required as the change (set out below) does not influence the assessment or change any of the conclusions of effect significance.
2CF14.	Applicant	**Thames Estuary Cockle Fishery Order (TECFO)** In section 8.4 of [REP1A-009] under the heading assumptions and limitations, it is noted that the current TECFO ran until 28 September 2024 at which point a new TECFO took effect. Provide an update as to whether the new TECFO has any implications for the	The Thames Estuary Cockle Fishery (No. 2) Order 2024 (TECFO) has been updated by The Thames Estuary Cockle Fisheries (No. 2) (Variation) Order 2025. The update is specifically in relation to article 5(12) of the 2024 Order concerning eligibility for a licence to dredge, fish for or take cockles within the regulated fishery. The change is set out below: The Thames Estuary Cockle Fishery (No. 2) Order 2024 Article 5

Reference	Question to:	Question	Applicant's Comments
		assessment, and if so provide amended assessment in [REP1A-009].	(12) Where a transitional period licence is issued to a company under article 6, any person who was a shareholder or officer of that company on 30th January 2024, is not eligible to be granted a licence under this article or a transitional period licence under article 6, whether as an individual or as a shareholder or officer of another company. The Thames Estuary Cockle Fisheries (No. 2) (Variation) Order 2025. Article 5 (12) A person ("P") is not eligible to be issued with a licence or to have a licence renewed under this article for a period of 7 years beginning with the 18th December 2024 if— (a) P, or a shareholder or officer of P, was on 30th January 2024 a shareholder or officer of a company ("C"); and (b) C has been issued with a transitional period licence under article 6.".

References

JNCC. 2025b. Updated Effective Deterrent Ranges (EDRs) for assessing the significance of noise disturbance against Conservation Objectives of harbour porpoise Special Areas of Conservation (SACs). (England, Wales & Northern Ireland) JNCC Report 803. JNCC, Peterborough, ISSN 0963-8091. https://hub.jncc.gov.uk/assets/5376c9a1-5d88-4291-aab4-028d5b4a1acd.

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