



**Application by National Grid Electricity Transmission (NGET) for Sea Link
The Examining Authority's written questions and requests for information (ExQ3)
Issued on 23 March 2026**

The following table sets out the Examining Authority's (ExA) written questions and requests for information – ExQ3.

Questions are set out using an issues-based framework developed following the Initial Assessment of Principal Issues provided as Annex C to the Rule 6 letter and informed by representations received to date with a view to assessing of the application against relevant policies and legislation.

Column 2 of the table indicates which Interested Parties (IPs) and other persons each question is directed to. The ExA would be grateful if all persons named could answer all questions directed to them, providing a substantive response, or indicating that the question is not relevant to them for a reason. This does not prevent an answer being provided to a question by a person to whom it is not directed, should the question be relevant to their interests. The order of questions does not imply any form of hierarchy or importance or any judgement on the relative importance of each topic.

Each question has a unique reference number which starts with 3 (indicating that it is from ExQ3) and then has an issue code and a question number. For example, the first question on General and Cross-Topic issues is identified as ExQ 3GEN1. When you are answering a question, please start your answer by quoting the unique reference number.

If you are responding to a small number of questions, answers in a letter format will suffice. If you are answering a larger number of questions, it will assist the ExA if you use a table based on this one to set out your responses. An editable version of this table in Microsoft Word is available on request from the case team: please contact southeastanglialink@planninginspectorate.gov.uk and include 'Sea Link ExQ3' in the subject line of your email.

Due to the period of time between deadline 5 and the issuing of these questions, it has not been possible for the ExA to fully evaluate all the information submitted at that deadline. It is therefore possible that submissions may have already provided the information requested. If that is the case, then there is no need for a party to re-submit the information. Therefore, in response to the question, please signpost where the information can be found by specific reference within a document identified through its [Examination Library](#) reference.

Use of artificial intelligence (AI) in casework evidence

If you use AI to create your submission, you should tell us that you have done this. You should specify which systems or tools you have used, the source of the information that the AI system has based its content on, and what information the AI has been used to create or alter. Further information can be found in the Planning Inspectorate's [guidance](#). By following this guidance, you will help the ExA to understand the origin



and accuracy of the information submitted, thereby supporting fair and impartial decision-making. **If you do not declare the use of AI in any evidence submission where it has been used or remove evidence such as watermarks we reserve the right to reject the submission.**

The Examination Library

References in these questions set out in square brackets (eg [APP-001]) are to documents catalogued in the Examination Library. The Examination Library can be obtained from the following link:

[EN020026- Sea Link - Examination Library.pdf](#)

It will be updated as the examination progresses.

Responses are due by deadline 6: 13 April 2026.



Abbreviations used:

Abbreviation	Description
ASD	Areas of Safeguarded Depth
ALARP	As Low As Reasonably Practicable
BMV	Best and most versatile
BNG	Biodiversity net gain
CBRA	Cable burial risk assessment
CNP	Critical National Priority
(o)AQMP	(outline) Air Quality Management Plan
(o)CTMP	(outline) Construction Traffic Management Plan
(o)CEMP	(outline) [onshore] Construction Environmental Management Plan
(o)OCEMP	(outline) Offshore Construction Environmental Management Plan
(o)CNVMP	(outline) Construction Noise and Vibration Management Plan
(o)CSIP	(outline) cable specification and installation plan
DDC	Dover District Council
(d)DCO	(draft) Development Consent Order
DL	Deadline
dDML	(draft) Deemed marine licence
EA	Environment Agency
EA1N	East Anglia One North

Abbreviation	Description
EA2	East Anglia Two
ECoW	Ecological or Environmental Clerk of Works
ES	Environmental Statement
ESC	East Suffolk Council
ExA	Examining Authority
FPC	Friston Parish Council
HDD	Horizontal directional drilling
HE	Historic England
HGV	Heavy Goods Vehicle
HA	Harwich Haven Authority
IP	Interested party
IPMP	In principle monitoring plan
ISH	Issue specific hearing
JNCC	Joint Nature Conservation Committee
KCC	Kent County Council
oLEMP	Outline Landscape and Ecological Management Plan
LGPL	London Gateway Port Limited
MCA	Maritime and Coastguard Agency
MCZ	Marine Conservation Zone



Abbreviation	Description
MMO	Marine Management Organisation
NE	Natural England
(o)NIP	(outline) Navigation and installation plan
NPS	National Policy Statement
NPS EN-1	Overarching NPS for Energy
NPS EN-3	National Policy Statement for Renewable Energy Infrastructure
PLA	Port of London Authority
RAM	Restricted in ability to manoeuvre
REAC	Register of Environmental Actions and Commitments
RSPB	Royal Society for the Protection of Birds

Abbreviation	Description
SCC	Suffolk County Council
SPR	Scottish Power Renewables
SEAS	Suffolk Energy Action Solutions Ltd
(o)SMP	(outline) Soil Management Plan
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest
TDC	Thanet District Council
TECFO	Thames Estuary Cockle Fishery Order
VMP	Vessel management plan
WFD	Water Framework Directive



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ExQ3	Question to:	Question:
1. General and Cross-topic Questions (GEN)		
General		
3GEN1.	Applicant	<p>Critical national priority</p> <p>Paragraph 4.2.4 of National Policy Statement (NPS) EN-1 (published November 2023) sets out the Government’s conclusion that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Paragraph 4.2.7 goes on to explain that the CNP policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. Paragraph 4.2.11 says that applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated and 4.2.12 says that applicants should set out how residual impacts will be compensated for as far as possible.</p> <p>For clarity and the avoidance of doubt, for each topic area the applicants are requested to set out (including any relevant cross-referencing to relevant documents) how they have met the test in paragraph 4.2.11 of NPS EN-1 that applicants must apply the mitigation hierarchy and demonstrate that it has been applied.</p>
3GEN2.	Applicant and all interested parties	<p>Critical national priority</p> <p>Paragraph 4.2.15 of NPS EN-1 says that where residual non-habitats regulations assessment or non-Marine Conservation Zone (MCZ) impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for CNP infrastructure. It goes onto say that the exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. The same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.</p> <ul style="list-style-type: none"> a) Without prejudice to the position of any party, are there any issues in this case that might potentially fall into this category of the exceptions to this presumption of consent? For example, might the issue of flooding and the application of the sequential and exception test potentially fall into this category in the event of there being an “unacceptable risk”? b) Are there any further submissions any party wishes to make on the potential application of CNP policy in this case (should it be required)?

ExQ3	Question to:	Question:
3GEN3.	Applicant	<p>Applicant's response to deadline 4 representations</p> <p>The applicant's deadline (DL) 5 covering letter [REP5-001] states that "the applicant has submitted comments on other submissions received at deadline 4 which comprises the applicant's responses to selected deadline 4 submissions. These are provided where it is considered that it is helpful to do so."</p> <p>It is imperative for an effective and efficient examination that the applicant provides a response to every submission to the examination to demonstrate that they have considered every point made and to enable the ExA to understand both sides of any outstanding disagreement.</p> <p>There are a number of submissions made at DL4 to which the applicant has not responded, including the [REP4-201] from Suffolk County Council which raises a number of outstanding concerns that need to be addressed.</p> <p>Provide a response to every DL4 submission which was not included in your DL5 submission on or before DL6 and ensure complete responses are provided for all future submissions.</p>
3GEN4.	Applicant	<p>Submission of monitoring data</p> <p>Revise relevant monitoring plans to include a commitment to submit monitoring data to The Crown Estate's Marine Data Exchange, as required by NPS EN-3 (paragraph 2.8.86). Submit updated plans by DL7.</p>
Design, parameters and other details of the Proposed Development		
3GEN5.	Applicant	<p>River Fromus Bridge</p> <p>What would be the likely implications for the construction programme if the draft Development Consent Order (dDCO) requirement required the design of the bridge to be approved by the relevant planning authority?</p>
3GEN6.	Applicant	<p>Maximum parameters for lighting</p> <p>Thanet District Council (TDC) [REP5-186] sets out its requirements for maximum parameters for lighting to be agreed and for justification for the 8m high lighting columns that are proposed. Provide an update to the dDCO adding the maximum lighting parameters, or explain why it is not required, with specific reference to the findings in [REP5-137].</p>

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ExQ3	Question to:	Question:
3GEN7.	Applicant	Permanent easement width Noting the National Trust comments [REP5-101] regarding an 80m permanent easement width in Pegwell Bay, update table 4.8 of Chapter 4 Description of the Proposed Project [REP1A-003] and any other parts of the application, as necessary, to reflect this and confirm whether this has any implications for the applicant's assessment findings.
3GEN8.	Relevant planning authorities	Independent design review Provide suggested wording to incorporate a post consent independent design review of the converter stations, Kent substation and River Fromus bridge
3GEN9.	Applicant	Requirement 3 Respond to Dover District Council's (DDC) request to be a consultee on the approval of the design of the converter station and substation in Kent, secured through the dDCO.
3GEN10.	Applicant, relevant planning authorities, Dover District Council (DDC), SCC, Kent County Council (KCC)	Requirement 3 Develop an agreed form of wording for the approval of details of the above ground elements of the proposed development. If agreement cannot be reached on specific points, explain what those points are and why agreement cannot be reached.
3GEN11.	Applicant	Requirement 3(2) Friston substation Respond to SCC's suggestion [REP5-185] that the substation should accord with all of the relevant information within the documents referred to in requirement 3(2)(a), rather than just the matters set out in (i) to (iv) inclusive.
3GEN12.	Applicant	Design Principles Advise whether it is possible to update the Design Principles to be more precise and provide greater clarity, as requested by the relevant planning authorities and following the selection of a preferred bidder for the converter stations, according to TDC [REP5-186] .

ExQ3	Question to:	Question:
Draft development consent order (dDCO)		
3GEN13.	East Suffolk Council (ESC)	<p>General</p> <p>In your DL5 submission [REP5-172] you state ‘ESC is of the view that wording is required in the dDCO to remove National Grid’s right to carry out works, “without the prior approval of the relevant planning authority”, where SPR has already carried out the works.’.</p> <p>Provide suggested drafting or detail of any amendments you consider would address this request.</p>
3GEN14.	ESC	<p>Article 2 (1)</p> <p>In your DL5 submission [REP5-172] you state ‘The current definition of maintain is unnecessarily broad and if it is to remain, the given activities must be further defined otherwise the Applicant will effectively have been given carte blanche. In addition, ESC requires wording to be inserted in the dDCO so as to require the Applicant to serve written notice on the relevant planning authority prior to the commencement any “material” maintenance works (i.e. those that are likely to cause disturbance etc.)’</p> <p>Provide suggested drafting or detail of any amendments you consider would address this request.</p>
3GEN15.	Suffolk County Council (SCC)	<p>Article 2 (1)</p> <p>Following ExQ1GEN15 and the applicant’s response [REP3-069] regarding Article 2(1) definition of ‘maintain’, provide dDCO drafting that would allay your concerns as set out in [REP4-201].</p>
3GEN16.	ESC	<p>Article 7</p> <p>Provide suggested drafting for a requirement as requested in [REP5-172] which would give the relevant planning authority 28 days to make representations in relation to any transfer or grant made under Article 7 (Consent to transfer benefit of order).</p>

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ExQ3	Question to:	Question:
3GEN17.	All local authorities	Article 10 Action point 115 from issue specific hearing 2 (ISH2) [EV6-033] asked all parties (applicant and councils) to meet/liase to agree suitable wording of article 10 which all parties are content with, with an update on progress and any agreement submitted by DL4. To date no suggested alternative drafting for article 10 has been submitted into the examination. Given the advanced stage of this examination and the absence of agreement, it appears likely that this is a matter upon which the ExA will need to adjudicate. To assist the ExA, can SCC work with all relevant local authorities to produce amended drafting for article 10 which addresses its previously discussed concerns, for submission by DL6.
3GEN18.	SCC	Article 23 Following the applicant's response to the ExA's question 1GEN35 [REP3-069] , do you consider there is evidence to support the inclusion of Part 4, Article 23 Removal of human remains? If so, provide reasons for the inclusion of the Article and provide dDCO wording that would satisfy your concerns raised in [REP4-201] .
3GEN19.	Applicant	Article 27 Change article 27(1)(a)(ii) in relation to class 10 land as suggested in [REP5-135] .
3GEN20.	Applicant	Article 27 Provide justification for the inconsistency between the 14-day notice period in Article 27(2) and the 28-day notice period in Article 28(3) or amend the drafting accordingly.
3GEN21.	ESC	Article 27(5) Does the removal of 'shrubs and shrubberies' from article 27(5) [REP5-006] provide sufficient reassurance that it would not prevent the replanting of hedges, as requested in [REP5-184] and [REP5-172] . If not, provide suggested wording.
3GEN22.	Applicant	Requirement 4 Respond to ESC [REP5-172] request for the alignment of the timescales of requirement 4 sub paragraphs (3) and (4) to 28 days and SCC [REP5-181] request for 28 days for responding to a notification of pre commencement operations.

ExQ3	Question to:	Question:
3GEN23.	Applicant	<p>Requirement 6</p> <p>For precision can 'substantially' be removed from this requirement in relation outline management plans to be approved. If not explain why not.</p>
3GEN24.	Applicant	<p>Requirement 6</p> <p>SCC [REP5-181] states when commenting on requirement 15 of the SPR DCOs in appendix C of [REP3-070], the applicant implies that its commitment is stronger than SPR's on account of the longer maintenance period: "... planting related to the mitigation of effects associated with Friston Substation (which would be within work 33 of SPRs consents) would be maintained for the lifetime of the asset if implemented by the Sea Link team, committing to a longer period in the Sea Link application than is referenced in SPR's requirement 15." However, SCC consider that this is apparently contradicted by the DCO wording which suggests failed planting will only be replaced if it falls within a five-year period after planting. SCC considers that the DCO wording should be amended to reflect LV03 to ensure it is clear that failed planting will be replaced throughout the lifetime of the permanent infrastructure.</p> <p>ESC in [REP5-172] suggest the following wording should be added to requirement 6: "Any replacement planting will be subject to the same management and monitoring arrangements (including management periods) as agreed for original planting through the approval of the Landscape and Ecological Management Plans under sub-paragraph (1)"</p> <p>Provide drafting to ensure that it is clear that failed planting related to the mitigation of effects associated with Friston substation would be replaced throughout the lifetime of the permanent infrastructure.</p>
3GEN25.	Thanet District Council (TDC)	<p>Requirement 6</p> <p>In response to ExQ2 2GEN26, TDC [REP5-207] suggested that an Operational Management Plan should be secured through the dDCO via requirement 6 to capture the operational commitments and mitigation that are not secured elsewhere in management plans or requirements.</p> <p>Provide suggest additional drafting for requirement 6 which would address your concerns.</p>

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ExQ3	Question to:	Question:
3GEN26.	ESC	<p>Requirement 13</p> <p>The applicant's submission [REP3-069] sets out that substations are excluded from paragraph 13(1) because they form part of the wider transmission network and therefore would be required to remain in operation even if the proposed development were to be decommissioned.</p> <p>Explain your submission [REP5-172] where you consider that the dDCO must include a substation decommissioning requirement.</p>
3GEN27.	SCC Applicant	<p>Requirement 15</p> <p>SCC [REP4-201] and [REP5-185] suggests that requirement 15 should be reworded.</p> <p>The ExA request that SCC and the applicant work together to agree alternative dDCO wording for requirement 15. If agreement cannot be reached then both parties to submit suggested wording by DL6.</p>
3GEN28.	Marine Management Organisation (MMO)	<p>Draft Deemed Marine Licence (dDML) Part 2 Condition 4</p> <p>Confirm whether the Marine Management Organisation (MMO) agrees with Natural England's (NE) suggested additional wording for Condition 4 (1) (a) an intertidal works methodology and mitigation plan [REP5-199]. If so, confirm whether the suggested wording is satisfactory or explain why not and, where relevant provide alternative wording.</p>

ExQ3	Question to:	Question:
3GEN29.	<p>ESC Friston Parish Council (FPC) Applicant</p>	<p>New Requirement – new substation at Grove Wood, Friston</p> <p>SCC [REP5-181] suggests the following drafting for a new requirement which they consider would be effective to ‘import’ the controls of the EA2 DCO into Schedule 3 of the Sea Link DCO and ensure that the Friston/Kiln Lane substation could not be provided without compliance with the terms of the EA2 DCO. SCC considers that such a requirement would eliminate the risk of derogation or regression without consent.</p> <p>‘Requirement [x] (new substation at Grove Wood, Friston, Suffolk)</p> <p>(1) Unless otherwise approved by the relevant planning authority, the Suffolk Substation (Work No. 1B) must be constructed in compliance with each Requirement applicable to Work No.41 of the East Anglia TWO Offshore Wind Farm Order 2022 (“SI 2022/433”), as if Work No.1B were constructed under SI 2022/433.</p> <p>(2) In so far as any Requirement of SI 2022/433 (“the 2022/433 Requirement”) entails the making of an application by the undertaker for the purposes of Work No. 41 or the approval of an application by the discharging authority for the purposes of that work, and at the date when the undertaker intends to carry out works comprised in Work No. 1B no application has been made and no approval of an applications has been given, the 2022/433 Requirements are deemed to be Requirements of this Schedule for all purposes concerned with their discharge and the undertaker is deemed to be a person entitled to apply for their discharge and the relevant planning authority is deemed to be the discharging authority.</p> <p>(3) The discharge of a 2022/433 Requirement by the relevant planning authority in accordance with paragraph (2) is conclusive evidence that that Requirement has been discharged for the purposes of this Schedule.’</p> <p>East Suffolk Council (ESC) and Friston Parish Council (FPC): Do you consider the new requirement, as drafted by SCC, would allay your concerns on this matter. If not please provide alternative drafting with reasons.</p> <p>Applicant: Do you consider the new requirement, as drafted by SCC, could be added to the dDCO. If not explain why not, including any alternative drafting.</p>

ExQ3	Question to:	Question:
3GEN30.	SCC	<p>New Requirement – lighting management plan</p> <p>In [REP5-181] SCC notes that requirement 3 of the most recent draft of the DCO [REP4-235] requires approval for operational lighting of the converter station but not the Friston substation. SCC does not see why this project would be justified in deviating from the Scottish Power Renewables (SPR) consent in this way. SCC notes ESC's concerns (e.g. within [REP3-085]) over the control of lighting and supports their ask for an appropriate requirement for a lighting management plan.</p> <p>Provide suggested drafting that you consider would address this matter.</p>
3GEN31.	SCC Applicant	<p>New Requirement – installation of cable ducts</p> <p>In [REP5-181] SCC requests a similar requirement to that in the EA1N/EA2 made DCOs to be inserted into the Sea Link dDCO in relation to Lion Link on account of the overlapping cable routes. SCC considers that this would make progress towards compliance with relevant parts of the NPS for energy, such as paragraph 3.3.80 of EN-1 concerning the avoidance of unnecessary impacts where avoidable through coordination.</p> <p>SCC: Provide drafting for the new requirement with reasons to explain why you consider it necessary.</p> <p>Applicant: Do you consider a new requirement could be added to the dDCO. If so, engage with SCC to provide agreed suggested drafting, if not explain why not.</p>
3GEN32.	SCC ESC Applicant	<p>New Requirement – control of development during operational phase</p> <p>SCC [REP5-181], ESC [REP5-172] and FPC [REP5-212] consider that a requirement akin to requirement 44 of the made orders for EA1N and EA2 is necessary for the Sea Link DCO.</p> <p>SCC, ESC and FPC: Provide drafting for the new requirement.</p> <p>Applicant: Do you consider a new requirement could be added to the dDCO. If so, engage with SCC and ESC to provide agreed suggested drafting, if not explain why not.</p>
Compulsory acquisition (CA)		
No further written questions at this time.		

ExQ3	Question to:	Question:
2. Landscape and visual		
3LVIA1.	Applicant	<p>Advance planting</p> <p>ESC [REP5-172] set out its concerns in relation to "a significant watering down by the applicant of its previous commitments to advance planting." Explain in detail the reasons for the change in approach to advance planting and whether the caveat "where planting areas do not conflict with construction compounds and activities" within outline Landscape and Ecological Management Plan (oLEMP) paragraph 5.8.1 would provide adequate safeguards against any instances of pre-commencement planting interfering with works. If not, why not?</p> <p>Provide a detailed response to ESC requirements in paragraphs 5.4 and 5.5 of [REP5-172].</p>
3LVIA2.	Applicant	<p>Outline lighting management plan</p> <p>ESC [REP5-184] sets out its requirement for the submission of an outline lighting management plan. Provide an outline lighting management or explain in detail why such a plan is not required, given that the applicant considers that insufficient information is currently available to provide night-time photomontages [REP5-137]. Add the outline lighting management plan to the dDCO and list of documents to be certified.</p>
3LVIA3.	Relevant planning authorities	<p>Lighting</p> <p>The dDCO includes a provision in requirement 3 for the submission and approval of details of operational lighting. Does this meet your requirements or do you consider that an outline lighting management plan and/ or maximum parameters for lighting are still required? If so, explain why and provide suggested wording.</p>
3LVIA4.	Applicant	<p>Landscape mitigation for Saxmundham converter station</p> <p>Provide a detailed response to the suggestions made by SCC in [REP4-150] for additional planting to mitigate landscape and visual effects.</p>
3LVIA5.	Applicant	<p>Cumulative landscape effects</p> <p>Provide a detailed response to the suggestions made by ESC and SCC in [REP5-204]</p>

ExQ3	Question to:	Question:
3LVIA6.	Applicant	<p>Friston substation</p> <p>Provide confirmation that all of the landscape mitigation approved for the SPR East Anglia One North (EA1N) and East Anglia Two (EA2) consents would be secured and can be implemented for the proposed development. If there are differences explain what these are and how they affect the achievement of mitigation.</p> <p>Provide a detailed explanation and plan indicating whether the landscape mitigation referenced above can be accommodated within the order limits.</p>
3. Ecology and biodiversity		
3ECOL1.	Applicant	<p>Noise contour map and lighting plan – Suffolk HDD compound</p> <p>Provide a detailed noise contour map for the Suffolk HDD compound (similar to those provided for the converter stations) showing predicted worst case L_{Amax} and L_{Aeq} levels. Also provide an indicative lighting plan for the compound.</p>
3ECOL2.	Applicant	<p>Access routes for vehicles within Sandlings Special Protection Area (SPA) and Leiston-Aldeburgh Site of Special Scientific Interest (SSSI)</p> <p>Provide evidence of a signed legal agreement with RSPB regarding vehicle and pedestrian access at the SPA and SSSI or make provision for specified routing and access arrangements to be agreed with RSPB within the Register of Environmental Actions and Commitments (REAC) or dDCO.</p> <p>RSPB may wish to comment on progress towards an agreement or the necessary wording for a REAC or dDCO commitment.</p>
3ECOL3.	Applicant	<p>LionLink cumulative assessment</p> <p>Explain why LionLink would not give rise to cumulative impacts due to hedgerow fragmentation. This is alluded to in the first column of Appendix table C.1 [REP5-127] but not concluded on. Where cumulative fragmentation impacts are confirmed, incorporate drafting for appropriate mitigation within the control documents or dDCO.</p>
3ECOL4.	Scottish Power Renewables (SPR)	<p>Ecological Management Plan</p> <p>Does SPR consider that all relevant ecological mitigation measures secured by its ecological management plan (as referenced in table 3.5, item 3.5.3 of the draft statement of common ground) have been addressed by the applicant. If not, explain what additional provisions it considers are necessary to be secured by the application and provide drafting.</p>

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ExQ3	Question to:	Question:
3ECOL5.	Forestry Commission	<p>Incursion into veteran tree root protection areas</p> <p>Confirm whether the applicant's response in [REP2-016] provides sufficient comfort that long term effects on veteran trees are unlikely and if not, explain why not.</p>
3ECOL6.	Applicant	<p>Environmental net gain</p> <p>Paragraph 4.6.15 of NPS EN-1 requires that applications should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered. Paragraph 4.6.13 distinguishes between environmental and biodiversity net gain (BNG). The applicant has provided a BNG feasibility report. Provide commentary on any wider environmental net gain measures delivered by the proposed development and where this is set out in a statement.</p>
3ECOL7.	Natural England (NE)	<p>Downgrading of bat assemblage</p> <p>Provide comment on the applicant's downgrading of the importance of the bat assemblage in [REP4-025] and [REP5-017] from national to regional based on level of use.</p>
3ECOL8.	Applicant	<p>Bird diverters</p> <p>Either draft a requirement to secure the use of bird diverters that are active for the duration of the night period, or update the REAC [REP5-115] provision B55 to include reference to 'low light and night conditions'.</p>
3ECOL9.	Applicant	<p>Mitigation for deer in Suffolk</p> <p>Include a commitment to detailed construction fencing plans being submitted for approval as part of the LEMP, or through a separate DCO requirement as suggested in ESC's response to ExQ2 question 2LVIA8 [PD-021] or explain why this is not necessary.</p>
3ECOL10.	KCC	<p>Reptile Surveys</p> <p>KCC's response to 2ECOL29 [REP5-195] suggests that updated surveys for reptiles should be undertaken 'where necessary'. Can KCC confirm whether surveys would be necessary in this location based on the applicant's proposed scope of works. Where relevant, provide drafting for a requirement or REAC provision to secure the relevant detail for the scope and methodology of surveys.</p>

ExQ3	Question to:	Question:
3ECOL11.	Applicant	<p>Environmental Clerk of Works</p> <p>As requested in 2ECOL2 [PD-021], explain why the outline Offshore Construction Environmental Management Plan (oCEMP) [REP5-066] now refers to an environmental clerk of works rather than an ecological 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 response to 2ECOL2 confirmed the change, rather than answering the specific question.</p>
3ECOL12.	ESC, SCC, TDC, KCC, National Trust	<p>Outline Offshore Construction Environmental Management Plan, outline Construction and Environmental Management Plan (oCEMP) [REP5-068] and REAC – Environmental Clerk of Works</p> <p>Do the local authorities or the National Trust have any concerns relating to the use of an Environmental Clerk of Works as opposed to an Ecological Clerk of Works to oversee works, noting that ecology and biodiversity measures originally referred to use of an Ecological Clerk of Works and the term ECoW is used interchangeably within the document? It is noted that REAC [REP5-115] provision B48 still refers to an ecological clerk.</p>
3ECOL13.	Applicant ESC, SCC, TDC, KCC	<p>oCEMP [REP5-068] provision B02 – vegetation removal</p> <p>Confirm whether the provision should read ‘Wherever possible’ rather than ‘The assumption will be’ and if not, suggest alternative wording.</p>
3ECOL14.	Applicant TDC, KCC	<p>oCEMP [REP5-068] provision B04 – invasive non-native species</p> <p>For transparency should the list of invasive non-native species also refer to Nuttall’s waterweed and if not, why not?</p>
3ECOL15.	Applicant ESC, SCC, TDC, KCC	<p>oCEMP [REP5-068] provision B05 – two stage habitat manipulation</p> <p>Should this provision refer to ‘reptiles’ rather than ‘common reptiles’ and if not, why not?</p>
3ECOL16.	Applicant ESC, SCC, TDC, KCC	<p>oCEMP [REP5-068] provision B07, B36, B53 – hedgerow gap filling</p> <p>Should ‘where practicable’ be removed or an alternative form of wording adopted to ensure that the conclusions of the environmental impact assessment in respect of bats and dormice can be relied on and if not, why not? Where relevant provide alternative wording.</p>

ExQ3	Question to:	Question:
3ECOL17.	Applicant	<p>oCEMP [REP5-068] provision B38 – bat impacts</p> <p>Confirm whether this provision can be updated to take account of the measures outlined in SCC's DL5 appendix B [REP5-180], such as full hedgerow surveys, provision of a colour coded map of important hedgerows and coppicing rather than removal and if not, why not?</p>
3ECOL18.	Applicant TDC KCC	<p>oCEMP [REP5-068] provision B44 – noise fencing</p> <p>Should this article be updated to refer to all relevant named designated sites and if not, why not?</p>
3ECOL19.	NE ESC SCC	<p>Outline Landscape and Ecological Management Plan</p> <p>Should the Suffolk oLEMP [REP4-065], or another control document, be updated to identify sensitive areas for wolverine or the need for a watching brief within Leiston-Aldeburgh SSSI to minimise risks of impacts in the event of frac out and if not, why not?</p>
3ECOL20.	NE	<p>Outline Landscape and Ecological Management Plan – Functionally Linked Land</p> <p>Confirm whether the oLEMP [REP4-067] provides sufficient detail regarding the management and monitoring of the proposed functionally linked land at Great Stonor. If not, confirm any additional provisions that should be secured and provide suggested drafting.</p>
3ECOL21.	NE	<p>REAC [REP5-115] provision AQ11</p> <p>Is Natural England satisfied that the provisions of AQ11 relating to location of generators are sufficient to avoid significant effects on the Sandwich Bay to Hacklinge Marshes SSSI.</p>
3ECOL22.	Applicant NE	<p>REAC [REP5-115] provision B65 - Sandwich Bay and Hacklinge Marshes SSSI tree height reduction</p> <p>It is noted that although tree height reductions in operation now avoid the March to August period, it is unclear from the wording whether there are now no controls on tree height reduction during construction. Provide alternative wording to clarify this or robust justification to explain why this wording is appropriate.</p> <p>NE may wish to comment.</p>

ExQ3	Question to:	Question:
4. Cultural heritage		
3CH1.	SCC KCC HE	<p>Assessment of heritage assets</p> <p>Is there sufficient evidence and level of assessment for the impact from the proposed development on all heritage assets (scoped in and out of the Environmental Statement (ES) assessment)?</p> <p>Furthermore, to clarify, is there any heritage asset (designated or non-designated) where your assessment conclusions would differ from that of the applicant?</p>
3CH2.	SCC KCC HE	<p>Cumulative assessment of heritage assets</p> <p>Has the applicant provided a sufficient cumulative assessment on heritage assets, considering not just the impacts to heritage assets from just the proposed development but from other projects in the areas too? Provide reasons for your response.</p>
3CH3.	Applicant	<p>Design of River Fromus Bridge</p> <p>Within the dDCO [REP5-005], requirement 3(3) refers to the bridge over the River Fromus. It states that “Development of the bridge crossing of the River Fromus (part of Work No. 3a) must not commence until details of the layout and scale of the bridge have been submitted to the relevant planning authority.” However, details of the final design of the bridge (not just the scale and layout) are not mentioned in this requirement for agreement with the planning authority.</p> <p>Given the sensitive location in terms of landscape and heritage, the ExA requires that the requirement be amended to require details of the bridge design to also be submitted for agreement by the local planning authority.</p>
3CH4.	KCC HE	<p>Richborough Saxon Shore Fort Scheduled Monument and Grade I listed buildings</p> <p>For the Richborough Fort complex, do you agree with the applicant [APP-063] that “the magnitude of impact is considered to be negligible. On an asset of high value this would result in a minor adverse effect which is not considered significant”? If not, set out how you would conclude the potential impact to this asset.</p>
3CH5.	KCC HE	<p>Ebbsfleet Peninsula Multi-Period Complex</p> <p>After a programme of archaeological excavation which the applicant has committed to for this asset the applicant has assessed the residual impact to be minor adverse [APP-063]. Considering all mitigation proposed, do you agree with the applicant’s assessment of residual impact on this complex? If not, explain how you would assess the residual impact.</p>

ExQ3	Question to:	Question:
3CH6.	KCC SCC HE	<p>Wider Historic Landscapes</p> <p>The applicant has submitted the Assessment of Cumulative Effects on the Wider Historic Landscapes [REP5-138].</p> <p>The ExA requests that you respond to this document and inform as to whether you agree with the conclusions of minor adverse effect for Suffolk and negligible effect for Kent. If not, explain why, and how you would evaluate the cumulative impact to the wider historic landscapes.</p>
5. Water environment		
3WE1.	Applicant	<p>Sequential Test</p> <p>In responding to 2WE2 [REP5-178], SCC disagree that it is necessary to relocate the particular drainage pond out of flood zone 3. Clearly explain why this is not feasible.</p>
3WE2.	Applicant	<p>Water Framework Directive</p> <p>Regulation 19 of The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 allows for derogations (exemptions) from WFD environmental objectives. If the Secretary of State determines that these objectives are not met, clearly set out how the requirements of regulation 19 have been satisfied.</p>
3WE3.	SCC	<p>Flood Risk Assessment</p> <p>Does the applicant's Surface Water Flood Risk and Climate Change - Technical Note [REP5-134] address all outstanding concerns with respect to the applicant's Flood Risk Assessment? If not, what concerns remain and what additional information is required?</p>
3WE4.	Environment Agency (EA) KCC	<p>Groundwater Flood Risk at the Minster Converter Station Site</p> <p>The applicant has submitted a report [REP5-122] to address the DL4 submission Application Document: Video evidence of the extent of the flooding on Minster Marshes on the area of the Converter Station build [REP4-146], Save Minister Marshes.</p> <p>Do the Environment Agency (EA) and KCC agree with the findings of the applicant's response, or if not, why not?</p>
3WE5.	EA	<p>Sequential and Exception Test</p> <p>In their response to 2WE1, ExQ2 [REP5-192] the EA did not provide a response regarding the sequential and exception test. Could the EA respond set out all reasonings relating to NPS EN1, paragraph 5.8.36?</p>

ExQ3	Question to:	Question:
3WE6.	EA	<p>Water Framework Directive</p> <p>Provide an update as to whether you believe that the proposed development is capable of meeting the objectives of the Water Framework Directive (WFD) and include a full commentary setting out any remaining concerns with respect to the relevant River Basin Management Plans?</p>
6. Geology and hydrogeology		
No further written questions at this time.		
7. Agriculture and soils		
3AS1.	Relevant planning authorities Applicant	<p>Reinstatement of field drains</p> <p>Relevant planning authorities: Commitment W10 of the REAC states that field drains will be permanently reinstated or rerouted ensuring their existing function is maintained. Provide comments as to whether this is sufficient to ensure that agricultural land drainage is adequately reinstated, taking into account the provisions of requirement 10 of the dDCO. If this commitment is insufficient, explain what measures are required.</p> <p>Applicant: Provide an update to the response given to Suffolk Energy Action Solutions (SEAS) in [REP3-064] table 29.1 in relation to obtaining details of current land drainage systems.</p>
3AS2.	Applicant	<p>Requirement 13 of the dDCO</p> <p>As the requirement in relation to decommissioning excludes substations, clarify whether this has been taken into account in the calculation of best and most versatile (BMV) land that would be reinstated through decommissioning. If it has not been taken into account, update the relevant chapters accordingly.</p>
3AS3.	Applicant	<p>Decommissioning</p> <p>In paragraph 6.9.26 of [PDA-019] it is stated that 11.47ha of BMV land would be reinstated if the project is decommissioned. In paragraph 6.9.27 of [PDA-023] it is stated that 12.21ha of BMV land would be reinstated. These figures are based on the entire above ground development being removed, including the land labelled 'ecological change' and the substations. Clarify whether the land labelled 'ecological change' includes the landscape and ecological mitigation land, and whether the intention is that the landscape mitigation would be removed? Confirm that this has been taken into consideration in relation to other topics. If not, why not?.</p>
3AS4.	Applicant	<p>Reinstatement of agricultural land over cables</p> <p>In the applicant's response to ExA question 1AS3 in [REP3-069] it is not clear whether the actual depth of burial may limit reinstatement and achievement of the pre-development agricultural land classification. Provide a more</p>

ExQ3	Question to:	Question:
		detailed explanation as to whether cable burial depths may affect the ability to achieve best and most versatile land at reinstatement, for example through the inability to reinstate field drainage.
3AS5.	Applicant	<p>Minimise impacts on best and most versatile land</p> <p>Following submission of the Agricultural Land Classification survey results for Suffolk [REP5-090] and Kent [REP5-091], provide an update as to how the applicant has sought to minimise the effects on BMV, including how the highest grades of land have been avoided.</p>
3AS6.	Applicant	<p>Aftercare management plan</p> <p>In [REP3-069] in response to ExA question 1AS2, it is stated:</p> <p>“The oSMPs also commit to an Aftercare Management Plan being produced by the Contractor which will detail the aftercare period, monitoring frequency and interventions which may be required depending on issues highlighted by monitoring during construction; the aftercare plans are adaptive, as the measures implemented will be based on the monitoring and assessment of recovery of the soils. A commitment to what the Aftercare Management Plan(s) will include will be submitted for Deadline 4.”</p> <p>Signpost to where this information was provided, or if it was not provided, submit at DL6.</p>
3AS7.	Relevant planning authorities	<p>Outline Soil management plan (oSMP)</p> <p>Would the oSMP make adequate provision for the reinstatement of land, soil management and handling? If not, explain why not and provide suggested wording for additional provision.</p>
3AS8.	Relevant planning authorities	<p>Reinstatement to pre-development agricultural land quality</p> <p>Provide comments as to whether the measures included in the oSMP would ensure that land would be restored to its pre-development agricultural grade. If not, provide details and suggested wording of additional measures or commitments.</p>
3AS9.	Relevant planning authorities	<p>oSMP</p> <p>Would the measures set out in the oSMP section 9. table 9.1 monitoring requirements be sufficient to ensure soil structures would not be detrimentally affected? Does this take into account the sandy soil types in Suffolk and the salt and marshy soil types in Kent?</p>
3AS10.	Applicant	<p>Coordination with other projects</p> <p>Provide an explanation of the opportunities to minimise the temporary and permanent use of BMV through coordination with other projects, including LionLink.</p>

ExQ3	Question to:	Question:
3AS11.	Applicant	<p>Inter-project cumulative effects</p> <p>Update tables 13.30 and 13.40 of [APP-073] to take into consideration other planned projects such as LionLink and the Suffolk Water Recycling, Transfer and Storage Project.</p>
3AS12.	Applicant	<p>Link boxes and link pillars</p> <p>Provide clarification as to whether the effects of these elements have been taken into consideration in the assessment of the loss of BMV land as there is no reference to them in the Agriculture and Soils chapters in the ES [PDA-019] and [PDA-023]. If not, why not.</p>
3AS13.	Applicant	<p>Micro-siting</p> <p>In terms of micro-siting, provide an explanation of how areas of higher quality land have been avoided in preference of poor quality, in the absence of detailed surveys?</p>
3AS14.	Applicant	<p>Economic and other benefits of the land</p> <p>Explain how the economic and other benefits of the land have been taken into account, having regard to NPS EN-1 paragraph 5.11.34.</p>
8. Traffic and transport		
3TT1.	Applicant	<p>Timing of peak traffic flows</p> <p>The Supplement to the Preliminary Cumulative Highway Impact Assessment in Suffolk [REP4-099] shows the total cumulative traffic flows, both including and excluding the proposed development construction traffic. It uses a 2028 baseline for heavy goods vehicles (HGVs) and for total vehicles for various road links and road junctions. However, whilst the overall peak of traffic may be in 2028, this does not mean that 2028 would be the busiest time for traffic on all the listed road links and junctions, due to different phases of development for example. Therefore, submit an additional set of tables in the form of those submitted with [REP4-099] highlighting only those links and junctions which would have their peak levels of cumulative traffic (with and without the proposed development) in years other than 2028.</p>

ExQ3: 23 March 2026

Responses due by deadline 6: Monday 13 April 2026

ExQ3	Question to:	Question:
3TT2.	SCC Applicant	<p>A12 enhancements</p> <p>From our March unaccompanied site inspections([EV1-022] and [EV1-023]), the ExA noted the works currently being undertaken along the A12, particularly the junctions at Friday Street A1094 and Yoxford B1122. Provide details of these works and any others along the A12 within the area of the proposed development and set out how they could benefit construction phase traffic for the proposed development, particularly in regard to driver delay.</p>
3TT3.	SCC KCC	<p>Cumulative assessments</p> <p>With the submission of the junction modelling for Kent [REP5-029] and the submission of the junction modelling for Suffolk due at DL6, is it the Council's view that there is sufficient information and a robust cumulative assessment of highway impacts for the construction phase of the proposed development? If not, detail what still needs to be submitted from the applicant to provide this robustness.</p>
3TT4.	SCC KCC	<p>Junction modelling response</p> <p>Provide a response to the junction modelling undertaken by the applicant, particularly with regards to what the results suggest about driver delay and highway safety (see [REP5-029] for Kent). Also confirm whether there was agreement on the junctions modelled.</p>
3TT5.	SCC KCC	<p>Significance of highway impacts</p> <p>Given all the information and assessment submitted to date from the applicant, as highway authorities would you consider that the highway impacts from the proposed development, both alone and in cumulatively with other projects, would be significant in any way? If so, explain how and why, along with any mitigation considered necessary to address significant impacts and how this could be secured.</p>
3TT6.	Applicant	<p>Monitoring of HGV numbers</p> <p>Outline Construction Traffic Management Plan (oCTMP) [REP5-064] section 7.7 explains the use of monitoring of HGVs by the Transport Co-Ordinator. For clarity, does this include tracking of HGV numbers using certain routes?</p> <p>If greater numbers of HGVs used particular road links and junctions than anticipated in the ES assessed worst-case scenario, what action would be taken and would it involve the County Councils as local highway authorities?</p>

ExQ3	Question to:	Question:
3TT7.	KCC SCC	<p>Capping of HGV numbers</p> <p>If capping of construction vehicles were considered necessary, would this be for HGVs or all forms of construction traffic? If considered necessary, which road links and/or road junctions should such caps be applied to?</p> <p>Finally, if the Highway Authorities considered capping of construction traffic as necessary to be secured within the DCO, provide suggested drafting for a requirement which would require capping and also sets out the process if the vehicle numbers exceeded these caps.</p>
3TT8.	Applicant	<p>Core hours impacts on peak traffic numbers</p> <p>What would be the implications of more restrictive working hours on traffic level peak times, such as if core hours were restricted to Monday to Friday and then Saturday mornings?</p>
3TT9.	SCC ESC Saxmundham Town Council	<p>HGV cap for B1121 and B1119 junction</p> <p>Within the submitted CTMP [REP5-064] the applicant states that there would be daily cap of ten HGV movements imposed at the B1121 Main Road/ B1119 Church Street signalised junction within Saxmundham, to minimise potential impacts of construction traffic at this location (associated with works at S-BM12). Respond to this commitment and state whether this would overcome concerns with regards to traffic at this junction?</p>
3TT10.	Network Rail	<p>Rail works process</p> <p>Typically, how long would it take for Network Rail to agree to applications for works like those suggested as possible at Benhall Railway Bridge? Is it possible that the request could be denied?</p>
3TT11.	Applicant	<p>Layout plan for Benhall Railway Bridge work options</p> <p>Provide an indicative layout of the proposed Benhall Railway Bridge works within order limits for Options 1 and 2, which should include the layout of a 'mini-bridge' and its base, works compounds, welfare areas and storage areas.</p>
9. Air quality		
3AQ1.	Applicant	<p>Cost of SF₆-free assets</p> <p>Provide evidence to demonstrate the 60% uplift in cost of SF₆-free equipment compared with SF₆-containing assets referenced in your response to 2AQ1 [REP5-135].</p>

ExQ3	Question to:	Question:
3AQ2.	SEAS ESC	<p>Model adjustment factors</p> <p>SEAS: In [RR-5210] and [REP2-121] SEAS made comments on the use of an adjustment factor of 3.79. In response, the applicant has explained why it considers this adjustment factor is appropriate. Does SEAS remain concerned regarding the adjustment factor and if so, can it explain what additional sensitivity testing or verification it considers to be necessary and why?</p> <p>ESC: May wish to comment.</p>
3AQ3.	Applicant ESC TDC	<p>Modelling parameters</p> <p>Explain why there is a difference in approach to surface roughness parameters and NO_x to NO₂ conversion in the updated appendix B technical note [REP5-136] compared with the original modelling report [APP-186]?</p> <p>The ExA notes that surface roughness parameters have changed from 0.5 to 0.3 m and the updated technical note uses a NO_x to NO₂ conversion rate of 70%, whereas the original assessment applied the Defra calculator. ESC and TDC may wish to comment.</p>
3AQ4.	ESC TDC Royal Society for the Protection of Birds (RSPB) NE	<p>Outline Air Quality Management Plan (oAQMP) and other air quality control measures (REAC and oCEMP)</p> <p>Comment on whether any further amendments to the oAQMP [REP5-074], [REP5-076] or other air quality controls are required and propose alternative drafting where relevant.</p>
10. Noise and vibration		
3NV1.	Applicant	<p>Whitearch Park Residential Park Homes</p> <p>Respond to SCC comments [REP3A-031] that residential park homes represent a particularly vulnerable receptor due to likely lower acoustic insulation and therefore whether there remains potential for adverse effects on the residential park from works at Benhall Bridge.</p>
3NV2.	ESC TDC	<p>Night time working controls for arrivals and departures from site</p> <p>The applicant's response to 2NV2 [REP5-135] suggests that day time controls in the REAC [REP5-115] or the outline Construction Noise and Vibration Management Plan (oCNVMP) [AS-131] [AS-133] are sufficient to control arrival/departure noise for 24 hour working. Notwithstanding the councils' position on working hours, are</p>

ExQ3	Question to:	Question:
		the councils satisfied that the proposed control measures would otherwise be sufficient to control night time noise? If not, suggest drafting for any other controls that might be required.
3NV3.	Applicant	<p>Friston substation – clarification regarding transformers</p> <p>Paragraph 1.2.1 of the Friston Substation and OHL Operational Noise Information (Informative) [AS-121] states “There would be no sources of noise during the normal operation of the proposed Friston Substation because there are no transformers proposed, which are typically the only source of noise at such sites. There would, however, be a backup generator, and gas insulated switchgear (GIS).”</p> <p>The design and layout plan figure DCO/S/DE/SS/1206 (GIS terminal option) [APP-037] includes a capacitive voltage transformer. Explain why this would not act as a source of operational noise and, if necessary, update the noise and vibration chapter to reflect this potential source.</p>
3NV4.	Applicant ESC TDC	<p>oCEMP [REP5-068] measures NV04 and NV05</p> <p>Can the applicant include reference to the British standard methodology (or its successor) that would be followed in these measures and if not, why not?</p> <p>ESC and TDC may wish to comment.</p>
3NV5.	ESC TDC RSPB NE	<p>Outline Construction Noise and Vibration Management Plan and other noise control measures (REAC and oCEMP)</p> <p>Comment on whether any further amendments to the oCNVMP or other noise controls are required and propose alternative drafting where relevant.</p>
11. Socio-economics, recreation and tourism		
3SERT1.	Applicant	<p>Skills and Employment Plan</p> <p>Respond to SCC’s suggested DCO requirement for a Skills and Employment Plan, as set out in [REP5-204]. Provide alternative wording if you do not agree to this.</p>
3SERT2.	Applicant KCC SCC East Suffolk Council	<p>Tourism monitoring and contributions</p> <p>SCC [REP5-185] has stated that the applicant should commit to monitor effects on accommodation capacity and tourism in coordination with cumulative developments. SCC also suggests a proportionate contribution to foster tourism, similar to the fund created by Sizewell C, if further embedded mitigation is not feasible.</p>

ExQ3	Question to:	Question:
	<p>Thanet District Council Dover District Council</p>	<p>Applicant: The ExA requires that the applicant commit within the DCO to monitoring of tourism impacts (including the availability of accommodation) through the construction and into the operational phases. Could this include a tourism fund, if the monitoring demonstrates significant tourism impacts? If this is not included, provide reasons why not.</p> <p>All County and District Councils: The ExA require that the Councils work together to provide wording for a requirement for the applicant to monitor the effects of the proposed development on tourism and accommodation, with adaptive management/mitigation if required.</p>
<p>3SERT3.</p>	<p>Applicant KCC ESC SCC</p>	<p>Permissive Paths Within the REAC [REP5-115] the applicant has stated under LV13 that it would consider opportunities to provide permissive access across the Saxmundham Converter Station site and establishing an attractive amenity value for users of the permanent PRoW diversions.</p> <p>Applicant: Provide a plan of the potential permissive paths. Furthermore, explain why a permissive path rather than a public right of way is proposed.</p> <p>SCC and ESC: Comment on the use of permissive paths as opposed to public rights of way, in terms of value for users and functionality for example.</p>
<p>3SERT4.</p>	<p>Applicant</p>	<p>Community Benefit Thanet District Council [REP5-186] have requested that the applicant engage with the Council and the local community to identify appropriate projects and secure community funds. Provide a response to this request.</p>
<p>3SERT5.</p>	<p>Applicant</p>	<p>A Supply Chain Plan East Suffolk Council [REP5-184] has requested submission of a Supply Chain Plan that helps local businesses identify opportunities for gaining contracts within the supply chain during the construction, operation, and decommissioning phases of the Suffolk Onshore Scheme. Provide a Supply Chain Plan or explain why one is not required.</p>

ExQ3	Question to:	Question:
12. Health and wellbeing		
3HW1.	Great Oaks Small School	<p>Great Oaks Small School</p> <p>Considering the commitments and responses made by the applicant up to DL5, does the school have any remaining concerns from a health and wellbeing perspective? If so, explain how these concerns could be suitably addressed.</p>
3HW2.	Ebbsfleet House and Martins - High Quality Lifestyles Limited (Priory Group)	<p>Ebbsfleet House and Martins - High Quality Lifestyles Limited (Priory Group)</p> <p>Considering the commitments and responses made by the applicant up to DL5, do you have any remaining concerns from a health and wellbeing perspective? If so, explain how these concerns could be suitably addressed.</p>
3HW3.	Applicant	<p>Mental Health and Wellbeing Monitoring Plan</p> <p>SCC [REP5-178] considers that the applicant should develop and implement a proportionate but robust Mental Health and Wellbeing Monitoring Plan for the duration of the proposed development (construction and early operation), with clear reporting routes and defined review points. The ExA requires the applicant to commit to such a monitoring plan. If the applicant does not agree to this, explain in detail why.</p>
3HW4.	Applicant	<p>Order limit change – health and wellbeing impacts</p> <p>SCC [REP5-178] stated that the extension of the Order Limits materially changes receptor proximity, bringing construction activities closer to residential properties that were not previously assessed within the ES. SCC requests that a proportionate and comprehensive approach would be to formally review the relevant ES chapters. Respond to these points made by the SCC in detail, including how such changes to impacts have been considered.</p>
13. Onshore Cumulative effects (intra-project)		
3CEIntra1.	Applicant	<p>Application of the Mitigation Hierarchy</p> <p>Does the applicant agree that they should deliver and secure the mitigations outlined in the deadline 5 submissions by the Councils, in order to have met the requirements of the mitigation hierarchy?</p> <p>Clearly set out your case for each individual mitigation requested including your reasoning if it is not deemed necessary.</p>

ExQ3	Question to:	Question:
3CEIntra2.	Applicant, All Councils	REAC commitment (GG40) to review / mitigate significant intra-project cumulative effects Do you agree with the proposed wording for REAC commitment GG40 offered by SCC in answering ExA question 2CEIntra2 in [REP5-204] ? In responding clearly explain your reasoning for your position and provide/justify any changes to the wording.
3CEIntra3.	Applicant	Construction Core Working Hours Does the applicant accept the proposed core working hours suggested by SCC in order to protect public health in responding to ExA question 2CEIntra2 in [REP5-204] ?
14. Onshore Cumulative effects (inter-project)		
No further written questions at this time.		
15. Marine physical environment		
3PE1.	MMO	Designated dredge disposal area Provide suggested dDML wording to secure a defined dredge disposal area.
3PE2.	NE Applicant	Cross Ledge, Goodwin Sands and Aldeburgh Napes NE has highlighted a number of concerns regarding impacts on sand banks including Cross Ledge, Goodwin Sands and Aldeburgh Napes [REP5-217] . Explain whether the updated Marine Chapter 1 [REP5-019] addresses NE's concerns or detail the necessary information required to be supplied by the applicant. The ExA suggests that a further meeting may help to agree the necessary information requirements, where they remain outstanding. The applicant may wish to comment.
3PE3.	Applicant	Coralline Crag mapping Provide more detailed/higher resolution mapping/chart information to enable greater resolution of the proposed HDD exit locations.
3PE4.	ESC, TDC, EA, MMO	Outline Offshore CEMP [REP5-066] provision MPE06 Confirm whether the beach profile and erosion rates monitoring provision in MPE06 should be subject to the caveat 'where rock bags are planned to be placed' and if not, suggest alternative wording.

ExQ3	Question to:	Question:
3PE5.	Applicant	<p>Cable burial risk assessment (CBRA) and REAC consistency</p> <p>NE [REP5-217] noted that commitment MPE07 to avoid installation of cables at the Coralline Crag without pre-cut trenches is not reflected in the CBRA [PDA-039], which states that in competent bedrock (Coralline Crag, Chalk, and flint beds) subcrops or outcrops, the preferred method of protection is by mechanical trenching. Update the CBRA to ensure consistency with the REAC, and any other relevant control documentation, or provide robust justification for the alternative approach.</p>
3PE6.	TDC, EA, NE, MMO	<p>Outline Offshore CEMP [REP5-066] provision MPE09</p> <p>Should the need for further monitoring after five years in MPE09 be subject to agreement with relevant stakeholders?</p>
16. Benthic ecology		
3BE1.	Applicant	<p>Monitoring programmes</p> <p>NPS EN-3 states the following: “Applicants must develop an ecological monitoring programme to monitor impacts during the pre-construction, construction and operational phases to identify the actual impacts caused by the project and compare them to what was predicted in the EIA/HRA” (paragraph 2.8.193)</p> <p>Set out in detail how the applicant considers it has complied with this policy with regards to the offshore proposed development. The applicant’s response should include all relevant topic areas in addition to benthic ecology.</p>
3BE2.	MMO Natural England Applicant	<p>Benthic surveys</p> <p>Within the outline Cable Specification and Installation Plan (oCSIP) [REP5-117] under section 3.2 it states that the applicant would undertake pre-construction surveys. For benthic ecology it suggests the use of drop down video or remotely operated vehicle.</p> <p>MMO and NE: Are these suitable forms of potential pre-construction benthic surveys? Should pre-construction benthic surveys be secured with a condition within the DML? If so, how should this be worded and would the details of the survey need to be agreed prior to the undertaking of these surveys?</p> <p>Applicant: The oCSIP only suggests what pre-installation surveys may be included. The ExA requests that the applicant set out how pre-installation benthic surveys are secured.</p>

ExQ3	Question to:	Question:
3BE3.	MMO Natural England	<p>Final cable route condition</p> <p>If the final route of the offshore cable (including micro-siting) should be agreed prior to installation (informed by a pre-installation survey) then how should this be secured? If it is considered that a condition within the DML is most suitable, provide wording for this.</p>
3BE4.	Applicant	<p>Post-installation surveys</p> <p>Would the Benthic Mitigation Plans referred to with within the oCEMP [REP5-066] and the subsequent In-Principle Monitoring Plan (IPMP) (BE05 and BE06) necessitate post-construction surveys? If these surveys and monitoring showed impacts greater than anticipated should adaptive management be necessary and how would this be secured and agreed by the MMO?</p>
3BE5.	MMO NE	<p>Benthic Mitigation Plans and monitoring conditions</p> <p>Should the Benthic Mitigation Plans referred to with within the oCEMP [REP5-066] and the subsequent IPMP (BE05 and BE06 of the REAC [REP5-115]) be secured as a condition within the DML? If so, provide wording for the condition.</p> <p>Furthermore, should there be an agreement with MMO or NE as to whether a Benthic Mitigation Plan and associated IPMP is necessary, based on pre-installation surveys and the proposed final cable route? If so, incorporate this into your suggested wording.</p>
3BE6.	Applicant	<p>Thanet Coast MCZ</p> <p>NE [REP5-218] have stated that there has been no evidence that rock placed 0.5m below the seabed would remain buried over the lifetime of the project and is unlikely to impact on Thanet Coast MCZ. Provide evidence to support the applicant's conclusions.</p>
3BE7.	Natural England MMO	<p>Cable protection removal</p> <p>In the applicant's response to ExA question 2BE7 [REP5-135] in relation to the removal of cable protection at decommissioning stage, the applicant states that removability of cable protection can be a factor in the final choice of cable protection used for the proposed development in some cases, although engineering and other sea users will also be a key factor in cable protection decisions. For example, the applicant states that to protect cable integrity at cable crossings, cable protection may not be removed at these locations. With the applicant committed to having removability of cable protection as a factor at decommissioning, is this a satisfactory approach?</p>

ExQ3	Question to:	Question:
3BE8.	Natural England MMO	Drill fluid management Within the offshore CEMP [REP5-066] the applicant has included details of drilling fluid management. From a benthic ecology perspective, does this address any concerns about potential drill fluid impacts to benthic ecology?
3BE9.	Natural England	Jack-Up vessels The applicant [REP5-135] has stated that there may be some faunal mortality due to the use of grounded or jack-up vessels during construction, but this is anticipated to be limited. Provide a response to these points and whether NE agrees with the conclusions on this issue.
17. Fish and shellfish ecology		
No further written questions at this time.		
18. Marine mammals		
3MM1.	Applicant	Quantification of effects of disturbance on harbour and grey seals Provide an update to ES part 4 chapter 4 Marine Mammals [REP5-023] in response to NE's comments at [REP5-219] to address the lack of quantification of effects of disturbance on harbour and grey seals.
3MM2.	Kent Wildlife Trust Applicant	Kent Dolphin Project Kent Wildlife Trust to provide the applicant with a copy of the Kent Dolphin Project report as requested in [REP5-132] and the applicant to provide an updated ES part 4 chapter 4 Marine Mammals [REP5-023] including qualitative data from marine mammal observations in the area.
3MM3.	Applicant	Goodwin Sands With reference to the depths below chart datum in the vicinity of Goodwin Sands, explain the minimum depths at which cable installation vessels will operate, and why this can only be achieved at high tide.
3MM4.	Joint Nature Conservation Committee (JNCC), Applicant	Southern North Sea Special Area of Conservation Applicant to provide the information requested by Joint Nature Conservation Committee (JNCC) [REP5-194] in its response to 2MM5 [PD-021] in relation to the additional detail on the scale of impact for impact pathways relating to prey species.

ExQ3	Question to:	Question:
3MM5.	NE	<p>Underwater noise modelling</p> <p>Does the information provided by the applicant in [REP5-132] deal with the concern expressed in [REP5-199]. If not, explain what further information is required from the applicant.</p>
3MM6.	NE	<p>In-combination effects</p> <p>Has the information provided by the applicant in [REP5-135] addressed the concerns of NE expressed in [REP5-219]? If not, explain what additional information is required.</p>
19. Marine Ornithology		
2MO1.	NE	<p>Reach et al. (2013) methodology</p> <p>Provide a copy of the Reach et al. (2013) methodology to the applicant to allow calculation of the proportion of 'bird (Red-Throated Diver) days' lost to enable the applicant to assess and quantify the implications for the Outer Thames Estuary by DL6. Otherwise provide an alternative methodology to achieve the same outcome or explain why this is not possible.</p> <p>If a methodology is not available, should the applicant provide information reasonably required to assess a potential derogation under the Habitats Regulations as soon as is reasonably possible and before the close of examination as set out in section 5.4 of NPS EN-1 and if not, why not?</p>
2MO2.	NE Applicant	<p>Emergency operation and maintenance activities in the Outer Thames Estuary</p> <p>Explain whether a strategic compensation mechanism, such as the Offshore Wind Environmental Improvement Package, could be used as a mechanism to secure compensation in the event that longer term operation and maintenance activities are required in the designated site during the winter period that have potential to give rise to adverse effects on integrity.</p> <p>The applicant may wish to comment.</p>
2MO3.	NE	<p>Displacement effects</p> <p>NE [REP5-199] has provided a substantial number of references that demonstrate the potential for displacement due to vessel movements. Can NE signpost to specific references to demonstrate that harm is likely from a small number of isolated vessel movements (as opposed to continuous offshore windfarm construction vessel traffic).</p>

ExQ3	Question to:	Question:
20. Marine archaeology		
No further written questions at this time.		
21. Shipping and navigation		
3SN1.	Applicant Maritime and Coastguard Agency (MCA)	<p>Concurrent restricted in ability to manoeuvre (RAM) vessel activities</p> <p>Maritime and Coastguard Agency (MCA):</p> <ul style="list-style-type: none"> • Explain whether there has been a change in circumstance that has led to the request for an enlarged area of interest (set out in figure 1 of your response to ISH2.09 in [REP4-164] and your response to action points in [REP4-165], if so, provide any additional information to explain what has led to the change in circumstances. • Explain the implications of concurrent RAM vessel activities in terms of safety and the economy and whether any residual effects would be significant/ As Low As Reasonably Practicable (ALARP). • Provide suggested wording and plans to secure the concurrent RAM restrictions that the MCA seeks and the means of securing it, whether through the dDCO/dDML or a control document such as the Outline Navigation and Installation Plan (oNIP). <p>Applicant: Clarify the implications for the proposed development of restricting concurrent RAM activities in the area of interest requested by the MCA.</p>
3SN2.	Applicant	<p>Outline Navigation and Installation Plan</p> <p>The oNIP is referred to as 'outline navigation installation plan' in the dDCO but the document itself is titled 'outline navigation <i>and</i> installation plan'. Either amend the document title or the wording in the dDCO so that there is consistency between the dDCO and the document.</p>
3SN3.	Applicant	<p>Outline Navigation and Installation Plan</p> <p>The oNIP is listed in schedule 16 dDML in the definitions in paragraph 1(1) as a document certified under article 60. However, it is not listed in schedule 19 as a certified document under article 60. Amend the dDCO to include the oNIP in schedule 19.</p>
3SN4.	MMO	<p>Cable burial</p> <p>Has the applicant's response in [REP5-132] to your concern in relation to cable burial depths from KP 96.343 to 113.83a [REP4-126] provided sufficient information? If not, what more do you require and why.</p>

ExQ3	Question to:	Question:
3SN5.	Applicant MMO and other relevant stakeholders	<p>Outline Cable Specification and Installation Plan [REP4-090]</p> <p>In the MMO's comments in [REP4-126] it is stated that the oCSIP will need to be compared to the CBRA. Has the comparison been undertaken and what is the outcome? Provide details of any concerns the MMO (or other stakeholder) have and any suggested remedy.</p>
3SN6.	MCA MMO PLA LGPL HHA	<p>Anchor strike risk</p> <p>Provide clarification as to whether concerns regarding anchor strike risk, particularly in relation to the Sunk anchorage would be adequately mitigated by the mitigation measures including the target depth of lowering and external cable protection details set out in the oCSIP [REP4-090]. If not, provide details of any remaining concerns and/ or additional measures that would be required.</p>
3SN7.	Applicant	<p>Cable exposure</p> <p>The MCA [REP1-162] requested amended wording in condition 3(12) of the dDML in order to further mitigate the risks of large container ships anchoring in the Sunk deepwater anchorage experiencing anchor snagging on temporarily exposed cables. The applicant responded in [REP2-034] that the revised wording of the condition would be considered. Provide an update as to whether the revised wording suggested by the MCA can be incorporated into the dDCO, and if not, why not.</p>
3SN8.	MMO	<p>Post consent monitoring</p> <p>[REP3-033] indicates that the MMO's request for regular post-construction maintenance reports and a separate section in the DML to be included for post consent monitoring has not been agreed by the applicant. Provide an explanation for the request including the implications of not including provision for post-construction maintenance reports and monitoring, and if necessary suggested wording for a section in the DML in relation to shipping and navigation matters.</p>
3SN9.	MMO MCA Port of London Authority (PLA) London Gateway Port Ltd (LGPL)	<p>dDML conditions 4 and 12</p> <p>Do conditions 4(6) and/ or 12(3) need to be amended to apply only to areas outside of the areas where the safeguarded depths are being agreed. If so, provide amended wording. If not, explain why not.</p>

ExQ3	Question to:	Question:
	Harwich Haven Authority (HHA) Applicant	
3SN10.	Applicant	<p>Proximity of the route to buoys and other aids to navigation</p> <p>Provide further detail in response to the concern of Trinity House in [REP4-204] regarding the status of the route and its proximity to buoys and other aids to navigation.</p>
3SN11.	Applicant	<p>Marking of cable crossings and cable lay</p> <p>Provide an update as to the status of discussions with Trinity House regarding the marking of cable crossings and cable lay [REP4-204].</p>
3SN12.	GridLink MMO MCA PLA LGPL HHA	<p>Planned cable crossing within North East Spit</p> <p>Provide your comments on the securing mechanisms included in requirement 17(2) [REP5-006] for safeguarding water depths in relation to the potential crossing with the planned GridLink cable.</p>
3SN13.	MMO MCA PLA LGPL HHA	<p>Cable crossings</p> <p>Provide your comments on the applicant's proposed mechanisms for safeguarding water depths at the point of cable crossings. If you consider that the proposed mechanism is not appropriate, provide a detailed explanation of why not, suggest a more appropriate mechanism and suggested wording, unless already provided.</p>
3SN14.	MMO MCA PLA LGPL HHA	<p>Planned cable joints within the three areas of safeguarded depth (ASD) on plate 1.2 of [REP4-090]</p> <p>The oCSIP sets out in section 4.4 that there will be no planned cable joints in the three ASDs. Is this sufficient to minimise risks to shipping and navigation to ALARP and mitigate any likely significant effects on shipping. If not, explain the additional measures that are required, and if appropriate provide suggested wording.</p>

ExQ3	Question to:	Question:
3SN15.	Applicant	<p>Areas of interest and areas of safeguarded depth plan</p> <p>The ExA understands the safeguarded depth plan to be [REP4-098]. The dDCO [REP5-005] defines areas of interest as being shown in [REP4-098] but that document does not indicate the areas of interest, only the areas of safeguarded water depth.</p> <p>Clarify whether areas of interest are those that are shown in plate 1.1 of [REP4-075]. If necessary provide an additional plan to be certified in the dDCO indicating the areas of interest.</p>
3SN16.	MMO MCA PLA LGPL HHA	<p>Unplanned cable joint repairs</p> <p>Condition 12 of the dDML [REP5-005] sets out that 'maintenance' includes cable repairs. REAC provision SN33 states that unplanned cable repair joints will be avoided in the Sunk, so far as practicable, but if such a scenario is unavoidable, the project shall consider potential collision risk and minimize time spent during maintenance in this region as much as possible. The oCSIP [REP4-090] sets out in section 4.4 further detail of the procedure for cable jointing and unforeseen repairs within the three areas of safeguarded water depth. Consider whether these provisions provide adequate safeguards to minimise risks to shipping and navigation to ALARP in this regard, and if not explain why not and suggest alternative or additional measures.</p>
3SN17.	MCA	<p>Exclusion zones</p> <p>Clarify whether the inclusion of reference to exclusion zones in dDCO/dDML condition 3 is sufficient. If not, why not.</p>
3SN18.	MCA	<p>Magnetic compass deviation</p> <p>The dDCO [REP5-005] includes condition 6 of the dDML in relation to compass deviation. Advise whether this meets your requirements. If it does not, explain why not and suggest how this could be overcome.</p>
3SN19.	Applicant	<p>Vessel management plan (VMP)</p> <p>Address comments made by the PLA [REP5-201] in response to 2SN4 setting out why a VMP is required in relation to vessel operation movements and communications. Consider whether they can be incorporated into the oNIP as overarching measures that apply for all offshore vessel activities and would not be restricted to the Areas of Interest.</p>
3SN20.	Applicant	<p>Consistency</p> <p>Ensure that there is consistency between documents regarding safeguarding water depths, as set out in comments made by LGPL in [REP5-174].</p>

ExQ3	Question to:	Question:
3SN21.	MCA MMO PLA LGPL HHA	Schedule of outstanding matters Provide a schedule of outstanding matters with a clear explanation of the implications (likely significant effects or ALARP) in terms of shipping and navigation if these matters remain unresolved at the close of examination. Where DCO/DML drafting could resolve these matters please provide suggested wording.
22. Commercial fisheries		
3CF1.	Applicant	Thames Estuary Cockle Fishery Order (TECFO) Further to your response to ExA question 2CF14, explain whether the new TECFO has any implications for the assessment of effects on commercial fisheries, and if so provide an amended assessment.
23. Other sea users		
No further written questions at this time.		
24. Marine intra-project cumulative effects		
No further written questions at this time.		
25. Marine inter-project cumulative effects		
No further written questions at this time.		
26. Climate change		
No further written questions at this time.		
27. Project-wide (combined) effects		
No further written questions at this time.		

ExQ3	Question to:	Question:
28. Other		
3OTH1.	Applicant	<p>Deposit of plastic and synthetics at sea Part 1(7)(e) of the dDML sets out that plastic and synthetics are authorised for deposit at sea. NPS EN-1 5.15.11 states that assessment should include other uses of material before disposal to sea.</p> <p>Applicant:</p> <ul style="list-style-type: none"> • Confirm whether this assessment has been carried out or whether it would be secured through a control document. • Provide an estimate of quantities and likely locations. <p>MMO/NE: Comment as to whether this is acceptable.</p>