

Action Points arising from Issue Specific Hearing 3 (ISH3) on environmental issues, held on Wednesday 25 March to Friday 27 March 2026. Historic England response.

Action ref. no	Response required from	Action	HE response
1	All parties	Submit any suggested drafting (whether relating to matters raised in ExQ3 or not) which you consider should be included in the draft Development Consent Order (dDCO), with reasons why you consider it is necessary.	Historic England does not have any additional comments or suggestions in regard to the wording of draft DCO.
37	Historic England	Considering the latest information submitted by the applicant in relation to listed buildings, conservation areas and scheduled ancient monuments, is Historic England content with the level of detail and assessment submitted for this examination?	Historic England can confirm that the information on historic environment submitted by the applicant and the level of assessment presented as part of this application is proportionate and sufficient for the purposes of this examination.
39	Historic England	Does there need to be any changes to the draft DCO or the support documents submitted by the applicant in relation to cultural heritage? If so, please set this out with alternative or additional wording.	Historic England is satisfied with the current wording of draft DCO. We consider that the wording in the document [REP5-005] is appropriate in the context of Cultural Heritage.

40	Historic England	<p>Is Historic England satisfied with the current level of information and the approach the applicant has set out in regards to the D-shaped enclosure in Suffolk?</p>	<p>The information related to enclosure identified in Suffolk (Fields F25.1 and F25.2) has been presented by the applicant in the following documents:</p> <ul style="list-style-type: none"> - Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136] - Change Request Appendix B Geophysical Survey Report [CR1-057] - Suffolk Phase 3 Archaeological Evaluation Final Report [REP5-140] <p>Historic England is satisfied with the level of information and assessment provided by the applicant in respect to this non-designated archaeological site. We consider that the enclosure is likely of regional importance, as assessed in an Addendum to Volume 6 Environmental Statement [CR1-055].</p> <p>Addendum to Volume 6 Environmental Statement [CR1-055] outlines that two options for mitigation of the enclosure area which are being considered: re-routing of the cable and haul road corridor to the east to avoid impact on the enclosure; and archaeological excavation of the entirety of the enclosure to allow for the original route of the cable and haul road.</p> <p>The applicant confirmed during the ISH3 that the currently preferred mitigation measure is</p>
----	------------------	--	--

			<p>avoidance of the enclosure and re-routing of the works corridor to the east (Transcript of Issue Specific Hearing 3 (ISH3) - Day 2 - Part 2 - 26 March 2026), as no significant archaeological remains have been identified in that area during most recent phase of trial trench evaluation [REP5-140]</p> <p>We understand that both options for proposed mitigation measures have been agreed with Suffolk County Council Archaeological Services. They are the appropriate authority for the provision of advice on the mitigation measures for non-designated heritage assets.</p> <p>We support outlined approach to mitigation and have no further comments to make.</p>
41	Historic England	With regards to Richborough Saxon Shore Fort, Roman Port, and Associated Remains in Kent, based on the applicant's submitted details and information, how would Historic England consider the potential impact to the setting and significance of these heritage assets?	<p>Historic England continues to maintain that the proposed development would result in a higher level of harm to Richborough Roman Fort than has been assessed by the applicant.</p> <p>As we previously highlighted in our Written Representation the applicant has assessed the magnitude of harm to the significance of the fort caused by development within its setting (during operation and maintenance) to be 'Negligible' with a resultant 'Minor Adverse' significance of effect ([APP-063] Table 3.14, pg. 65).</p>

			<p>On the assumption that appropriate design mitigation will be implemented, utilising the least intrusive of the design principles put forward (as described in Design Approach Document – Kent [APP-365] and Design Principles – Kent [APP-367]), Historic England assess the magnitude of harm to be ‘Small’ (as per [APP-63] Table 3.10, pg. 31). According to the methodology used by the applicant (as per [APP-046] plate 5.2, pg. 14), this may then result in a ‘Moderate’ or ‘Minor’ significance of effect. We consider that a ‘Minor’ significance of effect is appropriate and that the harm is therefore ‘Not Significant’.</p> <p>Despite our disagreement regarding the specific magnitude of harm, the resultant significance of the effect does therefore broadly align with the applicant’s assessment.</p> <p>It should be noted that this is subject to ensuring that the detailed design of the converter station meets the aims set out within the design parameters as currently set out. However, if a design is chosen that increases the intrusion of this structure within the landscape, then the harm may be considered ‘Moderate’ which would then be ‘Significant’ in EIA terms.</p>
--	--	--	--

42	Historic England	<p>With regards to the Ebbsfleet Peninsula Multi-Period Complex, based on the applicant's submitted details and information, how would Historic England consider the potential impact to the setting and significance of this heritage asset?</p>	<p>HE considers that the development is likely to result in some harm to the Ebbsfleet Peninsula Complex. This will result in a permanent residual change and a significant effect in EIA terms to an undesignated, but potentially nationally significant, heritage asset. The potential for harm is recognised in the ES.</p> <p>We acknowledge that appropriate steps have been taken to substantially limit the risk of harm to heritage asset. This is through design which is informed by archaeological evaluations to avoid what we believe are the most significant areas of archaeology.</p> <p>Areas of the Ebbsfleet complex within the order limits where archaeology needs to be preserved have been identified and will be protected through the works. We, along with the Kent County Council archaeological advisor are in regular discussions regarding the proposed excavations to establish appropriate protection measures. With the appropriate controls in place, we agree that the risk of harm to significant remains associated with this complex is reduced. Therefore, because steps are being taken to retain rather than remove archaeological remains, we agree that the residual effect for construction may be considered 'Minor Adverse' and 'Not Significant'.</p>
----	------------------	---	---

			<p>Regarding the setting of the Ebbsfleet complex, we agree with the Kent County Council archaeological advisor's assessment that the proposed development will permanently change the setting of the heritage asset causing a degree of harm. The level of impact would be 'small' using the criteria set out in the ES and the resulting effect would be 'Moderate Adverse' in EIA terms.</p>
43	Historic England	Other than the Ebbsfleet Peninsula Multi-Period Complex, does Historic England disagree with the applicant's assessment of impacts to any of the other non-designated heritage assets?	<p>Historic England has provided comments on the impact of the development on the Ebbsfleet Peninsula Multi-Period Complex as we consider that this particular non-designated archaeological site is likely of equivalent significance to a designated heritage asset.</p> <p>In relation to other non-designated heritage assets, we defer to the advice provided by the specialists of the relevant Local Authorities. They are best placed to judge if the conclusions of the assessment presented by the applicant in relation to these assets are acceptable.</p>