

The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.135: Applicant's Response to March Hearing (CAH2 and ISH3) Action Points

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1. About this Document

1.1 Purpose of this Document

1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) response to Action Points addressed to the Applicant arising at Compulsory Acquisition Hearing 2 held on 25 March 2026 and Issue Specific Hearing 3 held 25 to 27 March 2026. This is in respect of points due to be addressed at Deadline 6.

1.2 Structure

1.2.1 The Examining Authority (ExA) issued a list of action points during the Hearings and subsequently published the actions from the Compulsory Acquisition Hearing 2 in written form on 26 March 2026 and actions from Issue Specific Hearing 3 on 30 March 2026, in the following documents:

- **Action Points arising from Compulsory Acquisition Hearing 2 (CAH2) held on Wednesday 25 March 2026 [EV8-006]; and**
- **Action Points arising from Issue Specific Hearing 3 (ISH3) on environmental issues held on Wednesday 25 March to Friday 27 March 2026 [EV9-018].**

1.2.2 This document provides responses to those actions, due at Deadline 6, that were specifically addressed to the Applicant. Where appropriate, the Applicant has made minor stylistic or grammatical adjustments to the wording of the action points for clarity; however, these changes are not considered material and do not alter the substance of the actions or the Applicant's response.

2. Applicant's Response to Compulsory Acquisition Hearing 2

2.1 The Applicant's Response to Actions Table

Table 2.1 Response to Compulsory Acquisition Hearing 2 (25 March 2026)

Action No.	ExA Description	Applicant's Response	Deadline
AP1	Applicant to provide written evidence of progress in determining the ownership of unknown unregistered land plots.	<p>The Applicant has continued to undertake diligent inquiry to identify and reduce unknown and unregistered land interests across the Order limits. The most recent comprehensive data refresh was completed in December 2025, ahead of Deadline 3. This involved submitting edition dates for all relevant titles to HM Land Registry and reviewing any discrepancies identified on the registers. Checks were carried out to capture changes such as deceased parties, updates to proprietorship entries, company name changes, and address amendments, with records updated accordingly.</p> <p>In addition, a Search of the Index Map was submitted for the Category 1 Order limits. This process assists in identifying any additional registered titles within the Order limits, ensuring that they are captured where relevant and helping to minimise the extent of unknown ownerships. The Applicant also noted that responses to Land Interest Questionnaires assist in reducing unknown interests as information is returned, in accordance with the Applicant's land referencing methodology.</p> <p>The Applicant confirms the land referencing methodology is appended to the Consultation Report at Appendix G.</p> <p>The presence of some unregistered land is not unusual for a project of this scale and nature.</p> <p>The ongoing steps which are taken as part of the process of identifying owners of unknown unregistered plots, include</p> <ul style="list-style-type: none"> • regular HM Land Registry and Companies House checks, • sliver land checks, • issuing Land Interest Questionnaires, • the erection of site notices at unregistered plots wherever possible. • Engaging directly with known landowners and their agents through face to face engagement where appropriate. <p>Overall, the Applicant confirmed that the total area of unknown unregistered freehold land across the project amounts to less than 2% of the Order limits, equivalent to approximately 13.15 hectares (32.49 acres). The Applicant can confirm that there are currently 63 unregistered plots across the project, excluding reputed owners, mines and minerals, and highways.</p>	Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
		<p>The Applicant can provide specific examples of recently updated or newly identified interests.</p> <p>In relation to a residential property in Kent, the Applicant was notified of a change of ownership by the Examining Authority, the updated ownership details were not yet available on the Land Registry. The Applicant can confirm that its records, Book of Reference and supporting documents have been updated to reflect this position by replacing the former named owners with "the Owner". Statutory notices and a Land Interest Questionnaire were issued to the new owners once identified, and further reasonable steps were taken to obtain updated information, including attempts to contact the previous owners. No responses had been received at the time of the hearing.</p> <p>The Applicant can confirm the position in respect of an unregistered road in Kent known as Marsh Farm Lane, confirming that a cautionary interest exists adjacent to known landowners and that this will be reflected in the next update to the Book of Reference.</p> <p>Since the last Compulsory Acquisition Hearing, the Applicant has identified one additional Category 1 interest in Suffolk, which has been recorded accordingly.</p> <p>Application Document 9.16 Land Rights Tracker has been updated with evidence of how the applicant has determined ownership of all unknown and unregistered land plots.</p> <p>As per Application Document 5.1.8 Appendix G Land Referencing Methodology (APP-315), where land ownership information cannot be ascertained through desktop or site referencing methods, the land referencing team erect notices on site requesting information. The notice shows the unknown land ownership boundary in question and provides details of how to contact the land referencing team with any relevant information. These requests for information are typically in place for a period of four weeks and checked and (if necessary) replaced on a weekly basis. It may be deemed appropriate to adjust the maintenance period or number of times such notices are erected based on the acquiring authority's requirements. Such notices are used during statutory notice periods for consultation, examination and hearings as well as contact referencing.</p>	
AP2	Applicant to update the unregistered tab of the land rights tracker with specific actions that have been taken to identify the ownership of plots and to identify what the plots are comprised of, for example, ditches.	Application Document 9.16 Land Rights Tracker has been updated with the Interest Type in Column 'J' which sets out Highways, Ditches, Tracks, Riparian and other interest types.	Deadline 6
AP3	Applicant to provide an update on the detail of negotiations with Aldeburgh Golf Club and provide a Statement of Common Ground which includes the golf club's objection to compulsory acquisition (CA) with respect to the impact on the attractiveness of the course (as detailed in their relevant representation [RR-0093]).	Document Number 9.142 Draft Statement of Common Ground with Aldeburgh Golf Club is in active discussion. The draft SoCG has been issued to the Golf Club ahead of Deadline 6 and this document includes comments on the impact on the attractiveness of the course as raised by the golf club.	Deadline 6
AP4	Update of progress with relation to negotiations with Blackheath Farms Ltd following the agents group meeting on 23 March 2026.	Application Document 4.2.2 SOR Appendix B, Schedule of Negotiations with Land Interests has been updated for Deadline 6 and includes the update of negotiations with Blackheath Farms and the update to the Suffolk land agent's meeting on the 23 March 2026.	Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
AP5	Provide detail of the specific objections outstanding for each plot of Edward Spanton. Included the reasons why the objection remains and the likelihood of reaching agreement prior to the close of the examination.		Deadline 6
AP6	Update on progress negotiations with Edward Spanton and likelihood of reaching agreement prior to the close of the examination.	Application Document 4.2.2 SOR Appendix B, Schedule of Negotiations with Land Interests has been updated for Deadline 6 and includes the update of negotiations with Edward Spanton	Deadline 6
AP7	Applicant to provide evidence of discussions with Erik and Karen Collins to allay the concerns raised in their original representation, notably regarding use of the access at the end of Marsh Farm Lane [REP1A-096].	<p>Mr and Mrs Collins have a right of way for access on Marsh Farm Road to their property, which is an unregistered road but has a caution against first registration in favour of National Grid.</p> <p>REP1A-096 was submitted by Karen and Erik Collins. It is summarised below-</p> <ul style="list-style-type: none"> • Property Interest within the compulsory acquisition of rights boundary. • Marsh Farm Road- access and obstructions preventing daily use. • Construction use of Marsh Farm Road • Tree Management on Marsh Farm Road • Unclear Sea Link DCO documents • Inadequacy of consultation • Noise and dust pollution during construction • Pollution and debris running into the River Stour • Impacts on wildlife, bird strikes with vast increase in pylons at different heights crossing the River Stour at several points at known flight paths. • Impacts on the SSSI Sites at Pegwell Bay • Impacts of housing developments on Weatherlees sewage treatment plant • Impact on local tourism as a result of construction • An increased risk of security as energy infrastructure is the top target for attack, both actual and virtual. <p>A meeting was held with the proposed project and Mr and Mrs Collins on 21st January 2026 to discuss their issues regarding the property impacts in person. The meeting minutes are summarised below:</p> <ul style="list-style-type: none"> • It was confirmed their property is adjacent to the order limits, not within them, and that the Applicant is not seeking and land rights from Mr and Mrs Collins. • They have a right of way for access on Marsh Farm Road to their property, which is an unregistered road but has a caution against first registration in favour of National Grid. • It was confirmed that Marsh Farm Lane is being used to create a temporary scaffold on the north bank of the Stour. The purpose of the scaffold is to act as a safety net for the installation of upgraded conductors on the pylons. It would prevent them in a worst-case scenario from falling to the ground/into the Stour. • The new OHL project manager will discuss the works with the contractor to see if any additional clarity can be provided with regards to construction access and levels of traffic/programme. 	Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
AP8	Applicant to provide detailed justification for the need for the specific hedgerow on Ian Rix land and the effect it will have on the Christmas tree farm (plots 1/93, 1/94, 1/99 and 1/100).	<ul style="list-style-type: none"> • It was confirmed that these works will be a relatively short programme compared with the converter station build. It will be done in good conditions, likely late spring to early autumn. • Exact duration will be confirmed by the contractors' detail design. • Most of the noise and construction will be on the other side of the railway from the Collins' property. • The hedgerow management plan identifies the roadside hedge to be managed where it is overhanging the highway boundary. It was confirmed that there would not be a requirement for the Collins' boundary hedge line to be significantly cut back. • There may be a requirement for minor pruning where the hedge or overhanging branches impede access. • Queries in relation to traffic management have been noted and will be passed to the contractor in due course to consider appropriate mitigations. <p>No voluntary agreements are being sought in relation to this Right, as no further land rights are being sought.</p>	Deadline 6
		<p>The hedgerow proposed to the south of the B1119 on Ian Rix's land is part of the wider essential landscape and ecological mitigation identified in Figure 1 of Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk submitted at Deadline 6. The hedgerow planting was developed as part of the iterative design and assessment process in conjunction with East Suffolk Council (ESC) and Suffolk County Council (SCC) during the pre-application DCO phase. Both stakeholders highlighted the importance of creating a layered approach to landscape mitigation planting. This was reviewed by the Applicant in response to the likely effects of the Proposed Project and the hedgerow and hedgerow trees were designed into the wider suite of landscape and ecological mitigation measures as part of the mitigation hierarchy to reduce effects on landscape, visual and ecological receptors. The hedgerow planting along the south side of the B1119 was considered by the Applicant to provide a proportionate response to both the residual significant landscape and visual effects and the stakeholder requests whilst balancing the land take considerations. The additional function of the hedgerow and hedgerow tree planting has been previously set out by the Applicant in Table 12.1 of Application Document 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-132].</p> <p>Regarding landscape effects, for Landscape Character Area (LCA) L1: Heveningham and Knodishall Estate Claylands, the planting along the B1119 would contribute to the layered vegetation network in the LCA, and in reinstating hedgerows which were historic features of the landscape including across the converter station site. The hedgerow planting is part of the wider framework of landscape mitigation planting which collectively contributes to the mitigation measures for LCA L1. However, even once the planting is matured it is not considered to reduce the effects on the LCA L1 to non-significant at operation year 15 due to the scale and nature of the Saxmundham Converter Station and the alteration to the key characteristics of the LCA.</p> <p>Regarding visual effects, as set out within Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023] at paragraph 1.10.23 the significant adverse effects on visual receptors remaining at year 15 are all located in the highly localised landscape around Saxmundham Converter Station from all directions. This includes viewpoints 1, 3, 4,</p>	

Action No.	ExA Description	Applicant's Response	Deadline
AP9	Applicant to send the relevant information and examination library references on an ongoing basis to Mr David Rix for him to be able to view information in relation to the proposed development and the land plots of Mr Ian Rix.	<p>15, and 21 to the north. Whilst the proposed planting along the B1119 does not reduce the effects from significant adverse to non-significant adverse, it is an important mitigatory feature in softening views and creating another vegetative layer in views in addition to the woodland belts to the north of the converter station. This collective framework of planting has resulted in the magnitude of effect reducing from operation year 1 to year 15 for viewpoints 1, 4 and 21.</p> <p>With respect to the question posed at ISH3 regarding the effect on the landscape and visual assessment if the hedge in Mr Rix's land were to be removed, the Applicant considers that it is unlikely that this would alter the rating of the landscape assessment on LCA L1 (i.e. moving it from moderate adverse to major adverse). The removal of the hedge in Mr Rix's land would increase the visual effect for people travelling along the B1119 towards Saxmundham for a short section of their journey represented by viewpoint 4. Importantly, it would remove an opportunity, of which there are limited, to provide another layer of vegetation in the local landscape which is an important feature of the current and historic landscape pattern. Removal of this section of hedgerow would also limit the ecological connectivity and consequently limit the ability to provide new habitat for wildlife including nesting birds and commuting bats.</p> <p><u>Hedgerow and shade</u></p> <p>BS 5837:2012 (Trees in relation to design, demolition and construction) recommends that shading is calculated equivalent to tree height and is drawn as an arc (taken from the stem position) from north west to due east. The radius of the arc is equal to the height of the tree with the arc representing the shadow cast through the main part of the day. On that basis it would not be possible for shadow to be cast on the land occupied by Christmas trees.</p> <p>Furthermore, the 5 m access strip for maintenance of the hedgerow as shown in 1LVIA8 in Application Document 9.73 Applicant's Responses to First Written Questions [REP3-069] which would lie to the south of the hedgerow would mean that even if there was some shade cast from the hedgerow during early morning light, the shade wouldn't extend beyond the access track (based on the likely 3-4 m height that the hedgerow would be maintained at).</p>	Ongoing
		<p>Mr Rix is being signposted to the following documents</p> <ul style="list-style-type: none"> • Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk • Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095] • Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]. • Various correspondence with Suffolk County Council and East Suffolk Council about planting along the B1119 and their desire for the hedgerow and belts of woodland. <p>The Applicants have forwarded another copy of the meeting minutes, held by Teams, with Mr Rix where the justification and purpose of the hedge was explained and listened to the perceived impact to the farm, which we have sought to further quantify.</p>	

Action No.	ExA Description	Applicant's Response	Deadline
AP10	Applicant and Scottish Power Renewables (SPR) to provide an update following their meeting to clarify which land plots are subject to Options Agreement, particularly in relation to the land plots of Mr Rix. Applicant to update the book of reference (BoR) and any other associated documents accordingly to ensure accuracy.	<p>The Applicant met with representatives from SPR on Wednesday 1st April. It was a positive and productive meeting. SPR confirmed it will retain the Options over the land where it has not exercised or does not intend in the near future to exercise Options. There is no current plan to exercise Options beyond those discussed but will retain the option and ability to do so until works are complete or the Options expire. Further key acquisitions are being finalised for landscaping and the permanent access road.</p> <p>SPR provided shapefiles after the meeting including the areas exercised and those still to be exercised. The Applicant has updated its Book of Reference to reflect the areas where SPR have exercised it's Options. SPR have confirmed they will be exercising further Options, but this will likely fall outside of this Examination Period. The Applicant has therefore exercised caution and retained SPR as having an interest in land until the evidence of that transfer can be provided. SPR will confirm as and when other TP1's are available but it's unlikely any further transfers will be completed ahead of Sea Link's D7.</p> <p>SPR acknowledged their interests have continually changed throughout Sea Link examination.</p> <p>There are a number of plots where SPR have an Option over part of a title. Without a copy of the Option plan and the restrictions contained within it NGET have exercised caution and attributed the rights to the full HMLR title upon which they are listed against listed against.</p>	Deadline 6
AP11	Meeting to be organised with Mr Rix to follow up from the SPR meeting detailed above, and a note to be provided to the ExA on the results of this meeting.	<p>There will be a meeting scheduled with Mr Rix after deadline 6 to discuss any changes, run him through the outstanding matters and confirm the Sea Link position and the justification in regard to the rights sought in this application.</p> <p>An update on this meeting will be provided to the ExA by deadline 7 in Application Document 4.2.2 SOR Appendix B, Schedule of Negotiations with Land Interests and Application Document 9.16 Land Rights Tracker.</p>	Deadline 6
AP12	Mr Rix to supply a list of plots that they have outstanding objections to and detail on the specific reasons for their objection to each plot.		Deadline 6
AP13	Update of progress with relation to negotiations with James Rogers following the agents group meeting on 23 March 2026.	Application Document 4.2.2 SOR Appendix B, Schedule of Negotiations with Land Interests has been updated for Deadline 6 and includes the update of negotiations with James Rogers.	Deadline 6
AP14	Applicant to provide a detailed summary of negotiations and outstanding issues with Jean Spanton.	Application Document 4.2.2 SOR Appendix B, Schedule of Negotiations with Land Interests has been updated for Deadline 6 and includes the update of negotiations with Jean Spanton.	Deadline 6
AP15	Applicant to check for inconsistencies and rectify between the Statement of Negotiations and the BoR for Kent Wildlife Trust land plots.	Noted. Amendments have been made in 4.2.2 SOR Appendix B, Schedule of Negotiations with Land Interests has been updated for Deadline 6 and 9.16 Land Rights Tracker as updated for Deadline 6 and 4.2 Statement of Reasons as updated for Deadline 6	Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
AP16	Kent Wildlife Trust to provide written details of their specific objections in relation to land rights for each plot and in particular plots 5/10, 5/13, 5/18 and 5/38.		Deadline 6
AP17	Update of progress with relation to negotiations with Lindsay Peter Tomlinson following the agents group meeting on 23 March 2026.	Application Document 4.2.2 SOR Appendix B, Schedule of Negotiations with Land Interests has been updated for Deadline 6 and includes the update of negotiations with Lindsay Peter Tomlinson.	Deadline 6
AP18	Update of progress with relation to negotiations with Nicholas Stuchfield following the agents group meeting on 23 March 2026.	Application Document 4.2.2 SOR Appendix B, Schedule of Negotiations with Land Interests has been updated for Deadline 6 and includes the update of negotiations with Nicholas Stuchfield	Deadline 6
AP19	SPR to provide a composite copy of their land interests and update on the progress of transfer of benefit for the substation.		Deadline 6
AP20	Applicant to provide detailed written response to Statkraft UK Ltd relevant representation [RR-5075].	The response to the Statkraft UK Ltd relevant representation has been submitted as part of these Deadline 6 submissions at 9.146 Applicants Response to Relevant Representation Response to RR-5075	Deadline 6
AP21	Applicant to provide detailed written response Struan Robertson relevant representation [REP5-223].	<p>REP5-223 provided by the landowner in response to ExQ2 states:</p> <p>a. Quantum of land take: the loss of more than 100 acres of productive farmland as a result of this project, which represents a significant setback for our business.</p> <p>The Applicant confirms that 84 acres are proposed to be acquired outright, the remainder is temporary use and access and drainage rights. We are working with the landowner and their agent to understand the impacts of the acquisition of land and rights will have on their holding and to mitigate the impacts where possible.</p> <p>b. Compensation and losses in relation to past and ongoing survey works: The loss of crops, compromised field structure, and equipment damage due to inadequate reinstatement work have all adversely affected our operations.</p> <p>The Applicant is in ongoing correspondence with the landowner's agent to settle compensation matters following survey campaigns on their holding.</p> <p>c. Reinstatement post construction: Mr Robertson has raised a particular concern about the plans for future reinstatement of farmland and the creation of temporary drainage ponds in arable fields.</p> <p>There is a specific commitment, W31, within the document 9.84 Register of Environmental Actions and Commitments (REAC), that secures the removal of the drainage ponds serving temporary works and the subsequent re-instatement of the land. Temporary drainage ponds would typically be in situ for a period of approximately 2 years. With regard to land reinstatement – the project recognises the potential impact construction activities involving the stripping and stockpiling of soil resources could have, and this is covered by the assessment presented Part 3 Kent Chapter 6 Agriculture and Soils which assesses the effects on soil function as significant. The key mitigation lies within Outline Soil Management Plan – Kent. This sets out the framework for how good practice measures will be</p>	Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
AP22	Applicant to specifically justify the compulsory acquisition of Kent plot 2/133 and to provide details of the plots on which Struan Robertson holds an outstanding objection.	employed through soil stripping, stockpiling and reinstatement to enable land to be returned to its pre-construction condition.	Deadline 6
		<p>Application Document 4.2.2 SOR Appendix B, Schedule of Negotiations with Land Interests has been updated for Deadline 6 and includes the update of negotiations with Struan Robertson. Confirmation was received on 9 April 2026 stating that for the Class 1 land areas he is content to go straight to acquisition on a voluntary basis and the terms for this are under active negotiation.</p> <p>Mr Robertson has not specifically mentioned the plots which he has an outstanding objection on. He has submitted 3 Representations to the hearings.</p> <ul style="list-style-type: none"> • REP1- 140- a request to be heard • REP1A- 183- submissions made in relation to the impact of the project on the farm business • REP5- 223- the response is set above in AP21 and in 1GEN36 <p>The plots Struan Roberston holds and interest in are confirmed as:</p> <ul style="list-style-type: none"> • 2/118- Class 5 • 2/119- Class 8 • 2/120- Class 6 • 2/121- Class 8 • 2/122- Class 6 • 2/123- Class 1 • 2/124- Class 1 • 2/127- Class 1 • 2/128- Class 1 • 2/129- Class 1 • 2/130- Class 1 • 2/133- Class 1 • 2/134- Class 8 • 2/137- Class 1 • 2/138- Class 7 • 2/139- Class 7 • 2/140- Class 7 • 2/141- Class 1 • 2/142- Class 7 • 2/143- Class 7 • 2/146- Class 3 • 2/151- Class 8 • 2/155- Class 7 • 2/156- Class 7 • 2/157- Class 7 	

Action No.	ExA Description	Applicant's Response	Deadline
		<ul style="list-style-type: none"> • 2/158- Class 3 • 2/159- Class 8 • 2/160- Class 3 • 2/161- Class 6 • 2/162- Class 7 • 2/163- Class 7 • 2/164- Class 7 • 2/165- Class 7 • 2/166- Class 6 • 2/167- Class 7 • 2/168- Class 6 • 2/169- Class 1 • 2/170- Class 3 • 2/171- Class 7 • 2/172- Class 7 • 2/173- Class 8 • 2/174- Class 1 • 2/175- Class 7 • 2/176- Class 8 • 2/177- Class 8 • 2/178- Class 7 • 2/179- Class 7 • 2/180- Class 8 • 2/182- Class 8 • 2/183- Class 3 • 3/2- Class 5 • 3/6- Class 8 • 3/7- Class 3 • 3/8- Class 8 • 3/9- Class 1 • 3/11- Class 1 • 3/17- Class 1 • 3/20- Class 1 • 3/20a- Class 1 • 3/21- Class 1 • 3/22- Class 1 • 3/98- Class 1 • 4/1- Class 1 • 4/29- Class 3 	

Kent Plot 2/133 is marked as Class 1, Compulsory Acquisition of Land. The Applicant submits that the powers sought are proportionate, using a strategy that prioritises temporary possession during construction and securing only the smallest necessary permanent land and rights afterwards. This approach reduces long-term impacts on landowners while retaining construction flexibility. Permanent acquisition is limited to areas where land use will permanently change, including for the principal permanent assets such as the converter stations and substations

Application Document **2.14.2: Indicative General Arrangements Plans -Kent** (excerpt below) clearly shows the permanent change in use on the land in plot 2/133 including the converter station, access road, permanent drainage and the temporary compound, the location of which will then deliver advanced planting and landscape and ecological mitigation



Within Application Document **4.2.1. SOR Appendix A: Compulsory Acquisition and Temporary Possession Powers** plot 2/133 has the following associated works:

- Work No. 7- an Underground Electric Line Connection in Kent Work No. 8- Kent temporary work compound
- Work No. 9A- Access road to the Kent Converter Station and the Kent Substation
- Work No. 9B- The Kent Converter Station and associated equipment
- Work No. 10- Works to connect the Kent Converter Station to the Kent Substation
- Work No. 11- The new Kent Substation
- Work No. 13- Proposed principal drainage outside linear and non-linear limits of deviation
- Work No. 14- Proposed accesses for construction, monitoring and maintenance outside linear and non-linear limits of deviation
- Work No. 15- Proposed environmental mitigation and landscaping
- Work No. 16- Proposed utility diversions

That compulsory acquisition of the land is required to deliver the permanent changes of use proposed above as well as the advanced planting and landscape and ecological mitigation. The Applicant confirms this mitigation is required to be maintained for the operational lifetime of the project. It was explained that while a

Action No.	ExA Description	Applicant's Response	Deadline
		<p>small compound may be required initially to establish the planting, this would be removed once the mitigation is in place.</p> <p>The Applicant clarifies that, in considering the appropriate class of land rights, a key principle is whether the proposed use would materially change the use of the land. In this case, nature of the land in plot 2/133 will be permanently changed. If the land were to remain in third party ownership, there would be a risk that the mitigation or land use could be undermined in the future</p>	
AP23	Mark Chandler to supply information on restrictive covenant and plot details.		Deadline 6
AP24	Applicant to update on meeting with William Notcutts Estates and a detailed response to the points raised in [REP5-210]	Application Document 4.2.2 SOR Appendix B, Schedule of Negotiations with Land Interests has been updated for Deadline 6 and includes the update of negotiations with William Notcutt Estates.	Deadline 6
AP25	Applicant to provide an explanation of the existing deed of easement and existing rights they have on Mr Mahony's land and attempt to secure agreement with Mr Mahony.	<p>Mr Mahony has land subject to a deed with National Grid relating to the overhead line infrastructure on his land. NGET propose to rely on their existing rights to undertake the proposed works to existing towers on this land. The land is included within the Order Limits for completeness and to ensure there are no challenges to our existing rights.</p> <p>Mr Mahony's position is that he believes the works planned do not fall under the scope of the deed. The landowner continues to seek an access licence or payment in respect of the proposed works.</p> <p>The Applicant confirms it's position is that the existing deed of easement dated 2002, already provides the necessary rights to access and carry out the works. The landowner does not agree with this interpretation and has indicated that they may instruct solicitors to challenge the Applicant's reliance on the deed.</p> <p>The Applicant proposes to rely on the existing easement rights and does not intend to enter into a separate licence arrangement, as doing so would undermine the Applicant's legal position by implying that the existing deed is insufficient. The Applicant has included the land within the Order limits for completeness and, should the landowner object to the exercise of the existing rights, the matter can be addressed through the Temporary Possession powers sought in the Development Consent Order.</p> <p>In relation to neighbouring land, the Applicant confirms the existing deed of easement relates to land the overhead line is located in. The Applicant explained that, while access routes are typically agreed through discussion at the time of works, it considers that the deed provides sufficient rights to enable access and delivery of the works</p> <p>The Applicant will work to mutually agree a route of access for the proposed works which will aim mitigate any disturbance on the Landowner and their neighbour.</p>	Deadline 6
AP26	Mark Chandler to submit a list of the plots that Mr Ian Mather has an outstanding objection to CA with reasons		Deadline 6
AP27	Any affected persons who have not already submitted an objection to the CA or temporary possession of their land or rights and wish to do so, to provide		Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
	this in writing for DL6. Include an explanation why an objection remains and for which plot numbers.		
AP28	Applicant to provide an update on recent negotiations and progress and an agreed Statement of Common Ground with the National Trust.	<p>Application Document 4.2.2 SOR Appendix B, Schedule of Negotiations with Land Interests has been updated for Deadline 6 and includes the update of negotiations with National Trust.</p> <p>The Applicant confirms that an updated SOCG was re-issued to the National Trust on the 1st April 2026 for review. Further clarifications have been provided via email to the National Trust on 8th April 2026.</p> <p>A meeting was requested by the Applicant for 9th April 2026, but unfortunately due to resourcing, National Trust were unable to attend. An annotated SOCG has however been received from the National Trust on the 9th April which is currently under review.</p>	Deadline 6
AP29	Applicant to provide an update on recent negotiations and progress with the Crown Estate.	Application Document 4.2.2 SOR Appendix B, Schedule of Negotiations with Land Interests has been updated for Deadline 6 and includes the update of negotiations with The Crown Estate	Deadline 6
AP30	Applicant to provide an update on recent negotiations and progress on the agreement of protective provisions.	Application Document 9.75 Status of Negotiations with Statutory Undertakers and Schedule of Protective Provisions has been updated for Deadline 6 and includes the update of negotiations with Statutory Undertakers and the progress of agreement of protective provisions	Deadline 6
AP31	Applicant and SPR to provide wording for protective provisions for any areas outstanding.		Deadline 7
AP32	Applicant and Suffolk County Council to provide wording for protective provisions for any areas outstanding.		Deadline 7
AP33	Applicant to provide an update on recent negotiations and progress on agreements with Harwich Haven Authority and London Gateway Port.	<p>The Applicant confirms that draft PPs have been issued to LGPL and submitted at Deadline 5. The Applicant is awaiting comments from LGPL on its Protective Provisions which we understand are due imminently.</p> <p>With regards to Harwich Haven Authority, the Applicant has outlined its current position in an email on 25th March 2026:</p> <p><i>As per recent discussions in our monthly port calls with yourselves, PLA and LGPL, after the decision to include a Requirement on the face of the DCO for the Areas of Safeguarded Water Depths (including the 22.5m at the Sunk), we have removed references to this Requirement from all Protective Provisions to avoid the duplication of securing this commitment. The remaining detailed elements within each of PLA and LGPL are bespoke to them and are not secured in detail elsewhere in the DCO or Outline Plans.</i></p> <p><i>With regards to Concurrent RAM Operations, the project has followed the same position as Five Estuaries and North Falls with regards to securing these areas within each of the projects respective outline Navigation and Installation Plans and not in Protective Provisions.</i></p>	Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
		<p><i>With the above in mind, are HHA able to send through to us any bespoke Protective Provision text (outside of the two aspects already which are already secured elsewhere) so we can review?</i></p> <p>To date no further response has been received from Harwich Haven Authority and the Applicant therefore considers that Harwich Haven Authorities interests are already secured within the DCO and relevant Outline Plans.</p>	

3. Applicant's Response to Issue Specific Hearing 3

3.1 The Applicant's Response to Actions Tables

Table 3.1 Response to Issue Specific Hearing 3 (25 March 2026 to 27 March 2026) - General

Action No.	ExA Description	Applicant's Response	Deadline
AP1.	<p>All parties</p> <p>Submit any suggested drafting (whether relating to matters raised in ExQ3 or not) which you consider should be included in the draft Development Consent Order (dDCO), with reasons why you consider it is necessary.</p>	Wherever the Applicant is proposing new/updated drafting, this is included in the updated dDCO.	Deadline (DL) 6

Table 3.2 Response to Issue Specific Hearing 3 (25 March 2026 to 27 March 2026) – Water Environment

Action No.	ExA Description	Applicant's Response	Deadline															
AP2.	<p>Environment Agency (EA), Applicant</p> <p>Provide a summary of the current position regarding outstanding issues raised at DL5, set out any live flood risk issues that the ExA needs to be aware of, and draft any additional commitments/requirements necessary to mitigate the effects of flood risk.</p>	<p>The below provides a summary of the actions completed by the Applicant since deadline 5 to close out the remaining outstanding flood risk issues. The Flood Risk Assessment has been updated and shared with the Environment Agency and will be submitted to the examination at deadline 6.</p> <table border="1"> <thead> <tr> <th>Issue ID</th> <th>Action</th> <th>Notes</th> </tr> </thead> <tbody> <tr> <td>EA064</td> <td>Drawings showing the soffit heights of the Fromus and Stour bridges to mAOD are required.</td> <td>Drawings included in Appendix A of the updated Flood Risk Assessment (FRA) and cross referenced at paragraph 2.3.3 of the report.</td> </tr> <tr> <td>EA069</td> <td>Clarity on post construction reinstatement</td> <td>Commitment W06 has been revised. The new wording is included in Table 1.1 of the updated FRA and within the REAC to be submitted at Deadline 6.</td> </tr> <tr> <td>EA088</td> <td>Include information on distances between rock bags/concrete used at the HDD exit and the River Stour and coastal flood defences.</td> <td>Information has been added into FRA at paragraph 4.3.16.</td> </tr> <tr> <td>EA079</td> <td>Include more evidence base for impacts of coastal erosion and flood risk over the Project lifetime, using information from the Marine Physical Processes ES assessment.</td> <td>Section 4.3 (Operational Risk Assessments for Suffolk and Kent) of the FRA has been updated to include this requested information.</td> </tr> </tbody> </table>	Issue ID	Action	Notes	EA064	Drawings showing the soffit heights of the Fromus and Stour bridges to mAOD are required.	Drawings included in Appendix A of the updated Flood Risk Assessment (FRA) and cross referenced at paragraph 2.3.3 of the report.	EA069	Clarity on post construction reinstatement	Commitment W06 has been revised. The new wording is included in Table 1.1 of the updated FRA and within the REAC to be submitted at Deadline 6.	EA088	Include information on distances between rock bags/concrete used at the HDD exit and the River Stour and coastal flood defences.	Information has been added into FRA at paragraph 4.3.16.	EA079	Include more evidence base for impacts of coastal erosion and flood risk over the Project lifetime, using information from the Marine Physical Processes ES assessment.	Section 4.3 (Operational Risk Assessments for Suffolk and Kent) of the FRA has been updated to include this requested information.	DL6
Issue ID	Action	Notes																
EA064	Drawings showing the soffit heights of the Fromus and Stour bridges to mAOD are required.	Drawings included in Appendix A of the updated Flood Risk Assessment (FRA) and cross referenced at paragraph 2.3.3 of the report.																
EA069	Clarity on post construction reinstatement	Commitment W06 has been revised. The new wording is included in Table 1.1 of the updated FRA and within the REAC to be submitted at Deadline 6.																
EA088	Include information on distances between rock bags/concrete used at the HDD exit and the River Stour and coastal flood defences.	Information has been added into FRA at paragraph 4.3.16.																
EA079	Include more evidence base for impacts of coastal erosion and flood risk over the Project lifetime, using information from the Marine Physical Processes ES assessment.	Section 4.3 (Operational Risk Assessments for Suffolk and Kent) of the FRA has been updated to include this requested information.																

Action No. ExA Description	Applicant's Response		Deadline
EA066 and EA089	<p>Update the Statement at Ex 1.3.2 of the Flood Risk Assessment to clarify the intended meaning.</p> <p>Update 9.101: Kent Onshore Scheme – Fluvial Flooding from the River Stour [REP4-096] to include details of compensation for the temporary Kent drainage pond.</p> <p>Share commitment wording that secures floodplain compensation for the Kent Onshore scheme.</p>	<p>The last sentence of Ex1.3.2 has been updated within the FRA.</p> <p>Information has been included for the temporary Kent drainage basin within an update to 9.101: Kent Onshore Scheme – Fluvial Flooding from the River Stour. This now forms Appendix F of the updated FRA.</p> <p>Commitment W35 has been revised. The new wording is included in Table 1.1 of the updated FRA and within the REAC to be submitted at Deadline 6.</p>	
EA068	<p>Revise W06 commitment wording on stockpile set back distances, differentiating for the Suffolk and Kent Onshore schemes, and share with EA</p>	<p>Commitment W06 has been revised. The new wording is included in Table 1.1 of the updated FRA and within the REAC to be submitted at Deadline 6.</p>	
EA075	<p>Update commitment W06 to clarify that there would be no land raising in the floodplain associated with construction of construction access routes</p>	<p>Commitment W06 has been revised. The new wording is included in Table 1.1 of the updated FRA and within the REAC to be submitted at Deadline 6.</p>	
EA076	<p>Update commitments W02 and GG14 to address EA requirements regarding buffers to main rivers during construction.</p>	<p>Commitment W02 has been revised. The new wording is included in Table 1.1 of the updated FRA and within the REAC to be submitted at Deadline 6.</p> <p>Commitment GG14 is a measure to protect water quality so is not directly relevant to the FRA but will be updated to address the EA comment in the DL6 update to the REAC.</p>	
EA083	<p>Share the River Stour bridge outline construction method statement and append this to the updated FRA.</p>	<p>An outline method statement has been included as Appendix E within the updated FRA and cross referenced at paragraph 3.2.29.</p>	
EA065, EA070 and EA091	<p>Update the FRA to include the requested additional information for the Suffolk and Kent temporary drainage basins in FZ3.</p>	<p>Table 4.3 and paragraphs 4.3.12 and 4.3.13 (Suffolk) and Table 4.4 and paragraph 4.3.26 (Kent) have been added to the updated FRA to include the information requested. For Suffolk,</p>	

Action No.	ExA Description	Applicant's Response	Deadline			
		information has been added on an alternative, linear, drainage solution.				
		<table border="1"> <tr> <td>EA081</td> <td>Update the FRA to include the additional information presented characterising flood risk to the western approach road to the Fromus bridge.</td> <td>Plate 4.1 and paragraph 4.3.40 added to the updated FRA.</td> </tr> </table>	EA081	Update the FRA to include the additional information presented characterising flood risk to the western approach road to the Fromus bridge.	Plate 4.1 and paragraph 4.3.40 added to the updated FRA.	
EA081	Update the FRA to include the additional information presented characterising flood risk to the western approach road to the Fromus bridge.	Plate 4.1 and paragraph 4.3.40 added to the updated FRA.				

The Applicant's position is that these updates resolve all outstanding flood risk matters.

AP3.	<p>SCC, Applicant, EA</p> <p>Suffolk County Council (SCC), EA and applicant to pull together a position statement regarding the need, or otherwise, to locate the temporary drainage pond out of fluvial flood zone 3 in Suffolk.</p>	<p>The Applicant sets out its position with regard to this temporary drainage basin (TC-40-ATPN) in the response to the examining authority's written question 3WE1. As noted, given the position of SCC and the EA, who are opposed to the location of the basin, the Applicant proposes to remove TC-40-ATPN from the proposed project design. It will be removed from the drainage plans within the Suffolk Drainage Strategy, to be submitted at Deadline 6 and the minimum attenuation volume of 178m³ will instead be provided through a linear drainage feature comprising of infiltration trenches or swales along the short length of haul road previously draining to TC-40-ATPN. The Applicant has engaged with SCC and the EA who are both in favour of this design change.</p>	DL6
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AP4.	<p>SCC</p> <p>Confirm if any wider sustainability benefits to the community are deemed necessary to outweigh flood risk as per NPS EN1, section 5.8.11. In answering, provide full reasoning for your position and, if necessary, drafting for the DCO and/or Register of Environmental Actions and Commitments (REAC) suitable to secure.</p>		DL6
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AP5.	<p>Applicant and EA</p> <p>Joint position statement with respect to all matters relating to the proposed development meeting the objectives of the WFD. In answering confirm position with respect to 5 outstanding matters identified at DL4 – EA040, EA041, EA043, EA045 and EA046.</p>	<p>The Environment Agency and the applicant have reached agreement on the wording of Requirement 3 – Bridge over the River Fromus within document 3.1 Draft Development Consent Order. Both parties are satisfied with this wording, and the Environment Agency now consider that issue EA013 is resolved.</p> <p>The table below summarises the position regarding the other 5 outstanding matters.</p> <table border="1"> <thead> <tr> <th>EA Matter</th> <th>Position</th> </tr> </thead> <tbody> <tr> <td>EA040 - pollution risk from firefighting water</td> <td> <p>A new commitment W36 was added to the REAC at Deadline 5 [REP-115] which states: <i>As described in the Suffolk and Kent Drainage Strategies (Documents 9.17.1 and 9.17.2), penstock valves will be installed to isolate the outfalls of the drainage systems serving the operational substations and converter stations to prevent a pollution incident in the event of fire detection. The valves will be designed to close automatically, with a manual override available in the event of automation failure and the systems would be suitably maintained over the operational lifetime of the Proposed Project.</i></p> <p>The Environment Agency have indicated in discussions with the Applicant that they are content with this commitment and requested its inclusion within the REAC.</p> <p>The Applicant therefore considers this matter to be resolved.</p> </td> </tr> </tbody> </table>	EA Matter	Position	EA040 - pollution risk from firefighting water	<p>A new commitment W36 was added to the REAC at Deadline 5 [REP-115] which states: <i>As described in the Suffolk and Kent Drainage Strategies (Documents 9.17.1 and 9.17.2), penstock valves will be installed to isolate the outfalls of the drainage systems serving the operational substations and converter stations to prevent a pollution incident in the event of fire detection. The valves will be designed to close automatically, with a manual override available in the event of automation failure and the systems would be suitably maintained over the operational lifetime of the Proposed Project.</i></p> <p>The Environment Agency have indicated in discussions with the Applicant that they are content with this commitment and requested its inclusion within the REAC.</p> <p>The Applicant therefore considers this matter to be resolved.</p>	
EA Matter	Position						
EA040 - pollution risk from firefighting water	<p>A new commitment W36 was added to the REAC at Deadline 5 [REP-115] which states: <i>As described in the Suffolk and Kent Drainage Strategies (Documents 9.17.1 and 9.17.2), penstock valves will be installed to isolate the outfalls of the drainage systems serving the operational substations and converter stations to prevent a pollution incident in the event of fire detection. The valves will be designed to close automatically, with a manual override available in the event of automation failure and the systems would be suitably maintained over the operational lifetime of the Proposed Project.</i></p> <p>The Environment Agency have indicated in discussions with the Applicant that they are content with this commitment and requested its inclusion within the REAC.</p> <p>The Applicant therefore considers this matter to be resolved.</p>						

Action No.	ExA Description	Applicant's Response	Deadline
		EA041 - pollution from contaminated construction and concreting water, as-well as rainfall runoffs from the batching plant areas.	GG17 and GG15 were updated in the REAC at Deadline 5 [REP-115]. The Kent Drainage Strategy was updated at deadline 5 [REP5-085] at paragraph 8.1.15 to address the difference in wording between it and the Suffolk Drainage Strategy, with both now aligning to state 'Provision of a suitable vehicle wash area on hardstanding which drains to foul or shall be suitably treated on site.' Commitment W32 was also updated in the REAC at Deadline 5 [REP-115] to include specific measures for concrete pours and dealing with concrete washout.
		EA043 - pollution risk from dewatering	The Environment Agency have indicated in discussions with the Applicant that they are content with the commitment updates. The Applicant therefore considers this matter to be resolved. As requested, the Environment Agency has been included as a named consultee for Requirement 6, specifically (o) Construction Drainage Management Plan and (q) Operational Drainage Management Plan. Commitment GG15 has been updated in the REAC to be submitted at DL6 to address the requested changes.
		EA045 - silt pollution due to over-pumping	W20 and W24 have also been updated and included in the REAC at DL6 to address Environment Agency comments. The Applicant therefore considers this matter to be resolved. Commitment GG15 has been updated and the new wording included into the REAC at Deadline 6. The Kent and Suffolk Drainage Strategies were also updated at DL5 to address specific Environment Agency comments linked to this matter. The Applicant therefore considers this matter to be resolved.
		EA046 - pollution of Fromus and Hundred River: water quality monitoring	Commitment W26 has been updated further to address EA comments received at deadline 5. The new wording will go into REAC at deadline 6 and secures the requested monthly pre-construction monitoring frequency and the period of post construction monitoring that the Environment Agency require. The Applicant therefore considers this matter to be resolved.

Table 3.3 Response to Issue Specific Hearing 3 (25 March 2026 to 27 March 2026) – Traffic and Transport

Action No.	ExA Description	Applicant's Response	Deadline
AP6.	SCC Provide a written summary of the A12 works, setting out what is currently happening and what more is planned over the next few		DL6

Action No.	ExA Description	Applicant's Response	Deadline
	years. SCC to also set out if these works could benefit the proposed development, particularly the construction phase.		
AP7.	<p>Applicant and SCC</p> <p>SCC and the applicant to meet to discuss whether journey time analysis, particularly for the A12 in the area of the proposed development in Suffolk, could be produced, maybe with the use of the junction modelling. Provide an update at DL6.</p>	<p>The Applicant held a further meeting with SCC and ESC on 30 March 2026, and the junction modelling outputs were subsequently shared with them on 1 April 2026. This included junction modelling for the A12/ B1121 Main Road junction (to the south of Saxmundham) which includes details of Driver Delay for the A12 on the approaches to the B1121 Main Road. The junction modelling also includes a Sensitivity Test, to consider potentially higher Baseline traffic flows at other times of the year, driven by tourism traffic peaks in the summer months (see response to AP24 for further details). The Applicant's position with respect to further journey time analysis remains unchanged from the response to the Examining Authority's Second Written Question 2TT3 within Application Document 9.123 Applicant's Responses to Second Written Question [REP5-135]. It will not be possible to utilise a Strategic Transport Model within the remaining timescales of Examination due to reliance on third parties nor is this considered necessary given the Driver Delay outputs generated by the junction modelling. It is also not a standard approach to undertake this type of exercise for a time-limited construction phase assessment.</p>	DL6
AP8.	<p>Applicant</p> <p>Provide details on how larger vehicles would manage to turn safely at the junction of the A1094 onto B1121 south of Friston. This should include diagrams to show swept paths of larger vehicles including HGVs.</p>	<p>Due to the geometry of the B1121/A1094 junction construction HGVs will be banned from left turns into the B1121 from the A1094 and right turns out of the B1121 onto the A1094. This will form part of the induction process for the overhead line works and communicated with suppliers prior to deliveries being made. All HGVs for the limited works requiring access from the B1121 Aldeburgh Road, will report (prior to and post works) to the construction compounds. Compounds shall be accessed via the B1069 Snape Road or from the A1094 at the Hazlewood Hall Farm access. Therefore, access to and from the works site off the B1121 Aldeburgh Road will be from the east only, where the geometry is suitable for HGV access.</p>	DL6
			
		<p>Figure AP8-001 – 16.5m Articulated HGV entering B1121 Aldeburgh Road from the A1094.</p>	

Action No.	ExA Description	Applicant's Response	Deadline
		<p>Fewer than 30 peak daily construction vehicles are expected along the B1121 Aldeburgh Road and B1121 Saxmundham Road through Friston as a result of access S-BM11, which will be limited to access to existing overhead line towers and pylon works. This route will otherwise not be used by HGVs associated with the Proposed Project, as stated within (and secured by) Application Document 7.5.1.1 (D) Construction Traffic Management and Travel Plan Suffolk [REP5-064]. Only two HGVs are expected to form part of this 30-vehicle daily peak so only minimal HGV movements are expected over the relatively short period of the overhead line works.</p> <p>The Applicant is aware of the minimum visibility at the B1121/A1094 junction and is aware that a speed reduction project is planned to be implemented by SCC prior to the commencement of works for this project. Currently the visibility at the junction is approximately 120m, limited by horizontal and vertical geometry to the west of the junction along the A1094, this will meet the desired minimum for the proposed 40mph restriction proposed by SCC.</p> <p>The applicant recognises that speed restrictions may not in themselves reduce the actual speeds at the junction and therefore, all drivers using this junction will be briefed on the hazards of this route prior to use.</p>	
AP9.	<p>SCC Respond to the submitted document 9.107 Applicant's Response to SCC's DL4 Submission on Alternate Access to Saxmundham Converter Station.</p>		DL6
AP10.	<p>Applicant Respond to Mr Stevens concerns regarding numbers of HGVs which would have to access Minster Marshes during the construction phase.</p>	<p>The Applicant recognises that over the programme of the project thousands of vehicles will be required for the construction of the project. The Applicant has assessed the maximum number of HGV's accessing the Minster Converter Station site via the main proposed site access on the A256 (access K-BM02) as previously noted in a number of responses to documents submitted by the members of the public and by questions from interested Parties and the ExA. The number of vehicles mentioned by Mr Stevens in the Hearings relates to vehicles importing material to the Minster Converter Site for the creation of the piling platform. The number of these vehicles has been assessed as part of the ES and this has concluded no significant effects.</p> <p>The applicant has assessed a peak number of 236 vehicles per day (which includes 100 HGVs per day) for works associated with the Minster Converter Site (taken from Table 7.31 of Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] for access K-BM02) and it is this daily peak that has been used to assess impact. As previously mentioned during ISH3, the single busiest construction day would involve a daily maximum of 108 HGVs across all access points.</p>	DL6
AP11.	<p>Applicant, SCC, Kent County Council (KCC) The ExA requires the applicant to work with the County Councils (as Highway Authorities) to consider how any caps to HGV movements could be secured with wording also submitted, should the Secretary of State deem that capping is necessary. Please confirm whether this should be a requirement or part of a control document for securing the caps. This should also include which road links and junctions capping should be set and how the numbers of HGVs would be derived at to set the cap.</p>	<p>Construction vehicle and worker forecasts have been derived by the Front-End Engineering Design team based on the anticipated construction programme and construction compounds/ activities at each access point. Following ISH3, further meetings have been held with SCC Highways and KCC Highways in March 2026 to review the potential to commit to localised daily HGV caps on certain parts of the network. These have been considered by the Applicant and updated versions of Application Document 7.5.1.1 Outline CTMTP – Suffolk and Application Document 7.5.1.2 Outline CTMTP – Kent have been submitted at Deadline 6 to include these where they are considered to be justified following these further discussions.</p>	DL6

Action No.	ExA Description	Applicant's Response	Deadline
		<p>To confirm, the following daily HGV caps are included within the latest version of Application Document 7.5.1.1 Outline CTMTP – Suffolk where these caps are secured:</p> <ul style="list-style-type: none"> • A daily cap of ten HGV movements at the B1121 Main Road/ B1119 Church Street signalised junction within Saxmundham, to minimise potential impacts of construction traffic at this location (associated with works at access S-BM12) • A daily cap of ten HGV movements at the A1094/ B1122 roundabout junction within Aldeburgh, to minimise potential impacts of construction traffic at this location (associated with works at accesses S-BM01 and S-BM02). • Further to the above, the route along the B1121 Aldeburgh Road and B1121 Saxmundham Road through Friston (associated with access S-BM11) will be limited to access to existing overhead line towers and pylon works. This route will otherwise not be used by HGVs associated with the Proposed Project. <p>The following daily HGV caps are also included within the latest version of Application Document 7.5.1.2 Outline CTMTP – Kent where these caps are secured:</p> <ul style="list-style-type: none"> • A daily cap of ten HGV movements on Marsh Farm Road, to minimise potential impacts of construction traffic through access point K-BM04. Construction traffic HGVs through Minster will also be controlled, such that construction HGVs will not pass each other (two-way) at the same time. • A daily cap of ten HGV movements on Whitehouse Drove, to minimise potential impacts of construction traffic through access point K-BM05. Construction traffic HGVs along Richborough Road will also be controlled, such that construction HGVs will not pass each other (two-way) at the same time. • A daily cap of ten HGV movements will be imposed on Ebbsfleet Lane North, to minimise potential impacts of construction traffic through access point K-AP-6 (K-BM06). <p>Further to the above, both Application Document 7.5.1.1 Outline CTMTP – Suffolk and Application Document 7.5.1.2 Outline CTMTP – Kent include a commitment that no HGVs will arrive or depart site on Sundays or public holidays, other than for specified exception activities when required (as listed), when they will be limited to a maximum of 30 HGVs permitted per day on Sundays and public holidays.</p>	
AP12.	<p>SCC Respond on the 10 HGV cap proposed by the applicant for the signalised junction in Saxmundham.</p>		DL6
AP13.	<p>SCC, East Suffolk Council (ESC), Applicant The Construction Traffic Management Plan says the applicant has a preference for Option 1 (repairing or strengthening the existing bridge). Is this a strong enough form of wording? Should it be that if Option 1 is fully available then the applicant commits to taking this option ahead of the other options?</p>	<p>The Applicant has added the following to Application Document 7.2.1.1 Outline CTMTP – Suffolk within section 7.2.23: <i>‘Option 1 will be delivered if following the inspection and assessment of the bridge, the scope and programme of remedial works are proportionate and achievable within the programme of the project.’</i></p> <p>The scope for the Benhall Bridge Survey was sent to SCC and NR on the 27th November 2025, comments were received back from NR on the 3rd December 2025 and SCC on the 19th March 2026, with further information requested from SCC on the 20th March 2026, which was received on the 30th March 2026. The Applicant is now updating the scope of the survey with a view to sharing an updated scope with NR and SCC, before booking in the required possessions to carry out the survey. Given the timescales for the survey, the works required and the programme for the works are not within the Applicant’s control, the Applicant cannot</p>	DL6

Action No.	ExA Description	Applicant's Response	Deadline
		firmly commit to the repairs. However, the Applicant will endeavour to deliver the repairs as an additional benefit to the project in line with the commitment above.	
AP14.	<p>SCC, Applicant</p> <p>Applicant and SCC to consider whether there should be a restriction on any HGV movements (other than in relation to the bridge works) if and when Benhall Railway Bridge is closed to public traffic. If so, explain how this should be secured and provide wording.</p>	<p>The Applicant has considered this in consultation with SCC and has committed to a restriction on HGV movements when Benhall Rail Bridge is closed to public traffic within paragraph 7.2.38 of Application Document 7.5.1.1 Construction Traffic Management and Travel Plan Suffolk which has been updated at Deadline 6. This states that <i>“During any road closures of the B1121 for the project, no HGV construction traffic associated with the Proposed Project would use diversion routes through Saxmundham. In addition, LGV usage associated with the converter station during the Benhall Rail Bridge closure would be minimal (up to 60 LGVs per day). Diversions and any temporary mitigation required as part of the traffic management for the closure of the B1121 will be agreed under SCC's permitting scheme, and National Grid's Transport Co-ordinator would also liaise with SCC, other developers and Suffolk Constabulary on the timing of any closure to minimise impacts as far as practicable.”</i></p>	DL6
AP15.	<p>KCC</p> <p>Does KCC have any remaining concerns that need to be addressed during this examination in relation to Abnormal Indivisible Loads (AIL) access and the routes proposed? If so, explain how these issues could be resolved and how this should be secured.</p>		DL6
AP16.	<p>Applicant</p> <p>Applicant to respond to Aldeburgh Town Council concerns about health care access impacts through the period of construction and suggest possible mitigation if needed.</p>	<p>The Applicant and Aldeburgh Town Council met on 1st April 2026 to discuss the Council's concerns, including health care access, tourism, accommodation, traffic and transport, Town Council engagement, and community benefits.</p> <p>The Applicant is reviewing the concern regarding health care access to understand if additional measures are appropriate, and if so, what form these could take.</p> <p>More broadly, the Applicant will share additional information with the Council to provide clarity on other areas of concern. These include the Applicant's commitment regarding overnight accommodation, vehicle movement limits at certain locations, and how these are secured within the DCO.</p> <p>The Applicant has re-affirmed its commitment to ongoing proactive, timely, and appropriate engagement with the Council, and other Parish/Town Councils, to provide clear and relevant updates regarding the project.</p> <p>This includes the forthcoming engagement on community benefits, which will be undertaken separately to, and outside of the planning process, in line with Government guidance.</p> <p>The Applicant has otherwise previously responded to this point within Table 2.1 of Application Document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241] in response to Aldeburgh Town Council Deadline 3 Submission [REP3-112].</p>	DL6
AP17.	<p>Applicant</p> <p>Explain the time distribution of HGVs throughout a typical working day. Would there be peak times of the day for HGVs?</p>	<p>The existing daily profile of HGV movements on the surrounding highway network was originally reviewed within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] and Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] using the traffic count data for the A256 in Kent and the</p>	DL6

Action No.	ExA Description	Applicant's Response	Deadline
AP18.	<p>Applicant, All Councils</p> <p>If there are traffic delays due to proposed development construction traffic, either alone or in combination with other developments, is it likely that alternative routes would be taken by the public in their vehicles, potentially having an impact on more minor highways? If so, has this been assessed and is there actions needed to avoid this?</p>	<p>A12 in Suffolk as a guide. This indicated that HGV activity profile is typically flat between 8am-4pm, with slightly higher activity in the morning (between 8am-10am) and lower activity in the afternoon (between 4pm-6pm). The forecast HGV profile for construction traffic associated with the Proposed Project was therefore derived on this basis. However, HGV activity between 8am-10am is only expected to be marginally higher than levels between 10am-4pm, with a larger drop-off in HGV activity expected between 4pm-6pm. All construction HGVs associated with the Proposed Project will travel during the 10-hour window of 8am-6pm, with no HGV movements before 8am or after 6pm.</p> <p>The assessment work within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] and Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] assumed that a higher proportion of HGVs would travel during the AM network peak hour (8am-9am) to offer a robust assessment. Nonetheless, HGV movements will, in practice, be limited as far as possible so as not to travel during the traditional peak hours of 8am-9am and 5pm-6pm through the measures set out within Application Document 7.5.1.1 Outline CTMTP – Suffolk and Application Document 7.5.1.2 Outline CTMTP – Kent. Therefore, the peak time for HGVs is more likely to be between 9am-10am, although as set out above, this level of activity is only expected to be marginally higher than at other times of the day.</p> <p>The assessments within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] and Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] do not identify the potential for any significant effects on the highway network with respect to Driver Delay. Therefore, it is not expected that road users will experience any significant traffic delays as a result of construction traffic associated with the Proposed Project during the peak construction phase (2028 in Suffolk/ 2030 in Kent), nor will be encouraged to utilise alternative minor roads in this instance.</p> <p>Nonetheless, it is acknowledged that the potential for existing road users to use alternative routes as a result of increased network congestion (for example) would be a more likely scenario when including cumulative traffic associated with cumulative schemes. However, this again is not expected to be attributed to the Proposed Project as the cumulative assessments within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060] and Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073] did not identify the potential for any significant cumulative effects on the highway network with respect to Driver Delay as a result of the Proposed Project. The junction modelling outputs presented within the updated version of Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note in Suffolk (submitted at Deadline 6) and within Application Document 6.3.3.7.A (B) Environmental Statement Appendix 3.7.A Transport Assessment Note [REP5-029] in Kent also conclude the same findings, that any localised levels of congestion or delays are mainly attributed to Baseline traffic and/ or additional traffic associated with cumulative schemes, rather than construction traffic associated with the Proposed Project.</p> <p>In order to identify the potential for existing (Baseline) traffic to utilise alternative routes, an area-wide Strategic Transport Model would need to be used. This was not required as part of the Traffic and Transport assessment work, the scope of which was originally reviewed and agreed with the Local Highway Authorities at an early stage prior to DCO submission (during scoping meetings held in 2023). It is also not a standard approach to undertake this type of exercise for a time-limited construction phase assessment. As there has not been a requirement to utilise an area-wide strategic model based on the construction traffic forecasts of the Proposed Project, the potential for existing road users to utilise alternative routes has not been fully assessed. Nonetheless, this is not expected to be a likely</p>	DL6

Action No.	ExA Description	Applicant's Response	Deadline
AP19.	<p>SCC, KCC</p> <p>If there is anything else the Council's consider is necessary to include within the DCO with regards to traffic and transport matters, include this in your DL6 submission.</p>	<p>consequence as a result of construction traffic associated with the Proposed Project, as set out above.</p>	DL6
AP20.	<p>Applicant and SCC</p> <p>Provide a joint submission from the applicant and SCC on the junction modelling, with a conclusion of how this influences the overall cumulative traffic assessment for Suffolk and whether this indicates the need for mitigation.</p>	<p>The Applicant held a further meeting with SCC and ESC on 30 March 2026, and the junction modelling outputs were subsequently shared with them on 1 April 2026. This included junction modelling for the A12/ B1121 Main Road junction (to the south of Saxmundham), the A1094 Aldeburgh Road/ B1121 Aldeburgh Road junction and the A1094 Aldeburgh Road/ B1069 Snape Road junction. The junction modelling includes a Sensitivity Test, to consider potentially higher Baseline traffic flows at other times of the year driven by tourism related traffic peaks in summer months . The junction modelling also includes scenarios with and without cumulative traffic. The junction modelling has been submitted at Deadline 6 within an updated version of Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note to provide a summary of the junction modelling scope, methodology and results.</p> <p>The junction capacity assessments carried out pursuant to discussions with SCC Highways demonstrate that the Proposed Project will not have a significant effect on the operation of key local junctions and that the conclusions within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] and Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060] are valid and robust. The A12/ B1121 Main Road (South) and A1094 Aldeburgh Road/ B1121 Aldeburgh Road junctions are expected to operate within capacity with and without the Proposed Project. Whilst the A1094 Aldeburgh Road/ B1069 Snape Road junction is expected to operate over capacity, this is the case both with and without the Proposed Project. Additional mitigation has nonetheless been identified to manage construction worker traffic through this junction, secured within the updated version of Application Document 7.5.1.1 Outline CTMTP – Suffolk which was submitted at Deadline 6. No further additional mitigation is considered to be necessary following the junction modelling.</p>	DL6
AP21.	<p>Applicant and highways authorities</p> <p>The ExA requires that the applicant and the highway authorities at SCC and KCC meet to discuss remaining matters of disagreement and try to find a way to progress on these matters as soon as possible. Provide an update at deadline 6.</p>	<p>Suffolk</p> <p>The Applicant held a further meeting with SCC and ESC on 30 March 2026 to review matters relating to the junction modelling, Baseline traffic flows, traffic caps on HGV movements, construction workforce and travel assumptions, Benhall Railway Bridge and Protective Provisions, in order to progress discussions and work towards an agreement on these matters where necessary. Following this, the SCC Statement of Common Ground (SoCG) was shared with SCC for review on 2 April 2026, to determine which previous matters are now agreed. Additional measures have also been included within an updated version of Application Document 7.5.1.1 Outline CTMTP – Suffolk (submitted at Deadline 6), to further progress matters. An additional meeting will be held with SCC as soon as possible after Deadline 6, to review and address remaining Traffic and Transport matters as far as reasonably practicable, prior to the end of Examination.</p> <p>Kent</p> <p>The Applicant held a further meeting with KCC on 31 March 2026 to review KCC's feedback on the junction modelling and their request for additional measures for inclusion within Application Document 7.5.1.2 Outline CTMTP – Kent. Following this meeting, additional measures were included within an updated version of Application Document 7.5.1.2 Outline CTMTP – Kent (submitted at Deadline 6), as agreed during the meeting. KCC</p>	DL6

Action No.	ExA Description	Applicant's Response	Deadline
AP22.	<p>SCC, KCC</p> <p>With the submission of the junction modelling and the other information submitted by the applicant through this examination, do the Councils now consider that there is a sufficiently robust assessment of traffic and highways issues, both for the proposed development alone and also when considered cumulatively? If not, explain why.</p>	<p>SoCG is being shared with KCC again for review ahead of Deadline 7 to determine whether all matters are now agreed. An additional meeting will be held with KCC to allow any remaining traffic and transport matters to be addressed during Examination if possible/required.</p>	DL6
AP23.	<p>SCC, KCC</p> <p>At this point in the examination, do the Council's consider that there would be any impacts to traffic and transport, particularly driver delay, which would be assessed as significant in your view?</p> <p>If considered that significant adverse impacts would remain after mitigation, is there further mitigation which should be secured? If so, how would this be secured and with what wording?</p> <p>Would a requirement for the applicant to monitor and if necessary provide adaptive management/remediation mitigation be sufficient to overcome any concerns that the traffic and transport impacts would be significant? If so, please provide wording and explain how this could be secured.</p>		DL6
AP24.	<p>Applicant, SCC, KCC</p> <p>Given the winter months the applicant undertook baseline traffic surveys, does there need to be a seasonal adjustment with the junction modelling to take into account busier summer months with tourism traffic? If so, please include with the junction modelling.</p>	<p>Suffolk</p> <p>This matter was discussed with SCC Highways on 30 March 2026 when it was agreed that whilst the Baseline traffic surveys (carried out in January/ February 2024) were appropriate for use (methodology and neutral month period of data collection was agreed with SCC in advance of the surveys), that it would nonetheless be useful to include a Sensitivity Test as part of the junction modelling to account for a potentially higher Baseline at other times of the year. The Applicant has therefore carried out a Sensitivity Test by identifying and applying a robust seasonality factor to the Baseline traffic survey results to reflect busier network conditions and then carrying this through to the other scenarios. The junction modelling methodology and results are reported within Application Document 6.3.2.7.A ES Appendix 2.7.A Transport Assessment Note which was updated and submitted at Deadline 6. The results were also shared with SCC and ESC on 1 April 2026 for their review prior to Deadline 6. The junction capacity assessments (including the Sensitivity Test) carried out pursuant to discussions with SCC Highways demonstrate that the Proposed Project will not have a significant effect on the operation of key local junctions and that the conclusions within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] are valid and robust.</p> <p>Notwithstanding the above, the Baseline traffic flows which have informed Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] are based on an agreed survey methodology with SCC Highways and remain appropriate for the purposes of the original assessment work. The Applicant's position on this matter remains unchanged from that previously summarised within Application Document 9.79 Applicant's Comments on Written Representations [REP2-034] and Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]. The above Sensitivity Test has been carried out for the</p>	DL6

Action No.	ExA Description	Applicant's Response	Deadline
		<p>purposes of the junction modelling in Suffolk only, following further consultation with SCC Highways. No further traffic surveys or seasonality adjustments are required to inform Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054], as agreed with SCC.</p> <p>Kent</p> <p>The results of the junction modelling within Kent are reported within Application Document 6.3.3.7.A (B) Environmental Statement Appendix 3.7.A Transport Assessment Note [REP5-029] which was submitted at Deadline 5. KCC provided feedback on the junction modelling to the Applicant on 20 March 2026, including a request for additional measures to be considered as part of Application Document 7.5.1.2 Outline CTMTP – Kent. The outcomes of the junction modelling and the requested additional measures were subsequently reviewed during the meeting with KCC on 31 March 2026. It was agreed that the junction modelling and Baseline traffic data used to inform the junction modelling was acceptable, and that a Sensitivity Test to consider potentially higher baseline traffic flows at busier times of the year was not required by KCC. It was also agreed that Application Document 7.5.1.2 Outline CTMTP – Kent would be updated to include additional measures as discussed, such as measures to manage construction traffic during more sensitive times. The Applicant has therefore updated Application Document 7.5.1.2 Outline CTMTP – Kent (submitted at Deadline 6), but has not included a seasonality adjustment for the junction modelling within Kent given the above i.e. it was agreed with KCC Highways that this was not required.</p>	

Table 3.4 Response to Issue Specific Hearing 3 (25 March 2026 to 27 March 2026) – Socio-economics and Tourism

Action No.	ExA Description	Applicant's Response	Deadline
AP25.	<p>All Councils</p> <p>The ExA require that the Councils work together and provide wording for a requirement within the DCO, if the Councils considered it necessary, for the monitoring and possible adaptive management in regards to tourism impacts.</p>		DL6
AP26.	<p>Applicant</p> <p>Applicant to respond to comments from SEAS that there has been no attitudinal survey of tourism in the areas of the proposed development.</p>	<p>The Applicant acknowledges the concerns raised by SEAS regarding the absence of attitudinal surveys. However, the Applicant does not consider that undertaking such a survey would be necessary or proportionate, nor that it would materially alter the conclusions of the socio-economic assessment.</p> <p>Perception of impacts</p> <p>Whilst attitudinal surveys can provide contextual insight, they have inherent methodological limitations when used to predict tourism impacts. There is the risk that survey design and question framing may introduce bias, for example through leading questions, which can influence respondents' perceptions and responses. More specifically, they rely on respondents indicating how they might behave in a hypothetical future scenario. Evidence gathered from other major infrastructure projects demonstrates that such stated intentions do not reliably translate into actual visitor behaviour once construction is underway. For example, Sizewell C identified limited empirical evidence of any reduction in visitor numbers or expenditure beyond normal year-to-year variation. In addition, monitoring of other major infrastructure projects has shown that initial</p>	DL6

Action No.	ExA Description	Applicant's Response	Deadline
		<p>concerns about visitor perception do not typically translate into measurable impacts on tourism activity. For example, at Hinkley Point C, over 90% of visitors reported that their experience was unaffected by construction, while tourism employment in Somerset was found to have increased during the construction period. A similar pattern was observed during the construction of Sizewell B, where tourism employment increased and fluctuations remained consistent with normal economic variation. This evidence base is brought together in Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065]. The findings confirm that while perception surveys may indicate concern prior to construction, there is limited robust evidence to demonstrate that this leads to material adverse effects on visitor numbers, spending, or the wider tourism economy. This supports the conclusion in Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 [REP1A-005] that no significant adverse effects on tourism are anticipated. These comparator projects are considered appropriate and conservative benchmarks. These projects are substantially larger in scale than the Proposed Project and are located in environmentally and visually sensitive coastal areas with established visitor economies. By comparison, the Proposed Project is smaller in scale, with a shorter construction duration and a significantly smaller workforce.</p> <p>Attribution</p> <p>Suffolk has multiple infrastructure projects progressing concurrently which makes it extremely challenging to attribute any marginal changes in perception or behaviour to the Proposed Project in isolation. There is a significant possibility that Sizewell C impacts will be perceived as Sea Link impacts given the overlapping construction timescales and hence impacts would be overestimated. For this reason, the Applicant has placed greater weight on empirical evidence and observed outcomes from comparable projects, which it considers provide a more robust basis for assessment.</p>	
AP27.	<p>All Councils</p> <p>If there was to be a Skills and Employment Plan submitted by the applicant which would be considered acceptable by the Councils, would this be sufficient to overcome any remaining concerns relating to economic impacts?</p>		DL6
AP28.	<p>KCC, Dover District Council, Thanet District Council (TDC)</p> <p>Are there remaining concerns with regard to the potential displacement of tourists by workers of the proposed development (or in combination with other workers of other developments in the area) in tourist accommodation?</p>		DL6
AP29.	<p>Applicant</p> <p>Provide plans of the proposed permissive paths and how they would be secured? Furthermore, why have permissive paths been proposed rather than new public rights of way?</p>	<p>The Applicant has submitted an updated Application Document 2.7 Access, Rights of Way and Public Rights of Navigation Plans at Deadline 6 including the proposed permissive path from the permanently diverted PRow and the B1121 Main Road.</p> <p>The Applicant has proposed a permissive path as it will need to retain control for maintenance activities such as any maintenance to the Fromus Bridge, during which the permissive path may need to be closed. In addition, in the event of decommissioning and removal to the bridge the permissive path would need to be removed.</p> <p>Regarding the permissive paths through the woodland surrounding Saxmundham Converter Station, an example of potential routes is provided in response to WQ3 3SERT3 in Application Document 9.136 Applicant's Responses to Third Written Questions.</p>	DL6
AP30.	ESC, SCC		DL7

Action No.	ExA Description	Applicant's Response	Deadline
	Respond to the proposed permissive paths and whether they should be proposed as public rights of way?		

Table 3.5 Response to Issue Specific Hearing 3 (25 March 2026 to 27 March 2026) – Health and Wellbeing

Action No.	ExA Description	Applicant's Response	Deadline
AP31.	<p>Applicant</p> <p>Applicant to reconsider text within the dDCO, requirement 7, regarding the definition of severe weather as an exception to core working hours.</p>	<p>The dDCO contains the following wording with regards to severe weather:</p> <p><i>“The severe weather conditions referred to in sub-paragraph (4)(g) means any weather which prevents work from taking place during the core working hours referred to in sub-paragraph (1) and, as the case may be, the hours referred to in sub-paragraph (3) by reason of physical incapacity (whether for reasons of visibility, ground conditions, power availability, site access, wind or otherwise) or being contrary to safe working practices.”</i></p> <p>The Applicant is of the clear view that such an exception should be included in the requirement.</p> <p>The above additional wording is based on SCC’s suggested wording made during the Bramford-Twinstead examination. The Applicant feels that this wording provides a sufficient definition of severe weather, noting the various circumstances which might constitute severe weather, and noting that this wording was secured in the made DCO for Bramford to Twinstead. Severe weather has been recognised as a valid inclusion in other made DCOs, including The National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024, the National Grid (Hinkley Point C Connection Project) Order 2016 and the Southampton to London Pipeline Development Consent Order 2020.</p>	DL6
AP32.	<p>All Councils</p> <p>With regard to the proposed exceptions included in requirement 7, are there any that the Council considers as should be omitted or amended?</p>		DL6
AP33.	<p>Applicant</p> <p>Applicant to provide further detailed justifications for all exceptions included in requirement 7, relating to core hours.</p>	<p>The applicant has provided additional wording below each item listed in the dDCO under Section 7 Sub paragraph (4)</p> <p><i>(4) The following operations may take place outside the core working hours referred to in sub paragraph (1)—</i></p> <p><i>(a) trenchless crossing operations including at landfalls and beneath highways, railway lines, woodlands, nature reserves, Sites of Special Scientific Interest or watercourses;</i></p> <p>Trenchless crossings are required to operate 24hrs a day, 7 days a week this is to reduce the risks associated with the operation of stopping and starting the trenchless operation. When stopping a trenchless crossing operation this presents a high risk of the drill getting stuck due to ground shrinkage or the risk of the bore collapsing, this would result in delays to the program and the need to drill a new bore on a new alignment (within the Limited of deviation)</p>	DL6

Action No.	ExA Description	Applicant's Response	Deadline
		<p>An example of this kind of wording, relating to continuous periods of works is contained in Requirement 23 (2) (a) in the EA2 made DCO.</p> <p><i>(b) the installation and removal of conductors, pilot wires and associated protective netting across highways, railway lines or watercourses;</i></p> <p>Works on Overhead lines where there is a requirement to cross third party assets needs to be done in conjunction with permission granted by the third party, which are most likely to be , especially with Network Rail (Kent OHL works) , outside of normal working hours and may only be possible on days where there is limited use of the asset like a Sunday, Bank Holiday or overnight.</p> <p>An example of this kind of wording, relating to continuous periods of works, is contained in Requirement 24 (2) (a) in the EA2 made DCO.</p> <p><i>(c) the jointing of underground cables;</i></p> <p>Cable jointing is a 24hr operation due to the requirements for the work to be done in climatically controlled conditions and once started would require finishing to ensure the integrity of the joint is maintained.</p> <p>An example of this kind of wording, relating to continuous periods of works, is contained in Requirement 23 (2) (a) in the EA2 made DCO.</p> <p><i>(d) the continuation of any work activity commenced during the core working hours to a point where they can securely and or safely be paused;</i></p> <p>This drafting is intended to address activities such as concrete poring, dewatering, cable pulling or power float flooring being laid, where the works would need to complete to avoid issues with the finish requiring the works to be redone the following day, therefore delaying the program.</p> <p>An example of this kind of wording, is contained in Requirement 24 (2) (c) in the EA2 made DCO.</p> <p><i>(e) delivery to the transmission works of abnormal loads and any highway works requested by the highway authority to be undertaken outside the core working hours;</i></p> <p>The delivery of ALLs will generally take place over weekend, bank holidays or overnight to minimise the impacts on the road network to users. This will also involve the potential protection of structures, and or overbridging of structures. This will be done in conjunction with the highway authority, local police and other stakeholders.</p> <p>An example of this kind of wording, is contained in Requirement 23 (2) (c) in the EA2 made DCO.</p> <p><i>(f) the testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities;</i></p> <p>Once testing of electrical equipment has started it would require to be finished, which may take works outside of the core working hours. If faults are identified during the testing this may require works outside of the core working hours to fix the faults for the testing to continue.</p> <p>An example of this kind of wording, is contained in Requirements Section 23 and 24 (2) (d) in the EA2 made DCO.</p> <p><i>(g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities;</i></p> <p>This relates to activities such as concrete works, lifting or cladding of buildings where the program would be affected if there were delays, and the activity had started earlier in the day and had to be suspended due to a period of severe weather as covered in [AP-31].</p>	

Action No.	ExA Description	Applicant's Response	Deadline
AP34.	<p>All Councils</p> <p>All councils to work together to submit alternative wording with respect to core working hours including any restrictions and exceptions required, if the councils consider this necessary.</p>	<p><i>(h) activity necessary in the instance of an emergency where there is a risk to persons or property;</i> An example of this would be if during a period of heavy rain we were required to return to site to commence removal of surface water from site which could cause a risk to local properties or persons in the area of the project which occurred outside the core working hours. An example of this kind of wording, is contained in Requirement 23 and 24 (2) (e) in the EA2 made DCO</p> <p><i>(i) marine works (all works below the mean high water springs line);</i> This is the installation of the Offshore Scheme including HDD exit pits at both landfalls. Once offshore cable installation has started it would require finishing to ensure the integrity and safety of the cable and other sea users is maintained.</p> <p><i>(j) security monitoring;</i> This is for security patrols and visits when the site is not occupied to ensure all areas are secure, or in the case of a call out from a remote camera activation.</p> <p><i>(k) intrusive and non-intrusive surveys;</i> This is where surveys are required to be carried out outside of the core working hours such as bat surveys, badger surveys or other surveys which may be required when activity is not present on site like additional baseline noise surveys.</p> <p><i>(l) mechanical and electrical installation works within buildings once erected and enclosed;</i> This is for works inside the completed building which need to be carried out and completed once started, which will have limited impact on persons outside of the buildings.</p> <p>An example of this kind of wording, is contained in Requirement 23 and 24 (2) (b) in the EA2 made DCO</p> <p><i>(m) any highway works requested by the highway authority to be undertaken outside the core working hours; and</i> This is where we may need to complete the installation of works such as bellmouths, speed limit changes or traffic control installation outside of the working hours at the request of the highway authority to minimise the impact on users of the highway network, such as overnight.</p> <p><i>(n) any railway works to be undertaken as part of the project on a Saturday, Sunday, Bank Holiday or outside the core working hours</i> Works around Network rail assets are done during approved access windows, which tend to be when the network is at its quietest; therefore this could be overnight or on bank holiday weekends - hence this work would be outside of the core working hours and outside of the applicant's control.</p>	DL6

Action No.	ExA Description	Applicant's Response	Deadline
AP35.	<p>Applicant, SCC</p> <p>It is understood that SCC and the applicant are to meet on 7 April regarding access to healthcare and the implementation, monitoring and coordination of mitigation measures to minimise disruption to healthcare access. Provide an update following this meeting.</p>	<p>The Applicant organised a Health and Wellbeing Thematic Meeting on 7th April 2026 with Suffolk County Council (SCC) and East Suffolk Council (ESC). Discussion covered the following matters: health and wellbeing monitoring plan; access to healthcare; REAC commitments; core working hours; and topics within the latest submitted version of the SoCG [REP3-062] where local planning authorities felt agreement could be reached.</p> <p>The Applicant confirmed that it does not propose to develop a standalone Mental Health and Wellbeing Monitoring Plan. A detailed justification is provided in Application Document 9.136 Applicant's Responses to Third Written Questions (please refer to 3HW3). SCC outlined the components they would expect such a plan to include (as per REP5-178) and said they would provide further written suggestions. However, the Applicant maintains that the measures set out in Application Document 9.136 Applicant's Responses to Third Written Questions represent a proportionate and effective approach.</p> <p>In relation to healthcare access, the Applicant confirmed that no significant effects are anticipated, as assessed in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. Notwithstanding this, the Applicant reiterated its commitment to proactive mitigation, including engagement with emergency services, establishment of a "blue light" coordination group, clear communication of road closures, and provision of alternative transport where required.</p> <p>SCC raised comments on REAC commitments GG27, GG03 and NV03 following SCC written Responses to ExQ2 raised in [REP5-204]. The Applicant noted it was reviewing SCC's comments and would provide update at Deadline 6 within Application Document 9.131 Applicant's Comments on Responses to Second Written Questions.</p> <p>SCC raised concerns regarding core working hours, particularly in relation to community respite, cumulative impacts, and mental wellbeing, and expressed a preference for more predictable or restrictive working patterns (e.g. limiting Sunday and Bank Holiday working). SCC also requested clearer justification for working hour exceptions within the DCO. The Applicant has provided further clarification on exceptions within this document (see Action Point AP33) and has agreed to consider whether additional measures (such as improved predictability and communication of working patterns) can be incorporated. The applicant has already confirmed that there will be no routine working of Bank Holidays and the Weekends before Bank holidays at the converter station site in Suffolk and the converter station and substation site in Kent. Additionally, the predictability and communication point is now reflected in the following commitment which is included in Section 1 of the REAC:</p> <p><i>'The written scheme setting out stages of the authorised development developed under Requirement 4 will be made available on a website maintained by the Applicant so that communities can understand the intended programme of works. The version to be uploaded on the website will provide additional detail that identifies the weekends when it is anticipated that onshore construction work will be undertaken on Sundays and Bank Holidays. It will specify the works numbers affected by Sunday and Bank Holiday working so that communities can understand the area of the project likely to be affected. The Applicant will aim to update the website version on a 6 monthly basis where there have been changes to the programme.</i></p> <p><i>Where weekend is required unexpectedly on Sundays and Bank Holidays that have not been identified in the written scheme on the website, the Applicant will communicate with affected communities and relevant stakeholders, including those who have registered to receive updates, as far in advance of works as reasonably possible.</i></p>	DL6

Action No.	ExA Description	Applicant's Response	Deadline
		<i>For avoidance of doubt, for works that are part of Work No. 3B, Work No. 9B and Work No. 11, Bank Holiday working will only take place where required for activities specified in 7(4) as other elements of those works will not take place on Bank Holidays as specified in Requirement 7.'</i>	

Table 3.6 Response to Issue Specific Hearing 3 (25 March 2026 to 27 March 2026) – Cultural Heritage

Action No.	ExA Description	Applicant's Response	Deadline
AP36.	Applicant Applicant to respond in writing to Mr Nicholas Bridges oral submission, where new points have been made.	<p>The Applicant noted within ISH3 that the majority of Mr Nicholas Bridges' oral submissions at ISH3 covered points that have been responded to within Application Document 9.128 Applicant's Response to Nicholas Bridges Representations RR-3944 and REP3-132 and SEAS REP4-240 [REP5-141].</p> <p>As set out in REP5-141, the Applicant has provided a detailed response to the Relevant Representation [RR-0091] by the Alde and Ore Association and explained why the Alde Estuary is not part of the Landscape and Visual Impact Assessment study area. This was a decision made and agreed to by Suffolk County Council and East Suffolk Council at the scoping stage and within the Preliminary Environmental Information Report (PEIR). The Applicant's response is contained in Application Document 9.97 Applicant's Responses to Supplementary Agenda Additional Questions for Issue Specific Hearing 2 [REP4-094]. Therefore, the points raised in Mr Nicholas Bridges' oral submission at ISH3 relating to the Alde Estuary are not considered to be relevant to the potential effects arising from the Suffolk Onshore Scheme on landscape and visual receptors.</p> <p>As set out in REP5-141, the Applicant, at the request of the Examining Authority in ISH2, has provided an assessment of the heritage assets of St Botolph's Church and the Martello Tower in the Alde Estuary. This concluded that there would be no impact upon those heritage assets resulting from the Suffolk Onshore Scheme. The theory that the site of the church may be the place known as 'Ikenho' is discussed in REP5-141, as is the historical association between the site of the church and St Botolph, so these elements of its significance have not been missed as claimed in Mr Bridges' oral evidence. These elements will be unaffected by the Suffolk Onshore Scheme. Mr Bridges' points about assets in the Alde Estuary are used to claim that the study area for assessment of the effects of the scheme through change to the setting of heritage assets was too narrow. The study area for assessment was agreed at Scoping and PEIR stages with the Local Authority and Historic England. It is the Applicant's view that the study area is appropriate and proportionate. As demonstrated in the responses provided by Suffolk County Council, East Suffolk Council, Kent Council and Thanet District Council to Examiner's questions during ISH3, the relevant local authorities are satisfied that an appropriate level of assessment of cultural heritage assets has been provided.</p> <p>REP5-141 provides a response in relation to the assessment of assets in Sternfield and this is not repeated here.</p>	DL6

Action No.	ExA Description	Applicant's Response	Deadline
		<p>Within Mr Nicholas Bridges' oral submission at ISH3 points are raised regarding the more detailed, assessment of operational lighting associated with the Saxmundham Converter Station and Minster Converter Station and Substation on landscape and visual receptors presented within Application Document 9.124 Landscape and Visual Nighttime Assessment [REP5-137]. The oral submission refers to the Suffolk and Kent Baseline Nighttime Photography, contained within Appendix B of REP5-137, and questions why only one direction has been included. The baseline photography captured a full 360 degree sweep at each viewpoint and is presented as a 90-degree horizontal field of view to match the extent and direction of the day time photography presented within the Environmental Statement. This is in line with published guidance as described within Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095] and Application Document 6.3.3.1.A ES Appendix 3.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-143]. At paragraph 1.5.13 within REP5-137 it is stated that <i>"the nighttime survey observations are informed by the wider view experienced at each viewpoint and the baseline nighttime photography reflects a 90 degree horizontal field of view which in some instances excludes some of the light sources that were observed in the field"</i>.</p> <p>Within Mr Nicholas Bridges' oral submission at ISH3 points are raised regarding the need to assess effects of the scheme at night during different phases of the moon and with reference to the planets and stars. These individual elements of the night sky do not contribute to the significance of Hurts Hall Grade II listed building. The assessment of the nighttime conditions provided within Application Document 9.124 Landscape and Visual Nighttime Assessment [REP5-137] is considered to be sufficient to understand the nighttime setting of Hurts Hall and commentary on this has been provided in response to heritage matters in REP5-141.</p> <p>https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN020026-003058-Issue Specific Hearing 3 (ISH3) - Day 2 - Part 2 COMBINED TS.pdf</p> <p>The Applicant will respond to any additional new points made within Mr Nicholas Bridges' written submission expected at Deadline 6 within responses at Deadline 7.</p>	
AP37.	<p>Historic England</p> <p>Considering the latest information submitted by the applicant in relation to listed buildings, conservation areas and scheduled ancient monuments, is Historic England content with the level of detail and assessment submitted for this examination?</p>		DL6
AP38.	<p>Applicant</p> <p>There are several examples where the applicant's assessment conclusions for listed building impacts is that there was an initial assessment as part of the consented EA1N/2 project with no impact predicted, with then no additional impact predicted in relation to the Suffolk Onshore Scheme (such as with Knodishall Place). For clarity, does this mean that for the Sea Link proposed development alone the applicant considers that there would be no impact to the setting or significance of these listed buildings?</p>	This is correct. The Suffolk Onshore Scheme would have no impact upon such assets.	DL6
AP39.	<p>All Councils, Historic England</p>		DL6

Action No.	ExA Description	Applicant's Response	Deadline
AP40.	<p>Does there need to be any changes to the draft DCO or the support documents submitted by the applicant in relation to cultural heritage? If so, please set this out with alternative or additional wording.</p> <p>Historic England</p> <p>Is Historic England satisfied with the current level of information and the approach the applicant has set out in regards to the D-shaped enclosure in Suffolk?</p>		DL6
AP41.	<p>Historic England</p> <p>With regards to Richborough Saxon Shore Fort, Roman Port, and Associated Remains in Kent, based on the applicant's submitted details and information, how would Historic England consider the potential impact to the setting and significance of these heritage assets?</p>		DL6
AP42.	<p>Historic England</p> <p>With regards to the Ebbsfleet Peninsula Multi-Period Complex, based on the applicant's submitted details and information, how would Historic England consider the potential impact to the setting and significance of this heritage asset?</p>		DL6
AP43.	<p>Historic England</p> <p>Other than the Ebbsfleet Peninsula Multi-Period Complex, does Historic England disagree with the applicant's assessment of impacts to any of the other non-designated heritage assets?</p>		DL6

Table 3.7 Response to Issue Specific Hearing 3 (25 March 2026 to 27 March 2026) – Cumulative Effects

Action No.	ExA Description	Applicant's Response	Deadline
AP44.	<p>Applicant and councils</p> <p>The applicant and the Councils to work together and provide a document which provides the reasonings of the parties and DCO (and/or if appropriate REAC) wording to secure the measures identified in responding to 2WQ 2CEIntra3 should the Secretary of State deem this to be necessary.</p>	<p>The Applicant has been discussing this action point with the Council's; however, due to annual leave and statutory holidays we have not received details of each Council's position. As such the Applicant has provided a position on each of the measures identified in responding to 2WQ 2CEIntra3, however the Council positions will need to be provided in the final Statement of Common Ground to be submitted at deadline 7.</p> <p>Only SCC provided suggested specific measures in response to 2WQ 2CEIntra3. The Measures Requested were:</p> <ul style="list-style-type: none"> Restrict core construction hours to Monday–Friday 08:00–18:00 and Saturday 08:00–13:00, with no routine Sunday or Bank Holiday working to provide respite for local residents and recreational PRoW users <p><u>Applicant's Position</u></p> <p>The Applicant's position regarding the core working hours is as set out in the SoCG with Suffolk County Council, which is set out below.</p>	DL6

Action No.	ExA Description	Applicant's Response	Deadline
		<p>The core working hours proposed are required in order to facilitate the delivery of this critical nationally important electricity transmission infrastructure.</p> <p>There are robust controls in management documents including in Application Document 7.5.3 (C) Outline Construction Environmental Management Plan [REP5-068] and Application Document 9.83 (B) Outline Code of Construction Practice [REP4-232] that mitigate the effects of construction activity, and there are restrictions on noisy works (namely percussive piling) and on HGV movements on weekends in any case. These measures, combined with the removal of bank holiday weekends, support the position that the proposed core working hours (including weekends where necessary) are reasonable and justified.</p> <p>The Applicant has aligned the working hours for Works 1A and 1B, as we as <i>to those elements of Work No. 4, Work No. 13, Work No. 15 and Work No. 17 insofar as they are works required to construct, operate and/ or mitigate the environmental impacts of Work No. 1A and Work No 1B</i>, to those secured in the SPR DCO.</p> <ul style="list-style-type: none"> • A Mental Health and Wellbeing Monitoring Plan: SCC recommend a requirement for a proportionate plan to monitor and respond to community stress and wellbeing impacts during both construction and early operation. <p><u>Applicant's Position</u></p> <p>Please see the Applicant's response to WQ3 question 3HW3 in Application Document 9.136 Applicant's Responses to Third Written Questions. In summary, because it would be impossible to isolate the effects Sea Link is contributing to any area wide effects, it would also be impossible to identify reasonable and proportionate mitigation that could be delivered by Sea Link to address Sea Link's contribution to the overall effects reported. The value of any information gained by undertaking such an exercise for Sea Link alone would be negligible. Furthermore, and importantly, the Applicant has not identified any potential for significant effects on mental health and wellbeing.</p> <ul style="list-style-type: none"> • Mitigation for PRow impacts to include: <ul style="list-style-type: none"> ○ Fromus Access PRow ○ Resurfacing of Aldeburgh Path at the RSPB North Warren Reserve ○ B1119 PRow/Bridleway, <p><u>Applicant's Position</u></p> <p>The Applicant has developed wording for a commitment to deliver the permissive path from the B1121 along the Saxmundham Converter Station access to connect in to the permanently diverted PRow E-491/005/0 and the reinstated PRow E-491 006/0. The Applicant is also committing to creating permissive routes through the woodland planning, which is anticipated will be at least 750 m in length.</p> <p>The commitment, which will be included in Section 1 of the REAC, is as follows:</p> <p><i>"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) .</i></p> <p><i>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.</i></p>	

Action No.	ExA Description	Applicant's Response	Deadline
		<p><i>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.</i></p> <p><i>The permissive 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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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.</i></p> <p><i>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."</i></p> <p>The Applicant does not consider the proposed resurfacing of the Aldeburgh Path within the RSPB reserve to be an offsetting or compensatory measure for any significant effects on PRow. The Applicant is, however, happy to investigate options to deliver the measure but cannot commit to undertaking the work itself as it does not form part of the Suffolk Onshore Scheme as applied for and is not assessed in the Environmental Statement.</p> <p>Given the Applicant's commitment to providing the 1.2 km Fromus Valley permissive path, and other permissive paths around the woodland planting at the converter station, and has committed to exploring how the Aldeburgh path resurfacing may be delivered, it is considered unnecessary and disproportionate to also provide the 1.2 km B1119 Bridleway/PRow requested by SCC.</p>	
AP45.	<p>SCC, KCC</p> <p>Comment on whether you believe that the Secretary of State can consider that all stages of the mitigation hierarchy have been fully met based upon the mitigation offered by the applicant at DL5.</p>		DL6
AP46.	<p>Applicant</p> <p>The Environmental Statement shows residual significant effects (both moderate and major) at year 15 for landscape and visual receptors in both Kent and Suffolk for which no additional mitigation is proposed. Why is it not possible to offset or compensate for this residual effect? Explain how this accords with the mitigation hierarchy.</p>	<p>The Applicant has provided detailed information regarding how the mitigation hierarchy has been applied for all residual significant effects for landscape and visual receptors in Kent and Suffolk in response to ExQ3 3GEN1 in Application Document 9.136 Applicant's Responses to Third Written Questions.</p>	DL6
AP47.	<p>Applicant</p> <p>Potentially significant cumulative landscape and visual effects are identified in the onshore inter-project effects chapter for Suffolk with</p>	<p>The Applicant has provided detailed information regarding how the mitigation hierarchy has been applied for all residual significant cumulative effects for landscape and visual</p>	DL6

Action No.	ExA Description	Applicant's Response	Deadline
	LionLink, South Saxmundham Garden Neighbourhood and the Scottish Power Renewables (SPR) schemes with the conclusion that no further cumulative mitigation is available. Why is it not possible to offset or compensate in some way? Explain how this accords with the mitigation hierarchy.	receptors in Kent and Suffolk in response to ExQ3 3GEN1 in Application Document 9.136 Applicant's Responses to Third Written Questions.	
AP48.	Applicant, ESC, SCC, TDC, KCC Applicant and local authorities to develop a joint position statement with regard to the unmitigated significant residual landscape and visual effects to see if there are further mitigation measures that can be included or compensation measures to offset any residual significant effects, if the Secretary of State considers that to be necessary.	The Applicant has requested meetings with ESC, SCC and TDC to develop a joint position statement in response to this Action Point. It has not been possible to agree a time in advance of Deadline 6, but a joint response will be provided for Deadline 7.	DL6
AP49.	Applicant, ESC, SCC, TDC, KCC Continue discussions with the councils to seek to identify appropriate mitigation, including measures to compensate and offset significant effects. Provide a position statement at DL6, which includes reasoning as to why the parties consider these measures to be necessary, or not, and wording that can secure such measures should the Secretary of State deem them necessary. All parties to clearly identify any deemed conflicts they consider remain with the applicant's ability to meet the requirements of the Critical National Priority test.	The Applicant has been discussing this action point with the Council's; however, due to annual leave and statutory holidays we have not received details of each Council's position. As such the Applicant has provided a position on each of the measures identified in responding to 2WQ 2CEIntra3, however the Council positions will need to be provided in the final Statement of Common Ground to be submitted at deadline 7. <u>Applicant's Position</u> It is the Applicant's position that the significant residual effects of the project have been mitigated, following the mitigation hierarchy, to the fullest extent possible. The mitigation hierarchy has been followed throughout the development of the Proposed Project and the Applicant's response to 3GEN1 in Application Document 9.136 Applicant's Responses to Third Written Questions demonstrates how each stage in the mitigation hierarchy has been applied to all significant residual effects as far as possible. The fact that three of the four councils have also not identified additional mitigation measures supports the Applicant's position regarding the lack of availability of any further measures to mitigate or offset the few remaining significant residual effects. The Applicant's position regarding the five measures identified by SCC (reduced working hours, a mental health and wellbeing monitoring plan and three PRow related proposals) are as set out in response to Action Point 44 above.	DL6

Table 3.8 Response to Issue Specific Hearing 3 (25 March 2026 to 27 March 2026) – Marine Physical Environment

Action No.	ExA Description	Applicant's Response	Deadline
AP50.	Applicant Update dDCO requirement 16 to reflect the commitment to the trenchless crossing exiting 45m east of the continuous Coralline Crag outcrop in Suffolk.	The Applicant confirms that Requirement 16 will be updated to reflect the commitment to the trenchless crossing exiting 45m east of the continuous Coralline Crag outcrop in Suffolk at Deadline 6.	DL6
AP51.	Applicant Refine the minimum depth commitment in the Suffolk near-shore/fore-shore area to ensure no exposure of cable in a worst case erosion scenario.	As set out in Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [REP1A-003] the depth of the HDD conduits at the Suffolk landfall will be 17 m to 25 m (at its deepest point). The SMP policy for Thorpeness Haven Beach is for 'Managed Realignment' from 2055 to 2105, prior to this it is for 'Hold the Line' from 2005 to 2055.	DL6

Action No.	ExA Description	Applicant's Response	Deadline
		<p>For the cable to become exposed in the nearshore/foreshore area, it is estimated that the coastline would need to retreat over 250 m landward including downward erosion that would not occur in reality due to the presence of the resistant Coralline Crag formation.</p> <p>Current NCERM projections (2025) for an undefended coastline are for erosion of 118 m by 2105 for a location 1.7 km to north of landfall where the mechanism of erosion is quite different involving undercutting of soft cliff material. However, taking this as an indication of the maximum extent of the area at risk of coastal erosion under an extreme climate change scenario, this is significantly less than what would be required to expose cables at the HDD exit. Even allowing for uncertainty in future projections, the extent of erosion required to expose the ducts containing the cables is not therefore possible as a result of ongoing coastal processes at Aldeburgh.</p> <p>The Applicant has also provided a commitment (MPE06) to undertake monitoring and analysis of intertidal and subtidal profiles on an annual basis. This will identify future coastal erosion rates which could be affected by a deterioration of the Coralline Crag (or other subtidal features) or climate change effects, in the event that these are more severe than predicted.</p> <p>With the above in mind, the Applicant considers the existing HDD design parameters at Suffolk is more than sufficient to reduce the likelihood of cable exposure. Notwithstanding this, the Applicant is considering whether a REAC commitment to a minimum depth is appropriate. We will discuss the details of any drafting with ESC and resolve for Deadline 7.</p>	
AP52.	<p>Applicant Provide draft requirement wording that commits to no excavation within designated sites in the Suffolk and Kent landfall areas during operation (including emergency repair), or only if subject to a separate approval process.</p>	<p>The Applicant understands the term 'landfall areas' to refer to landfall installation by trenchless landfall techniques between the onshore transition joint bay and the exit pits. The Applicant confirms that the installation of the cables will be within the trenchless landfall installation and that, with the exception of the temporary entry and exit pits, no surface excavation works will be required above the trenchless landfall alignment during either the installation or operational phases (including emergency repair) of the project, and no rights are being sought in this regard. At the entry and exit locations during installation, excavations may extend up to 30m from the surface level plan location of the entry and exit pits to ensure that the duct and cable installation are installed at sufficient depth below surface. Once installed there will be no surface excavation works during operation. The Applicant will continue to give consideration to the appropriate form of wording of a requirement or commitment to be submitted at D7.</p>	DL6
AP53.	<p>Applicant Confirm that there would be no use of pneumatic casings or provide an assessment of the use of temporary casings, either in terms of significant noise effects at either landfall or any impact on the integrity of the Coralline Crag.</p>	<p>The Applicant can confirm that casing installation using a pneumatic hammer is not proposed for the landfalls and has not been assessed as part of the Project.</p> <p>Application Document 9.13: Pegwell Bay Construction Method Technical Note [REP4-229] and Application Document 9.92 Outline Cable Specification and Installation Plan [REP5-117] have been updated to clarify the above at Deadline 6.</p>	DL6
AP54.	<p>Applicant Update Pegwell Bay construction method technical note to confirm use of bentonite in the foreshore area and ensure that the technical note and relevant technical chapters provide a clear and consistent definition of the near shore, foreshore and offshore.</p>	<p>The Applicant confirms that Application Document 9.13: Pegwell Bay Construction Method Technical Note [REP4-229] has been updated at Deadline 6.</p> <p>The Applicant confirms that for the purposes of this Application, Nearshore and Offshore is defined in Paragraph 1.6.4 of Application Document 6.2.4.1. The Applicant also confirms that for this Application, the foreshore is the coastal area situated between the</p>	DL6

Action No.	ExA Description	Applicant's Response	Deadline
		mean high-water and mean low-water marks, representing the intertidal zone and these terms are therefore used interchangeably.	

Table 3.9 Response to Issue Specific Hearing 3 (25 March 2026 to 27 March 2026) – Noise and Vibration

Action No.	ExA Description	Applicant's Response	Deadline
AP55.	<p>Applicant</p> <p>Meet with the ESC and TDC (and if relevant KCC and SCC) for a tripartite noise meeting. The aim of the meeting:</p> <ul style="list-style-type: none"> • draft a dDCO requirement relating to the s61 process and confirm whether s61 commitments should be on the face of the DCO or within the outline construction noise and vibration management plan (oCNVMP). • agree wording of Article 49 as it relates to both construction and operation. • draft a dDCO requirement for operational converter and substation noise limits and confirm whether noise thresholds should be on the face of the DCO or part of the REAC. 	<p>A tripartite meeting was held on Thursday 9 April 2026 between East Suffolk Council, Thanet District Council and National Grid. See Application Document 9.33 Operational Noise Technical Note for further detail.</p>	DL6
AP56.	<p>Applicant</p> <p>Provide a technical note, outlining the effect of 24-hour construction vehicle noise from the hoverport area for residential receptors and any necessary mitigation. The technical note should include noise contour mapping based on the marine ornithology maps [REP5-032]. The modelling should apply a hard ground assumption to the hoverport.</p>	<p>A response is provided in Application Document 9.148 Hoverport Construction Access Noise Modelling – Technical Note. This confirms that there remains no potential for significant effects as a result of use of the hoverport access. Please note that access would not be continual over a 24-hour period, being limited by the tidal access windows and emergency situations.</p>	DL6
AP57.	<p>Applicant</p> <p>Comment on the need for an R-wave study at the hoverport and the potential impact on invertebrates from any nighttime lighting.</p>	<p>There is no requirement for an R-wave (vibration) study at the hoverport. The number of vehicles traversing the hoverport is low (a few dozen per day even at peak times) and they will be slow moving. Vibration arises when driving over uneven surfaces. Photographs submitted into the examination show that through the vegetated areas where invertebrates and reptiles are most likely to be present due to the availability of cover from predators, the access roads are flat intact tarmac with no crevices. The concrete apron is much more sparsely vegetated and therefore there is a lower likelihood of relevant species being present due to the high exposure to predators. Moreover, in this area only low-pressure vehicles will be used to move to and from the intertidal area. These produce little to no ground vibration.</p> <p>With regard to nighttime lighting at the hoverport, the Schedule 5 invertebrates of particular relevance (fiery clearwing moth and Sussex emerald moth) are either day-flying or fly around dusk and dawn and are only on the wing in summer when there would be a reduced need for lighting at any wheel wash. Moreover, these insects are most likely to be present in areas with some vegetation cover rather than in open exposed areas of tarmac where risk of predation is high. This is relevant because any wheel wash and associated lighting would be at the southern edge of the hoverport at the boundary with the intertidal. This is the location least likely to support Schedule 5 invertebrates.</p>	DL6
AP58.	ESC		DL6

Action No.	ExA Description	Applicant's Response	Deadline
AP59.	<p>Respond to the applicant's points relating to noise during start up and close down periods.</p> <p>SCC</p> <p>Respond to the applicant's comments on noise thresholds for the shoulder hours.</p>		DL6
AP60.	<p>Applicant</p> <p>Comment on the use of white noise alarms (or equivalent quiet systems) and what level of commitment the applicant could make to secure their use.</p>	<p>National Grid will discuss the use of vehicle reversing alarms with its contractors and is committed to using alternatives to the standard voice reversing alarm or beeping where feasible e.g. white noise alarms or camera exclusions zones. This will however only be possible on vehicles that the contractors have control over, as it will not be possible to control this for delivery vehicles which may not yet have this technology available. Nonetheless, companies will be encouraged to use alternatives to the standard voice reversing alarm or beeping if this is possible. This commitment has been added to Application Document 7.5.1.1: Outline Construction Traffic and Management and Travel Plan – Suffolk and Application Document 7.5.1.2: Outline Construction Traffic and Management and Travel Plan – Kent issued at Deadline 6.</p>	DL6
AP61.	<p>Applicant</p> <p>Check and confirm in writing whether discharge of backup generators within the SPR consents relates to the National Grid substation or the SPR substations. If the latter, provide an assessment of the implications for cumulative noise and air quality from generators.</p>	<p>SPR have indicated that there is an intention to use back up generators within their EA2 Substation and likely within the EA1N substation, although the exact design of this has yet to be completed.</p> <p>An assessment of operational noise from the proposed back up generator at the proposed National Grid Substation at Friston is provided in 6.3.2.9.E Appendix 2.9.E Friston Substation and OHL Operational Noise Information (Informative) [AS-121]. The assessment indicates that significant adverse effects from the operation of the back-up generator are not expected during daytime or night-time periods, noting that the generator would only operate at night during a fault, with testing being undertaken during daytimes only.</p> <p>A cumulative air quality assessment of back-up generators emissions has been undertaken, as presented in Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendix B, updated at Deadline 6. The assessment concludes that cumulative air quality effects arising from operational generator emissions would not be significant.</p>	DL6

Table 3.10 Response to Issue Specific Hearing 3 (25 March 2026 to 27 March 2026) – Air Quality

Action No.	ExA Description	Applicant's Response	Deadline
62	<p>Applicant</p>	<p>Construction vehicle and worker forecasts have been derived by the Front-End Engineering Design team based on the anticipated construction programme and construction compounds/activities at each access point. The traffic flows used in the air quality</p>	Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
	<p>Confirm how Annual Average Daily Traffic Data (AADT) presented in the cumulative vehicle emissions assessment relates to the peak traffic data presented in the transport assessment.</p>	<p>assessment have then been generated by the Applicant's Traffic and Transport team based on the above, as well as the traffic surveys which were carried out in 2024.</p> <p>The traffic and transport assessment is informed by peak construction traffic flows for the single busiest day of the construction programme and assesses the weekday network peak hours (8am-9am and 5pm-6pm), development (shoulder) peak hours (7am-8am and 6pm-7pm), as well as 12-hour weekday (7am-7pm), 24-hour weekday and a Saturday lunchtime period (12pm-1pm). The air quality assessment, however, requires 24-hour Annual Average Daily Traffic (AADT), as it is primarily concerned with assessing potential effects against air quality objectives that are based on annual mean concentrations. Peak traffic flows are therefore not used directly in the air quality assessment. Accordingly, the 24-hour AADT construction traffic flows for the Proposed Project have been calculated for the busiest year of the construction programme, which represents 2028 in Suffolk and 2030 in Kent.</p> <p>In terms of the Future Baseline, AADT flows are derived by summing hourly traffic flows to produce a typical 24-hour weekday total, using data from Automatic Traffic Counts or Manual Classified Counts. This 24-hour total is then adjusted using day-type and seasonal factors (if necessary), to reflect typical conditions on an average day of the year, resulting in an AADT value. Annualisation factors are then applied to uplift the surveyed traffic flows to the relevant future-year assessment periods. Peak period flows are therefore captured within the AADT, but only as a proportion of the overall daily traffic volume. As above, the traffic surveys were carried out in 2024 and background traffic growth was applied to derive future baseline traffic flows for 2028 in Suffolk, and 2030 in Kent, aligning with the peak construction periods.</p> <p>In summary, both the peak traffic data used in the transport assessment and the 24-hour AADT data used in the cumulative vehicle emissions assessment are derived from the same construction vehicle and worker forecasts supplied by the Front-End Engineering Design team. They are applied differently to address distinct assessment objectives, therefore the values presented in each assessment are not identical.</p>	
63	<p>Applicant</p> <p>SCC [REP5-178] noted that the oCTMP [REP4-061] allows for diversion of light construction traffic through Saxmundham. Provide evidence to demonstrate that vehicle movements on the Saxmundham road links would be below the threshold for air quality assessment.</p>	<p>The proposed converter station would ordinarily be accessed via the A12, B1121 Main Road (Benhall Rail Bridge) and access S-BM09 to the south of Saxmundham. When Benhall Rail Bridge is temporarily closed, this normal access route would not be available and alternative routes would need to be used. However, HGVs associated with the Proposed Project will not access S-BM09 when the bridge is closed, meaning that HGVs would not be diverted onto alternative routes during these periods. As a result, construction activities at the converter station would be minimal during any bridge closure periods and these works would be programmed to avoid these periods when possible.</p> <p>Consequently, there would be limited need for construction workers' vehicles and Light Goods Vehicles (LGVs) to divert onto alternative routes, such as via Saxmundham to the north, in order to access the proposed converter station while the bridge is closed.</p> <p>As a worst-case assumption, it has been estimated that up to 60 LGVs (including cars) per day could access the proposed converter station during a bridge closure. This equates to a two-way daily flow of 120 LGV movements per working day (i.e. 60 arrivals and 60 departures). It is assumed all LGVs would utilise the A12, and that those approaching from the south would divert from the A12 via the B1119 Rendham Road (SRL17) and LGVs</p>	Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
64	<p>ESC Confirm whether diversion of construction traffic through Saxmundham would have any implications for the impact assessment.</p>	<p>approaching from the north would divert from the A12 via the B1121 Main Road to the north of Saxmundham (SRL15). These links are shown on Figure 6.4.2.7.6 of Application Document 6.4.2.7 ES Figures Suffolk Traffic and Transport, updated at Deadline 6. On this basis, there would be approximately 60 two-way LGV movements per day on each route, based on 50% staff/LGVs travelling to/from the north and 50% staff/LGVs travelling to/from the south (this formed an assessment scenario within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]). When these diverted LGV flows related to the Proposed Project are added to the redistributed baseline LGV flows (total flows minus HGV flows) presented in Table 3.9 of Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055], this would result in a temporary increase of approximately 953 LGV movements on SRL15 (increasing from 893 LGV movements due to just redistributed traffic) and 435 LGV movements on SRL17 (increasing from 375 LGV movements due to just redistributed traffic).</p> <p>In the worst-case scenario, such works would last for up to 45 days (based on 15 temporary road closures of the B1121 for three-day periods for the mini-bridge option). When these daily flows are averaged across an entire year, the resulting changes in LGV flows would therefore be well below the Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK) screening criterion of a change of 500 LGVs Annual Average Daily Traffic, and no further assessment is required.</p> <p>It should also be noted that Application Document 7.5.1.1 (D) Construction Traffic Management and Travel Plan Suffolk has been updated at Deadline 6 to clarify that LGV usage associated with the converter station during the Benhall Bridge closure would be minimal. It also stipulates that the diversions and any temporary mitigation required as part of the traffic management for the closure will be agreed under SCC's permitting scheme, and National Grid's Traffic Coordinator would also liaise with SCC, other developers and Suffolk Constabulary on the timing of any closure to minimise impacts as far as practicable.</p>	Deadline 6
65	<p>Applicant Provide evidence that traffic levels are below the threshold whereby construction vehicle air quality assessment should have taken into account movements from Ramsgate Port and the A299 Royal Harbour Approach Tunnel.</p>	<p>The construction vehicle emissions assessment considered all links within the traffic and transport study area (as shown in Figure 6.4.3.7.6 of Application Document 6.4.3.7 ES Figures Kent Traffic and Transport [APP-266]). This included all of the relevant links that provide connectivity to the A299 Royal Harbour Approach Tunnel to and from the Proposed Project, namely A299 Hengist Way (K-RL4). For the purposes of the forecast trip distribution within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067], which was agreed with KCC Highways, it was expected that 15% of staff, 10% of Light Goods Vehicles (LGVs) and 10% of Heavy Goods Vehicles (HGVs) associated with all access points would travel via the A299 (East) and therefore potentially via the A299 Royal Harbour Approach Tunnel. This equates to the following for the A299 (East) during the peak construction year (2030) as presented in Table 8.14 of Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068] for the A299 Hengist Way east of the Sevenscore Roundabout (K-RL4):</p> <ul style="list-style-type: none"> • 26 LGVs and 11 HGVs Annual Average Daily Traffic (AADT). <p>The above incorporates construction vehicle trips associated with all access points, including the same proportion (15% of staff, 10% of LGVs and 10% of HGVs) of construction vehicles associated with accesses K-BM07 and K-BM03 on Sandwich Road.</p>	Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
66	<p>Applicant Explain the likely effect of oxides of nitrogen (NOx) emissions on ditches adjacent to the Kent converter and substation site and explain whether additional mitigation is required for nutrient loading or acidification effects on the local ditch network.</p>	<p>The above flows for the A299 (East) are well below the Institute of Air Quality Management and Environmental Protection UK screening thresholds applicable to this area (change of 500 AADT for LDVs and 100 AADT for HDVs).</p> <p>As such, construction vehicle movements associated with Ramsgate Port and the A299 Royal Harbour Approach Tunnel are below the applicable IAQM/EPUK screening criteria and have therefore not been scoped into further construction traffic air quality assessment.</p>	Deadline 6
67	<p>Applicant Subject to confirmation of whether additional generators are present on the SPR sites, update the air quality technical note [REP5-136] with a cumulative assessment of operational generator emissions with the SPR proposals on Grove Wood.</p>	<p>The detailed design of the SPR East Anglia One North and East Anglia Two sites has not yet been confirmed and, as such, the presence, location and capacity of any back-up generators at these sites is currently unknown. Cumulative effects in relation to the SPR East Anglia One North and East Anglia Two sites have therefore been assessed on the basis that back-up generators would be provided, representing a worst-case assumption. This assessment is presented in Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendix B, updated at Deadline 6. The assessment concludes that cumulative effects arising from operational generator emissions would not be significant.</p>	Deadline 6
68	<p>Applicant Provide further detail regarding the supply of water for dust suppression (likely source and timing availability, notwithstanding SPR supply position). Address ESC concerns in response.</p>	<p>The Applicant is committed to ensuring that sufficient water is available on site at all times to enable effective dust suppression during construction. The following measures will be implemented:</p> <ul style="list-style-type: none"> • Where there is a risk of dust generation from stockpiled materials, stockpiles will be appropriately managed through covering or seeding to minimise the need for water-based suppression. • Water will, where practicable, be retained within temporary and permanent site drainage features for reuse in dust suppression activities, thereby reducing reliance on external water supplies. 	Deadline 6

Action No.	ExA Description	Applicant's Response	Deadline
69	<p>Applicant Confirm whether proposed monitoring in the outline Air Quality Management Plans (oAQMP) includes Whitearch residential park.</p>	<ul style="list-style-type: none"> A mains water supply connection has been secured with Essex and Suffolk Water for the Friston site. This connection will be installed, tested and available for use at Grove Road, within the Order Limits, from Q3 2026. In the event that the mains supply is unavailable for any reason, the Applicant has engaged with local contractors who can provide on-site water storage and tanker-delivered water supplies to ensure continuity of dust suppression measures. <p>Application Document 7.5.6.1 Outline Air Quality Management Plan – Suffolk has been updated at Deadline 6. The updated version includes two additional air quality monitoring locations compared to the previous iteration submitted at Deadline 5 (Application Document 7.5.6.1 (D) Outline Air Quality Management Plan – Suffolk [REP5-074]). One of the new monitoring locations is at Whitearch Residential Park, identified as monitoring location 'Suffolk 7'.</p>	Deadline 6

Table 3.11 Response to Issue Specific Hearing 3 (25 March 2026 to 27 March 2026) - Ornithology

Action No.	ExA Description	Applicant's Response	Deadline
AP70.	<p>Applicant Update marine ornithology chapter and habitats regulations assessment (HRA) with Red-Throated Diver (RTD) displacement assessment based on Reach et al (2013) method.</p>	<p>As set out in Application Document 7.8 (C) Red Throated Diver Protocol, Application Document 6.2.4.5 (D) Environmental Statement Part 4 Marine Chapter 5 Marine Ornithology, and Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 submitted at Deadline 6, following a meeting with Natural England on 01 April 2026, the Applicant has committed to including Pre-Lay Grapnel Run (PLGR) activities in the seasonal restriction for the Red Throated Diver feature of the Outer Thames Estuary (OTE) SPA. As such, an assessment of displacement effects during the overwintering season based on the Reach et al (2013) method is no longer required as the potential for any impact to occur has been removed through the commitment to undertaking the PLGR works outside the overwintering season (01 November to 31 March).</p>	DL6
AP71.	<p>Applicant Confirm with Natural England whether effects identified as likely to give rise to Adverse Effects on Integrity (AEoI) can be ruled out before close of examination, or provide relevant information to inform a derogation case (for example, in respect of impacts on RTD due to emergency cable breaks/repairs) as required by NPS EN-1</p>	<p>The Applicant confirms that a meeting was held with Natural England on 01 April 2026 to discuss and clarify the position on matters including emergency repairs and the implications for Adverse Effects on Integrity (AEoI).</p> <p>Natural England confirmed in this meeting that provided that the Red Throated Diver Protocol (Application Document 7.8), including Seasonal Restriction, is adhered to in full following their requested updates, then no likely AEoI are anticipated for the licensable activities listed in the DCO/dML. Natural England confirmed that no derogation case therefore is required for the licensable activities of the Proposed Project. The Applicant anticipates that this position will be reflected in Natural England's own submissions into Deadline 6 and the Applicant is actively engaging with Natural England on this matter.</p>	DL6

The Applicant discussed with Natural England the possibility of impacts on RTD due to unplanned emergency breaks/repairs (which are exempt from the marine licensing regime under the Marine Licensing (Exempted Activities) Order 2011). Unlike repairs comprising part of routine operational and maintenance activity, the scope, extent, or timing of any emergency repair is by its nature less well understood until a fault occurs. The Applicant will continue to discuss with Natural England as to whether these may give rise to AEoI. The Applicant will update on the outcome of these discussions, including on a derogation case (if required) at Deadline 7.

For clarity, emergency cable repair differs to routine repairs, and means works to address damage or faults which may give rise to danger to persons or property, or adversely affect the safe and proper functioning, integrity, or operability of the offshore HVDC cable asset. Such an occurrence would be highly unlikely (given that the risk of internal faults during operation is negligible, theoretical examples of what may necessitate an emergency repair are limited to external factors such as terrorism, other illegal maritime activity, or damage from a vessel that is itself in a mayday situation) and indeed may never happen. An emergency cable repair does not therefore comprise part of normal operation and maintenance activity.

Nonetheless, a series of commitments have been agreed between the Applicant and Natural England which would be implemented should any unplanned emergency repair be required:

1. A commitment to a definition of Emergency works to be included in the CSIP and RTD Protocol submitted and agreed with the MMO in consultation with the relevant SNCB/s prior to construction under Condition 4 of the dML.
2. A commitment to apply the best practice mitigation in the RTD protocol during emergency works to be secured in the CEMP to minimise the impacts as much as possible. In addition to the RTD protocol, following emergency works, a log should be submitted to the MMO no more than 4 weeks post conclusion of the emergency works highlighting activity, location and duration etc.
3. In addition, the acknowledgement and a process to be followed within the Red Throated Diver Protocol that depending on the duration of emergency works within the SPA ensures that any requirement for compensation for impacts is considered and where MMO consider necessary implemented.

This provides a mechanism to secure and agree compensation, if required, in the (unlikely) event of any unplanned emergency repair work occurring within the designated site which required emergency activity during the winter period and is secured within the Red Throated Diver Protocol under Condition 4 of the dML. This plan would need to be approved by the MMO prior to commencing construction activities.

As reflected in the Red Throated Diver Protocol, all relevant notifications will be submitted prior to any emergency repairs being carried out and subsequent reporting will be submitted to the MMO no more than 4 weeks post conclusion of the emergency works.

Application Document 7.8 (C) Red Throated Diver Protocol, Application Document 9.92 (C) Outline Cable Specification and Installation Plan and Application Document 7.5.2 (D) Outline Offshore Construction Environmental Management Plan have been updated and submitted at Deadline 6 to ensure consistency between documents.

Table 3.12 Response to Issue Specific Hearing 3 (25 March 2026 to 27 March 2026) – Ecology and Biodiversity

Action No.	ExA Description	Applicant's Response	Deadline
AP72.	Applicant Update terrestrial elements of the ecology and biodiversity chapters and HRA to reference potential effects from unexploded ordnance (UXO) at trenchless crossing entry pits in Suffolk and Kent.	This has been added for Deadline 6	DL6
AP73.	Applicant Explain your response to 2LVIA5 [REP5-135], which states that the restoration of the acid grassland to a higher quality than its current quality would be a requirement of the golf club with the restored cable corridor to be managed for a five year duration. Also explain how the requirement would be secured.	The Applicant would like to clarify that it is the replanting of scrub species and occasional trees that would be a requirement of the golf club. The reference to the restored acid grassland being a higher quality than the current condition would be a result of the Applicant's restoration methods (since the current grassland is botanically very degraded) rather than a requirement of the golf club.	DL6
AP74.	Applicant Confirm that an appropriate offset (for example 30m) has been applied to the proposed site access road over the River Fromus to avoid disturbance for barn owls.	The 30m setback referenced in ISH3 relates to a temporary buffer from Siemens temporary GI and other investigation works which are currently taking place. For the DCO, REAC measure B34 commits to moving the barn owl nest box near the River Fromus bridge further south, outside the disturbance zone, and adding two additional nest boxes to provide a net increase in barn owl nesting opportunities as a result of the Proposed Project. This is discussed in the Suffolk Ecology and Biodiversity ES chapter in paragraph 2.9.83.	DL6
AP75.	Applicant Update the REAC to fully reflect the measures outlined in EA0001 [REP5-192], such as a minimum 10m offset to avoid impacts on nocturnal protected species, or provide justification as to why this is not appropriate.	This has been updated for Deadline 6 in line with the wording agreed with the Environment Agency.	DL6
AP76.	Applicant Provide an explanation as to why the proposed Minster converter station and sub-station site layout cannot retain the double hedge and ditch that connects the Sandwich Bay to Hacklinge Marshes Site of Special Scientific Interest to the wider ditch network.	The layout of the Converter Station and Substation are driven by the electrical processes that the equipment performs within the site, namely the converter station which converts the electricity from DC to AC and the substation that connects the AC into the transmission network. Application Document 2.14.2 Indicative General Arrangements Plans - Kent (Version 2, change request) [CR1-025] shows that the double hedge and ditch bisect the converter station plot, the land either side of the ditch is insufficient in and of itself to accommodate the converter station and specifically the principal components of the DC and Valve halls, without impacting on the Minster Stream. The land required for the converter station processes is laid out in the Application Document 2.13.2 Design and Layout Plans – Kent Drawing DCO/K/DE/SS/1251 [APP-037] .	DL6

Action No.	ExA Description	Applicant's Response	Deadline
		A converter station requires around 6 hectares, the field to the west of the hedge is only 4 hectares. The way the site is laid out at Minster is to take the DC coming in from Suffolk via the offshore cable, through the converter station to the east of the site and then the AC flows out the other end onto the rest of the network via the substation to the west. To change the layout of the project to retain the ditch and prevent diversion of the Minster Stream, would require the converter and substation to swap locations, this would require routing the HVDC cables further to the west to enter from the north and would require a significant additional length of OHL connecting the existing OHL route to the substation. This additional OHL would be more than double the proposed length and would require additional over sail of the SSSI. If the ditch was retained in this manner there would need to be multiple crossing points provided between the converter station and substation and the ditch would be crossed by the connecting infrastructure which would result in the need for regular maintenance of the vegetation to retain safety clearances.	
AP77.	Save Minster Marshes Provide any evidence of beaver activity in the Minster stream area.		DL6
AP78.	ESC Provide a list of hedgerows of particular concern for bats, where the council considers that use of horizontal directional drilling (HDD) might be justified.		DL6
AP79.	Applicant Comment on ESC's concerns [REP5-172] relating to article 27 and hedgerow gaps.	The Applicant has reviewed this drafting and at Article 27(5)(j) and (6)(i), proposes to delete the words 'or any other deep-rooted organism', such that the exception just refers to 'trees'.	DL6
AP80.	Applicant Update the REAC [REP5-115] and outline Landscape and Ecological Management Plans (oLEMP) [REP4-065] [REP4-067] to address the mechanism for mitigation of hedgerow gaps post-construction. This should cover the period until mitigation becomes sufficiently established.	This has been added to the Suffolk and Kent oLEMPs and REAC measure B53 for Deadline 6.	DL6
AP81.	ESC, SCC Respond to the applicant's comments regarding hedgerow gaps.		DL6
AP82.	Applicant Provide an update on any agreements with National Trust regarding works in Pegwell Bay.	The Applicant confirms that the latest updated Statement of Common Ground for National Trust has been issued to the Stakeholder for review on 01/04/2026 following the amended non-technical workshop on the 19 th March. The Applicant has addressed all the concerns raised by the National Trust in this document and will await feedback with the aim of getting joint agreement by Deadline 6.	DL6
AP83.	Applicant Explain whether there can be any greater separation between the proposed works and the saltmarsh. Include consideration as to whether more disturbing works activities could be restricted in areas close to the saltmarsh.	The Applicant confirms that as committed to previously in B69 of the REAC ' <i>Trenchless crossing exit pits in Pegwell Bay will be at least 105 m seaward from the edge of the saltmarsh. The temporary working area will be located at a minimum distance of 50 m from the edge of the saltmarsh.</i>	DL6

Action No.	ExA Description	Applicant's Response	Deadline
AP84.	<p>TDC Comment on the applicant's proposed approach to accessing the hoverport and intertidal area, including use of wheel washing as set out in its response to 2ECOL24 [REP5-135].</p>	<p>The temporary working area defined in this commitment and presented on the work plans is for access only, with the more disturbing works in relation to the cofferdam and exit pits occurring over 90m from the saltmarsh edge.</p> <p>Within the dML, Condition 10 states 10.—(1) <i>Landfall installation must only use trenchless landfall techniques between the onshore transition joint bay and the exit pits.</i> (2) <i>No exit to trenchless landfall techniques must occur within 50m of saltmarsh habitat within Pegwell Bay</i></p> <p>The Applicant confirms that is will review this wording in the dML and update at Deadline 6 for additional clarity and alignment with the B69 REAC commitment.</p>	DL6
AP85.	<p>Applicant Confirm any lighting requirements at the hoverport, for example for wheel washing.</p>	<p>The specification and layout for any lighting that may be required to facilitate access to the mudflats via the hoverport have not yet been defined, may not be required, and will be subject to the Main Works Contractor's detailed method engineering.</p> <p>To mitigate any risk to Schedule 5 invertebrates, including disturbance during use of places of shelter or protection, a REAC commitment has been secured at Deadline 6. This commits to avoiding any incidental or direct lighting of vegetated areas by locating any temporary task lighting, where required, as close as practicable to the seawards edge of the hoverport and/or as close as practicable to Sandwich Road.</p>	DL6
AP86.	<p>Applicant Draft DCO Requirement 5(3) [REP5-005] secures mitigation in respect of pre-commencement operations. The primary control is the REAC [REP5-115], however triggers in the REAC such as GG02 relate to construction rather than pre-commencement activities and the REAC does not appear to be separately inclusive of all of the ecological survey requirements in the oLEMPs [REP4-065] [REP4-067]. Explain how requirement 5 secures that relevant ecological surveys for species such as bats, dormice and reptiles would be carried out in advance of construction activities like vegetation clearance or update the REAC with a specific pre-commencement provision that secures ecological surveys.</p>	<p>The Applicant has included a REAC measure that states '<i>The key ecology survey updates as set out in the Kent oLEMP (specifically for Schedule 1 birds, roosting bats, dormice, and riparian mammals) must be undertaken prior to vegetation clearance in those areas</i>'.</p>	DL6
AP87.	<p>Applicant Provide additional detail on the scope and methodology of proposed pre-commencement surveys in the oLEMP [REP4-065] [REP4-067] or make provision for agreement of scope and methodology with the relevant planning authorities (for example for bats, reptiles and dormice).</p>	<p>Provision for agreement of scope and methodology with the relevant planning authorities has been added for Deadline 6.</p>	DL6

Action No.	ExA Description	Applicant's Response	Deadline
AP88.	Applicant ESC [REP5-172] reference A1.21 suggests that operation of the authorised development does not fall under the definition of all works forming part of the authorised development in requirements 5 and 6, this is because the definition of authorised development relates to works rather than operation. Suggest alternative wording to ensure that control plans apply to operational activities.	The Applicant can confirm that at Requirements 5(1) and 6(2), the references to 'works' will be deleted, such that both just refer to the 'authorised development'. The Applicant is reviewing the need for express reference to 'construction, operation and maintenance'.	DL6
AP89.	Applicant Provide further detail about the procurement procedure relating to biodiversity net gain (BNG) and how it would secure local net gain commitments. Also provide information on any local net gain proposals, where possible.	See Appendix A for Applicant's response.	DL6

Table 3.13 Response to Issue Specific Hearing 3 (25 March 2026 to 27 March 2026) – Any other Business

Action No.	ExA Description	Applicant's Response	Deadline
AP90.	Marianne Fellowes Provide any further evidence on the need for the project that you consider is not already before the ExA.		DL6

Appendix A Sea Link BNG – Response to Examining Authority Action Point 89

A.1 Examining Authority Action

Appendix Table A.1 Response to Action Point 89

AP 89	Provide further detail about the procurement procedure relating to biodiversity net gain (BNG) and how it would secure local net gain commitments. Also provide information on any local net gain proposals, where possible
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A.1.1	National Grid is currently in the process of developing the questions that will be included in the Qualifying Utilities Dynamic Market (QUDM) for biodiversity gains, marine restoration and enhancement under the Procurement Act 2023, which will cover our portfolio of projects across England and Wales.
A.1.2	The QUDM is a pre-vetted pool of capable suppliers and works as a dynamic framework where a utility company publishes a notice, suppliers register and qualify (proving their technical capability). Applications to enter the QUDM are anticipated to open in April/May 2026 and will be advertised on the Government Find a Tender Service.
A.1.3	National Grid will then invite qualified members to bid for opportunities, for Sea Link this is likely to be via an individual project tender. The strategic criteria set out below are indicative of the questions we are likely to pose for a project specific Sea Link offsite BNG tender, although these are still in development.

A.2 Strategic criteria

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| A.2.1 | The Statutory Biodiversity Metric User Guide Principle 8 sets out that “Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.” |
| A.2.2 | Principle 9 sets out that “Proposals should aim to maintain habitat extent - supporting more, bigger, better and more joined up ecological networks, and ensure that proposed or retained habitat parcels are of sufficient size for ecological function.” |
| A.2.3 | For the Sea Link Project proposals for provision of biodiversity units should consider the following strategic criteria: <ul style="list-style-type: none">● location – weight will be given to sites that can deliver biodiversity units together, ideally in single strategic locations in each of Suffolk and Kent;<ul style="list-style-type: none">○ greater weight will be given to proposals which are located in East Suffolk authority area and Thanet District Council authority area;● capacity – weight will be given to sites that can accommodate a large number of biodiversity units, with a preference for a small number of larger sites; |

- **connectivity** – weight will be given to sites that can act as part of an ecological network in providing a buffer, stepping stone or corridor to sites and features of ecological importance;
 - greater weight will be given to sites that meet the objectives of the Local Nature Recovery Strategy (LNRS).

A.2.4 A site further away from the development may provide opportunity for greater ecological benefit and value than one close by. We will seek to deliver high quality outcomes for the landscapes, habitats and communities affected by the Project by delivering biodiversity units that seek to maximise benefits for nature at a large scale.

A.2.5 Decisions on proposals relating to the location of biodiversity units will need to balance the requirements of Principles 8 and 9, the strategic criteria, and what is available from providers to meet the Project’s timescales.

A.2.6 National Grid will welcome suppliers that can co-ordinate smaller operators to deliver collectively at scale, such as farm or landowner clusters, so that the scale of our requirements and ambitions do not preclude smaller businesses and landowners.

A.3 Needs of the Project and trading rules

A.3.1 There is no requirement or guidance for BNG on NSIPs, so habitat trading rules were not applied. Applying biodiversity trading rules would significantly narrow the pool of acceptable off-site opportunities, imposing practical constraints such as the requirement to source like-for-like units for habitats like acid grassland and floodplain wetland mosaic, which are often scarce locally. This could result in delivery sites being located farther from the Order Limits, potentially diminishing ecological and community benefits within the immediate area. Furthermore, promising landscape-scale restoration schemes (such as large wetland complexes or woodlands) might not comply with the strict trading-rule hierarchy and could be excluded, even if they offer greater biodiversity value or enhance climate resilience.

A.3.2 By not strictly following the trading rules, the Proposed Project is able to use them as a guide or shopping list, enabling partnerships with trusted organisations to deliver off-site biodiversity net gain habitats that provide broader environmental and societal benefits.

A.4 Wider environmental and societal benefits including EELS

A.4.1 Suppliers will be asked to confirm that they can deliver of a range of biodiversity gains, that deliver quantifiable wider environmental and societal benefits, including environmental education, learning and skills. Co-benefits could include, but not be limited to, ecosystem services, climate adaptation and resilience, species abundance, and community benefits, which could include public access.

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