

The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.136.1: Applicant's Responses to Third Written Questions - Appendices

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Contents

Appendix A	3GEN1 Mitigation Hierarchy	A.1
Appendix B	3ECOL1 Noise Contour Plan - Suffolk HDD Compound	B.1
Appendix C	3ECOL1 Lighting Plan – Suffolk HDD Compound	C.1
Appendix D	3CEIntra1 PRow Effects Offsetting/Compensation	D.1
Appendix E	3TT11 Benhall Rail Bridge Option 1 and Option 2 Works Layout Plans	E.1

Appendix A 3GEN1 Mitigation Hierarchy

A.1 Submissions the mitigation hierarchy in response to ExQ 3GEN1

Introduction and Summary

A.1.1 This document is the Applicant's response to ExQ 3GEN1, which states:

“Critical national priority

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.

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.”

A.1.2 In summary, the Applicant responds as follows:

A.1.3 There has been full compliance with policy on the mitigation hierarchy in the present case. The mitigation hierarchy has been applied throughout the siting, design and development of the Proposed Project, as demonstrated in the Environmental Statement (“ES”). The Applicant has sought to:

- **avoid** impacts through routing, siting, HDD/trenchless design choices and design refinement (these are generally referred to as ‘embedded measures’ within the ES);
- **reduce** impacts through construction methods, micro-siting, temporal and seasonal controls and working areas restrictions;
- **mitigate** remaining impacts through additional mitigation measures including those identified within the REAC and other control documents such as outline plans; and
- where appropriate, provide **compensation** or enhancement measures.

A.1.4 The residual effects reported in the ES and subsequent submissions are those that could not reasonably be avoided, reduced or further mitigated, consistent with NPS EN-1 paras. 4.2.11 and 4.2.12.

A.1.5 The application of the mitigation hierarchy has led to positive outcomes and limited residual adverse effects for a major infrastructure project. The remaining residual effects are acceptable without further mitigation or compensation, which would not be proportionate or effective and is not reasonably required.

- A.1.6 Policy on the mitigation hierarchy does not require all adverse effects to be avoided. Nor does policy mean that, if impacts cannot be fully mitigated, some form of compensation must be provided. National policy expressly recognises that nationally significant energy infrastructure projects such as the Proposed Project will give rise to significant residual adverse impacts.
- A.1.7 Appendix Table A.1 sets out the residual likely significant effects identified in the ES and subsequent submissions, by geographic area and topic, and explains in further detail how the mitigation hierarchy has been applied.

The EIA Regulations

- A.1.8 The term ‘mitigation hierarchy’ does not appear in the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 (“the EIA Regulations”). However, the EIA Regulations impose legal obligations in respect of the assessment of environmental impacts which include provision about consideration of mitigation. The ES must include:

A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment and, where appropriate, of any proposed monitoring arrangements (for example the preparation of a post-project analysis). That description should explain the extent, to which significant adverse effects on the environment are avoided, prevented, reduced or offset, and should cover both the construction and operational phases.

(Sch. 4, para. 7; see also reg. 14(2)(d))
- A.1.9 The reference to “*avoid, prevent, reduce or, if possible, offset*” corresponds with how policy formulates the mitigation hierarchy (i.e. avoid, reduce, mitigate, compensate).
- A.1.10 This legal requirement in the EIA Regulations to describe mitigation measures applies to significant adverse effects. It is not expressed as applying to non-significant effects.

Policy

General

- A.1.11 CNP policy and policy on the mitigation hierarchy in NPS EN-1 must be read in the context of, and consistently with, NPS EN-1 as a whole. Two other aspects of policy in NPS EN-1 are particularly important in this respect.
- A.1.12 First, NPS EN-1 expressly recognises that nationally significant energy infrastructure projects such as the Proposed Project will give rise to significant residual adverse impacts:

3.1.2 However, it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts. These effects will be minimised by the application of policy set out in Parts 4 and 5 of this NPS. See also Part 2 of each technology specific NPS.
- A.1.13 This recognition is also found in sections of NPS EN-1 dealing with specific impacts. Section 5.10 on Landscape and Visual repeatedly recognises this point:

5.10.5 Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation.

...

5.10.13 *All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.*

...

5.10.35 *The scale of energy projects means that they will often be visible across a very wide area. The Secretary of State should judge whether any adverse impact on the landscape would be so damaging that it is not offset by the benefits (including need) of the project.*

A.1.14 The policy obligation to apply the mitigation hierarchy must be read alongside the above policy recognition that significant residual adverse impacts may remain. It is not the case that all significant residual adverse impacts must be avoided.

A.1.15 Secondly, NPS EN-1 explains that when it uses the term ‘effects’ and ‘impacts’ in relation to environmental matters, it is referring to likely significant effects and likely significant impacts. Paragraph 4.3.8 provides (emphasis added):

4.3.8 *In this NPS and the technology specific NPSs, when used in relation to environmental matters the terms ‘effects’, ‘impacts’ or ‘benefits’ **should be understood to mean likely significant effects, likely significant impacts, or likely significant benefits.***

A.1.16 This approach to ‘effects’ is consistent with approach in the EIA Regulations, which are concerned with significant effects (as set out above).

Critical national priority policy

A.1.17 CNP policy is principally contained in section 4.2 of NPS EN-1. CNP policy creates a “*presumption of consent*” (para. 4.2.15), which applies if the requirements of CNP policy are met. Those requirements include application of the mitigation hierarchy (para. 4.2.11).

Mitigation hierarchy

A.1.18 The mitigation hierarchy is defined in the Glossary of NPS EN-1 as follows:

Mitigation hierarchy A term to incorporate the avoid, reduce, mitigate, compensate process that applicants need to go through to protect the environment and biodiversity

A.1.19 CNP policy requires compliance with the mitigation hierarchy in the following terms:

4.2.11 *Applicants must apply the mitigation hierarchy and demonstrate that it has been applied. They should also seek the advice of the appropriate SNCB or other relevant statutory body when undertaking this process. Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated.*

4.2.12 *Applicants should set out how residual impacts will be compensated for as far as possible. Applicants should also set out how any mitigation or compensation measures will be monitored and reporting agreed to ensure success and that action is taken. Changes to measures may be needed e.g. adaptive management. The cumulative impacts of multiple developments with residual impacts should also be considered.*

- A.1.20 This policy obligation to comply with the mitigation hierarchy needs to be read in context of the explanation in NPS EN-1 that when it refers to ‘effects’ or ‘impacts’, it means likely significant effect or likely significant impacts (NPS EN-1 para. 4.3.8 set out above).
- A.1.21 Accordingly, the policy obligation in para. 4.2.11 that “*Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated*” is to be understood as referring to any significant residual impacts.
- A.1.22 This approach to the mitigation hierarchy is further reinforced by policy on the mitigation hierarchy in para. 4.3.4 and the express reference therein to “*significant*” effects (emphasis added):
- 4.3.4 *To consider the potential effects, including benefits, of a proposal for a project, the applicant must set out information on the likely significant environmental, social and economic effects of the development, and show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for, following the mitigation hierarchy. This information could include matters such as employment, equality, biodiversity net gain, community cohesion, health and well-being.*
- A.1.23 This is not to say that non-significant effects are immaterial to the ExA’s and Secretary of State’s consideration of the application, but rather that what policy requires is for an applicant to show how any likely significant negative effects would be avoided, reduced, mitigated or compensated for.

Compensation

- A.1.24 Compensation is included in the mitigation hierarchy (see NPS EN-1 Glossary definition set out above). However, it is dealt with separately within the hierarchy. NPS EN-1 para. 4.2.11 provides that “*Applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated*”. Paragraph 4.2.12 then goes on to say “*Applicants should set out how residual impacts will be compensated for as far as possible*”. Accordingly, compensation is both separated out from the rest of the hierarchy and qualified by the words “*as far as possible*”.
- A.1.25 Likewise, the EIA Regulations state: “*avoid, prevent, reduce or, if possible, offset any identified significant adverse effects*” (Sch. 4, para. 7 set out above).
- A.1.26 It is important to recognise the reasons for the different treatment of compensation.
- A.1.27 First, compensation cannot remove or reduce adverse effects. In this respect it is different from the other three elements of the hierarchy (avoid, reduce, mitigate). If compensation is provided, the adverse effect will still exist¹, but there may be a countervailing benefit elsewhere.
- A.1.28 Secondly, policy in NPS EN-1 recognises that the scope for compensation will vary depending on the type of impact.
- A.1.29 In respect of biodiversity impacts, for example, NPS EN-1 discusses compensation at length (see section 5.4 Biodiversity and Geological Conservation). Compensation may be appropriate in respect of biodiversity because impacts can be quantified and like-for-like or better outcomes secured. Accordingly, policy recognises that there may be scope

¹ As now recognised in the 2025 version of NPS EN-1 at para. 4.2.25: “*Compensation, by definition, does not reduce an adverse effect resulting from a development*”.

to compensate for loss or deterioration of habitats by compensatory habitat creation (paras. 5.4.44, 5.4.53).

A.1.30 Many other effects addressed by NPS EN-1, however, such as traffic and transport, air quality and noise, are inherently location-specific, exposure-based or temporary, and are addressed through mitigation and management rather than compensation. For these impact types, compensation would neither address the actual effect experienced by receptors (e.g. there is no meaningful way by which a traffic impact experienced by local receptors could be ‘compensated for’ at another location) nor align with NPS EN-1’s policy framework, which does not envisage offsetting such effects elsewhere. Accordingly, in respect of these other impacts, policy in NPS EN-1 makes little or no reference to compensation. Relevantly to the present case, the Landscape and Visual section of NPS EN-1 (section 5.10) does not refer to compensation. See for example (emphasis added):

5.10.6 Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints the aim should be to minimise harm to the landscape, providing reasonable mitigation where possible and appropriate.

...

5.10.37 The Secretary of State should consider whether the project has been designed carefully, taking account of environmental effects on the landscape and siting, operational and other relevant constraints, to minimise harm to the landscape, including by appropriate mitigation.

A.1.31 These points in respect of compensation were correctly recognised in the Examining Authority’s Report for the Bramford to Twinstead Reinforcement DCO² (emphasis added):

3.9.196. Some early confusion over the Applicant’s use of the mitigation hierarchy and whether more compensation should be provided was largely clarified during the Examination. The ExA understands the local authorities’ concerns that some of the impacts of the Proposed Development on landscape and views cannot be fully mitigated but does not concur that this should automatically mean that some form of compensation must be provided.

3.9.197. It agrees with the Applicant that compensation is not treated in the same way as the other three elements of the hierarchy in planning policy terms, and that compensation does not reduce or overcome an adverse effect in terms of the EIA. The ExA does not believe that a compensation scheme of the sort promoted by the local authorities and the Partnership would be a proportionate response to the residual effects in this case, and notes that the Proposed Development in itself will bring some significant benefits to the landscape and views and that the Applicant is said to be discussing community benefits with the host local authorities outside the DCO process and ExA consideration.

A.1.32 In Issue Specific Hearing 3 for the Proposed Project, Interested Parties emphasised the words “*compensated for as far as possible*” in NPS EN-1 para. 4.2.12. As the ExA in the Bramford to Twinstead scheme correctly recognised, that policy wording does not mean that if impacts cannot be fully mitigated some form of compensation must be provided. It

²<https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020002-001913-BTTR%20-%20ExA%20Recommendation%20Report.pdf>

needs to be asked whether any compensation would “*be a proportionate response to the residual effects*” (para. 3.9.197).

Enhancement

- A.1.33 Policy in NPS EN-1 distinguishes between the components of the mitigation hierarchy and enhancement. Paragraph 4.6.1 draws this distinction expressly (emphasis added):
- 4.6.1 *Environmental net gain is an approach to development that aims to leave the natural environment in a measurably better state than beforehand. **Projects should therefore not only avoid, mitigate and compensate harms, following the mitigation hierarchy, but also consider whether there are opportunities for enhancements.***
- A.1.34 Policy gives examples of enhancement (e.g. para. 4.6.13: “*landscape enhancement ... increased access to natural greenspace ... the enhancement, expansion or provision of trees and woodlands*”).
- A.1.35 Policy in respect of the mitigation hierarchy does not require developers to provide enhancement.

Application of law and policy in the present case

- A.1.36 The ES satisfies the requirements of the EIA Regulations, including in respect of consideration of measures to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects.
- A.1.37 The Proposed Project meets the requirements of policy on the mitigation hierarchy in NPS EN-1. The mitigation hierarchy has been applied throughout design and development of the Proposed Project, as demonstrated in the ES. The Applicant has sought to:
- **avoid** impacts through routing, siting, HDD/trenchless design choices and design refinement (these are generally referred to as ‘embedded measures’ within the ES);
 - **reduce** impacts through construction methods, micro-siting, temporal and seasonal controls and working areas restrictions;
 - **mitigate** remaining impacts through additional mitigation measures including those identified within the REAC and other control documents such as outline plans; and
 - where appropriate, provide **compensation** or enhancement measures.
- A.1.38 The principal securing mechanisms are the draft DCO, the REAC, the onshore and offshore CEMPs, the topic-specific management plans, and the DML conditions for offshore works.
- A.1.39 The residual effects reports in the ES and subsequent submissions are those that could not reasonably be avoided, reduced or further mitigated, consistent with NPS EN-1 paras. 4.2.11 and 4.2.12.
- A.1.40 The Applicant’s approach to mitigation is explained in ES Part 1 Chapter 5 *EIA Approach and Methodology* paras 5.4.4 – 5.4.7 [APP-046]. Mitigation measures to avoid, prevent, reduce or offset likely significant effects are identified within the *Proposed Project Design and Embedded Mitigation* section and the *Additional Mitigation and Enhancement Measures* section of each ES topic chapter as relevant.

- A.1.41 The remaining residual effects can be considered as part of the planning balance, in accordance with NPS EN-1 para. 4.1.5.
- A.1.42 Those residual effects are acceptable without further mitigation or compensation. Further mitigation or compensation has been considered but would not be proportionate or effective and is not reasonably required. In respect of two particular matters raised by Suffolk County Council (“**SCC**”):
- In relation to landscape ‘offsetting’ sought by SCC, landscape enhancements incorporating additional planting on the Saxmundham Converter Station site and along field boundaries remote from the site would not have any additional mitigatory effect and therefore do not address the landscape and visual residual impacts of the Proposed Project and would not be meaningful ‘compensation’ (see the Applicant’s response in SCC SoCG **[REP3-062]** and 3LVIA4 in **Application Document 9.136 Applicant’s Response to Third Written Questions** submitted at Deadline 6).
 - In respect of a new permanent PRow along the B1119 suggested by SCC, this would represent an enhancement measure, rather than a compensation measure. As explained more fully in *Applicant’s Response to Suffolk County Council’s Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125]* at p.5-6, there is both spatial and temporal separation between the only significantly affected PRow during construction (Bridleway 491/010/0) and the location and timing of the delivery of the proposed permanent PRow along the B1119 being requested by SCC. A 75 m section of Bridleway 491/010/0 would be subject to 145 m long diversion (an increase of 70 m) during two periods of only four weeks each. For the remainder of the construction period Bridleway 491/010/0 would remain open, with priority given to users over construction vehicles. During this time there will also be a temporary diversion in place along the B1119 whilst PRow 460/023/0 is temporarily closed to allow for construction of the Saxmundham Converter Station and associated landscape planting. When the works are complete Bridleway 491/010/0 will be fully reinstated and will no longer be impacted by the Proposed Project. At the same time the temporary diversion along the B1119 would be removed and a permanent diversion put in place. The section of Bridleway 491/010/0 that would be temporarily affected by the Proposed Project is over 550 m from the temporary diversion along the B1119 at its closest point, which is also the route proposed by SCC to be made permanent. The level of temporary impact on Bridleway 491/010/0 is not enough to justify the scale of enhancement being proposed (i.e. the new permanent PRow), particularly on top of the measures already agreed to and explained in **[REP5-125]** and further discussed in Appendix D to this document. These measures include a 1.2 km permissive path along the access from the B1121 into the Saxmundham site via the Fromus Bridge, the only footpath to cross the width of the Fromus Valley south of Saxmundham, and a key link from SCCs proposed South Saxmundham Garden Neighbourhood. They also include provision of permissive paths through the woodland planting around the Substation, connecting to the permanently diverter PRow in this area.
- A.1.43 National policy expressly recognises that virtually all large infrastructure projects will have significant adverse effects. In respect of the Proposed Project, it is notable that in the context of a major infrastructure project the residual adverse effects are limited. The proper application of the mitigation hierarchy has led to this positive outcome.

A.2 Topic Specific Residual Significant Effects and the Mitigation Hierarchy

- A.2.1 This section of Appendix A has been produced in response to ExQ3 3GEN1 which requests that *‘for each topic 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’*.
- A.2.2 The mitigation hierarchy has been applied throughout the siting, design and development of the Proposed Project as summarised in **Application Document 7.3 Design Development Report [APP-321]** and as demonstrated in the Environmental Statement (ES). The Design Development Report sets out that the Applicant has undertaken an options appraisal process from the outset and applied this at the strategic level and for siting and routeing selection. It explains the Applicant’s options appraisal process and that the Proposed Project’s evolution has been underpinned by a set of principles which include considering options which avoid or reduce and mitigate impacts on environmental or socioeconomic constraints to generally be of benefit/advantage compared with those which have likely significant residual effects, as less environmentally or socially damaging routes support National Grid’s statutory duty under Schedule 9 to the Electricity Act 1989 to ‘have regard to the desirability of preserving amenity’. Therefore, decisions made for the selection of strategic options and preferred sites and routes for the Proposed Project have applied the mitigation hierarchy.
- A.2.3 Further, the ES explains, under each topic area chapter for each aspect of the Proposed Project (Suffolk Onshore Scheme; Kent Onshore Scheme; Project-wide and Offshore), the relevant design features and the embedded mitigation measures (such as siting, design and construction methodology commitments – measures that typically avoid or reduce effects) and management and control measures as well as other additional mitigation measures proposed (which typically mitigate or, if possible, compensate/offset effects) which together demonstrate how the Proposed Project will avoid, prevent or reduce and, if possible, offset likely significant effects on the environment, and demonstrate how the mitigation hierarchy has been applied comprehensively across topic areas.
- A.2.4 Tables A.1-A.4 present the residual likely significant effects identified in the Environmental Statement (see **Application Document 6.2.5.3 (B) Part 5 Combined Chapter 3 Summary of Likely Significant Effects [REP1A-013]**), by geographic area and topic which illustrates the limited scope of these effects and that the majority of potentially significant environmental effects have been avoided by the comprehensive application of the mitigation hierarchy via the steps summarised above. Where there are residual significant environmental effects, the explanation in the tables demonstrate how the mitigation hierarchy has been applied with respect to those residual likely significant effects.

Appendix Table A.2 Suffolk Onshore Scheme – Residual Likely Significant Effects Mitigation Hierarchy

Topic / Project Phase	Description of Effect	Mitigation Hierarchy				Residual Effect
		Avoidance	Reduction	Mitigation	Compensation	
Landscape and Visual						
Construction (including decommissioning)	Adverse effect on landscape character at Suffolk Coastal Landscape Character Assessment (SCLCA) Landscape Character Area (LCA) B4	Routeing, siting and design development sought to avoid the most sensitive receptors including veteran and ancient trees and where practicable mature vegetation along the River Fromus.	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA. This included siting the Saxmundham Converter Station close to mature woodland at Bloomfield’s Covert to the south of the field to reduce effects on the setting of LCA B4.</p> <p>Designing the permanent access road to limit effects on the historic landscape setting of Hurts Hall and avoiding direct views along it to the Saxmundham Converter Station.</p> <p>Reducing the footprint and scale of the Fromus bridge as much as possible whilst balancing Environment Agency requirements.</p>	<p>The outline Landscape and Ecological Management Plan (oLEMP) for Suffolk (Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan - Suffolk submitted at Deadline 6) and Register of Environmental Actions and Commitments (REAC) (Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 6) measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p> <p>Commitment to the construction lighting levels</p>	There is no policy or legal requirement that the mitigation hierarchy requires all residual landscape and visual effects to be compensated for or that it is appropriate for alternative landscape compensation to be provided if it is accepted that there are any residual adverse landscape and visual effects that result from the Proposed Project. Further details contained at 3.9.20 within Application Document 9.23 Draft Statement of Common Ground Between National Grid Electricity Transmission and the Suffolk County Council [REP3-062] .	Moderate adverse (significant)

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
				to be the lowest necessary (REAC GG21).		
	Adverse effect on landscape character at SCLCA LCA L1	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including avoiding the loss of boundary features such as mature trees and hedgerows and woodland blocks.	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA.</p> <p>The siting of the proposed Saxmundham Converter Station and associated construction works including compounds located close to mature woodland at Bloomfield's Covert to the south of the field to reduce effects on the local landscape character.</p> <p>The width of the HVAC and HVDC cable corridors narrowed as far as practicable to reduce the effect on the local landscape.</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p> <p>Commitment to locate the Saxmundham Converter Station as far as practicable within the southern extent of the site, consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV10, LV11 and LV12).</p> <p>Commitment to the construction lighting levels to be the lowest necessary (REAC GG21).</p>	Not appropriate, as above	Moderate adverse (significant)
	Adverse effect on visual amenity at Viewpoints 1, 4, 5, 20 and 21	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including avoiding the loss of boundary features such	The scale and location of proposed infrastructure were refined through the iterative design process and EIA. This included reducing the width of the	The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.	Not appropriate, as above	Major adverse (significant)

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
	as mature trees and hedgerows in views.		<p>HVAC and HVDC cable corridors as far as practicable to reduce the alteration to the existing vegetation network in views.</p> <p>The siting of the proposed Saxmundham Converter Station and associated construction works including compounds located close to mature woodland at Bloomfield's Covert to the south of the field to reduce effects on visual amenity.</p> <p>Designing the permanent access road to avoid channelling direct views along it to the Saxmundham Converter Station.</p> <p>Reducing the footprint and scale of the Fromus bridge as much as possible whilst balancing Environment Agency requirements.</p> <p>Routeing the HVAC and HVDC cable corridors away from foreground residential and recreational users views wherever possible to limit views of construction activity.</p>	<p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p> <p>Commitment to locate the Saxmundham Converter Station as far as practicable within the southern extent of the site, consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV10, LV11 and LV12).</p> <p>Commitment to the construction lighting levels to be the lowest necessary (REAC GG21).</p>		
	Adverse effect on visual amenity at Viewpoints 2, 3, 15 and 19	Routeing, siting and design development sought to avoid the most sensitive receptors including avoiding the loss of veteran and ancient trees and where practicable boundary features such as mature trees and hedgerows and mature vegetation along the River Fromus in views.	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA. This Included reducing the width of the HVAC and HVDC cable corridors as far as practicable to reduce the alteration to the existing vegetation network in views</p> <p>The siting of the proposed Saxmundham Converter</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and</p>	Not appropriate, as above	Moderate adverse (significant)

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
			<p>Station and associated construction works and compounds located close to mature woodland at Bloomfield's Covert to the south of the field to reduce effects on visual amenity.</p> <p>Designing the permanent access road to avoid channelling direct views along it to the Saxmundham Converter Station.</p> <p>Reducing the footprint and scale of the Fromus bridge as much as possible whilst balancing Environment Agency requirements.</p> <p>Routeing the HVAC and HVDC cable corridors away from foreground residential and recreational users views wherever possible to limit views of construction activity.</p>	<p>other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p> <p>Commitment to locate the Saxmundham Converter Station as far as practicable within the southern extent of the site, consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV10, LV11 and LV12).</p> <p>Commitment to the construction lighting levels to be the lowest necessary (REAC GG21).</p>		
	Adverse effect on visual amenity for Friston Scenario 2 (i.e. Friston Substation built as part of the Proposed Project) at Viewpoints 6, 7 and 22	<p>Siting of the Friston substation was entirely influenced by the consented EA1N and EA2 substations to mirror their footprints.</p> <p>Routeing of the HVAC and HVDC cables and design development sought to avoid the most sensitive receptors where practicable including avoiding the loss of boundary features such as mature trees and hedgerows in views.</p>	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA.</p> <p>The width of the HVAC and HVDC cable corridors narrowed as far as practicable to reduce alteration to the existing vegetation network in views.</p> <p>Routeing the HVAC and HVDC cable corridors away from foreground residential and recreational users views wherever possible to limit views of construction activity.</p> <p>The HVAC and HVDC corridor interface with SPRs consented planting has</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and</p>	Not appropriate, as above	Moderate adverse (significant)

Topic / Project Phase	Description of Effect	Mitigation Hierarchy				Residual Effect
		Avoidance	Reduction	Mitigation	Compensation	
			<p>been designed to reduce the effects by adjusting the species mix rather than the planting areas.</p> <p>Revising the route of the substation access road to avoid the veteran tree.</p>	<p>timescales allow (REAC LV13 and oLEMP).</p> <p>Commitment to the construction lighting levels to be the lowest necessary (REAC GG21).</p>		
Operation and maintenance	Adverse effect on landscape character at SCLCA LCA B4	<p>Routeing, siting and design development sought to avoid the most sensitive receptors including veteran and ancient trees and where practicable mature vegetation along the River Fromus.</p>	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA. This included siting the Saxmundham Converter Station close to mature woodland at Bloomfield's Covert to the south of the field to reduce effects on the setting of LCA B4.</p> <p>Key Design Principles to inform the design of the Saxmundham Converter Station to limit effects on landscape character.</p> <p>Designing the permanent access road off the B1121 to limit effects on the historic landscape setting of Hurts Hall and by preventing a straight alignment to avoid direct views channelled along it to the Saxmundham Converter Station.</p> <p>Reducing the footprint and scale of the River Fromus bridge as much as possible to lessen the influence on landscape character, whilst balancing the Environment Agency height requirements.</p> <p>Ensuring the Order Limits were sufficient to allow for reinstatement of vegetation along the B1121 taking</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Implementation of the outline landscape mitigation (oLEMP and REAC LV13) including the following.</p> <p>Proposed landscape planting to integrate the infrastructure with existing landscape features where possible, including hedgerow and clusters of tree planting along the access road and extensive native woodland planting along the River Fromus.</p> <p>The long-term landscape and ecological benefits of the native woodland mitigation planting to permanently replace the rotational cricket bat willow plantation (oLEMP). This would be only perceptible as whips in year 1 (noting that much of this area would be planted in advance of operation). As this matures, the proposed planting would assist in integration of the bridge</p>	Not appropriate, as above	<p>Moderate adverse (significant) – year 1</p> <p>Minor adverse (not significant) - year 15</p>

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
			visibility splays into account.	<p>into the landscape, create new green infrastructure links and provide a permanent wooded corridor along the River Fromus within the southern approach to Saxmundham.</p> <p>Commitment to successful reinstatement mitigation planting including adaptive management (REAC LV03, A22, GG06, GG07 and oLEMP).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p> <p>Commitments regarding the design of the River Fromus bridge (REAC LV14).</p> <p>Commitment to the operational lighting levels to be the lowest necessary (REAC B39).</p> <p>Commitment to replacement tree planting of three standard trees per each individual mature tree to be removed (REAC A21).</p>		
	Adverse effect on landscape character at SCLCA LCA L1	Routeing, siting and design development sought to avoid the most sensitive receptors including veteran and ancient trees and where practicable boundary features such as mature	The scale and location of proposed infrastructure were refined through the iterative design process and EIA. This included siting of the proposed Saxmundham Converter	The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO. Commitment to sensitive routeing and siting of	Not appropriate, as above	Moderate adverse (significant) – year 1 and year 15

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
	trees, hedgerows and woodland blocks.		<p>Station close to mature woodland at Bloomfield's Covert to the south of the field to reduce effects on the local landscape character.</p> <p>Key Design Principles to inform the design of the Saxmundham Converter Station to limit effects on landscape character.</p> <p>Reducing the width of the HVAC and HVDC cable corridors as far as practicable to reduce the effect on the local landscape resulting in minimal permanent tree loss.</p>	<p>infrastructure and temporary works (REAC LV07).</p> <p>Implementation of the outline landscape mitigation (oLEMP and REAC LV13) including the following. Noting that the planting would be only perceptible as whips in year 1.</p> <p>Proposed landscape planting to integrate the infrastructure into the landscape by responding to the local and historic landscape character. This includes strengthening the existing landscape framework of the site, extending and enhancing the woodland planting along the western and southern boundaries with native woodland to provide structural screening to the Saxmundham Converter Station.</p> <p>Establishing a layered approach to landscape planting with two belts of woodland to the north of the Converter Station as well as a further linear belt of woodland with hedgerow and tree planting along the B1119.</p> <p>Providing a deep belt of woodland along the local ridge line to the south of Wood Farm connecting to Bloomfield's Covert.</p> <p>Strengthening existing vegetation with native woodland species where appropriate to contribute to the local landscape character (oLEMP and REAC LV13).</p>	

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
				<p>Commitment to successful establishment and management of all reinstated areas and mitigation planting including adaptive management (REAC LV03, A22, GG06, GG07 and oLEMP).</p> <p>Commitment to replacement tree planting of three standard trees per each individual mature tree to be removed (REAC A21).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p> <p>Commitment to locate the Saxmundham Converter Station as far as practicable within the southern extent of the site, consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV10, LV11 and LV12).</p> <p>Commitment to the operational lighting levels to be the lowest necessary (REAC B39).</p>		
	Adverse effect on visual amenity at Viewpoints 1, 4, 5, 20 and 21	Routeing, siting and design development sought to avoid the most sensitive	The scale and location of proposed infrastructure were refined through the	The oLEMP and REAC measures listed below are secured through	All of these viewpoints are representative of views experienced by recreational	Major adverse (significant) – year 1 and year 15 for Viewpoint 5

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
	receptors where practicable including avoiding the loss of boundary features such as mature trees and hedgerows and mature vegetation along the River Fromus in views.	<p>iterative design process and EIA. This Included reducing the width of the HVAC and HVDC cable corridors as far as practicable to reduce the alteration to the existing vegetation network in views and removal of mature vegetation.</p> <p>The siting of the proposed Saxmundham Converter Station close to mature woodland at Bloomfield's Covert to the south of the field to reduce effects on visual amenity.</p> <p>Key Design Principles to inform the design of the Saxmundham Converter Station to limit effects on visual receptors.</p> <p>Designing the permanent access road to avoid channelling direct views along it to the Saxmundham Converter Station.</p> <p>Reducing the footprint and scale of the Fromus bridge as much as possible whilst balancing Environment Agency requirements.</p> <p>Ensuring the Order Limits were sufficient to allow for reinstatement of vegetation along the B1121 taking visibility splays into account.</p>	<p>Requirement 6 of the draft DCO.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Implementation of the outline landscape mitigation (oLEMP and REAC LV13) including the following. Noting that the planting would be only perceptible as whips in year 1.</p> <p>Proposed landscape planting to integrate the infrastructure into the landscape and views, including hedgerow and clusters of tree planting along the access road and extensive native woodland planting along the River Fromus.</p> <p>The long-term landscape and ecological benefits of the native woodland mitigation planting to permanently replace the rotational cricket bat willow plantation (oLEMP). This would be only perceptible as whips in year 1 (noting that much of this area would be planted in advance of operation). As this matures, the proposed planting would assist in integration of the bridge into the landscape, create new green infrastructure links and provide a permanent wooded corridor along the River Fromus within the southern approach to Saxmundham.</p>	<p>users along various PRow within close proximity to the Saxmundham Converter Station. Whilst not compensating for the significant residual effects on visual amenity, which is not possible, the Applicant is providing new permissive paths as part of the Proposed Development which will provide enhanced connectivity in the local network of PRow as well as enhancement to visual amenity for the users. The enhancement measures include 1.2 km of permissive path along the permanent access road along with permissive access within the woodland landscape around the Saxmundham Converter Station.</p>	<p>Major adverse (significant) – year 1 for Viewpoints 1, 4, 20, 21</p> <p>Moderate adverse (significant) – year 15 for Viewpoints 1, 4, 20, 21</p>

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
				<p>Strengthening the existing landscape framework of the site, extending and enhancing the woodland planting along the western and southern boundaries with native woodland to provide structural screening to the Saxmundham Converter Station.</p> <p>Establishing a layered approach to landscape planting with two belts of woodland to the north of the Converter Station as well as a further linear belt of woodland with hedgerow and tree planting along the B1119.</p> <p>Providing a deep belt of woodland along the local ridge line to the south of Wood Farm connecting to Bloomfield's Covert.</p> <p>Commitment to successful reinstatement mitigation planting including adaptive management (REAC LV03, A22, GG06, GG07 and oLEMP).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p> <p>Commitment to the operational lighting levels to be the lowest necessary (REAC B39).</p>		

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
				<p>Commitment to replacement tree planting of three standard trees per each individual mature tree to be removed (REAC A21).</p> <p>Commitment to locate the Saxmundham Converter Station as far as practicable within the southern extent of the site, consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV10, LV11 and LV12).</p> <p>Strengthening existing vegetation with native woodland species where appropriate to contribute to the local landscape character (oLEMP and REAC LV13).</p>		
	Adverse effect on visual amenity at Viewpoints 2, 3, 15 and 19	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including avoiding the loss of boundary features such as mature trees and hedgerows and mature vegetation along the River Fromus in views.	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA. This Included reducing the width of the HVAC and HVDC cable corridors as far as practicable to reduce the alteration to the existing vegetation network in views and removal of mature vegetation.</p> <p>The siting of the proposed Saxmundham Converter Station close to mature woodland at Bloomfield's Covert to the south of the</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Implementation of the outline landscape mitigation (oLEMP and REAC LV13) including the following. Noting that the planting would be only perceptible as whips in year 1.</p> <p>Proposed landscape planting to integrate the</p>	Viewpoints 2, 3 and 19 are representative of views experienced by recreational users along various PRow within close proximity to the Saxmundham Converter Station. Whilst not compensating for the significant residual effects on visual amenity, which is not possible, the Applicant is providing new permissive paths as part of the Proposed Development which will provide enhanced connectivity in the local network of PRow as well as enhancement to visual amenity for the users. The enhancement measures	Moderate adverse (significant) – year 1 and year 15

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
			<p>field to reduce effects on visual amenity.</p> <p>Key Design Principles to inform the design of the Saxmundham Converter Station to limit effects on visual receptors.</p> <p>Designing the permanent access road to avoid channelling direct views along it to the Saxmundham Converter Station.</p> <p>Reducing the footprint and scale of the Fromus bridge as much as possible whilst balancing Environment Agency requirements.</p> <p>Ensuring the Order Limits were sufficient to allow for reinstatement of vegetation along the B1121 taking sight lines into account.</p>	<p>infrastructure into the landscape and views, including hedgerow and clusters of tree planting along the access road and extensive native woodland planting along the River Fromus.</p> <p>The long-term landscape and ecological benefits of the native woodland mitigation planting to permanently replace the rotational cricket bat willow plantation (oLEMP). This would be only perceptible as whips in year 1 (noting that much of this area would be planted in advance of operation). As this matures, the proposed planting would assist in integration of the bridge into the landscape, create new green infrastructure links and provide a permanent wooded corridor along the River Fromus within the southern approach to Saxmundham.</p> <p>Strengthening the existing landscape framework of the site, extending and enhancing the woodland planting along the western and southern boundaries with native woodland to provide structural screening to the Saxmundham Converter Station.</p> <p>Establishing a layered approach to landscape planting with two belts of woodland to the north of the Converter Station as well as a further linear belt of woodland with</p>	<p>include 1.2 km of permissive path along the permanent access road along with permissive access within the woodland landscape around the Saxmundham Converter Station.</p>

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
				<p>hedgerow and tree planting along the B1119.</p> <p>Providing a deep belt of woodland along the local ridge line to the south of Wood Farm connecting to Bloomfield's Covert.</p> <p>Commitment to successful reinstatement mitigation planting including adaptive management (REAC LV03, A22, GG06, GG07 and oLEMP).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p> <p>Commitment to the operational lighting levels to be the lowest necessary (REAC B39).</p> <p>Commitment to replacement tree planting of three standard trees per each individual mature tree to be removed (REAC A21).</p> <p>Commitment to locate the Saxmundham Converter Station as far as practicable within the southern extent of the site, consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV10, LV11 and LV12).</p>		

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
				Strengthening existing vegetation with native woodland species where appropriate to contribute to the local landscape character (oLEMP and REAC LV13).		
	Adverse effect on visual amenity for Friston Scenario 2 at Viewpoint 6, 7 and 22.	Siting of the Friston substation was entirely influenced by the consented EA1N and EA2 substations to mirror their footprints. Routeing of the HVAC and HVDC cables and design development sought to avoid the most sensitive receptors where practicable including ancient and veteran trees and avoiding the loss of boundary features such as mature trees and hedgerows in views.	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA. This included reducing the width of the HVAC and HVDC cable corridors as far as practicable to reduce alteration to the existing vegetation network in views.</p> <p>The HVAC and HVDC corridor interface with SPR's consented planting has been designed to reduce the effects by adjusting the species mix rather than the planting areas.</p> <p>Revising the route of the substation access road to avoid the veteran tree.</p> <p>Key Design Principles aligned to SPR's Kiln Lane substation design to limit effects on visual receptors and ensure a visually coordinated development.</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>Implementation of the outline landscape mitigation (oLEMP and REAC LV13) including the following. Noting that the planting would be only perceptible as whips in year 1.</p> <p>Implementing the mitigation planting which is aligned with the consented detailed landscape design pursuant to Requirement 14(1) of the East Anglia TWO DCO.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Commitment to successful reinstatement mitigation planting including adaptive management (REAC LV03, A22, GG06, GG07 and oLEMP).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with</p>	Not appropriate, as explained in respect to LCA B4 above	Moderate adverse (significant) – year 1 and year 15

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
				<p>construction works and timescales allow (REAC LV13 and oLEMP).</p> <p>Commitment to the operational lighting levels to be the lowest necessary (REAC B39) and aligned with those consented pursuant to the East Anglia TWO DCO.</p> <p>Commitment to replacement tree planting of three standard trees per each individual mature tree to be removed (REAC A21).</p>		
Ecology and Biodiversity						
Construction	Ornithological habitat loss/creation from construction of Saxmundham Converter Station and Friston Substation.	<p>Sensitive ecological features were taken into account in cable route selection and siting of converter station and substation. This includes:</p> <p>Routing the cable route outside areas of deciduous woodland and veteran trees where possible (REAC measure GG08).</p> <p>Routing the cable route outside designated sites where possible (e.g. avoiding Sandlings SPA).</p> <p>Locating the converter station and substation in arable fields rather than in habitats that would support a more diverse bird assemblage (e.g. woodland).</p>	<p>Specific measures include: narrowing the cable corridor to 20 metres (39 metres where HVAC and HVDC cables need to be parallel) at ditch and hedgerow crossings to minimise loss of suitable nesting habitat, as reflected in mitigation measure B11 in the REAC.</p> <p>Using trenchless methods to cross North Warren RSPB Reserve (REAC commitment B21),</p>	<p>Reinstating habitat as soon as works in an area are complete., This is secured through the Suffolk oLEMP and REAC measure GG07, H02, W02, W13, AS12 (Suffolk only), LV09 (Suffolk only),</p>	<p>Management of 12 ha of arable land for ground nesting farmland birds, particularly skylark, maintained favourably for the lifetime of the Proposed Project (REAC measure B40).</p> <p>Paragraph 2.9.60 of Application Document REP4-025 (6.2.2.2 (D) Environmental Statement Part 2 Suffolk Chapter 2 Ecology and Biodiversity) documents creation in Suffolk of 21 ha of woodland, 6.9 ha of species rich neutral grassland, 1.5 ha of native hedgerow and 0.8 ha of balancing pond around the Saxmundham Converter Station and Friston Substation, which is much greater than the combined temporary and permanent losses of woodland, grassland and wetland habitats.</p>	<p>Medium term moderate adverse (significant) until such time as the net new planting of vegetation matures.</p> <p>Long term moderate beneficial (significant) once the net new planting of vegetation has matured.</p>

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
Operation and Maintenance	Habitat loss/creation as part of Saxmundham Converter Station and Friston Substation proposals	Sensitive ecological features were taken into account in siting of converter station and substation. This includes: Locating the converter station and substation in arable fields rather than in habitats that would support a more diverse botanical assemblage (e.g. woodland).	None available, as the converter station and substation must be a certain size.	None available, as the converter station and substation must be a certain size.	Paragraph 2.9.60 of Application Document REP4-025 (6.2.2.2 (D) Environmental Statement Part 2 Suffolk Chapter 2 Ecology and Biodiversity) documents creation in Suffolk of 21 ha of woodland, 6.9 ha of species rich neutral grassland, 1.5 ha of native hedgerow and 0.8 ha of balancing pond around the Saxmundham Converter Station and Friston Substation, which is much greater than the combined temporary and permanent losses of woodland, grassland and wetland habitats.	Medium term moderate adverse (significant) until such time as the net new planting of vegetation matures. Long term moderate beneficial (significant) once the net new planting of vegetation has matured.
	Ornithological habitat loss/creation as part of Saxmundham Converter Station and Friston Substation proposals	Sensitive ecological features were taken into account in siting of converter station and substation. This includes: Locating the converter station and substation in arable fields rather than in habitats that would support a more diverse bird assemblage (e.g. woodland).	None available, as the converter station and substation must be a certain size.	None available, as the converter station and substation must be a certain size.	Management of 12 ha of arable land for ground nesting farmland birds, particularly skylark, maintained favourably for the lifetime of the Proposed Project (REAC measure B40). Paragraph 2.9.60 of Application Document REP4-025 (6.2.2.2 (D) Environmental Statement Part 2 Suffolk Chapter 2 Ecology and Biodiversity) documents creation in Suffolk of 21 ha of woodland, 6.9 ha of species rich neutral grassland, 1.5 ha of native hedgerow and 0.8 ha of balancing pond around the Saxmundham Converter Station and Friston Substation, which is much greater than the combined temporary and permanent losses of woodland, grassland and wetland habitats.	Medium term moderate adverse (significant) until such time as the net new planting of vegetation matures. Long term moderate beneficial (significant) once the net new planting of vegetation has matured.

Topic / Project Phase	Description of Effect	Mitigation Hierarchy				Residual Effect
		Avoidance	Reduction	Mitigation	Compensation	
Cultural Heritage						
No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.						
Water Environment						
No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.						
Geology and Hydrogeology						
No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.						
Agriculture and Soils						
Construction	Temporary impacts to soil function and disruption to soil ecosystem services	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including considering sensitive soil receptors, as set out in 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] .	The scale and location of proposed infrastructure were refined through the iterative design process and EIA. Impacts on soil function are reduced through good practice guidance as detailed in 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354] . Damage from soil handling is reduced through defined stripping, storage and reinstatement procedures.	Where practicable soil resources will be reused on site in line with landscape and ecological designs as detailed in 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065] . The restoration of the temporarily disturbed soils will be conducted in line with the measures detailed within 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354] . Item AS02 in 9.83 (B) Outline Code of Construction Practice [REP4-232] states that “Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be recreated.... This will aim to restore land to the pre-construction ALC grade (unless otherwise agreed with the landowner)”.	There is no way to compensate for the temporary and permanent loss of BMV land	Moderate to minor adverse (significant)
	Permanent loss of BMV land	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including considering	The scale and location of proposed infrastructure were refined through the	There is no mitigation for the direct loss of BMV land. This is recognised in the NPS-EN1 (2025) which states that “ <i>Although in the</i>	There is no way to compensate for the temporary and permanent loss of BMV land	Major to moderate adverse (significant)

Topic / Project Phase	Description of Effect	Mitigation Hierarchy				Residual Effect
		Avoidance	Reduction	Mitigation	Compensation	
	sensitive soil receptors, as set out in 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] .		iterative design process and EIA.	<i>case of most energy infrastructure there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site". This is further clarified in the Land Use Framework for England (2026), which states that there is enough land to "build the homes needed to address the housing crisis, maintain domestic food production, restore nature at scale, and build clean, homegrown power to provide energy security" and that "these are not competing demands". It also states that "we can locate energy infrastructure alongside nature-rich food production". The Agricultural Land Classification Surveys (9.30 Agricultural Land Classification (ALC) Survey Results - Suffolk [REP5-090]) conducted as part of the Project confirm grades similar to the Provisional ALC grades considered as part of the original routeing and siting design (6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]).</i>		
Decommissioning	Temporary impacts to soil function and disruption to soil ecosystem services	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including considering sensitive soil receptors, as set out in 6.2.1.3 Part 1 Introduction Chapter 3	The scale and location of proposed infrastructure were refined through the iterative design process and EIA. Impacts on soil function are reduced through good practice guidance as	Where practicable soil resources will be reused on site in line with landscape and ecological designs as detailed in 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-	There is no feasible way to compensate or offset the temporary or permanent effects on BMV land.	Moderate to minor adverse (significant)

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
		Main Alternatives Considered [APP-044] .	detailed in 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354] . Damage from soil handling is reduced through defined stripping, storage and reinstatement procedures.	065] . The restoration of the temporarily disturbed soils will be conducted in line with the measures detailed within 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354] . Item AS02 in 9.83 (B) Outline Code of Construction Practice [REP4-233] states that “Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be recreated.... This will aim to restore land to the pre-construction ALC grade (unless otherwise agreed with the landowner)”.		
Traffic and Transport						
No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.						
Air Quality						
No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.						
Noise and Vibration						
No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.						
Socio-Economics, Recreation and Tourism						
No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.						
Health and Wellbeing						
No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.						
Intra-Project Cumulative Effects						
Construction	Potential intra-project cumulative effect for the scenario where Friston Substation is built as part of the Proposed Project (Friston scenario 2), as a result of significant visual amenity effects in-combination with minor additional noise, traffic and	Avoidance measures have been applied where possible such as avoiding routing traffic on the most sensitive routes including small rural road and through villages, with	Reduction measures have been applied, for example by reducing the number of HGV movements on Sundays.	Mitigation measures have been applied including through the application of Best Practicable Means (BPM) to address construction noise.	Compensation is not available to address any of the contributing impacts. There is no way to compensate for temporary impacts relating to traffic and	Significant adverse (noting these are more recently reported as moderate at most (see Application Document 9.141 Intra Project Cumulative Effect

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
	transport, and health and wellbeing effects, upon some residential receptors during construction	associated avoidance of noise sensitive receptors. The Applicant is also avoiding effects on Bank Holiday weekends.			transport, noise or visual amenity.	Significance - Technical Note))
	Potential intra-project cumulative effect on transport and road users along some routes due to significant visual amenity effects combined with minor noise and vibration, and traffic and transport effects.	Avoidance measures have been applied where possible such as avoiding routing traffic on the most sensitive routes including small rural road and through villages, with associated avoidance of noise sensitive receptors. The Applicant is also avoiding effects on Bank Holiday weekends.	Reduction measures have been applied, for example by reducing the number of HGV movements on Sundays.	Mitigation measures have been applied including through the application of Best Practicable Means (BPM) to address construction noise.	Compensation is not available to address any of the contributing impacts. There is no way to compensate for temporary impacts relating to traffic and transport, noise or visual amenity.	Significant adverse (noting these are more recently reported as moderate at most (see Application Document 9.141 Intra Project Cumulative Effect Significance - Technical Note))
	Potential intra-project cumulative effect on PRow users of footpath 491/010/0 due to significant visual amenity effects combined with minor socio-economic (changes to user experience and local travel patterns) and minor traffic and transport effects.	Avoidance measures have been applied where possible including avoiding closing any PRow without providing a suitable diversion.	Reduction measures have been applied including reducing the length of time PRow are temporarily diverted.	Many mitigation measures have been applied including ensuring priority for PRow users.	It is considered that appropriate compensation is not available to address the potential temporary effect on this bridleway. Please see Application Document Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125] for further detail. However the Applicant has committed to providing footpath benefits following construction including the permissive path along the Fromus access.	Significant adverse (noting these are more recently reported as moderate at most (see Application Document 9.141 Intra Project Cumulative Effect Significance - Technical Note))
Operation and maintenance	Potential intra-project cumulative effect upon some residential receptors where Friston Substation is built as part of the Proposed Project (Friston scenario 2), as a result of significant visual effects combined with minor noise, and health and wellbeing effects during the operational and maintenance phase.	Avoidance measures have been applied where possible such as avoiding routing traffic on the most sensitive routes including small rural road and through villages, with associated avoidance of noise sensitive receptors. The Applicant is also avoiding effects on Bank Holiday weekends.	Reduction measures have been applied, for example by reducing the number of HGV movements on Sundays.	Mitigation measures have been applied including through the application of Best Practicable Means (BPM) to address construction noise.	Compensation is not available to address any of the contributing impacts. There is no way to compensate for temporary impacts relating to traffic and transport, noise or visual amenity.	Significant adverse (noting these are more recently reported as moderate at most (see Application Document 9.141 Intra Project Cumulative Effect Significance - Technical Note))

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
	Potential intra-project cumulative effect on some road and PRow users due to significant visual amenity effects combined with minor noise and vibration, and traffic and transport effects during operation.	Avoidance measures have been applied where possible such as avoiding routing traffic on the most sensitive routes including small rural road and through villages, with associated avoidance of noise sensitive receptors. The Applicant is also avoiding effects on Bank Holiday weekends	Reduction measures have been applied, for example by reducing the number of HGV movements on Sundays.	Mitigation measures have been applied including through the application of Best Practicable Means (BPM) to address construction noise.	Compensation is not available to address any of the contributing impacts. There is no way to compensate for temporary impacts relating to traffic and transport, noise or visual amenity.	Significant adverse (noting these are more recently reported as moderate at most (see Application Document 9.141 Intra Project Cumulative Effect Significance - Technical Note))
Decommissioning	Potential intra-project cumulative effect for the scenario where Friston Substation is built as part of the Proposed Project (Friston scenario 2), as a result of significant visual amenity effects in-combination with minor additional noise, traffic and transport, and health and wellbeing effects, upon some residential receptors during decommissioning.	Avoidance measures have been applied where possible such as avoiding routing traffic on the most sensitive routes including small rural road and through villages, with associated avoidance of noise sensitive receptors. The Applicant is also avoiding effects on Bank Holiday weekends.	Reduction measures have been applied, for example by reducing the number of HGV movements on Sundays.	Mitigation measures have been applied including through the application of Best Practicable Means (BPM) to address construction noise.	Compensation is not available to address any of the contributing impacts. There is no way to compensate for temporary impacts relating to traffic and transport, noise or visual amenity.	Significant adverse (noting these are more recently reported as moderate at most (see Application Document 9.141 Intra Project Cumulative Effect Significance - Technical Note))
	Potential intra-project cumulative effect on transport and road users along some routes due to significant visual amenity effects combined with minor noise and vibration, and traffic and transport effects during decommissioning phase.	Avoidance measures have been applied where possible such as avoiding routing traffic on the most sensitive routes including small rural road and through villages, with associated avoidance of noise sensitive receptors. The Applicant is also avoiding effects on Bank Holiday weekends.	Reduction measures have been applied, for example by reducing the number of HGV movements on Sundays.	Mitigation measures have been applied including through the application of Best Practicable Means (BPM) to address construction noise.	Compensation is not available to address any of the contributing impacts. There is no way to compensate for temporary impacts relating to traffic and transport, noise or visual amenity.	Significant adverse (noting these are more recently reported as moderate at most (see Application Document 9.141 Intra Project Cumulative Effect Significance - Technical Note))
	Potential intra-project cumulative effect to PRow users of footpath 491/010/0 due to significant visual amenity effects combined with minor socio-economic effects (changes to user experience and local travel patterns) and traffic and transport effects during decommissioning.	Avoidance measures have been applied where possible including avoiding closing any PRow without providing a suitable diversion.	Reduction measures have been applied including reducing the length of time PRow are temporarily diverted	Many mitigation measures have been applied including ensuring priority for PRow users.	It is considered that appropriate compensation is not available to address the potential temporary effect on this bridleway. Please see Application Document Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125] for	Significant adverse (noting these are more recently reported as moderate at most (see Application Document 9.141 Intra Project Cumulative Effect Significance - Technical Note))

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
					further detail. However the Applicant has committed to providing footpath benefits following construction including the permissive path along the Fromus access.	
Inter-Project Cumulative Effects						
<i>Cumulative Effects Assessment Stage 4 (assessment of Proposed Project with each of the other individual developments)</i>						
Landscape and Visual	<p>Potential inter-project cumulative effects on landscape character and visual amenity SECHNL, Seascape Character Type (SCT) 03 Nearshore Waters, Suffolk Heritage Coast, Landscape Character Areas (LCA) L1 and K3, and viewpoints 6, 7, 8, and 22 at construction (including decommissioning) as a result of the combination of the Proposed Project and East Anglia ONE North & East Anglia TWO Offshore Windfarms. Significant visual effects would remain at viewpoint 6 during operation.</p> <p>It should be noted that since the inter-project cumulative effects assessment was produced for the SECHNL, inter-project cumulative assessment has been produced for the Natural Beauty Indicators and Special Qualities Indicators (contained within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]) and their sub-factors (contained within Appendix A of Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendices [REP5-136]). This demonstrates that there would be potential significant inter-project cumulative effects for selected sub-factors at construction.</p>	<p>Routeing, siting and design development sought to avoid the most sensitive receptors including ancient and veteran trees as well as where practicable avoiding the loss of boundary features such as mature trees and hedgerows.</p> <p>Avoiding siting permanent infrastructure within the SECHNL (and Suffolk Heritage Coast) and its setting. This avoids the permanent loss of habitats within the SECHNL including acid grassland. Routeing of the HVDC to avoid higher quality habitats such as high-quality acid grassland including by routeing along the northern edge of the golf course. Avoiding trenched crossing at the landfall within the SECHNL and Suffolk Heritage Coast.</p>	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA.</p> <p>Limiting construction works within the SECHNL, this includes the temporary landfall compound, working areas and HVDC cable corridor which have been reduced to the minimum. The only compound within the SECHNL is for the landfall trenchless crossing which must be at the launch pit location of the trenchless crossing so cannot be moved. Routeing altered to avoid mature individual trees which are characteristic in the local landscape and to reduce mature woodland removal at Old Broom Covert where a plantation forest could be utilised instead.</p> <p>The siting of the proposed Saxmundham Converter Station and associated construction works located close to mature woodland at Bloomfield's Covert to the south of the field to reduce effects on the local</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>Implementation of the outline landscape mitigation (oLEMP and REAC LV13) including the following. Noting that the planting would be only perceptible as whips in year 1 operation.</p> <p>Strengthening the existing landscape framework of the Saxmundham Converter Station site, extending and enhancing the woodland planting along the western and southern boundaries with native woodland to provide structural screening to the Saxmundham Converter Station.</p> <p>Establishing a layered approach to landscape planting with two belts of woodland to the north of the Converter Station as well as a further linear belt of woodland with hedgerow and tree planting along the B1119.</p> <p>Providing a deep belt of woodland along the local</p>	<p>There is no policy or legal requirement that the mitigation hierarchy requires all residual landscape and visual effects to be compensated for or that it is appropriate for alternative landscape compensation to be provided if it is accepted that there are any residual adverse landscape and visual effects that result from the Proposed Project. Further details contained at 3.9.20 within Application Document 9.23 Draft Statement of Common Ground Between National Grid Electricity Transmission and the Suffolk County Council [REP3-062].</p> <p>The acid grassland enhancement measures (REAC B28) are considered to fully compensate for the short term and temporary cumulative effects and provide further enhancement for the SECHNL (P) within the operational phase of the Project which is required due to the enhanced duty in Section 85(A1) of the Countryside and Rights of Way Act 2000. Notwithstanding the Applicant's position with</p>	<p>Potential significant at construction (including decommissioning) for SECHNL (selected sub-factors of the Natural Beauty and Special Qualities Indicators), SCT03 Nearshore Waters, Suffolk Heritage Coast, LCA L1 and K3, and viewpoints 6, 7, 8, and 22.</p> <p>Potential significant at operation for viewpoint 6.</p>

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
			<p>landscape character and visual amenity.</p> <p>Key Design Principles to inform the design of the Saxmundham Converter Station to limit effects on landscape and visual receptors.</p> <p>The width of the HVAC and HVDC cable corridors narrowed as far as practicable to reduce the effect on the local landscape and visual amenity.</p> <p>The HVAC and HVDC corridor interface with SPR's consented planting has been designed to reduce the effects by adjusting the species mix rather than the planting areas.</p>	<p>ridge line to the south of Wood Farm connecting to Bloomfield's Covert.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Commitment to successful reinstatement mitigation planting including adaptive management (REAC LV03, A22, GG06, GG07 and oLEMP).</p> <p>Commitment to fully reinstating the temporary works within the SECHNL associated with the landfall and HVDC cable corridor (REAC LV09 and oLEMP).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p> <p>Commitment to trenchless technique at the landfall within the SECHNL and Suffolk Heritage Coast (REAC B21).</p> <p>Commitment to locate the Saxmundham Converter</p>	<p>respect to meeting the s85 duty, the Applicant as a result of ongoing dialogue with Suffolk & Essex Coast & Heaths National Landscape Partnership (SECHNLP) and Suffolk County Council (SCC) has drafted a s106 Unilateral Undertaking which outlines the Furthering The Purposes Compensation Fund which the Applicant has agreed to provide for the purpose of funding and delivering projects within the National Landscape. This was first issued to SECHNLP and SCC on 24 March 2026 and re-issued on 30 March 2026 incorporating comments received from SECHNLP.</p>

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
				<p>Station as far as practicable within the southern extent of the site, consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV10, LV11 and LV12).</p> <p>Commitment to the construction and operational lighting levels to be the lowest necessary (REAC GG21 and B39).</p>		
	Potential inter-project cumulative effects on landscape character and visual amenity (LCA L1, SCT03 Nearshore Waters and visual amenity for viewpoints 1-7, 15-17, and 19-21) at all project stages as a result of the combination of the Proposed Project and LionLink Offshore Interconnector.	Routeing, siting and design development sought to avoid the most sensitive receptors including ancient and veteran trees and where practicable avoiding the loss of boundary features such as mature trees and hedgerows and mature vegetation along the River Fromus.	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA. This Included reducing the width of the HVAC and HVDC cable corridors as far as practicable to reduce the alteration to the existing vegetation network in views and removal of mature vegetation.</p> <p>The siting of the proposed Saxmundham Converter Station and associated construction works located close to mature woodland at Bloomfield's Covert to the south of the field to reduce effects on the local landscape character and visual amenity.</p> <p>Key Design Principles to inform the design of the Saxmundham Converter Station to limit effects on landscape and visual receptors.</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>The oLEMP identifies in Section 7.6 how the landscape mitigation measures have been designed to accommodate and complementary to LionLink and to enable co-location of infrastructure. The oLEMP identifies the mechanisms to support a cohesive overall design for the wider Saxmundham site thereby providing mitigation of cumulative landscape and visual effects.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Implementation of the outline landscape mitigation (oLEMP and</p>	There is no policy or legal requirement that the mitigation hierarchy requires all residual landscape and visual effects to be compensated for or that it is appropriate for alternative landscape compensation to be provided if it is accepted that there are any residual adverse landscape and visual effects that result from the Proposed Project. Further details contained at 3.9.20 within Application Document 9.23 Draft Statement of Common Ground Between National Grid Electricity Transmission and the Suffolk County Council [REP3-062] .	Potential significant – All project stages

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
			<p>Designing the permanent access road off the B1121 to limit effects on the historic landscape setting of Hurts Hall and by preventing a straight alignment to avoid direct views channelled along it to the Saxmundham Converter Station.</p> <p>Reducing the footprint and scale of the River Fromus bridge as much as possible to lessen the influence on landscape character, whilst balancing the Environment Agency height requirements.</p> <p>Ensuring the Order Limits were sufficient to allow for reinstatement of vegetation along the B1121 taking visibility splays into account.</p>	<p>REAC LV13) including the following. Noting that the planting would be only perceptible as whips in year 1.</p> <p>Proposed landscape planting to integrate the infrastructure into the landscape and views, including hedgerow and clusters of tree planting along the access road and extensive native woodland planting along the River Fromus.</p> <p>The long-term landscape and ecological benefits of the native woodland mitigation planting to permanently replace the rotational cricket bat willow plantation (oLEMP). This would be only perceptible as whips in year 1 (noting that much of this area would be planted in advance of operation). As this matures, the proposed planting would assist in integration of the bridge into the landscape, create new green infrastructure links and provide a permanent wooded corridor along the River Fromus within the southern approach to Saxmundham.</p> <p>Strengthening the existing landscape framework of the site, extending and enhancing the woodland planting along the western and southern boundaries with native woodland to provide structural screening to the</p>	

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
				<p>Saxmundham Converter Station.</p> <p>Establishing a layered approach to landscape planting with two belts of woodland to the north of the Converter Station as well as a further linear belt of woodland with hedgerow and tree planting along the B1119.</p> <p>Providing a deep belt of woodland along the local ridge line to the south of Wood Farm connecting to Bloomfield's Covert.</p> <p>Strengthening existing vegetation with native woodland species where appropriate to contribute to the local landscape character (oLEMP and REAC LV13).</p> <p>Commitment to successful reinstatement mitigation planting including adaptive management (REAC LV03, A22, GG06, GG07 and oLEMP).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p>	

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
				<p>Commitment to locate the Saxmundham Converter Station as far as practicable within the southern extent of the site, consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV10, LV11 and LV12).</p> <p>Commitment to the construction and operational lighting levels to be the lowest necessary (REAC GG21 and B39).</p>		
	Potential inter-project cumulative effects on landscape character (LCAs B4, L1 and 01) and visual amenity at construction (including decommissioning) as a result of the combination of the Proposed Project and South Saxmundham Garden Neighbourhood.	Routeing, siting and design development sought to avoid the most sensitive receptors including ancient and veteran trees and where practicable avoiding the loss of boundary features such as mature trees and hedgerows and mature vegetation along the River Fromus.	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA. This Included reducing the width of the HVAC and HVDC cable corridors as far as practicable to reduce the alteration to the existing vegetation network in views and removal of mature vegetation.</p> <p>The siting of the proposed Saxmundham Converter Station and associated construction works located close to mature woodland at Bloomfield's Covert to the south of the field to reduce effects on the local landscape character and visual amenity.</p> <p>Key Design Principles to inform the design of the Saxmundham Converter Station to limit effects on</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Implementation of the outline landscape mitigation (oLEMP and REAC LV13) including the following. Noting that the planting would be only perceptible as whips in year 1.</p> <p>Proposed landscape planting to integrate the infrastructure into the landscape and views, including hedgerow and clusters of tree planting along the access road and extensive native woodland planting along the River Fromus.</p>	Not appropriate, as above	Potential significant – Construction and decommissioning

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
			<p>landscape and visual receptors.</p> <p>Designing the permanent access road off the B1121 to limit effects on the historic landscape setting of Hurts Hall and by preventing a straight alignment to avoid direct views channelled along it to the Saxmundham Converter Station.</p> <p>Reducing the footprint and scale of the River Fromus bridge as much as possible to lessen the influence on landscape character, whilst balancing the Environment Agency height requirements.</p> <p>Ensuring the Order Limits were sufficient to allow for reinstatement of vegetation along the B1121 taking visibility splays into account.</p>	<p>The long-term landscape and ecological benefits of the native woodland mitigation planting to permanently replace the rotational cricket bat willow plantation (oLEMP). This would be only perceptible as whips in year 1 (noting that much of this area would be planted in advance of operation). As this matures, the proposed planting would assist in integration of the bridge into the landscape, create new green infrastructure links and provide a permanent wooded corridor along the River Fromus within the southern approach to Saxmundham.</p> <p>Strengthening the existing landscape framework of the site, extending and enhancing the woodland planting along the western and southern boundaries with native woodland to provide structural screening to the Saxmundham Converter Station.</p> <p>Establishing a layered approach to landscape planting with two belts of woodland to the north of the Converter Station as well as a further linear belt of woodland with hedgerow and tree planting along the B1119.</p> <p>Providing a deep belt of woodland along the local ridge line to the south of Wood Farm connecting to Bloomfield's Covert.</p>	

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
				<p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p> <p>Commitment to locate the Saxmundham Converter Station as far as practicable within the southern extent of the site, consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV10, LV11 and LV12).</p> <p>Commitment to the construction lighting levels to be the lowest necessary (REAC GG21).</p>		
Agriculture and Soils	The Sizewell C related rail improvements and rail extension route will result in additional temporary soil disturbance and temporary (though long term) loss of BMV land resulting in the potential for a minor cumulative effects on these receptors at construction and decommissioning. This could result in a significant inter-project cumulative effect when considered in combination with the Proposed Project.	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including considering sensitive soil receptors, as set out in 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] .	The scale and location of proposed infrastructure were refined through the iterative design process and EIA. Impacts on soil function are reduced through good practice guidance as detailed in 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354] . Damage from soil handling is reduced through defined	Where practicable soil resources will be reused on site in line with landscape and ecological designs as detailed in 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065] . The restoration of the temporarily disturbed soils will be conducted in line with the measures detailed within 7.5.10.1	There is no feasible way to compensate or offset the temporary or permanent effects on BMV land.	Potential significant

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
			stripping, storage and reinstatement procedures.	Outline Soil Management Plan – Suffolk [APP-354]. Item AS02 in 9.83 (B) Outline Code of Construction Practice [REP4-232] states that “Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be recreated.... This will aim to restore land to the pre-construction ALC grade (unless otherwise agreed with the landowner)”.		
	The onshore elements of the East Anglia ONE and TWO windfarms are likely to result in additional temporary soil disturbance and temporary and permanent loss of BMV land which alone result in a minor effect potential for significant cumulative effects on these receptors at construction and decommissioning. This could result in a significant inter-project cumulative effect when considered in combination with the Proposed Project	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including considering sensitive soil receptors, as set out in 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044].	The scale and location of proposed infrastructure were refined through the iterative design process and EIA. Impacts on soil function are reduced through good practice guidance as detailed in 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]. Damage from soil handling is reduced through defined stripping, storage and reinstatement procedures.	Where practicable soil resources will be reused on site in line with landscape and ecological designs as detailed in 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065]. The restoration of the temporarily disturbed soils will be conducted in line with the measures detailed within 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354]. Item AS02 in 9.83 (B) Outline Code of Construction Practice [REP4-232] states that “Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be recreated.... This will aim to restore land to the pre-construction ALC grade	There is no feasible way to compensate or offset the temporary or permanent effects on BMV land.	Potential significant

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation (unless otherwise agreed with the landowner)".		
	The Croft Farm land and buildings development could result in additional temporary soil disturbance and temporary and permanent loss of BMV land resulting in the potential for significant cumulative effects on these receptors at construction and decommissioning.	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including considering sensitive soil receptors, as set out in 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] .	The scale and location of proposed infrastructure were refined through the iterative design process and EIA. Impacts on soil function are reduced through good practice guidance as detailed in 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354] . Damage from soil handling is reduced through defined stripping, storage and reinstatement procedures.	Where practicable soil resources will be reused on site in line with landscape and ecological designs as detailed in 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065] . The restoration of the temporarily disturbed soils will be conducted in line with the measures detailed within 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354] . Item AS02 in 9.83 (B) Outline Code of Construction Practice [REP4-232] states that "Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be recreated.... This will aim to restore land to the pre-construction ALC grade (unless otherwise agreed with the landowner)".	There is no feasible way to compensate or offset the temporary or permanent effects on BMV land.	Potential significant
	The South Saxmundham Garden Neighbourhood development could result in additional temporary soil disturbance and temporary and permanent loss of BMV land resulting in the potential for significant cumulative effects on these receptors at construction and decommissioning.	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including considering sensitive soil receptors, as set out in 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] .	The scale and location of proposed infrastructure were refined through the iterative design process and EIA. Impacts on soil function are reduced through good practice guidance as detailed in 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354] . Damage from soil handling is reduced through defined	Where practicable soil resources will be reused on site in line with landscape and ecological designs as detailed in 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065] . The restoration of the temporarily disturbed soils will be conducted in line with the measures detailed within 7.5.10.1	There is no feasible way to compensate or offset the temporary or permanent effects on BMV land.	Potential significant

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
			stripping, storage and reinstatement procedures.	Outline Soil Management Plan – Suffolk [APP-354]. Item AS02 in 9.83 (B) Outline Code of Construction Practice [REP4-232] states that “Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be recreated.... This will aim to restore land to the pre-construction ALC grade (unless otherwise agreed with the landowner)”.		
<i>Assessment of total cumulative effects (assessment of Proposed Project with all other developments)</i>						
Landscape and Visual	<p>There is the potential for significant cumulative effects for a short term and temporary period on the SECHNL as a result of the potential simultaneous or sequential construction of the Suffolk Onshore Scheme, Sizewell C main development site, East Anglia ONE & TWO Offshore Windfarms and LionLink Offshore Interconnector. The concentration of construction activity associated with the landfalls and HVDC cable corridors within part of the SECHNL has the potential to alter the perception of the SECHNL with construction of major energy projects becoming a temporary characteristic feature of the landscape. These total cumulative effects are unlikely to remain once all projects are operational, particularly once the cable corridors are reinstated and mitigation planting becomes established over time.</p> <p>It should be noted that since the inter-project cumulative effects assessment was produced for the</p>	<p>Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including avoiding the loss of boundary features such as mature trees and hedgerows.</p> <p>Avoiding permanent infrastructure within the SECHNL (and Suffolk Heritage Coast) and its setting. This avoids the permanent loss of habitats within the SECHNL including acid grassland. Routeing of the HVDC to avoid higher quality habitats such as high-quality acid grassland including by routeing along the northern edge of the golf course. Avoiding trenched crossing at the landfall within the SECHNL and Suffolk Heritage Coast.</p>	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA.</p> <p>Limiting construction works within the SECHNL, this includes the temporary landfall compound, working areas and HVDC cable corridor which have been reduced to the minimum. The only compound within the SECHNL is for the landfall trenchless crossing which must be at the launch pit location of the trenchless crossing so cannot be moved. Routeing altered to avoid mature individual trees which are characteristic in the local landscape and to reduce mature woodland removal at Old Broom Covert where a plantation forest could be utilised instead.</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>Commitment to fully reinstating the temporary works within the SECHNL associated with the landfall and HVDC cable corridor (REAC LV09 and oLEMP).</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p>	<p>There is no policy or legal required that the mitigation hierarchy requires all residual landscape and visual effects to be compensated for or that it is appropriate for alternative landscape compensation to be provided if it is accepted that there are any residual adverse landscape and visual effects that result from the Proposed Project. Further details contained at 3.9.20 within Application Document 9.23 Draft Statement of Common Ground Between National Grid Electricity Transmission and the Suffolk County Council [REP3-062].</p> <p>The acid grassland enhancement measures (REAC B28) are considered to fully compensate for the short term and temporary</p>	<p>Potential significant – construction and decommissioning (selected sub-factors of the Natural Beauty and Special Qualities Indicators for the SECHNL)</p>

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
	SECHNL, inter-project cumulative assessment has been produced for the Natural Beauty Indicators and Special Qualities Indicators (contained within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]) and their sub-factors (contained within Appendix A of Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendices [REP5-136]). This demonstrates that there would be potential significant inter-project cumulative effects for selected sub-factors at construction.		The width of the HVAC and HVDC cable corridors narrowed as far as practicable to reduce the effect on the local landscape.	<p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p> <p>Commitment to trenchless technique at the landfall within the SECHNL and Suffolk Heritage Coast (REAC B21).</p> <p>Commitment to the construction lighting levels to be the lowest necessary (REAC GG21).</p>	cumulative effects and provide further enhancement for the Suffolk & Essex Coast & Heaths National Landscape (SECHNLP) within the operational phase of the Project which is required due to the enhanced duty in Section 85(A1) of the Countryside and Rights of Way Act 2000. Notwithstanding the Applicant's position with respect to meeting the s85 duty, the Applicant as a result of ongoing dialogue with Suffolk & Essex Coast & Heaths National Landscape Partnership (SECHNLP) and Suffolk County Council (SCC) has drafted a s106 Unilateral Undertaking which outlines the Furthering The Purposes Compensation Fund which the Applicant has agreed to provide for the purpose of funding and delivering projects within the National Landscape. This was first issued to SECHNLP and SCC on 24 March 2026 and re-issued on 30 March 2026 incorporating comments received from SECHNLP.	
	Total cumulative effects are likely on LCA L1 (Heveningham and Knodishall Estate Claylands) primarily as a result of East Anglia ONE & TWO Offshore Windfarms and LionLink Offshore Interconnector developments, although the remaining projects may also contribute in a minor way to the total effect.	Routeing, siting and design development sought to avoid the most sensitive receptors including ancient and veteran trees and where practicable avoiding the loss of boundary features such as mature trees and hedgerows.	The scale and location of proposed infrastructure were refined through the iterative design process and EIA. This Included reducing the width of the HVAC and HVDC cable corridors as far as practicable to reduce the effect on the local landscape and visual amenity.	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>The oLEMP identifies in Section 7.6 how the landscape mitigation measures have been designed to accommodate and complementary to LionLink and to enable co-location of infrastructure. The oLEMP identifies the</p>	There is no policy or legal requirement that the mitigation hierarchy requires all residual landscape and visual effects to be compensated for or that it is appropriate for alternative landscape compensation to be provided if it is accepted that there are any residual adverse landscape and visual effects that result from the Proposed Project. Further details contained at	Potential significant – all project stages

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
			<p>The siting of the proposed Saxmundham Converter Station and associated construction works located close to mature woodland at Bloomfield's Covert to the south of the field to reduce effects on the local landscape character and visual amenity.</p> <p>Key Design Principles to inform the design of the Saxmundham Converter Station to limit effects on landscape and visual receptors.</p>	<p>mechanisms to support a cohesive overall design for the wider Saxmundham site thereby providing mitigation of cumulative landscape and visual effects.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Implementation of the outline landscape mitigation (oLEMP and REAC LV13) including the following. Noting that the planting would be only perceptible as whips in year 1</p> <p>Strengthening the existing landscape framework of the site, extending and enhancing the woodland planting along the western and southern boundaries with native woodland to provide structural screening to the Saxmundham Converter Station.</p> <p>Establishing a layered approach to landscape planting with two belts of woodland to the north of the Converter Station as well as a further linear belt of woodland with hedgerow and tree planting along the B1119.</p> <p>Providing a deep belt of woodland along the local ridge line to the south of Wood Farm connecting to Bloomfield's Covert.</p>	<p>3.9.20 within Application Document 9.23 Draft Statement of Common Ground Between National Grid Electricity Transmission and the Suffolk County Council [REP3-062].</p>

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
				<p>Strengthening existing vegetation with native woodland species where appropriate to contribute to the local landscape character (oLEMP and REAC LV13).</p> <p>Commitment to successful reinstatement mitigation planting including adaptive management (REAC LV03, A22, GG06, GG07 and oLEMP).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p> <p>Commitment to locate the Saxmundham Converter Station as far as practicable within the southern extent of the site, consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV10, LV11 and LV12).</p> <p>Commitment to the construction and operational lighting levels to be the lowest necessary (REAC GG21 and B39).</p>	

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
	There would be total cumulative effects for a temporary and limited duration for LCA K3 (Aldringham and Freston Sandlands) and SCT 03 Nearshore Waters during construction (and decommissioning)	Routeing, siting and design development sought to avoid the most sensitive receptors including ancient and veteran trees and where practicable avoiding the loss of boundary features such as mature trees and hedgerows.	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA.</p> <p>The width of the HVAC and HVDC cable corridors narrowed as far as practicable to reduce the effect on the local landscape and visual amenity.</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Commitment to successful reinstatement mitigation planting including adaptive management (REAC LV03, A22, GG06, GG07 and oLEMP).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p> <p>Commitment to the construction lighting levels to be the lowest necessary (REAC GG21).</p>	Not appropriate, as above	Potential significant– construction and decommissioning
	Total cumulative effects on representative viewpoints have the potential to be significant as a result of the total combined effects primarily from the Suffolk Onshore Scheme with East Anglia ONE & TWO Offshore Windfarms and	Routeing, siting and design development sought to avoid the most sensitive receptors including ancient and veteran trees and where practicable avoiding the loss of boundary	The scale and location of proposed infrastructure were refined through the iterative design process and EIA. This Included reducing the width of the HVAC and HVDC cable	The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.	Not appropriate, as above	Potential significant – all project stages

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
LionLink Offshore Interconnector developments for various viewpoints at all project stages	features such as mature trees and hedgerows and mature vegetation along the River Fromus.	<p>corridors as far as practicable to reduce the alteration to the existing vegetation network in views and removal of mature vegetation.</p> <p>The siting of the proposed Saxmundham Converter Station and associated construction works located close to mature woodland at Bloomfield's Covert to the south of the field to reduce effects on the local landscape character and visual amenity.</p> <p>Key Design Principles to inform the design of the Saxmundham Converter Station to limit effects on landscape and visual receptors.</p> <p>Designing the permanent access road off the B1121 to limit effects on the historic landscape setting of Hurts Hall and by preventing a straight alignment to avoid direct views channelled along it to the Saxmundham Converter Station.</p> <p>Reducing the footprint and scale of the River Fromus bridge as much as possible to lessen the influence on landscape character, whilst balancing the Environment Agency height requirements.</p> <p>Ensuring the Order Limits were sufficient to allow for reinstatement of vegetation along the B1121 taking visibility splays into account.</p>	<p>The oLEMP identifies in Section 7.6 how the landscape mitigation measures have been designed to accommodate and complementary to LionLink and to enable co-location of infrastructure. The oLEMP identifies the mechanisms to support a cohesive overall design for the wider Saxmundham site thereby providing mitigation of cumulative landscape and visual effects.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Implementation of the outline landscape mitigation (oLEMP and REAC LV13) including the following. Noting that the planting would be only perceptible as whips in year 1.</p> <p>Proposed landscape planting to integrate the infrastructure into the landscape and views, including hedgerow and clusters of tree planting along the access road and extensive native woodland planting along the River Fromus.</p> <p>The long-term landscape and ecological benefits of the native woodland mitigation planting to permanently replace the rotational cricket bat willow plantation (oLEMP). This would be only perceptible</p>		

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
				<p>as whips in year 1 (noting that much of this area would be planted in advance of operation). As this matures, the proposed planting would assist in integration of the bridge into the landscape, create new green infrastructure links and provide a permanent wooded corridor along the River Fromus within the southern approach to Saxmundham.</p> <p>Strengthening the existing landscape framework of the site, extending and enhancing the woodland planting along the western and southern boundaries with native woodland to provide structural screening to the Saxmundham Converter Station.</p> <p>Establishing a layered approach to landscape planting with two belts of woodland to the north of the Converter Station as well as a further linear belt of woodland with hedgerow and tree planting along the B1119.</p> <p>Providing a deep belt of woodland along the local ridge line to the south of Wood Farm connecting to Bloomfield's Covert.</p> <p>Strengthening existing vegetation with native woodland species where appropriate to contribute to the local landscape character (oLEMP and REAC LV13).</p>		

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
				<p>Commitment to successful reinstatement mitigation planting including adaptive management (REAC LV03, A22, GG06, GG07 and oLEMP).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p> <p>Commitment to locate the Saxmundham Converter Station as far as practicable within the southern extent of the site, consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV10, LV11 and LV12).</p> <p>Commitment to the construction and operational lighting levels to be the lowest necessary (REAC GG21 and B39).</p>		
Landscape and Visual (Sequential Cumulative Visual Assessment at operational stage)	Sequential route – B1119: Potential intensification and extension of effects on visual amenity of users of B1119 between Saxmundham and Leiston, as a result of the Proposed Project in combination with Sizewell	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including avoiding the loss of boundary features such	The scale and location of proposed infrastructure were refined through the iterative design process and EIA.	The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.	Not appropriate, as above	Potential significant at operation

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
	C, LionLink Offshore Interconnector and to a lesser extent East Anglian ONE & TWO Offshore Windfarms.	as mature trees and hedgerows.	<p>The siting of the proposed Saxmundham Converter Station located close to mature woodland at Bloomfield's Covert to the south of the field to reduce effects on the local landscape character and visual amenity.</p> <p>Key Design Principles to inform the design of the Saxmundham Converter Station to limit effects on landscape and visual receptors.</p> <p>The width of the HVAC and HVDC cable corridors narrowed as far as practicable to reduce the effect on the local landscape and visual amenity resulting in minimal permanent tree loss.</p>	<p>The oLEMP identifies in Section 7.6 how the landscape mitigation measures have been designed to accommodate and complementary to LionLink and to enable co-location of infrastructure. The oLEMP identifies the mechanisms to support a cohesive overall design for the wider Saxmundham site thereby providing mitigation of cumulative landscape and visual effects.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Implementation of the outline landscape mitigation (oLEMP and REAC LV13) including the following. Noting that the planting would be only perceptible as whips in year 1.</p> <p>Strengthening the existing landscape framework of the site, extending and enhancing the woodland planting along the western and southern boundaries with native woodland to provide structural screening to the Saxmundham Converter Station.</p> <p>Establishing a layered approach to landscape planting with two belts of woodland to the north of the Converter Station as well as a further linear belt</p>	

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
				<p>of woodland with hedgerow and tree planting along the B1119. Providing a deep belt of woodland along the local ridge line to the south of Wood Farm connecting to Bloomfield's Covert.</p> <p>Strengthening existing vegetation with native woodland species where appropriate to contribute to the local landscape character (oLEMP and REAC LV13).</p> <p>Commitment to successful reinstatement mitigation planting including adaptive management (REAC LV03, A22, GG06, GG07 and oLEMP).</p> <p>Commitment to replacement tree planting of three standard trees per each individual mature tree to be removed (REAC A21).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p>		

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
				<p>Commitment to locate the Saxmundham Converter Station as far as practicable within the southern extent of the site, consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV10, LV11 and LV12).</p> <p>Commitment to the operational lighting levels to be the lowest necessary (REAC B39).</p>		
	Sequential route – B1121: potential intensification and extension of effects on visual amenity of users of the B1121 to the south of Saxmundham, where there is combined theoretical visibility between the Proposed Project and other cumulative developments (Sizewell C, LionLink Offshore Interconnector and East Anglian ONE & TWO Offshore Windfarms) both in combination and succession.	Routeing, siting and design development sought to avoid the most sensitive receptors including ancient and veteran trees and where practicable avoiding the loss of boundary features such as mature trees and hedgerows and mature vegetation along the River Fromus.	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA.</p> <p>The siting of the proposed Saxmundham Converter Station and associated construction works located close to mature woodland at Bloomfield’s Covert to the south of the field to reduce effects on the local landscape character and visual amenity.</p> <p>Key Design Principles to inform the design of the Saxmundham Converter Station to limit effects on landscape and visual receptors.</p> <p>Designing the permanent access road off the B1121 to limit effects on the historic landscape setting of Hurts Hall and by preventing a straight alignment to avoid direct</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>The oLEMP identifies in Section 7.6 how the landscape mitigation measures have been designed to accommodate and complementary to LionLink and to enable co-location of infrastructure. The oLEMP identifies the mechanisms to support a cohesive overall design for the wider Saxmundham site thereby providing mitigation of cumulative landscape and visual effects.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Implementation of the outline landscape</p>	Not appropriate, as above	Potential significant at operation

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
			<p>views channelled along it to the Saxmundham Converter Station.</p> <p>Reducing the footprint and scale of the River Fromus bridge as much as possible to lessen the influence on landscape character, whilst balancing the Environment Agency height requirements.</p> <p>Ensuring the Order Limits were sufficient to allow for reinstatement of vegetation along the B1121 taking visibility splays into account.</p>	<p>mitigation (oLEMP and REAC LV13) including the following. Noting that the planting would be only perceptible as whips in year 1.</p> <p>Proposed landscape planting to integrate the infrastructure into the landscape and views, including hedgerow and clusters of tree planting along the access road and extensive native woodland planting along the River Fromus.</p> <p>The long-term landscape and ecological benefits of the native woodland mitigation planting to permanently replace the rotational cricket bat willow plantation (oLEMP). This would be only perceptible as whips in year 1 (noting that much of this area would be planted in advance of operation). As this matures, the proposed planting would assist in integration of the bridge into the landscape, create new green infrastructure links and provide a permanent wooded corridor along the River Fromus within the southern approach to Saxmundham.</p> <p>Strengthening the existing landscape framework of the site, extending and enhancing the woodland planting along the western and southern boundaries with native woodland to provide structural screening to the</p>	

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
				<p>Saxmundham Converter Station.</p> <p>Establishing a layered approach to landscape planting with two belts of woodland to the north of the Converter Station as well as a further linear belt of woodland with hedgerow and tree planting along the B1119.</p> <p>Providing a deep belt of woodland along the local ridge line to the south of Wood Farm connecting to Bloomfield's Covert.</p> <p>Strengthening existing vegetation with native woodland species where appropriate to contribute to the local landscape character (oLEMP and REAC LV13).</p> <p>Commitment to successful reinstatement mitigation planting including adaptive management (REAC LV03, A22, GG06, GG07 and oLEMP).</p> <p>Commitment to replacement tree planting of three standard trees per each individual mature tree to be removed (REAC A21).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced</p>	

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
				planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).		
				Commitment to locate the Saxmundham Converter Station as far as practicable within the southern extent of the site, consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV10, LV11 and LV12).		
				Commitment to the operational lighting levels to be the lowest necessary (REAC B39).		
	Sequential route – PRowS within the Study Area: potential intensification and extension of effects on visual amenity of users on the PRowS within the Study Area as a result of the Proposed Project and other cumulative developments (Sizewell C, LionLink Offshore Interconnector and East Anglian ONE & TWO Offshore Windfarms), which is likely to be most notable in closer proximity to the Suffolk Onshore Scheme where the proportion of the view occupied by both LionLink Offshore Interconnector and the Suffolk Onshore Scheme would be larger.	Routeing, siting and design development sought to avoid the most sensitive receptors including ancient and veteran trees and where practicable avoiding the loss of boundary features such as mature trees and hedgerows and mature vegetation along the River Fromus.	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA.</p> <p>The siting of the proposed Saxmundham Converter Station and associated construction works located close to mature woodland at Bloomfield's Covert to the south of the field to reduce effects on the local landscape character and visual amenity.</p> <p>Key Design Principles to inform the design of the Saxmundham Converter Station to limit effects on landscape and visual receptors.</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>The oLEMP identifies in Section 7.6 how the landscape mitigation measures have been designed to accommodate and complementary to LionLink and to enable co-location of infrastructure. The oLEMP identifies the mechanisms to support a cohesive overall design for the wider Saxmundham site thereby providing mitigation of cumulative landscape and visual effects.</p>	Whilst not compensating for the significant residual effects on visual amenity along the sequential PRow, which is not possible, the Applicant is providing new permissive paths as part of the Proposed Development which will provide enhanced connectivity in the local network of PRow as well as enhancement to visual amenity for the users. The enhancement measures include 1.2 km of permissive path along the permanent access road along with permissive access within the woodland landscape around the Saxmundham Converter Station.	Potential significant at operation

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
			<p>Designing the permanent access road off the B1121 to limit effects on the historic landscape setting of Hurts Hall and by preventing a straight alignment to avoid direct views channelled along it to the Saxmundham Converter Station.</p> <p>Reducing the footprint and scale of the River Fromus bridge as much as possible to lessen the influence on landscape character, whilst balancing the Environment Agency height requirements.</p> <p>Ensuring the Order Limits were sufficient to allow for reinstatement of vegetation along the B1121 taking visibility splays into account.</p>	<p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Implementation of the outline landscape mitigation (oLEMP and REAC LV13) including the following. Noting that the planting would be only perceptible as whips in year 1.</p> <p>Proposed landscape planting to integrate the infrastructure into the landscape and views, including hedgerow and clusters of tree planting along the access road and extensive native woodland planting along the River Fromus.</p> <p>The long-term landscape and ecological benefits of the native woodland mitigation planting to permanently replace the rotational cricket bat willow plantation (oLEMP). This would be only perceptible as whips in year 1 (noting that much of this area would be planted in advance of operation). As this matures, the proposed planting would assist in integration of the bridge into the landscape, create new green infrastructure links and provide a permanent wooded corridor along the River Fromus within the southern approach to Saxmundham.</p> <p>Strengthening the existing landscape framework of</p>		

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
				<p>the site, extending and enhancing the woodland planting along the western and southern boundaries with native woodland to provide structural screening to the Saxmundham Converter Station.</p> <p>Establishing a layered approach to landscape planting with two belts of woodland to the north of the Converter Station as well as a further linear belt of woodland with hedgerow and tree planting along the B1119.</p> <p>Providing a deep belt of woodland along the local ridge line to the south of Wood Farm connecting to Bloomfield's Covert.</p> <p>Strengthening existing vegetation with native woodland species where appropriate to contribute to the local landscape character (oLEMP and REAC LV13).</p> <p>Commitment to successful reinstatement mitigation planting including adaptive management (REAC LV03, A22, GG06, GG07 and oLEMP).</p> <p>Commitment to replacement tree planting of three standard trees per each individual mature tree to be removed (REAC A21).</p> <p>Commitment to retaining all veteran and ancient</p>	

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
				<p>trees (REAC A05) and other vegetation where practicable (REAC LV01, LV13, B07 and B11).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV13 and oLEMP).</p> <p>Commitment to locate the Saxmundham Converter Station as far as practicable within the southern extent of the site, consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV10, LV11 and LV12).</p> <p>Commitment to the operational lighting levels to be the lowest necessary (REAC B39).</p>		
Agriculture and Soils	Combined temporary disturbance to soils and temporary and permanent loss of BMV land, as a result of the Proposed Project in-combination with other developments (Sizewell C, East Anglian ONE & TWO Offshore Windfarms, Croft Farm land and buildings, South Saxmundham Garden Neighbourhood), considered likely to result in a significant cumulative effect based on the information available to date.	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including considering sensitive soil receptors, as set out in 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] .	The scale and location of proposed infrastructure were refined through the iterative design process and EIA. Impacts on soil function are reduced through good practice guidance as detailed in 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354] . Damage from soil handling is reduced through defined stripping, storage and reinstatement procedures.	Where practicable soil resources will be reused on site in line with landscape and ecological designs as detailed in 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065] . The restoration of the temporarily disturbed soils will be conducted in line with the measures detailed within 7.5.10.1 Outline Soil Management Plan – Suffolk [APP-354] . Item AS02 in 9.83	There is no feasible way to compensate or offset the temporary or permanent effects on BMV land.	Significant

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
				<p>(B) Outline Code of Construction Practice [REP4-232] states that “Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be recreated... This will aim to restore land to the pre-construction ALC grade (unless otherwise agreed with the landowner)”.</p>	

Appendix Table A.3 Kent Onshore Scheme – Residual Likely Significant Effects Mitigation Hierarchy

Topic / Project Phase	Description of Effect	Mitigation Hierarchy				Residual Effect
		Avoidance	Reduction	Mitigation	Compensation	
Landscape and Visual						
Construction (including decommissioning)	Adverse impact on landscape character at Thanet District Council Landscape Character Assessment (TDLCA) LCA E1	<p>Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including avoiding the loss of boundary features such as mature trees and hedgerows and to minimise impact on existing landscape features such as drainage ditches.</p> <p>Avoidance of the wider marsh landscape for the siting of the Minster Converter Station and Substation to the west of the railway line.</p> <p>Avoidance of the use of low height tower types to reduce the number of towers proposed and subsequent wirescape.</p>	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA.</p> <p>The siting of the proposed Minster Converter Station and Substation and associated construction works located close to the existing infrastructure at Richborough Energy Park to reduce effects on the local landscape character.</p>	<p>The outline Landscape and Ecological Management Plan (oLEMP) for Kent (Application Document 7.5.7.2 (D) Outline Landscape and Ecological Management Plan - Kent submitted at Deadline 6) and Register of Environmental Actions and Commitments (REAC) (Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 6) measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV18, B07 and B11).</p> <p>Commitment to locate the Minster Converter Station and Substation as close to the existing infrastructure at Richborough Energy Park (REAC LV15).</p> <p>Commitment to minimise impact on existing landscape features</p>	<p>There is no policy or legal requirement that the mitigation hierarchy requires all residual landscape and visual effects to be compensated for or that it is appropriate for alternative landscape compensation to be provided if it is accepted that there are any residual adverse landscape and visual effects that result from the Proposed Project. Further details contained at 3.9.20 within Application Document 9.23 Draft Statement of Common Ground Between National Grid Electricity Transmission and the Suffolk County Council [REP3-062].</p>	Moderate adverse (significant)

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
				including drainage ditches (REAC LV16).		
				Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV18 and oLEMP).		
				Commitment to the construction lighting levels to be the lowest necessary (REAC GG21).		
	Adverse impact on landscape character at Dover District Council Landscape Character Assessment (DDLCA) LCA A2	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including avoiding the loss of boundary features such as mature trees and hedgerows and to minimise impact on existing landscape features such as drainage ditches. Avoidance of the use of low height tower types to reduce the number of towers proposed and subsequent wirescape.	The scale and location of proposed infrastructure were refined through the iterative design process and EIA.	The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO. Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07). Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV18, B07 and B11). Commitment to minimise impact on existing landscape features including drainage ditches (REAC LV16). Commitment to consideration of advanced planting where planting does not conflict with construction works and	Not appropriate, as above	Moderate adverse (significant)

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
				timescales allow (REAC LV18 and oLEMP). Commitment to the construction lighting levels to be the lowest necessary (REAC GG21).		
	Adverse impact on visual amenity at Viewpoints 3, 5, 6 and 11	<p>Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including avoiding the loss of boundary features such as mature trees and hedgerows and to minimise impact on existing landscape features such as drainage ditches.</p> <p>Avoidance of the wider marsh landscape for the siting of the Minster Converter Station and Substation to the west of the railway line.</p> <p>Avoidance of the use of low height tower types to reduce the number of towers proposed and subsequent wirescape.</p>	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA.</p> <p>The siting of the proposed Minster Converter Station and Substation and associated construction works located close to the existing infrastructure at Richborough Energy Park to reduce effects on the local landscape character and visual amenity.</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV18, B07 and B11).</p> <p>Commitment to locate the Minster Converter Station and Substation as close to the existing infrastructure at Richborough Energy Park (REAC LV15).</p> <p>Commitment to minimise impact on existing landscape features including drainage ditches (REAC LV16).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and</p>	Not appropriate, as above	Moderate adverse (significant)

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
				timescales allow (REAC LV18 and oLEMP).		
				Commitment to the construction lighting levels to be the lowest necessary (REAC GG21).		
	Adverse impact on visual amenity at Viewpoint 4	<p>Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including avoiding the loss of boundary features such as mature trees and hedgerows and to minimise impact on existing landscape features such as drainage ditches.</p> <p>Avoidance of the wider marsh landscape for the siting of the Minster Converter Station and Substation to the west of the railway line.</p> <p>Avoidance of the use of low height tower types to reduce the number of towers proposed and subsequent wirescape.</p>	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA.</p> <p>The siting of the proposed Minster Converter Station and Substation and associated construction works located close to the existing infrastructure at Richborough Energy Park to reduce effects on the local landscape character and visual amenity.</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV18, B07 and B11).</p> <p>Commitment to locate the Minster Converter Station and Substation as close to the existing infrastructure at Richborough Energy Park (REAC LV15).</p> <p>Commitment to minimise impact on existing landscape features including drainage ditches (REAC LV16).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and</p>	Not appropriate, as above	Major adverse (significant)

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
				timescales allow (REAC LV18 and oLEMP). Commitment to the construction lighting levels to be the lowest necessary (REAC GG21).		
Operation and maintenance	Adverse impact on landscape character at TDLCA LCA E1	<p>Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including avoiding the loss of boundary features such as mature trees and hedgerows and to minimise impact on existing landscape features such as drainage ditches.</p> <p>Avoidance of the wider marsh landscape for the siting of the Minster Converter Station and Substation to the west of the railway line.</p> <p>Avoidance of the use of low height tower types to reduce the number of towers proposed and subsequent wirescape.</p>	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA.</p> <p>The siting of the proposed Minster Converter Station and Substation and associated construction works located close to the existing infrastructure at Richborough Energy Park to reduce effects on the local landscape character.</p> <p>Key Design Principles to inform the design of the Minster Converter Station and Substation to limit effects on landscape and visual receptors.</p> <p>The landscape proposals included designing the landscape planting in collaboration with the cultural heritage specialists to respect the character of the former Wantsum Channel and to integrate into the proposals in the eastern edge of the former marshland with existing influence of mature vegetation and development.</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV18, B07 and B11).</p> <p>Commitment to locate the Minster Converter Station and Substation as close to the existing infrastructure at Richborough Energy Park (REAC LV15) and consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV17).</p> <p>The long-term benefits of the proposed mitigation planting (oLEMP and REAC LV18). This would be only perceptible as whips in year 1. As this</p>	Not appropriate, as above	<p>Moderate adverse (significant) – year 1</p> <p>Minor adverse (not significant) – year 15</p>

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
				<p>matures, the proposed planting would provide separation from the wider marsh landscape and integrate the site into the relatively wooded edge of the former marsh.</p> <p>Commitment to successful reinstatement mitigation planting including adaptive management (REAC LV04, A22, GG06, GG07 and oLEMP).</p> <p>Commitment to minimise impact on existing landscape features including drainage ditches (REAC LV16).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV18 and oLEMP).</p> <p>Commitment to the operational lighting levels to be the lowest necessary (REAC B39).</p> <p>Commitment to replacement tree planting of three standard trees per each individual mature tree to be removed (REAC A21).</p>		
	Adverse impact on visual amenity at Viewpoint 4	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including avoiding the loss	The scale and location of proposed infrastructure were refined through the iterative design process and EIA.	The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.	Not appropriate, as above	Major adverse (significant)

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
	of boundary features such as mature trees and hedgerows and to minimise impact on existing landscape features such as drainage ditches.		The siting of the proposed Minster Converter Station and Substation and associated construction works located close to the existing infrastructure at Richborough Energy Park to reduce effects on the local landscape character.	Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).	
	Avoidance of the wider marsh landscape for the siting of the Minster Converter Station and Substation to the west of the railway line.		Key Design Principles to inform the design of the Minster Converter Station and Substation to limit effects on landscape and visual receptors.	Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV18, B07 and B11).	
	Avoidance of the use of low height tower types to reduce the number of towers proposed and subsequent wirescape.		The landscape proposals included designing the landscape planting in collaboration with the cultural heritage specialists to respect the character of the former Wantsum Channel and to integrate into the proposals in the eastern edge of the former marshland with existing influence of mature vegetation and development.	Commitment to locate the Minster Converter Station and Substation as close to the existing infrastructure at Richborough Energy Park (REAC LV15) and consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV17).	
				The long-term benefits of the proposed mitigation planting (oLEMP and REAC LV18). This would be only perceptible as whips in year 1. As this matures, the proposed planting would provide separation from the wider marsh landscape and integrate the site into the relatively wooded edge of the former marsh.	
				Commitment to successful reinstatement mitigation planting including adaptive management (REAC LV04, A22, GG06, GG07 and oLEMP).	

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
				<p>Commitment to minimise impact on existing landscape features including drainage ditches (REAC LV16).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV18 and oLEMP).</p> <p>Commitment to the operational lighting levels to be the lowest necessary (REAC B39).</p> <p>Commitment to replacement tree planting of three standard trees per each individual mature tree to be removed (REAC A21).</p>		
	Adverse impact on Viewpoint 5, 6 and 11	<p>Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including avoiding the loss of boundary features such as mature trees and hedgerows and to minimise impact on existing landscape features such as drainage ditches.</p> <p>Avoidance of the wider marsh landscape for the siting of the Minster Converter Station and Substation to the west of the railway line.</p>	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA.</p> <p>The siting of the proposed Minster Converter Station and Substation and associated construction works located close to the existing infrastructure at Richborough Energy Park to reduce effects on the local landscape character and visual amenity.</p> <p>The design of the Minster Converter Station and</p>	<p>The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO.</p> <p>Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07).</p> <p>Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV18, B07 and B11).</p>	Not appropriate, as above	Moderate adverse (significant) – year 1 and year 15

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
	Avoidance of the use of low height tower types to reduce the number of towers proposed and subsequent wirescape.	Substation to limit effects on landscape and visual receptors.	Proposed landscape planting to integrate the infrastructure with existing landscape features where possible and separation from the wider marsh landscape. Ensuring tree planting of three standard trees per each individual mature tree lost.	Commitment to locate the Minster Converter Station and Substation as close to the existing infrastructure at Richborough Energy Park (REAC LV15) and consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV17).	
			The landscape proposals included designing the landscape planting in collaboration with the cultural heritage specialists to respect the character of the former Wantsum Channel and to integrate into the proposals in the eastern edge of the former marshland with existing influence of mature vegetation and development.	The long-term benefits of the proposed mitigation planting (oLEMP and REAC LV18). This would be only perceptible as whips in year 1. As this matures, the proposed planting would provide separation from the wider marsh landscape and integrate the site into the relatively wooded edge of the former marsh.	
				Commitment to successful reinstatement mitigation planting including adaptive management (REAC LV04, A22, GG06, GG07 and oLEMP).	
				Commitment to minimise impact on existing landscape features including drainage ditches (REAC LV16).	
				Commitment to consideration of advanced planting where planting does not conflict with construction works and	

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
				<p>timescales allow (REAC LV18 and oLEMP).</p> <p>Commitment to the operational lighting levels to be the lowest necessary (REAC B39).</p> <p>Commitment to replacement tree planting of three standard trees per each individual mature tree to be removed (REAC A21).</p>		
Ecology and Biodiversity						
Construction	Habitat loss/creation from construction of Minster Converter Station and Substation proposals	<p>Sensitive ecological features were taken into account in cable route selection and siting of converter station and substation. This includes:</p> <p>Routing the cable route outside areas of deciduous woodland and veteran trees where possible (REAC measure GG08).</p> <p>Routing the cable route outside designated sites where possible (e.g. avoiding the terrestrial component of Sandwich Bay to Hacklinge Marshes SSSI).</p> <p>Siting the construction compounds in arable fields rather than in other habitats (e.g. woodland).</p> <p>Siting the converter station and substation to minimise loss of functionally linked land for golden plover.</p> <p>Avoiding habitat loss within the former hoverport.</p>	<p>Specific measures include:</p> <p>Narrowing the cable corridor to 20 metres at ditch and hedgerow crossings to minimise habitat, as reflected in mitigation measure B11 in the REAC.</p> <p>Using trenchless methods to cross Thanet Coast & Sandwich Bay SPA/Ramsar site/Sandwich Bay SAC/Sandwich Bay to Hacklinge Marshes SSSI (REAC measure B42).</p>	<p>Reinstating habitat as soon as works in an area are complete. This is secured through the Kent oLEMP and REAC measure GG07, H02, W02, and W13.</p>	<p>Paragraph 2.9.65 of Application Document REP5-017 (6.2.3.2 Environmental Statement Part 3 Kent Chapter 2 Ecology and Biodiversity) documents creation of in Kent 6.5 ha of woodland, 5 ha species rich neutral grassland, 1 km native hedgerow, and 2 ha of balancing pond around the Minster Converter Station and Substation, which is much greater than the combined temporary and permanent losses of woodland, grassland and wetland habitats.</p>	<p>Medium term moderate adverse (significant) until the net new planting has matured.</p> <p>Long term moderate beneficial (significant) once the net new planting has matured.</p>

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
	Ornithological habitat loss/creation from construction of Minster Converter Station and Substation, and loss/enhancement of arable land	<p>Sensitive ecological features were taken into account in cable route selection and siting of converter station and substation. This includes:</p> <p>Routing the cable route outside areas of deciduous woodland and veteran trees where possible (REAC measure GG08).</p> <p>Routing the cable route outside designated sites where possible (e.g. avoiding the terrestrial component of Sandwich Bay to Hacklinge Marshes SSSI).</p> <p>Siting the construction compounds in arable fields rather than in habitats with a more diverse bird assemblage (e.g. woodland)</p> <p>Locating the temporary bridge across the Stour and the foundations of new pylons outside or between the wetlands at Abbey Farm rather than through them.</p> <p>Avoiding habitat loss within the former hoverport.</p> <p>Siting the converter station and substation to minimise loss of functionally linked land for wintering golden plover.</p>	<p>Specific measures include:</p> <p>Narrowing the cable corridor to 20 metres at ditch and hedgerow crossings to minimise loss of suitable nesting habitat, as reflected in REAC measure B11.</p> <p>Using trenchless methods to cross Thanet Coast & Sandwich Bay SPA/Ramsar site/Sandwich Bay to Hacklinge Marshes SSSI (REAC measure B42).</p>	<p>Reinstating habitat as soon as works in an area are complete. This is secured through the Kent oLEMP and REAC measure GG07, H02, W02, and W13.</p>	<p>Paragraph 2.9.65 of Application Document REP5-017 (6.2.3.2 Environmental Statement Part 3 Kent Chapter 2 Ecology and Biodiversity) documents creation of in Kent 6.5 ha of woodland, 5 ha species rich neutral grassland, 1 km native hedgerow, and 2 ha of balancing pond around the Minster Converter Station and Substation, which is much greater than the combined temporary and permanent losses of woodland, grassland and wetland habitats.</p> <p>Management of a 10ha area of farmland favourably for farmland birds and for non-breeding golden plover.</p>	<p>Medium term moderate adverse (significant)</p> <p>Long term moderate beneficial (significant)</p>
Operation and maintenance	Habitat loss/creation from proposals at Minster Converter Station and Substation	Siting the converter station and substation in an primarily arable field reducing landtake from more botanically diverse habitats.	None available, as the converter station and substation must be a certain size.	None available, as the converter station and substation must be a certain size.	<p>Paragraph 2.9.65 of Application Document REP5-017 (6.2.3.2 Environmental Statement Part 3 Kent Chapter 2 Ecology and Biodiversity) documents creation of in Kent 6.5 ha of woodland, 5 ha species rich neutral grassland, 1 km native hedgerow, and 2 ha of</p>	<p>Medium term moderate adverse (significant) until the net new planting has matured.</p> <p>Long term moderate beneficial (significant) once the net new planting has matured.</p>

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
					balancing pond around the Minster Converter Station and Substation, which is much greater than the combined temporary and permanent losses of woodland, grassland and wetland habitats.	
	Ornithological habitat loss/creation from proposals at Minster Converter Station and Substation	Siting the converter station and substation to minimise loss of functionally linked land for wintering golden plover.	None available, as the converter station and substation must be a certain size.	None available, as the converter station and substation must be a certain size.	Paragraph 2.9.65 of Application Document REP5-017 (6.2.3.2 Environmental Statement Part 3 Kent Chapter 2 Ecology and Biodiversity) documents creation of in Kent 6.5 ha of woodland, 5 ha species rich neutral grassland, 1 km native hedgerow, and 2 ha of balancing pond around the Minster Converter Station and Substation, which is much greater than the combined temporary and permanent losses of woodland, grassland and wetland habitats. Management of a 10ha area of farmland favourably for farmland birds and for non-breeding golden plover.	Medium term moderate adverse (significant) Long term moderate beneficial (significant)

Water Environment

No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.

Geology and Hydrogeology

No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.

Agriculture and Soils

Construction	Temporary impacts to soil function and disruption to soil ecosystem services	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including considering sensitive soil receptors, as set out in 6.2.1.3 Part 1 Introduction Chapter 3	The scale and location of proposed infrastructure were refined through the iterative design process and EIA. Impacts on soil function are reduced through good practice guidance as detailed in 7.5.10.2 Outline	Where practicable soil resources will be reused on site in line with landscape and ecological designs as detailed in 7.5.7.2 (C) Outline Landscape and Ecological Management Plan - Kent [REP4-067] . The restoration of the	There is no feasible way to compensate or offset the temporary or permanent effects on BMV land.	Moderate to minor adverse (significant)
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Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
	Main Alternatives Considered [APP-044].		Soil Management Plan – Kent [APP-355]. Damage from soil handling is reduced through defined stripping, storage and reinstatement procedures.	temporarily disturbed soils will be conducted in line with the measures detailed within 7.5.10.2 Outline Soil Management Plan – Kent [APP-355]. Item AS02 in 9.83 (B) Outline Code of Construction Practice [REP4-232] states that “Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be recreated.... This will aim to restore land to the pre-construction ALC grade (unless otherwise agreed with the landowner)”.		
Permanent loss of BMV land	<u>Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including considering sensitive soil receptors, as set out in 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044].</u>	<u>The scale and location of proposed infrastructure were refined through the iterative design process and EIA.</u>	There is no mitigation for the direct loss of BMV land. This is recognised in the NPS-EN1 (2025) which states that “ <i>Although in the case of most energy infrastructure there may be little that can be done to mitigate the direct effects of an energy project on the existing use of the proposed site</i> ”. This is further clarified in the Land Use Framework for England (2026), which states that there is enough land to “ <i>build the homes needed to address the’ housing crisis, maintain domestic food production, restore nature at scale, and build clean, homegrown power to provide energy security</i> ” and that “ <i>these are not competing demands</i> ”. It also states that “ <i>we can locate energy infrastructure alongside</i>	There is no way to compensate for the temporary and permanent loss of BMV land	Major to moderate adverse (significant)	

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
				<p><i>nature-rich food production</i>". The Agricultural Land Classification Surveys (9.31 Agricultural Land Classification (ALC) Survey Results - Kent [REP5-091]) conducted as part of the Project confirm grades similar to the Provisional ALC grades considered as part of the original routeing and siting design (6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]).</p>		
Decommissioning	Temporary impacts to soil function and disruption to soil ecosystem services	<p>Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including considering sensitive soil receptors, as set out in 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044].</p>	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA.</p> <p>Impacts on soil function are reduced through good practice guidance as detailed in 7.5.10.2 Outline Soil Management Plan – Kent [APP-355].</p> <p>Damage from soil handling is reduced through defined stripping, storage and reinstatement procedures.</p>	<p>Where practicable soil resources will be reused on site in line with landscape and ecological designs as detailed in 7.5.7.2 (C) Outline Landscape and Ecological Management Plan - Kent [REP4-067].</p> <p>The restoration of the temporarily disturbed soils will be conducted in line with the measures detailed within 7.5.10.2 Outline Soil Management Plan – Kent [APP-355].</p> <p>Item AS02 in 9.83 (B) Outline Code of Construction Practice [REP4-232] states that "Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be recreated.... This will aim to restore land to the pre-construction ALC grade (unless otherwise agreed with the landowner)".</p>	<p>There is no feasible way to compensate or offset the temporary or permanent effects on BMV land.</p>	Moderate to minor adverse (significant)

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
Traffic and Transport						
No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.						
Air Quality						
No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.						
Noise and Vibration						
No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.						
Socio-Economics, Recreation and Tourism						
No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.						
Health and Wellbeing						
No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.						
Intra-Project Cumulative Effects						
Construction	Potential intra-project cumulative effect, as a result of significant visual amenity effects in-combination with minor additional noise, traffic and transport, and health and wellbeing effects, upon some residential receptors in proximity to viewpoints 5 and 11.	Avoidance measures have been applied where possible such as avoiding routing traffic on the most sensitive routes including small rural road and through villages, with associated avoidance of noise sensitive receptors. The Applicant is also avoiding effects on Bank Holiday weekends.	Reduction measures have been applied, for example by reducing the number of HGV movements on Sundays.	Mitigation measures have been applied including through the application of Best Practicable Means (BPM) to address construction noise.	Compensation is not available to address any of the contributing impacts. There is no way to compensate for temporary impacts relating to traffic and transport, noise or visual amenity.	Significant adverse (noting these are more recently reported as moderate at most (see Application Document 9.141 Intra Project Cumulative Effect Significance - Technical Note))
	Potential intra-project cumulative effect to PRoW users of TE37 and the Saxon Shore Way due to significant visual amenity effects at some locations combined with minor traffic and transport, socio-economic, and health and well-being effects upon the regional trail.	Avoidance measures have been applied where possible including avoiding closing any PRoW without providing a suitable diversion.	Reduction measures have been applied including reducing the length of time PRoW are temporarily diverted	Many mitigation measures have been applied including ensuring priority for PRoW users.	It is considered that appropriate compensation is not available to address the potential temporary effect on this bridleway. Please see Application Document Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125] for further detail. However the Applicant has committed to providing footpath benefits following construction including the permissive path along the Fromus access.	Significant adverse (noting these are more recently reported as moderate at most (see Application Document 9.141 Intra Project Cumulative Effect Significance - Technical Note))
Decommissioning	The residual significance of effects is expected to be the same as for construction, see above.					

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
Inter-Project Cumulative Effects						
<i>Cumulative Effects Assessment Stage 4 (assessment of Proposed Project with each of the other individual developments)</i>						
Agriculture and Soils	The residential development Hoo Farm is likely to result in additional temporary soil disturbance and temporary and permanent loss of BMV land resulting in the potential for significant cumulative effects on these receptors at construction and decommissioning, when considered in combination with the Proposed Project.	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including considering sensitive soil receptors, as set out in 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] .	The scale and location of proposed infrastructure were refined through the iterative design process and EIA. Impacts on soil function are reduced through good practice guidance as detailed in 7.5.10.2 Outline Soil Management Plan – Kent [APP-355] . Damage from soil handling is reduced through defined stripping, storage and reinstatement procedures.	Where practicable soil resources will be reused on site in line with landscape and ecological designs as detailed in 7.5.7.2 (C) Outline Landscape and Ecological Management Plan - Kent [REP4-067] . The restoration of the temporarily disturbed soils will be conducted in line with the measures detailed within 7.5.10.2 Outline Soil Management Plan – Kent [APP-355] . Item AS02 in 9.83 (B) Outline Code of Construction Practice [REP4-232] states that “Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be recreated... This will aim to restore land to the pre-construction ALC grade (unless otherwise agreed with the landowner)”. The restoration of the temporarily disturbed soils	There is no feasible way to compensate or offset the temporary or permanent effects on BMV land.	Potential significant
	Richborough Energy Park development is likely to result in additional temporary soil disturbance and temporary and permanent loss of BMV land resulting in the potential for significant cumulative effects on these receptors at construction and decommissioning, when	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including considering sensitive soil receptors, as set out in 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] .	The scale and location of proposed infrastructure were refined through the iterative design process and EIA. Impacts on soil function are reduced through good practice guidance as detailed in 7.5.10.2 Outline	Where practicable soil resources will be reused on site in line with landscape and ecological designs as detailed in 7.5.7.2 (C) Outline Landscape and Ecological Management Plan - Kent [REP4-067] . The restoration of the temporarily disturbed soils	There is no feasible way to compensate or offset the temporary or permanent effects on BMV land.	Potential significant

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		Compensation
	considered in-combination with the Proposed Project.		<p>Soil Management Plan – Kent [APP-355].</p> <p>Damage from soil handling is reduced through defined stripping, storage and reinstatement procedures.</p>	<p>will be conducted in line with the measures detailed within 7.5.10.2 Outline Soil Management Plan – Kent [APP-355].</p> <p>Item AS02 in 9.83 (B) Outline Code of Construction Practice [REP4-232] states that “Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be recreated.... This will aim to restore land to the pre-construction ALC grade (unless otherwise agreed with the landowner)”.</p>		
	The Land On The West Side Of Tothill Street development is likely to result in additional temporary soil disturbance and temporary and permanent loss of BMV land resulting in the potential for significant cumulative effects on these receptors, at construction and decommissioning, when considered in-combination with the Proposed Project.	<p>Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including considering sensitive soil receptors, as set out in 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044].</p>	<p>The scale and location of proposed infrastructure were refined through the iterative design process and EIA.</p> <p>Impacts on soil function are reduced through good practice guidance as detailed in 7.5.10.2 Outline Soil Management Plan – Kent [APP-355].</p> <p>Damage from soil handling is reduced through defined stripping, storage and reinstatement procedures.</p>	<p>Where practicable soil resources will be reused on site in line with landscape and ecological designs as detailed in 7.5.7.2 (C) Outline Landscape and Ecological Management Plan - Kent [REP4-067].</p> <p>The restoration of the temporarily disturbed soils will be conducted in line with the measures detailed within 7.5.10.2 Outline Soil Management Plan – Kent [APP-355].</p> <p>Item AS02 in 9.83 (B) Outline Code of Construction Practice [REP4-232] states that “Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be</p>	<p>There is no feasible way to compensate or offset the temporary or permanent effects on BMV land.</p>	Potential significant

Topic / Project Phase	Description of Effect	Mitigation Hierarchy				Residual Effect
		Avoidance	Reduction	Mitigation	Compensation	
	considered in-combination with the Proposed Project.		Damage from soil handling is reduced through defined stripping, storage and reinstatement procedures.	with the measures detailed within 7.5.10.2 Outline Soil Management Plan – Kent [APP-355] . Item AS02 in 9.83 (B) Outline Code of Construction Practice [REP4-232] states that “Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be recreated.... This will aim to restore land to the pre-construction ALC grade (unless otherwise agreed with the landowner)”.		
<i>Assessment of total cumulative effects (assessment of Proposed Project with all other developments)</i>						
Landscape and Visual	When considering the total potential cumulative effect of all the other developments combined with the Kent Onshore Scheme, there is the potential for a significant total cumulative effect on LCA E1 Stour Marshes. The concentration of energy related development close to and within Richborough Energy Park, whilst occupying the less sensitive part of LCA E1, would have the potential to result in a small and peripheral part of LCA E1 becoming an energy-focused landscape, rather than exhibiting characteristics of the wider marsh. The mitigation planting associated with the Kent Onshore Scheme would provide some separation between the combined developments	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including avoiding the loss of boundary features such as mature trees and hedgerows and to minimise impact on existing landscape features such as drainage ditches. Avoidance of the wider marsh landscape for the siting of the Minster Converter Station and Substation to the west of the railway line. Avoidance of the use of low height tower types to reduce the number of towers proposed and subsequent wirescape.	The scale and location of proposed infrastructure were refined through the iterative design process and EIA. The siting of the proposed Minster Converter Station and Substation and associated construction works located close to the existing infrastructure at Richborough Energy Park to reduce effects on the local landscape character. Key Design Principles to inform the design of the Minster Converter Station and Substation to limit effects on landscape and visual receptors. Proposed landscape planting to integrate the	The oLEMP and REAC measures listed below are secured through Requirement 6 of the draft DCO. Commitment to sensitive routeing and siting of infrastructure and temporary works (REAC LV07). Commitment to retaining all veteran and ancient trees (REAC A05) and other vegetation where practicable (REAC LV01, LV18, B07 and B11). Commitment to locate the Minster Converter Station and Substation as close to the existing infrastructure at Richborough Energy Park (REAC LV15) and	There is no policy or legal requirement that the mitigation hierarchy requires all residual landscape and visual effects to be compensated for or that it is appropriate for alternative landscape compensation to be provided if it is accepted that there are any residual adverse landscape and visual effects that result from the Proposed Project. Further details contained at 3.9.20 within Application Document 9.23 Draft Statement of Common Ground Between National Grid Electricity Transmission and the Suffolk County Council [REP3-062] .	Potential significant at all project stages

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
	and the wider marsh landscape, thereby limiting the potential for cumulative significant effects to within the eastern periphery of LCA E1. The remaining part of LCA E1 would not experience significant total cumulative effects.		<p>infrastructure with existing landscape features where possible and separation from the wider marsh landscape. Ensuring tree planting of three standard trees per each individual mature tree lost.</p> <p>The landscape proposals included designing the landscape planting in collaboration with the cultural heritage specialists to respect the character of the former Wantsum Channel and to integrate into the proposals in the eastern edge of the former marshland with existing influence of mature vegetation and development.</p>	<p>consideration of orientation and massing to protect existing vegetation and design to be sympathetic and integrated into the surroundings (REAC LV17).</p> <p>The long-term benefits of the proposed mitigation planting (oLEMP and REAC LV18). This would be only perceptible as whips in year 1. As this matures, the proposed planting would provide separation from the wider marsh landscape and integrate the site into the relatively wooded edge of the former marsh.</p> <p>Commitment to successful reinstatement mitigation planting including adaptive management (REAC LV04, A22, GG06, GG07 and oLEMP).</p> <p>Commitment to minimise impact on existing landscape features including drainage ditches (REAC LV16).</p> <p>Commitment to consideration of advanced planting where planting does not conflict with construction works and timescales allow (REAC LV18 and oLEMP).</p> <p>Commitment to the operational lighting levels to be the lowest necessary (REAC B39).</p>	

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect	
		Avoidance	Reduction	Mitigation		
				Commitment to replacement tree planting of three standard trees per each individual mature tree to be removed (REAC A21).		
Agriculture and Soils	Combined temporary disturbance to soils and temporary and permanent loss of BMV land, as a result of the Proposed Project in combination with Residential Development (Hoo Farm), Richborough Energy Park, Land On the West Side of Tothill Street, Goshall Valley East Street, Ash, and Spitfire Green, is considered likely to result in a significant cumulative effect based on the information available to date	Routeing, siting and design development sought to avoid the most sensitive receptors where practicable including considering sensitive soil receptors, as set out in 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] .	The scale and location of proposed infrastructure were refined through the iterative design process and EIA. Impacts on soil function are reduced through good practice guidance as detailed in 7.5.10.2 Outline Soil Management Plan – Kent [APP-355] . Damage from soil handling is reduced through defined stripping, storage and reinstatement procedures.	Where practicable soil resources will be reused on site in line with landscape and ecological designs as detailed in 7.5.7.2 (C) Outline Landscape and Ecological Management Plan - Kent [REP4-067] . The restoration of the temporarily disturbed soils will be conducted in line with the measures detailed within 7.5.10.2 Outline Soil Management Plan – Kent [APP-355] . Item AS02 in 9.83 (B) Outline Code of Construction Practice [REP4-232] states that “Where land is being returned to agricultural use, the appropriate soil conditions (for example through the replacement of stripped layers and the removal of any compaction) will be recreated.... This will aim to restore land to the pre-construction ALC grade (unless otherwise agreed with the landowner)”.	There is no feasible way to compensate or offset the temporary or permanent effects on BMV land.	Adverse (significant)

Appendix Table A.4 Offshore Scheme – Residual Likely Significant Effects Mitigation Hierarchy

Topic / Project Phase	Description of Effect	Mitigation Hierarchy			Residual Effect
		Avoidance	Reduction	Mitigation	
Physical Environment					

No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.

Benthic Ecology

No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.

Fish and Shellfish Ecology

No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.

Marine Mammals

No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.

Marine Ornithology

No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.

Marine Archaeology

No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.

Shipping and Navigation

No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.

Commercial Fisheries

No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.

Other Sea Users

No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.

Intra-Project Cumulative Effects

No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.

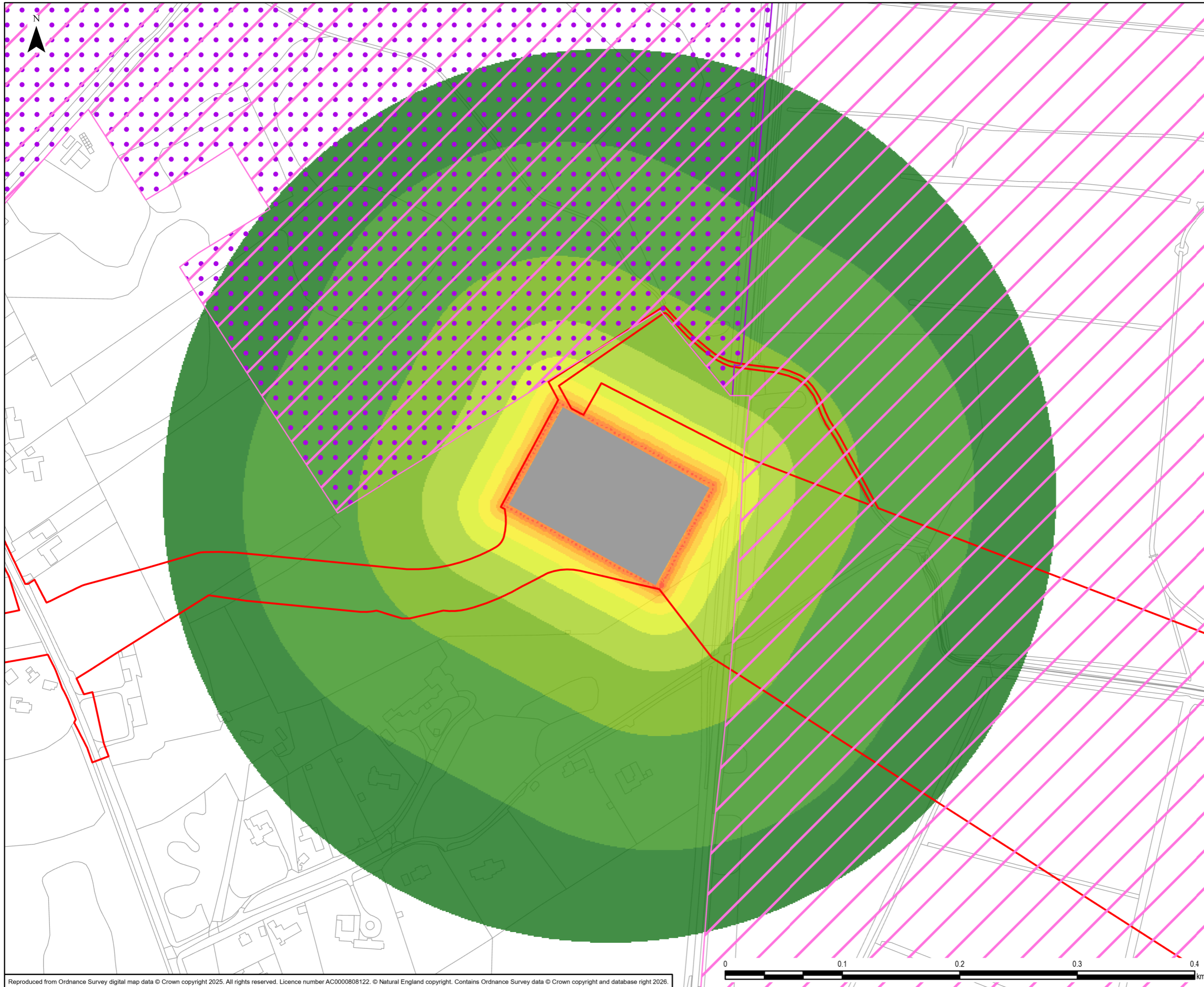
Inter-Project Cumulative Effects

No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.

Appendix Table A.5 Project-wide – Residual Likely Significant Effects Mitigation Hierarchy

Topic / Project Phase	Description of Effect	Mitigation Hierarchy				Residual Effect
		Avoidance	Reduction	Mitigation	Compensation	
Climate Change						
	No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.					
Project-wide (Combined) Effects of the Proposed Project						
	No likely significant residual effects identified as all potential significant effects have been addressed through the application of the mitigation hierarchy.					

Appendix B 3ECOL1 Noise Contour Plan - Suffolk HDD Compound



Legend

- Order Limits
- HDD Location
- Special Protection Area (SPA)
- Site of Special Scientific Interest (SSSI)

Average noise level (dB)

- <= 35 dBA
- 35 - 40 dBA
- 40 - 45 dBA
- 45 - 50 dBA
- 50 - 55 dBA
- 55 - 60 dBA
- 60 - 65 dBA
- 65 - 70 dBA
- 70 - 75 dBA
- 75 - 80 dBA

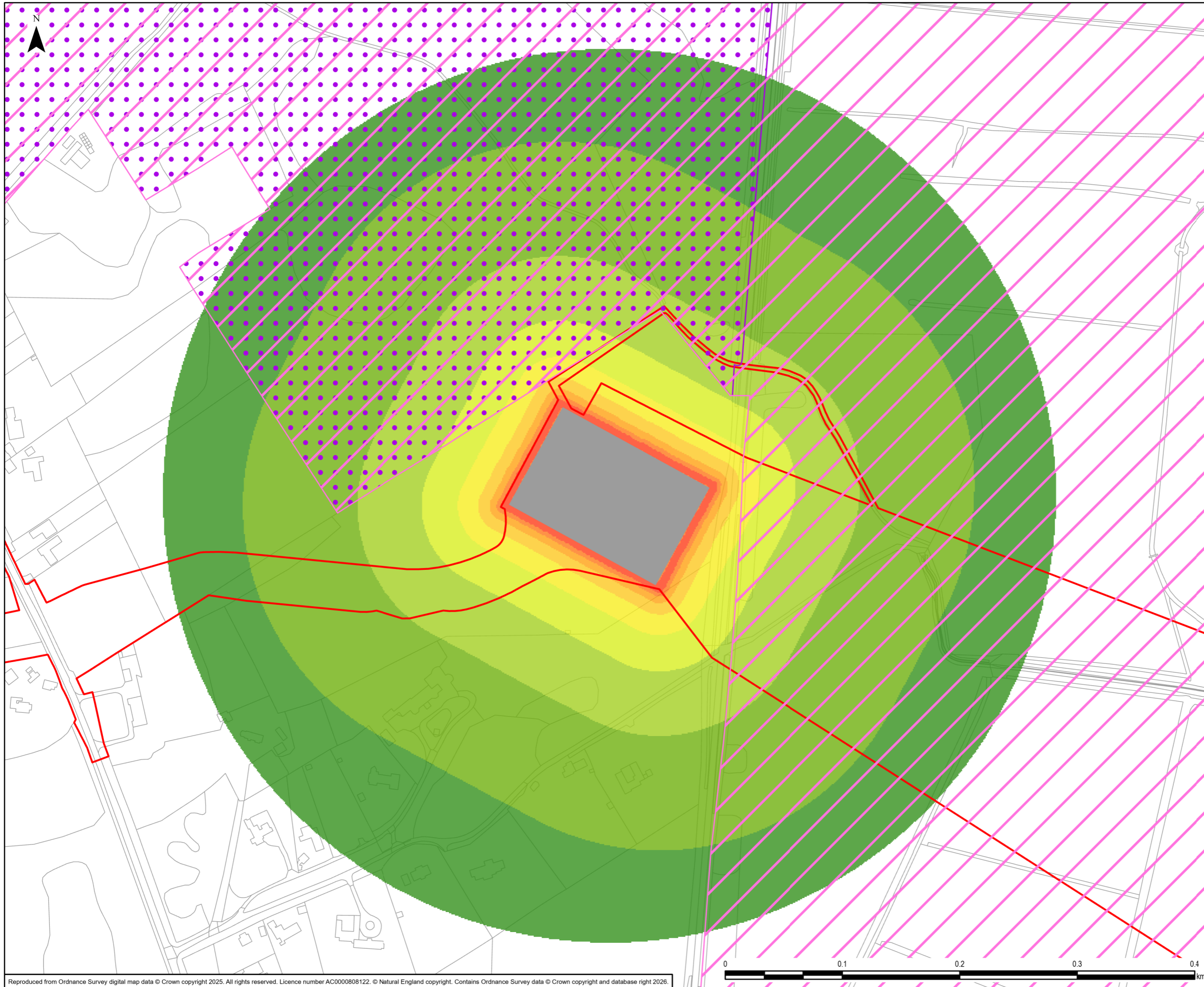
0	27/03/2026	DEADLINE 6 EXAMINATION SUBMISSION	EH	EB	DG
Rev	Date	Description	GIS	Chk	App



Scheme: SEA LINK

Document Title: INDICATIVE SOUND PROPAGATION MODEL
OUTPUTS - AVERAGE CONSTRUCTION NOISE LEVEL

Creator: EH	Date: 27/03/2026	Checker: EB	Date: 27/03/2026	Approver: DG	Date: 27/03/2026
Document Ref: FIGURE 1	Scale: 1:3,000	Format: A3	Sheets: 1	Rev: 0	



Legend

- Order Limits
- HDD Location
- Special Protection Area (SPA)
- Site of Special Scientific Interest (SSSI)

Maximum noise level (dB)

- <= 35 dBA
- 35 - 40 dBA
- 40 - 45 dBA
- 45 - 50 dBA
- 50 - 55 dBA
- 55 - 60 dBA
- 60 - 65 dBA
- 65 - 70 dBA
- 70 - 75 dBA
- 75 - 80 dBA

0	27/03/2026	DEADLINE 6 EXAMINATION SUBMISSION	EH	EB	DG
Rev	Date	Description	GIS	Chk	App



Scheme: SEA LINK

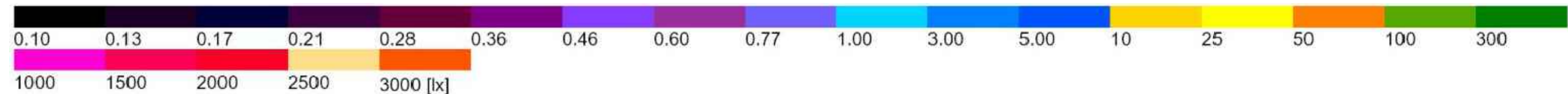
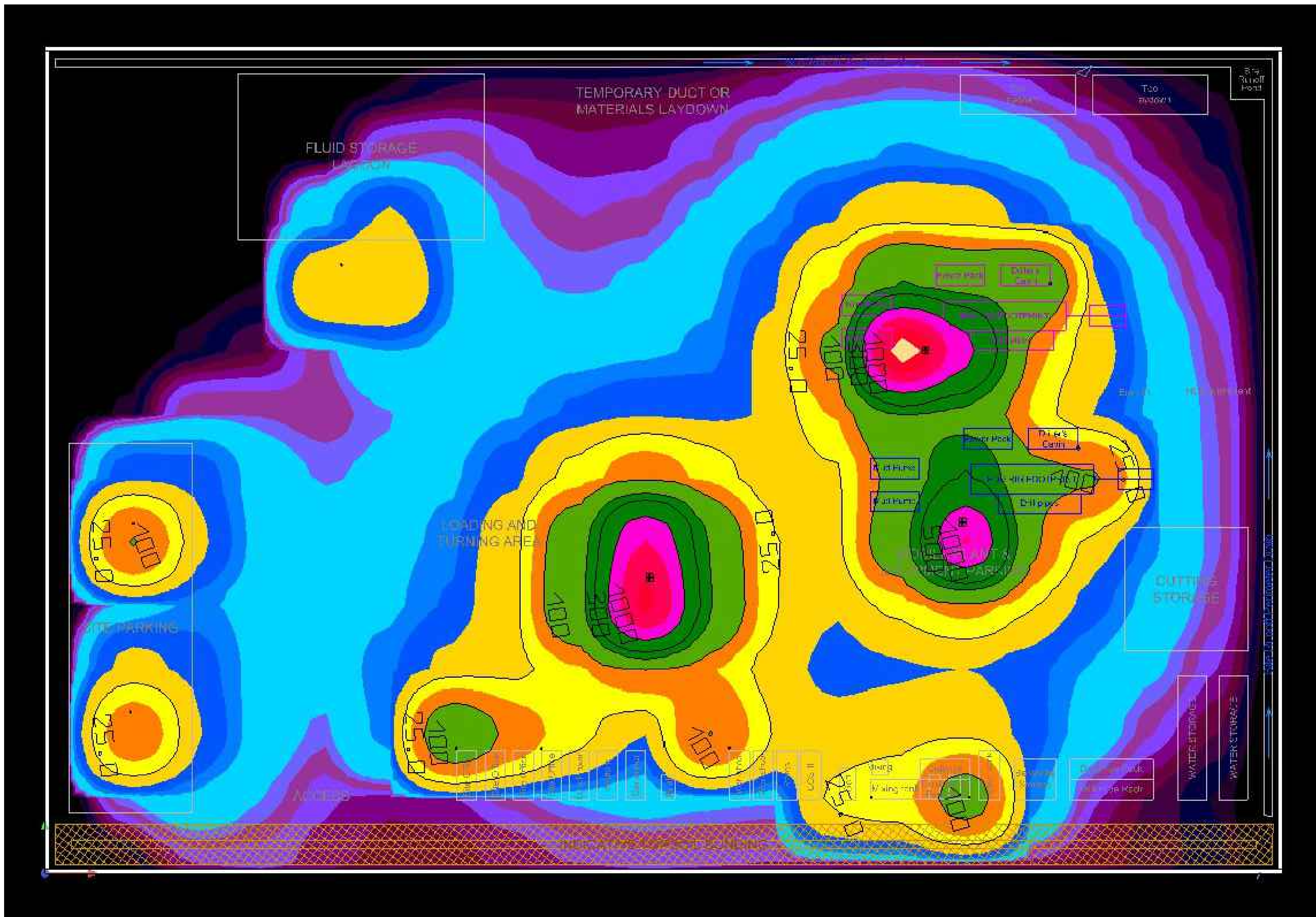
Document Title: INDICATIVE SOUND PROPAGATION MODEL OUTPUTS - MAXIMUM CONSTRUCTION NOISE LEVEL

Creator: EH	Date: 27/03/2026	Checker: EB	Date: 27/03/2026	Approver: DG	Date: 27/03/2026
Document Ref: FIGURE 2	Scale: 1:3,000	Format: A3	Sheets: 1	Rev: 0	

Appendix C 3ECOL1 Lighting Plan – Suffolk HDD Compound

Notes

1. Do not scale from this drawing.
2. All dimensions are in metres/millimetres unless otherwise stated.
3. This drawing is to be read in conjunction with all relevant documents and drawings.
4. No unauthorised disclosure, storage or copying.
5. Detailed design, including final dimensions, to be decided at a later date.
6. Refer to drawing references DCO/S/DE/SS/1211 and DCO/S/DE/SS/1213 within Application Document 2.13 Design and Layout Plans for the compound location
7. HDD = Horizontal Directional Drill.



Sheet X Centroid Coordinate: N/A Sheet Y Centroid Coordinate: N/A

Issue	Date	Remarks	Drawn	Checked	Approved
A	10/04/2026	PRELIMINARY	TM	JW	JW

Title
 THE NATIONAL GRID ELECTRICITY TRANSMISSION PLC (SEA LINK) ORDER
 SUFFOLK LANDFALL COMPOUND LIGHTING

SHEET 1 of 2



Application Number

National Grid Drawing Reference
 SEAL-MMD-SEAL-ENG-DWG-0823

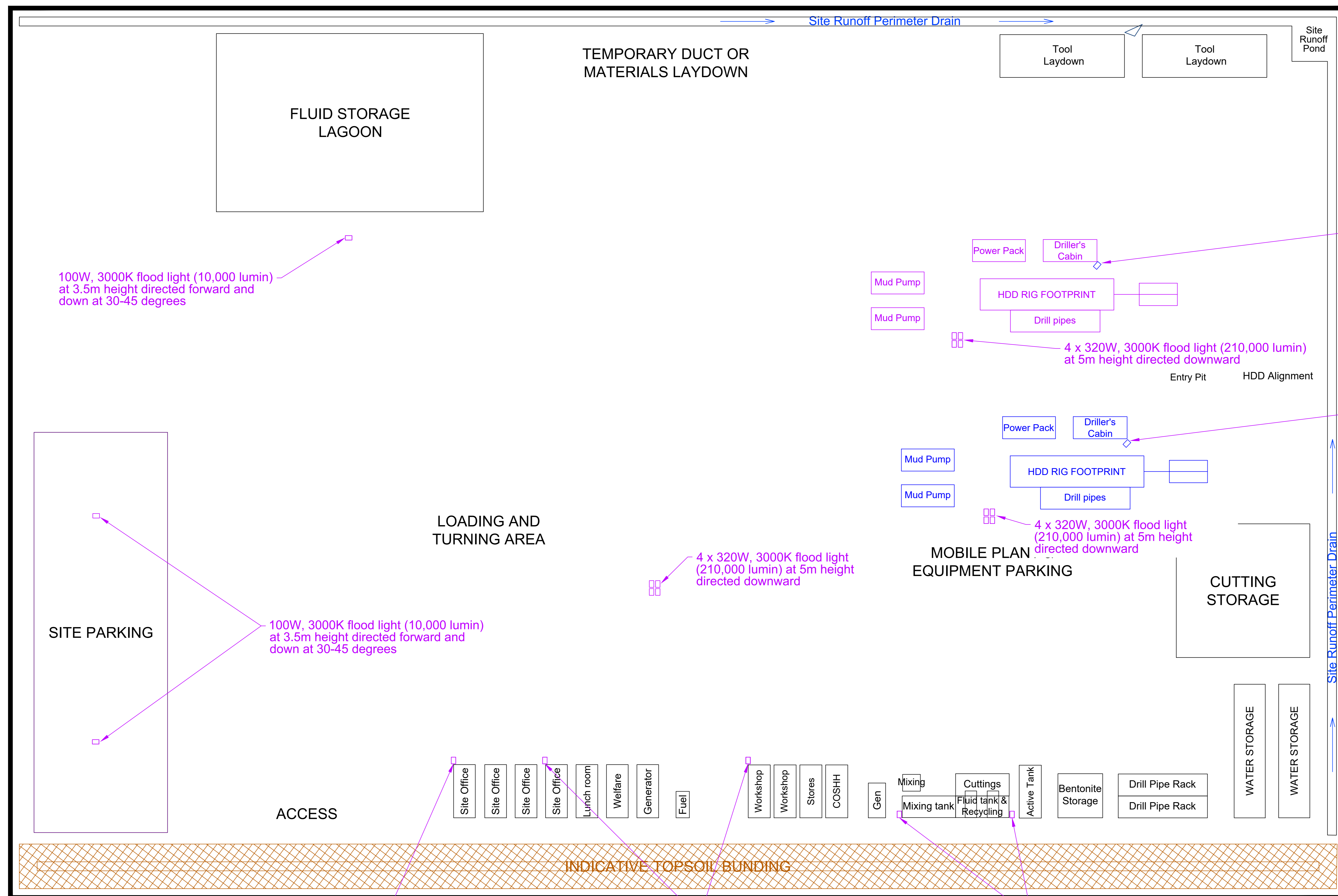
Scale	Sheet Size	Sheet	Issue
NTS	A1	SHEET 1 OF 2	01

Notes

1. Do not scale from this drawing.
2. All dimensions are in metres/millimetres unless otherwise stated.
3. This drawing is to be read in conjunction with all relevant documents and drawings.
4. No unauthorised disclosure, storage or copying. Detailed design, including final dimensions, to be decided at a later date.
5. Refer to drawing references DCO/S/DE/SS/1211 and DCO/S/DE/SS/1213 within Application Document 2.13 Design and Layout Plans for the compound location
7. HDD = Horizontal Directional Drill.

Legend

- 4 x 320W, 3000K flood light (210,000 lumen)
- 100W 3000K flood light (10,000 lumen)
- 200W, 3000K flood light (20,000 lumen)



100W, 3000K flood light (10,000 lumen) at 3.5m height directed forward and down at 30-45 degrees

100W, 3000K flood light (10,000 lumen) at 3.5m height directed forward and down at 30-45 degrees

100W, 3000K flood light (10,000 lumen) at 3.5m height directed forward and down at 30-45 degrees

4 x 320W, 3000K flood light (210,000 lumen) at 5m height directed downward

100W, 3000K flood light (10,000 lumen) at 3.5m height directed forward and down at 30-45 degrees

100W, 3000K flood light (10,000 lumen) at 4.5m height directed forward and down at 30-45 degrees

4 x 320W, 3000K flood light (210,000 lumen) at 5m height directed downward

200W, 3000K flood light (20,000 lumen) at 3.5m height directed at 30-45 degrees down onto the HDD rig

200W, 3000K flood light (20,000 lumen) at 3.5m height directed at 30-45 degrees down onto the HDD rig

Sheet X Centroid Coordinate: N/A Sheet Y Centroid Coordinate: N/A

Issue	Date	Remarks	Drawn	Checked	Approved
A	10/04/2025	PRELIMINARY	TM	JW	JW

Title
 THE NATIONAL GRID ELECTRICITY TRANSMISSION PLC (SEA LINK) ORDER
 SUFFOLK LANDFALL COMPOUND LIGHTING
 SHEET 2 of 2

nationalgrid

Application Number

National Grid Drawing Reference
 SEAL-MMD-SEAL-ENG-DWG-0823

Scale	Sheet Size	Sheet	Issue
NTS	A1	SHEET 2 OF 2	01

Appendix D 3CEIntra1 PRow Effects Offsetting/Compensation

D.1 Introduction

- D.1.1 This technical note has been prepared in response to discussions at ISH3 regarding whether it is possible to offset temporary construction stage effects on PRow that are potentially significant (though likely to be moderate) through the provision of permanent improvements to footpath provision post construction.

D.2 Offsetting and Compensation

- D.2.1 There is no legal definition of compensation or offsetting as it applies to Environmental Impact Assessment and the definition is therefore a matter of planning judgement. As such it is not precise and is open to interpretation. It is the Applicant's view that compensation must address the residual harm to the receptor.
- D.2.2 Some impact types lend themselves well to this form of compensation and offsetting, such as the provision of new or improved habitat to replace habitat that is lost. A good example of this is the Applicant's provision of alternative foraging habitat for golden plover to offset the loss of foraging habitat at the Minster Converter and substation site. There are other types of impact that cannot be offset or compensated for in this way, examples being noise, traffic and transport, air quality and visual impacts.
- D.2.3 In ISH3 the Applicant provided examples of topic areas associated with the Proposed Project for which it is not considered that offsetting and compensation are available. These included impacts such as driver delay and severance, noise and vibration, visual amenity and air quality. These can be avoided, reduced and mitigated, but not offset or compensated for.

D.3 What effect is being considered for offsetting/compensation?

- D.3.1 In document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra Project Cumulative Effects [APP-059] the Applicant reported a potentially significant intra-project cumulative effect on Bridleway 491/010/0 during construction. Bridleway 491/010/0 is crossed by the AC Cable route from the Saxmundham Converter Station to the Kiln Lane Substation; it is also crossed by a construction access.
- D.3.2 The cumulative effects on Bridleway 491/010/0 arise due to a reduced amenity value of the Bridleway primarily due to a loss of visual amenity because there will be views of construction activity, including construction of both the Saxmundham Converter and Kiln Lane Substation. This effect applies predominantly to parts of the Bridleway that will not be physically affected by the project by diversions or closures. Other factors contributing to the intra-project effect include transport related effects of severance (minor) pedestrian delay (minor) non-motorised users (minor) fear (minor) and diversion (negligible). The transport related effect is limited to a 75m section of the Bridleway which will be temporarily diverted for up to 4 weeks via a 144m diversion (and increase in journey length of approximately 80m). For the remainder of the time the Bridleway will remain open to the public, with priority given to users; as such the potential transport

related effect would be limited to situations where a user approached the crossing and had to wait whilst a vehicle already crossing the PRow finished crossing and the gates were returned to favour of the PRow user.

- D.3.3 The Applicant recognises that SCC considers there to be an overall effect of several minor and negligible effects on PRows that form part of the PRow network (nexus) in the vicinity of the works during construction.

D.4 The application of the mitigation hierarchy to significant intra-project effects on Bridleway 491/010/0

- D.4.1 Each of the sources of intra-project cumulative effect on the Bridleway (and to a minor degree on other PRow in the area) has been mitigated as far as reasonably practicable following the mitigation hierarchy. This is set out below:

D.4.2 **Avoid** – As the order limits for the Proposed Project begin at the coast and end inland at Saxmundham/Friston it is clearly impossible to avoid intersecting several PRow along the way. Some key routes have been avoided by using trenchless construction techniques at the coast, including sections of the King Charles III England Coastal Path in both East Suffolk and Kent. There is a form of non-spatial avoidance in the mitigation in that the Applicant has avoided the need to close any PRow during construction without there being a suitable diversion proposed. This addresses the traffic and transport contribution to the effect but not the visual element for which avoidance measures are not considered to be available.

D.4.3 **Reduce** – there are many examples of the applicant applying measures to reduce effects. These include reducing the length of diversions, reducing the length of time or number of times diversions are in place and reducing delay to PRow users by giving them priority at crossings. Again, these measures address the traffic and transport type effects but not the visual amenity effects on overall amenity for PRow users, for which reduction measures are not considered to be available.

D.4.4 **Mitigate** – examples of additional mitigation also include many of the other measures set out in the Suffolk Outline PRow Management Plan (oPRoWMP) [Application Document 7.5.9.1]. These include adoption of all of the additional measures requested by SCC in table A6 of **REP2-062**. It would not be possible to mitigate the visual effects during construction through screen planting because of the time required for vegetation to establish and become an effective screen; planting could not be provided on the temporarily diverted section because of the need for it to function as a temporary construction access.

D.4.5 Again, these measures help to mitigate the transport related effects, but not the visual amenity effects on overall amenity for PRow users, for which reduction measures are not considered to be available.

D.4.6 **Offset/Compensate** – The Applicant's view is that offsetting and compensating for an effect must still be a form of redress or remedy for the PRow user who experiences a reduction in amenity during construction. It is the Applicant's view that under this definition of offsetting, there are no such measures available. There is no way to offset or compensate for the remaining transport related impact, which is a slight increase in journey length during temporary diversions, and a potential delay for a PRow user if a vehicle is already crossing a PRow when they arrive at the crossing. There is also no way to offset or compensate a PRow user for the reduction in visual amenity that results from being able to see the construction works.

- D.4.7 It is important to note that NPS EN-1. Paragraph 5.10.5 acknowledges that "*virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape*" and paragraph 5.10.6 states that "*Projects need to be designed carefully, taking account of the potential impact on the landscape. Having regard to siting, operational and other relevant constraints [avoid] the aim should be to minimise harm to the landscape [reduce], providing reasonable mitigation where possible and appropriate [mitigate]*" (square brackets and emphasis added). Any direct or indirect reference to compensation is conspicuous by its absence from paragraph 5.10.6 or any paragraphs of NPS EN-1, EN-3 or EN-5 that relate to landscape and visual impacts. This is in contrast to the Biodiversity and Geological Conservation section of NPS EN-1 (Section 5.4), which includes numerous references to compensation being required as part of the mitigation hierarchy for biodiversity impacts, including at paragraphs 5.4.35, 5.4.42, 5.4.43, and 5.4.44.
- D.4.8 It is the Applicant's position that there is no policy or legal requirement that the mitigation hierarchy requires all residual significant landscape and visual effects to be compensated for or that it is appropriate for alternative landscape compensation to be provided if it is accepted that there are any significant residual adverse landscape and visual effects that result from the Proposed Project.

D.5 Suffolk County Council's Proposals

- D.5.1 Suffolk County Council has suggested three actions that they consider would compensate or offset the temporary effects on PRow during construction. These are:
- Creation of a new 1.2 km PRow along the Saxmundham Converter Station access route
 - Resurfacing of the Aldeburgh Footpath – a PRow that crosses the North Warren RSPB reserve/ Leiston - Aldeburgh SSSI.
 - Creation of a new PRow along a 1.2 km length of the B1119.

D.6 The Applicant's Commitments

Permissive path along the Saxmundham Converter Station access route

- D.6.1 The Applicant has committed to providing a permissive path along the access route to the Saxmundham Converter Station site from the B1121, crossing the Fromus Valley and crossing the River Fromus via a new bridge. This is secured via commitment
- D.6.2 The Applicant is able to do this because it is already taking permanent rights over this land for the permanent site access, and therefore no additional rights need to be taken from the landowner. The Applicant is in the process of updating the Suffolk oPRowMP to include specific measures in relation to the proposed permissive paths
- D.6.3 The permissive path would be well advertised/signposted and would provide the only footpath crossing the Fromus valley south of Saxmundham. For the most part the footpath would be separated from the access road itself, and would be tree lined, though where it crosses the Fromus Bridge the path would need to be demarcated via road markings or a textured surface, as there is insufficient room for a raised footway.

- D.6.4 Following construction of Sea Link and, if granted a DCO, LionLink, the permissive path would function in all ways as if it were a PRow, save for its temporary closure in the rare circumstances when major repairs were necessary, for example should AIL need to access the site to deliver a new transformer. This permissive path would be 1.2 km in length and, upon reaching the Saxmundham converter station, would connect in to the permanently diverted PRow E-491/005/0 and the reinstated PRow E-491 006/0. This Permissive Path would be particularly beneficial in providing a connection to PRow E-460 020/0 to the west (though with a need to cross the B1121) which in turn connects to the South Saxmundham Garden Neighbourhood land, a large residential planning allocation to the West of the B1121.
- D.6.5 The Saxmundham Converter site will be surrounded by approximately 17 ha of woodland planting. In addition to the diverted PRow E-491/005/0 to the south of the Converter Station and the reinstated PRow E-491 006/0 to the north, the Applicant has committed to creating permissive paths through the woodland area. The commitments to create permissive access along the access and through the woodland were added to Application Document 7.5.7.1 Outline Landscape and Ecological Management Plan – Suffolk at Deadline 5, which confirms in section 5.1.4 that the landscape design objectives include
- D.6.6 *“- To provide enhancement measures relating to access where the rights being sought over the land would also allow for permissive access to be granted. The locations where this is proposed are the permanent access route from the B1121 to the Saxmundham Converter Station Site and access around the proposed woodland planting around the Saxmundham Converter Station site*
- D.6.7 *- To establish an attractive amenity value for users of the permanent PRow diversions should this not conflict with safety, security or operational requirements for the Converter Station”*
- D.6.8 At Deadline 6 the permissive path along the access has also been added to the Access, Rights of Way and Public Rights of Navigation Plans [**Application Document 2.7**]. The permissive access routes through the woodland will depend on the final landscaping design so have not been added to these plans, but firm commitments are made to both permissive paths in the REAC and Suffolk oPRowWMP.
- D.6.9 To allow the woodland to establish these paths will need to be demarcated and fenced to prevent damage by deer. It is considered that approximately 750 m of permissive path will be able to be created within the woodland.
- D.6.10 Regardless of whether the above permissive paths are considered to be compensation or enhancement, the provision of this 1.2 km high quality permissive path, providing the first public access to cross the Fromus Valley south of Saxmundham, would more than offset the intra-project cumulative effect on Bridleway 491/010/0, and the small number of minor construction stage temporary intra-project effects on other PRow in the vicinity of Saxmundham.
- D.6.11 As such, the additional B1119 PRow is not considered necessary, as the effects are already offset by a permissive route of equivalent length and possibly higher value. These additional measures are significant in the context of the Sea Link project, which does not result in any temporary or permanent closures of PRow that are not subject to diversions, and almost all diversions are short in length and duration. The provision of permanent permissive paths of substantial length to offset the temporary and short duration diversion of PRow during construction clearly indicates a substantially greater commitment than may otherwise be expected.

- D.6.12 In addition to the provision of permissive paths, the Applicant is also providing two permanent diversion routes to replace a closed section of E-491/005/0. The length of the section proposed to be extinguished is approximately 448 m and to permanent diversion are an 800m section of PRow to the west of the converter station and a 531 m section of PRow to the east giving a total length of 1.331 km of diverted PRow to replace the 448 m closed section, and overall gain of 883 m of new PRow.
- D.6.13 It is also noted that SCC have previously suggested that the B1119 PRow could be provided as a permissive path as an alternative approach, without suggesting this would reduce its value as a compensatory measure.

Resurfacing of the Aldeburgh Footpath (PRow E-103/006/0)

- D.6.14 The Applicant does not consider this to be a necessary compensation or offsetting measure, particularly given that the PRow would otherwise be unaffected by the works.
- D.6.15 The Applicant would be unable to undertake this work for two main reasons. The proposed resurfacing works are proposed within a section of the cable route being installed via trenchless techniques. Above ground works in this area are limited to access for frac out spotters and, in the highly unlikely event that frac out were to occur, a tractor and bowser and a 4WD vehicle to allow clean up any frac out. This resurfacing work is not therefore included in the project description, there is no assessment of the potential effects of this work on the Aldeburgh Leiston SSSI, and no consultation has been undertaken with Natural England on the acceptability and impacts of the works. As such it is not considered that the works fall within the works that would be granted under the DCO. In addition, the works have not been requested directly by the RSPB who manage the nature reserve, though it is understood from SCC that they would be amenable to the works.
- D.6.16 Although the Applicant is unable to undertake the works under the Sea Link DCO the Applicant is happy to discuss other ways in which this enhancement could be delivered, such as through a change to the heads of terms.

Creation of a new PRow along a 1.2 km length of the B1119

- D.6.17 Given the Applicant's commitment to creation of permissive paths of substantial length along the Saxmundham Converter Station Access Road and around the woodland planting of just under 2 km in length, the Applicant does not consider the additional PRow along the B1119 to be necessary or proportional.
- D.6.18 Provision of this PRow by the Applicant would require the Applicant to take a class of rights over land not otherwise needed for the project through compulsory acquisition. The tests for compulsory acquisition are higher than the policy tests for introducing compensation or additional benefits to a project, with that acquisition required to be necessary and in the public interest. Given the above, the requested additional PRow link does not meet these tests and could therefore not be included in the Sea Link project. This was explained to SCC prior to submission as well as being discussed in numerous meetings between the parties throughout the Pre-Examination and Examination periods.

D.7 Conclusion

- D.7.1 The definition of what is and is not offsetting and compensation in EIA terms is not provided in National Planning Policy EN-1. EN-1 implies that offsetting/compensation is

not always possible. Whereas it states in 4.2.11 that applicant's for CNP projects "*should demonstrate that all [significant] residual impacts are those that cannot be avoided, reduced or mitigated*" (our emphasis), when it comes to compensation it implies it is not always possible when stating in 4.2.12 "*Applicants should set out how residual impacts will be compensated for as far as possible*" (our emphasis). When EN-1 also recognises, in section 3.1.2, when referencing energy infrastructure need, that "*it will not be possible to develop the necessary amounts of such infrastructure without some significant residual adverse impacts*" it also implies that there is not an offsetting or compensatory solution to all significant effects. Further information on the legal and policy aspects of the mitigation hierarchy are set out in Appendix A of **Application Document 9.136 Applicant's Responses to Third Written Questions**

D.7.2 There are individual topics for which offsetting and compensation are clearly not possible, as set out previously. For other topics whether offsetting and compensation is an effective remedy to effects, or simply an enhancement after the effects have discontinued, is open to interpretation, as has been seen throughout the Sea Link Examination.

D.7.3 In the case of the potentially significant cumulative effect on Bridleway 491/010/0, it is the applicant's view that irrespective of which interpretation is taken, the mitigation hierarchy has been fully complied with.

D.7.4 The Applicant is in the process of updating the REAC and Suffolk oPRoWMP to include specific measures in relation to the proposed permissive paths. The wording of the proposed commitment is as follows:

"GG43 - A permissive path will be created along the permanent access road into the Saxmundham Converter Station as shown indicatively on sheet 1 of 7 of the Access, Rights of Way and Public Rights of Navigation Plans (Application document 2.7.1) .

The path will be opened for public access once the construction of the LionLink Converter station is complete except where National Grid requires a closure for maintenance purposes.

Should the construction of LionLink be delayed such that construction at Saxmundham Converter Station for Sea Link is complete before construction has started on the Converter Station for LionLink, the permissive path would be open on completion of the Sea Link works and then closed for safety reasons for the duration of the LionLink construction works.

The path will run from the access off the B1121, across the Fromus Bridge, to where it intersects with the westernmost section of the permanently diverted E-491/005/0.

Opportunities will be sought to extend the permissive path from the point of intersection with E-491/005/0 through the woodland planting north of the converter station to connect into the reinstated PRoW E-491/006/0.

The permissive path will be clearly signposted at both ends and will be accessible to walkers only due to the route over the Fromus bridge not being suitable for cyclists and horse riders.

The permissive path will be located between the access road and the boundary planting except for where it crosses the Fromus bridge, where a pedestrian section of the bridge would be segregated using markings and/or tactile paving and/or delineation strips.

The permissive path would only be temporarily closed when major maintenance is required for either the Saxmundham or LionLink Converter stations(should the LionLink DCO be granted), when large loads may need to be delivered, or else where maintenance of the access road and associated vegetation is required. During any other periods of high activity on the haul road, when safety may be a concern, barriers and or path marshals would be provided."

D.8 Appendix D.A - Further mitigation measures identified by SCC that have been adopted for the Proposed Development.

D.8.1 The Applicant has adopted the following measures at the request of SCC. These measures are now incorporated in the Suffolk Outline Public Rights of Way Management Plan, and updated copy of which is being submitted at Deadline 6.

- Where a PRow crosses the haul road, the surface will be firm, smooth, level, and free draining with no loose stones or voids on the surface. This may require additional work to the type 1 surface such as compacting fines (4 or 6mm to dust aggregate) to fill voids.
- No steps or gradients will be introduced which could deter wheeled users (1 in 20 is accepted standard). The crossing will be maintained in a safe and fit condition for use by pedestrians, wheeled users, cyclists, and equestrians (as appropriate) all year round, to the reasonable satisfaction of the Highway Authority.
- Use of signage (including Give Way signs) to ensure that haul road users are aware of the potential for PRow users to cross their path and PRow users are aware that they are approaching a construction interface with the associated hazards.
- Use of gates that give priority to users of PRow at all times other than when there is a vehicle in the process of crossing the PRow when PRow users approach.
- A speed restriction to 10mph along the haul road/ construction roads in the vicinity (circa 20m) of the PRow (speed limit on the remainder of the haul road will be 30mph).
- Information regarding the presence of the PRow and the potential for PRow users will be included in the Method Statements, such that vehicle and plant operators will be mindful always for members of the public (hikers, dog walkers, horse riders, cyclists etc).
- No-reversing restrictions will be in place at locations where construction traffic interact with PRow.
- Stopping/parking of vehicles and mobile plant will not be permitted at locations where construction traffic interact with PRow.
- Temporary fencing to be installed along the length of the working width, with gaps in the fencing to allow access along the PRows. Signage will be in place so that users can quickly identify the continuation of the route across the haul road.
- Information regarding these measures will be a compulsory part of the induction training for drivers
- The surface of each PRow where it crosses the construction road will be kept in a safe and fit condition at all times for all legal users. The PRow will be maintained to a standard agreed with SCC as Local Highway Authority; and

- The positioning of site notices will be carefully considered to keep sign clutter to a minimum and to collate information on route closures where appropriate. Signs will be carefully worded with clear, uncomplicated information showing maps that the public would be familiar with (e.g. OS maps with topography context) to give them confidence that their walk or ride will still be possible, albeit with a minor diversion.

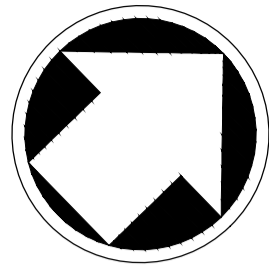
PRoW Reinstatement:

- A pre-construction and post-construction survey of the PRoW (surface condition and street furniture) affected will be undertaken by an experienced surveyor. The results of these surveys will be shared with SCC.
- A qualified Agricultural Liaison Officer (ALO) will be employed to ensure that information on existing land conditions is obtained, recorded, and verified during the PRoW surveys.
- The ALO will act as the point of contact for the restoration of the PRoW.
- The pre-condition and post-construction surveys will include a photographic record with accompanying map and table listing:
 - Date record taken, Map reference, Reference and type of PRoW, Overview description of PROW, giving average width, surface type, general condition, Highlighting any defects in current condition such as wet areas, pre-existing surface damage such as ruts, compaction, or obstructions Note any other vehicle use (farm or private vehicle use).

Appendix E 3TT11 Benhall Rail Bridge Option 1 and Option 2 Works Layout Plans

E.1 Introduction

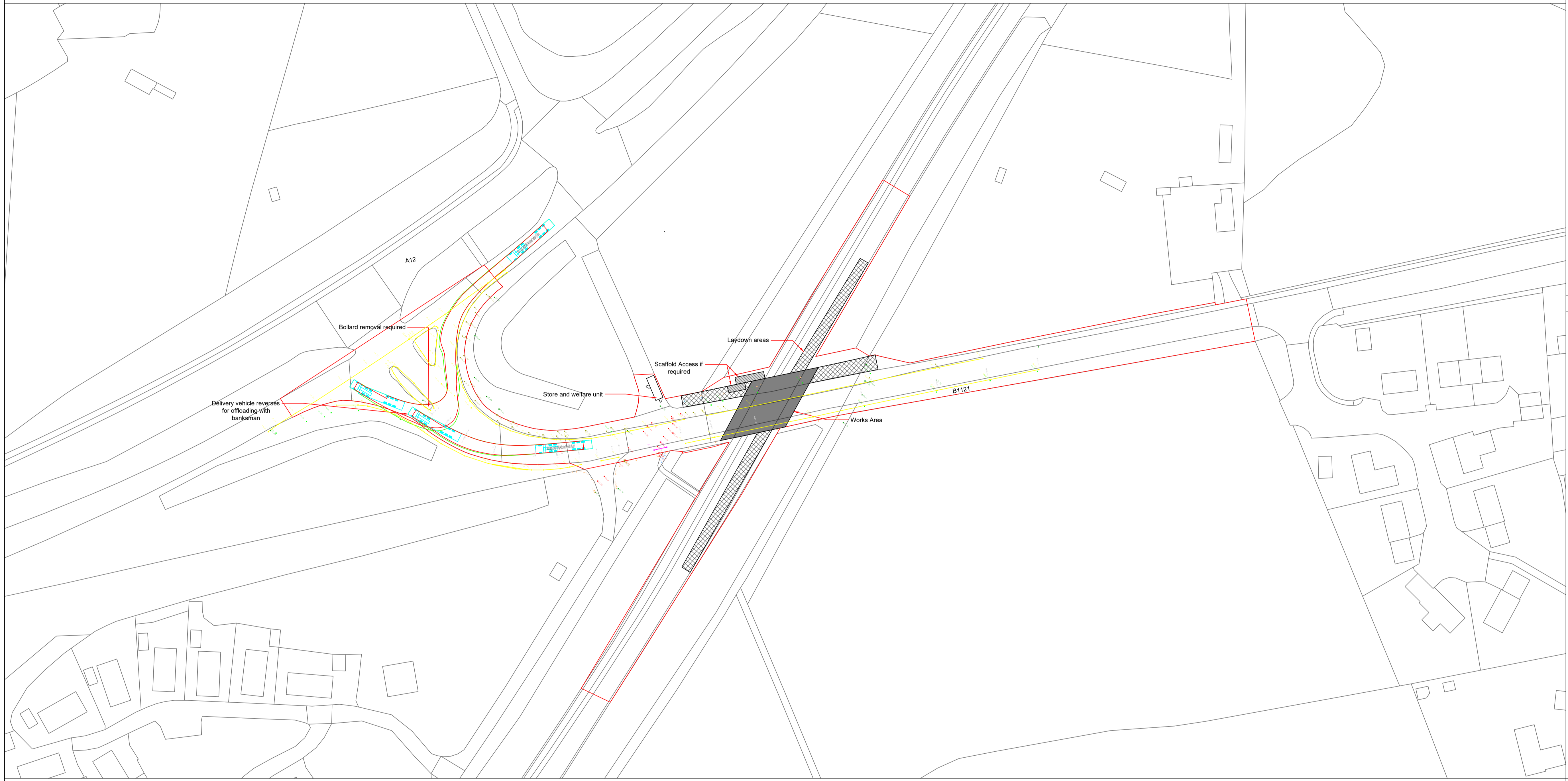
- E.1.1 This Appendix has been developed in response to ExQ3 3TT11. This Appendix includes indicative layout plans for the proposed works areas associated with Option 1 and Option 2 for the ALL access across the Benhall Rail Bridge on the B1121 Main Road.
- E.1.2 This Appendix should be read in conjunction with **Application Document 9.112 (A) Benhall Railway Bridge - Crossing Feasibility Study [REP4-101]** for information on the Options depicted.



THE NATIONAL GRID (SEA LINK) ORDER
 PINS APPLICATION NUMBER: EN020026
 INDICATIVE OPTION 1 BENHALL RAILWAY BRIDGE REMEDIAL WORKS – WORKING AREA
 SHEET 1 OF 2

Notes

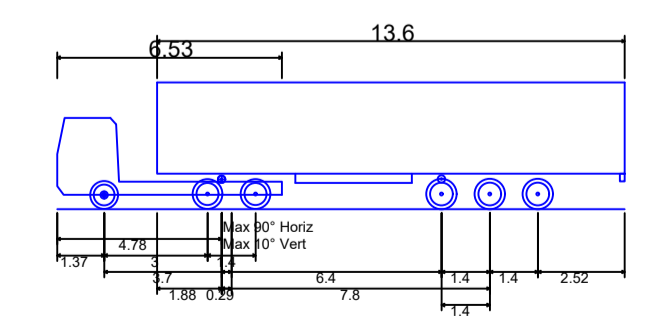
1. This plan is scaled at paper size A1, therefore any prints taken at smaller sizes will affect accuracy of the measurement units and should not be scaled against.
2. These plans will sit within the Order Limits. Due to the need for future flexibility, National Grid will be applying for Order Limits and Limits of Deviation within its Development Consent Order, within which any final alignment would lie. Therefore, all aspects of the authorised development, including the cable alignment, converter stations, substations and pylon locations should be treated as indicative only.
3. Reference should be made to the Guide to the Plans (Document Ref 2.1) which provides further information on what the plans show.
4. For further information on construction please refer to the construction section of the Environmental Statement.
5. Dimensions are in meters unless otherwise stated.
6. This works layout plan is indicative and will be updated at detailed design.
7. Works extent is subject to the findings from the proposed structural inspection and assessment.
8. Access and laydown along the railway is subject to agreement with Network Rail.
9. Laydown areas have been identified to enable the road to be opened between works periods where practicable.



Legend

- Topographical survey kerb line

Typical Plan Layout



Max Legal Length (UK) Articulated Vehicle (16.5m)
 Overall Length 16.500m
 Overall Width 2.550m
 Overall Body Height 3.681m
 Min Body Ground Clearance 0.411m
 Max Track Width 2.500m
 Lock to lock time 6.00s
 Kerb to Kerb Turning Radius 6.530m

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A	APR 2026	For Information	BC	WB	JW
Issue	Date	Remarks	Drawn	Checked	Approved

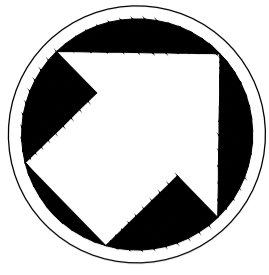
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 THE NATIONAL GRID (SEA LINK) ORDER
 PINS APPLICATION NUMBER: EN020026
 INDICATIVE OPTION 1 BENHALL RAILWAY BRIDGE
 REMEDIAL WORKS – WORKING AREA
 SHEET 1 OF 2



Application Number EN020026

National Grid Drawing Reference
 SEAL-MMD-SEAL-ENG-DWG-0822

Scale	Sheet Size	Sheet	Issue
As shown	A1	SHEET 1 OF 2	A



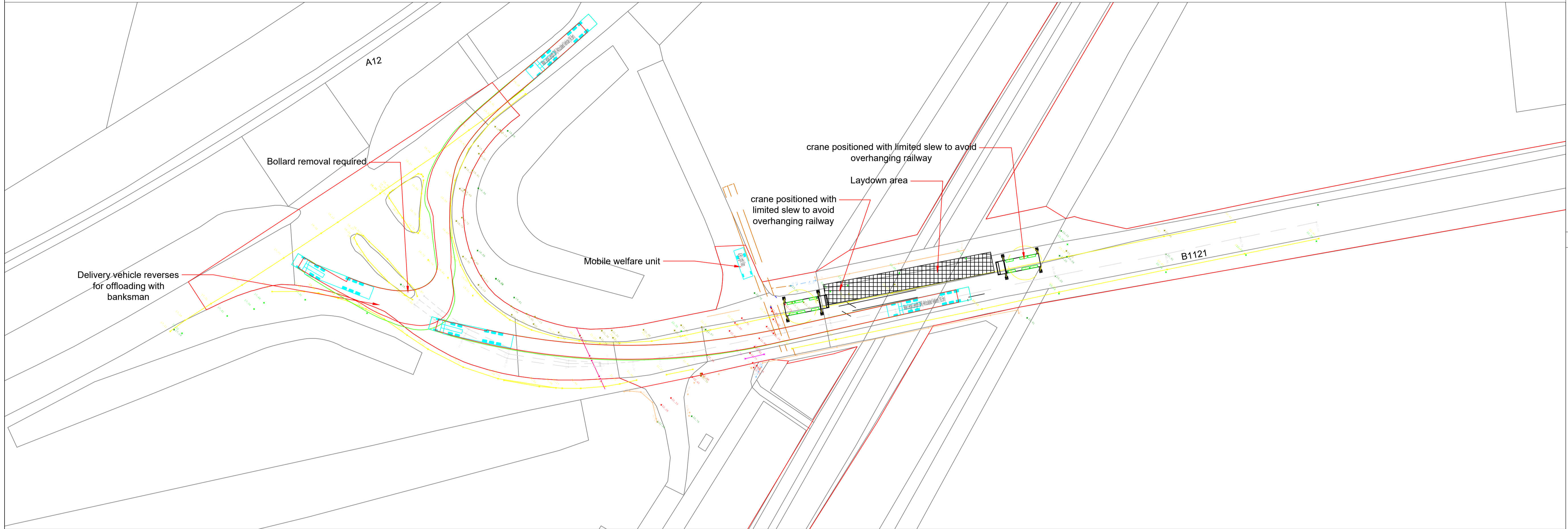
THE NATIONAL GRID (SEA LINK) ORDER
 PINS APPLICATION NUMBER: EN020026
 INDICATIVE OPTION 2 BENHALL RAIL BRIDGE MODULAR OVERBRIDGE
 SHEET 2 OF 2

Notes

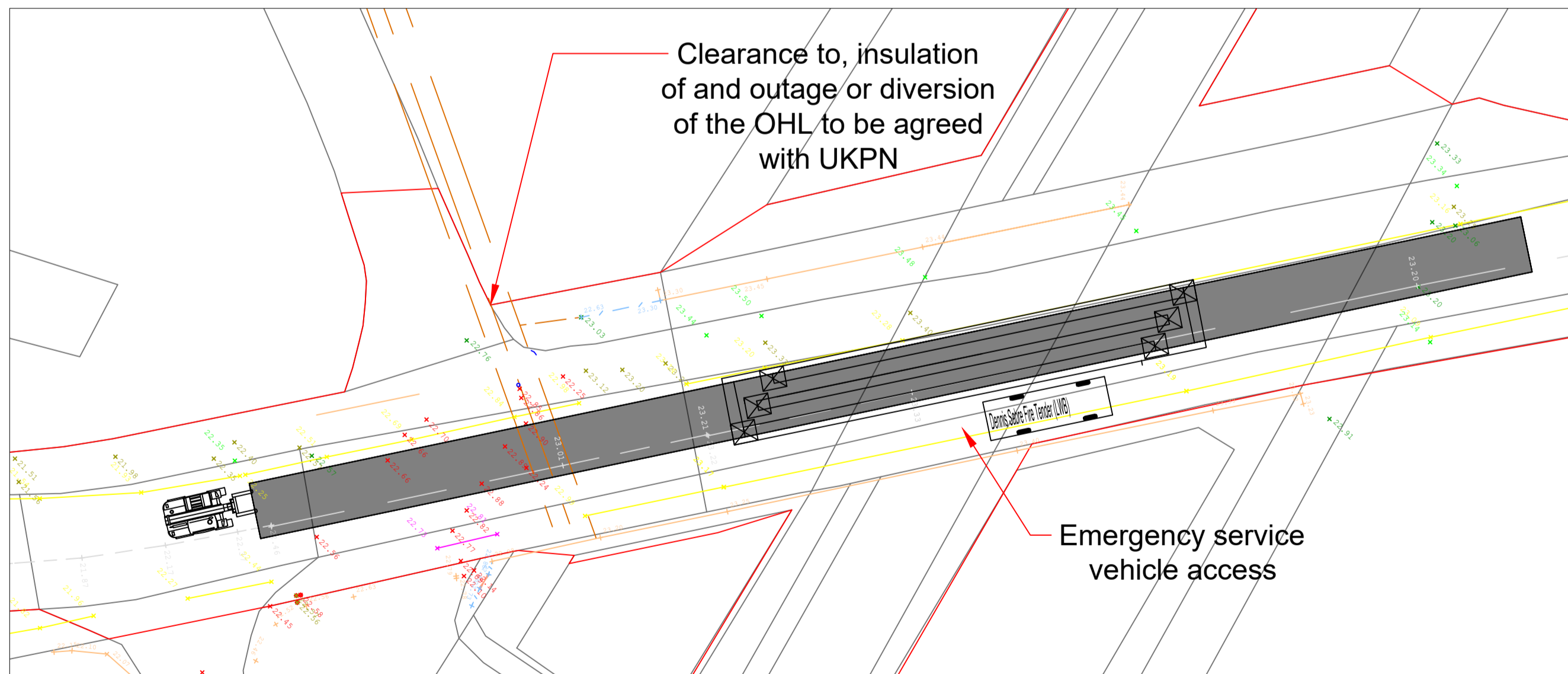
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3. Reference should be made to the Guide to the Plans (Document Ref 2.1) which provides further information on what the plans show.
4. For further information on construction please refer to the construction section of the Environmental Statement.
5. Dimensions are in meters unless otherwise stated.
6. Following delivery of the main girders and decking to the laydown area the cranes will lift the main span into position.
7. The ramps will be installed using cranes and telehandlers moving progressively east and west from the main bridge span.
8. Removal operations will be similar but in reverse.
9. This works layout plan is indicative and will be updated at detailed design.

Legend

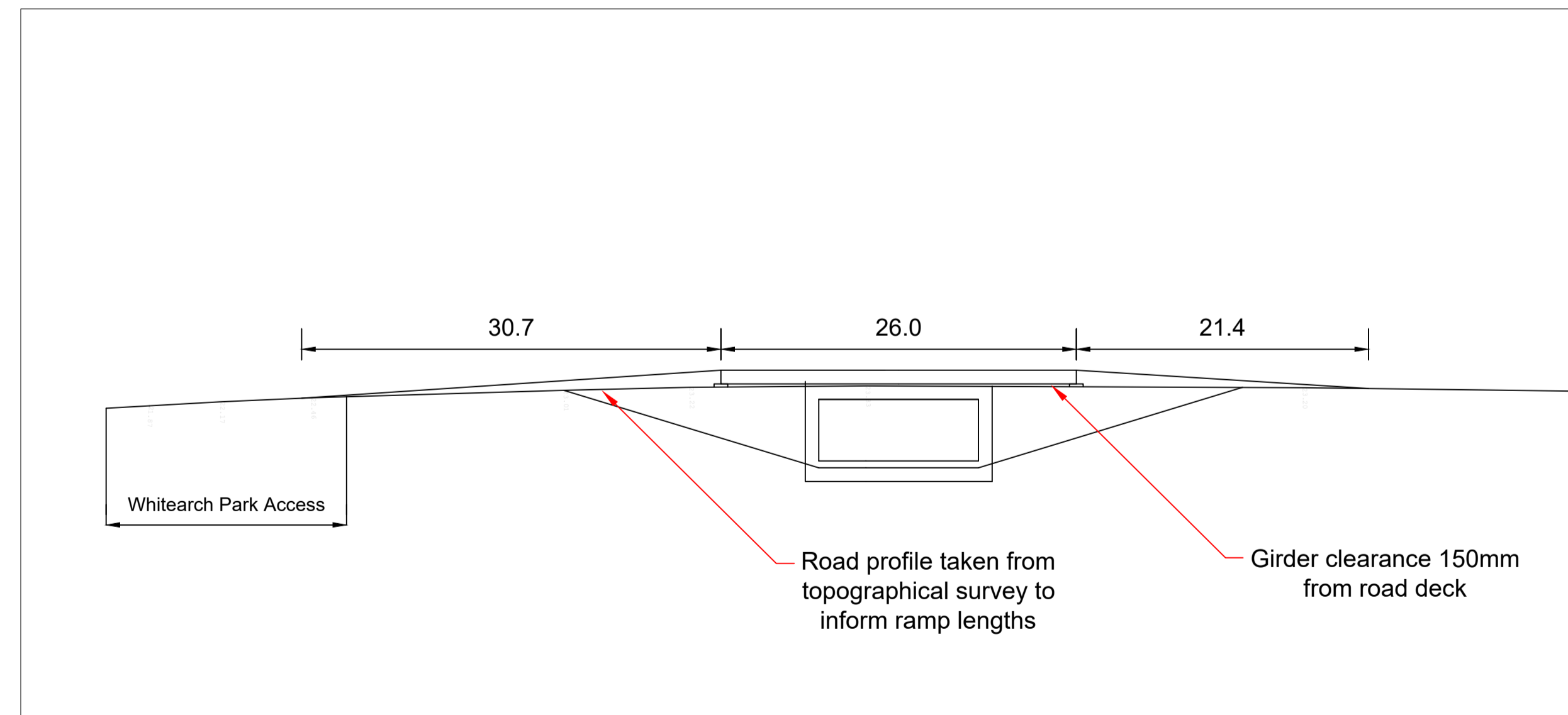
- Topographical survey kerb line
- Topographical survey parapet



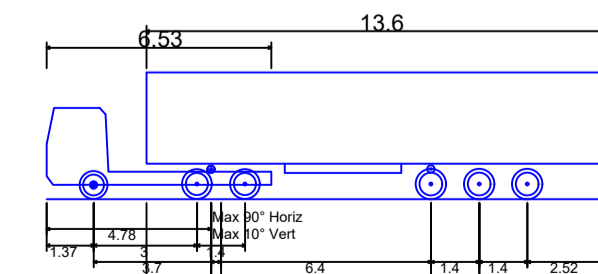
Typical Plan Layout - Delivery and laydown



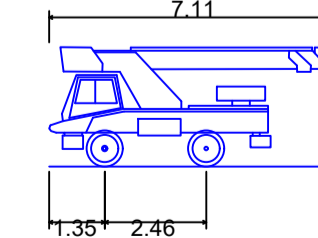
Temporary mini-bridge layout



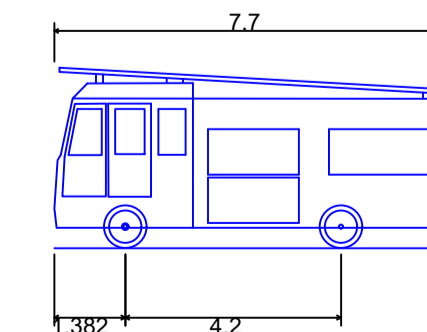
Temporary mini-bridge section



Max Legal Length (UK) Articulated Vehicle (16.5m)
 Overall Length 16.500m
 Overall Width 2.550m
 Overall Body Height 3.661m
 Min Body Ground Clearance 0.411m
 Max Track Width 2.500m
 Lock to lock time 6.00s
 Kerb to Kerb Turning Radius 6.530m



Small Mobile Crane
 Overall Length 7.110m
 Overall Width 2.500m
 Overall Body Height 2.895m
 Min Body Ground Clearance 0.427m
 Track Width 2.500m
 Lock to lock time 4.00s
 Kerb to Kerb Turning Radius 5.800m



Dennis Sabre Fire Tender (LWB)
 Overall Length 7.700m
 Overall Width 2.430m
 Overall Body Height 3.512m
 Min Body Ground Clearance 0.397m
 Track Width 2.380m
 Lock to lock time 5.00s
 Kerb to Kerb Turning Radius 7.400m

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 MODULAR OVERBRIDGE
 SHEET 2 OF 2

nationalgrid			
Application Number	EN020026		
National Grid Drawing Reference			
SEAL-MMD-SEAL-ENG-DWG-0822			
Scale	Sheet Size	Sheet	Issue
As shown	A1	SHEET 2 OF 2	A

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

Registered in England and Wales
No. 4031152
nationalgrid.com