

EXQ ref	Response required from	Question	HE response
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)? Furthermore, to clarify, is there any heritage asset (designated or non-designated) where your assessment conclusions would differ from that of the applicant?</p>	<p>Historic England considers that the applicant has provided sufficient level of information necessary for the assessment of impact for all known heritage assets.</p> <p>The information has been presented in the ES Chapter 3 Cultural Heritage [APP-050], Cultural Heritage Baseline Report [APP-109], Appendix F Lists of Heritage Assets Scoped Out of Assessment [REP3-070], Applicant’s Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086], and Updated Archaeological Assessment – Suffolk [REP5-087]. We consider that level of assessment is proportionate and in line with policy requirements.</p> <p>Historic England advice is focused on the assessment of impacts on the highly graded designated heritage assets. We have also provided comment in relation to non-designated heritage assets which might be of equivalent significance to designated heritage assets (particularly Ebbsfleet Peninsula Complex).</p> <p>Regarding impacts to grade II listed buildings and majority of non-designated heritage assets we would defer to the advice provided by the relevant specialists of the Local Authorities.</p> <p>Historic England continues to maintain that there is a higher level of harm to Richborough Roman Fort than has been assessed by the applicant. As we previously highlighted in our Written Representation the applicant has assessed the magnitude of harm</p>

			<p>to the significance of the form 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 [APP-365] Design Approach Document – Kent, and [APP-367] Design Principles – Kent), Historic England assess the magnitude of harm to be 'Small' (as per [APP-063] 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. This is subject however to ensuring that the detailed design of the converter station meets the aims set out within the design parameters as currently set out. It should be noted however that 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'.</p> <p>Historic England also 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</p>
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			<p>EIA terms to an undesignated, but potentially nationally significant, heritage asset.</p> <p>Historic England disagrees that the ability to mitigate the effect through a programme of archaeological works would reduce the significance of the effect to ‘Minor’ ([APP-063] Table 3.12, pg 60) as the harm here is only somewhat offset and not truly lessened by the ability to record remains prior to their removal.</p> <p>Our advice is in line with para 5.9.16 of EN-1 which recognises that the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted.</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?</p> <p>Provide reasons for your response.</p>	<p>Historic England reviewed the documents provided by the applicant: ES Chapter 3 Cultural Heritage [APP-050], Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-60], Cultural Heritage Gazetteers [APP-110], Applicant’s Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086] and Assessment of Cumulative Effects on the Wider Historic Landscapes [REP5-138].</p> <p>While the information is fragmented between different documents and not clearly cross referenced, we consider that the cumulative assessment is sufficient for the purpose of this examination.</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</p>	<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>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>	<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>
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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>	<p>Historic England agrees with the conclusions of the ES that the development is still 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. HE disagrees that the ability to mitigate the effect through a programme of archaeological works would reduce the significance of the effect to 'Minor' (Table 3.12, pg 60, Doc 6.2.3.3, Environmental Statement, Part 3 Kent, Chapter 3 Cultural Heritage) as the harm here is only somewhat offset and not truly lessened by the ability to record remains prior to their removal. This is in line with para 5.9.16 of EN-1 which recognises that the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted.</p> <p>However, we agree 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 think are the most significant areas of archaeology. 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, in this case, because steps are being taken to retain rather than remove archaeological remains, the residual effect for construction we agree that the residual</p>
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			<p>effect for construction may be considered 'Minor Adverse' and 'Not Significant' as set out in table 3.13.</p> <p>We also agree with the Kent County Council archaeological advisor that the change to the setting of the Ebbsfleet complex will result in a 'Moderate Adverse' effect, as the magnitude of impact is greater than the 'Negligible' assigned by the applicant. We think that it would be a 'Small' impact using the criteria set out in the ES.</p>
3CH6.	SCC KCC HE	<p>Wider Historic Landscapes</p> <p>The applicant has submitted the Assessment of Cumulative Effects on the Wider Historic Landscapes [REP5-138]. 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>	<p>Historic England welcomes submission of the Assessment of Cumulative Effects on the Wider Historic Landscapes by the applicant. We agree with the conclusions of the document in context of the designated heritage assets.</p> <p>However, as wider historic landscapes are predominantly composed of non-designated heritage assets and the main focus of the assessment does not fall within our remit, we defer to the specialist advisors to Local Authorities to provide detailed comments.</p>

Application by National Grid Electricity Transmission for an Order Granting Development Consent for the Sea Link Project - The Examining Authority's written questions and requests for information (ExQ3) Issued on 23 March 2026
Historic England's response to ExQ3