

The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.136: Applicant's Responses to Third Written Questions

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0. About this Document

Purpose of this Document

- 0.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) responses to the Examining Authority's Third Written Questions (ExQ3) **[PD-023]**, received on 23 March 2026 in relation to the Sea Link Project. It includes responses to all questions directed to the Applicant. In addition, the Applicant has provided responses to certain questions not specifically addressed to it, where it considers that doing so would assist the Examining Authority's understanding of the Project or the issues raised.

Project Overview

- 0.1.2 National Grid Electricity Transmission plc (hereafter referred to as 'the Applicant') has submitted an application for development consent for the Sea Link Project, which proposes to reinforce the electricity transmission network between Suffolk and Kent. The Project comprises the construction and operation of a new high-voltage electricity transmission connection, including underground cables, converter stations, grid supply point substations, and associated infrastructure. It also includes the removal of sections of existing infrastructure and various ancillary works.
- 0.1.3 The application for development consent was accepted for Examination on 23 April 2025.
- 0.1.4 A full description of the Project is provided in Chapter 4 of the Environmental Statement: Project Description **[REP1A-003]**.

Structure of the Document

- 0.1.5 This document is structured to align with the numbering used in the Examining Authority's ExQ3 **[PD-023]**. Chapters are numbered accordingly, beginning with '1'.
- 0.1.6 Within each chapter there is a response table. Within each table, four columns are provided as follows:
- As provided by the ExA, Column 1 sets out the unique reference number of each question.
 - As provided by the ExA, Column 2 of the table indicates which Interested Parties (IPs) and other persons each question is directed to.
 - As provided by the ExA, Column 3 provides a written description of the question to be answered by Deadline 6; and
 - As provided by the Applicant, Column 4 provides the Applicant's response to the question(s) raised, as required.
- 0.1.7 For completeness, the Applicant has included all of the ExAs Written Questions, whether or not they are directed to the Applicant. In some instances, the Applicant has

provided feedback to questions not directed to the Applicant where it was considered to be of potential assistance to the ExA or IPs and other persons.

0.1.8 In addition, the following appendices are included in **Application Document 9.136.1 Applicant's Responses to Third Written Questions – Appendices** submitted at deadline 6:

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

1. General and Cross-topic Questions

1.1 General

Table 1.1 General

Reference	Question to:	Question	Applicant's Comments
3GEN1.	Applicant	<p>Critical national priority</p> <p>Paragraph 4.2.4 of National Policy Statement (NPS) EN-1 (published November 2023) sets out the Government's conclusion that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure. Paragraph 4.2.7 goes on to explain that the CNP policy applies following the normal consideration of the need case, the impacts of the project, and the application of the mitigation hierarchy. Paragraph 4.2.11 says that applicants should demonstrate that all residual impacts are those that cannot be avoided, reduced or mitigated and 4.2.12 says that applicants should set out how residual impacts will be compensated for as far as possible.</p> <p>For clarity and the avoidance of doubt, for each topic area the applicants are requested to set out (including any relevant cross-referencing to relevant documents) how they have met the test in paragraph 4.2.11 of NPS EN-1 that applicants must apply the mitigation hierarchy and demonstrate that it has been applied.</p>	<p>The Applicant's response to WQ3 3GEN1 is set out in its entirety in Appendix A in Application Document 9.136.1 Applicant's Responses to Third Written Questions - Appendices.</p>
3GEN2.	Applicant and all interested parties	<p>Critical national priority</p> <p>Paragraph 4.2.15 of NPS EN-1 says that where residual non-habitats regulations assessment or non-Marine Conservation Zone (MCZ) impacts remain after the mitigation hierarchy has been applied, these residual impacts are unlikely to outweigh the urgent need for CNP infrastructure. It goes onto say that the exception to this presumption of consent are residual impacts onshore and offshore which present an unacceptable risk to, or unacceptable interference with, human health and public safety, defence, irreplaceable habitats or unacceptable risk to the achievement of net zero. The same exception applies to this presumption for residual impacts which present an unacceptable risk to, or unacceptable interference offshore to navigation, or onshore to flood and coastal erosion risk.</p> <p>a) Without prejudice to the position of any party, are there any issues in this case that might potentially fall into this category of the exceptions to this presumption of consent? For example, might the issue of flooding and the application of the sequential and exception test</p>	<p>None of the exceptions to the presumption of consent for CNP Infrastructure, with respect to impacts on human health and public safety, defence, irreplaceable habitats, risk to the achievement of net zero, offshore navigation, or onshore flood and coastal erosion risk set out in paragraph 4.2.15 of NPS EN-1, apply to the residual impacts arising from the Proposed Project. The residual impacts of the Proposed Project are summarised in Appendix A.</p> <p>The ES concludes (see Application Document 6.2.5.3 (B) Part 5 Combined Chapter 3 Summary of Likely Significant Effects [REP1A-013]) that there is no likely significant residual effect on health and wellbeing. It is also noted that NPS EN-1 at 4.4.7 and 4.4.8 provides:</p> <p><i>"4.4.7 Generally, those aspects of energy infrastructure which are most likely to have a significantly detrimental impact on health are subject to separate regulation (for example for air pollution) which will constitute effective mitigation of them, so that it is unlikely that health concerns will either by themselves constitute a reason to refuse consent or require specific mitigation under the Planning Act 2008.</i></p> <p><i>4.4.8 However, not all potential sources of health impacts will be mitigated in this way and the Secretary of State may want to take account of health concerns when setting requirements relating to a range of impacts such as noise."</i></p> <p>Matters of public safety and pollution controls have been considered where appropriate in the ES including Application Document 6.3.2.5.A Appendix 2.5.A Preliminary Contamination Risk Assessment, Application 6.3.2.5.B Qualitative Groundwater Risk Assessment, Application Document 6.3.3.5.A Appendix 3.5.A Preliminary Contamination Risk Assessment, Application</p>

Reference	Question to:	Question	Applicant's Comments
		<p>potentially fall into this category in the event of there being an “unacceptable risk”?</p> <p>b) Are there any further submissions any party wishes to make on the potential application of CNP policy in this case (should it be required)?</p>	<p>Document 6.3.3.5.B Appendix 3.5.B Qualitative Groundwater Risk Assessment, Application Document 6.3.2.7.A Appendix 2.7.A Transport Assessment Note, Application Document 6.3.3.7.A Appendix 3.7.A Transport Assessment Note and Application Document 6.8 Flood Risk Assessment. Measures that would be implemented to maintain public safety during construction and operation of the Proposed Project are detailed in management plans submitted with the application, including Application Document 7.5.3 (C) Outline Onshore Construction Environmental Management Plan [REP5-068] and Application Document 7.5.2 (C) Outline Offshore Construction Environmental Management Plan [REP5-066].</p> <p>The impacts of the Proposed Project on Ministry of Defence safeguarded areas (such as offshore Practice and Exercise Areas) have been assessed in Application Document 6.2.4.9 (B) Part 4 Marine Chapter 9 Other Sea Users [REP1-061], which concluded that there the Proposed Project would have a minor/negligible effect (not significant) on these assets.</p> <p>There is no loss of, or significant adverse effect on, ancient woodland and ancient/veteran trees or other irreplaceable habitats from the Proposed Project as reported in Arboricultural Impact Assessment (AIA) (Application Document 6.10) [APP-294 and APP-295]; Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP4-025]; and Application Document 6.2.3.2 Part 3 Kent Chapter 2 Ecology and Biodiversity [REP5-017].</p> <p>There is no risk to the achievement of net zero from the Proposed Project; indeed, the Proposed Project will play an important role in assisting with the achievement of net zero, as recognised for example by its inclusion in the Government’s Clean Power 2030 report.</p> <p>The impact of the Proposed Project on shipping and navigation is assessed in Application Document 6.2.4.7 (D) ES Part 4 Marine Chapter 7 Shipping and Navigation [REP5-026], and that of the Proposed Project on coastal erosion, in Application Document 6.2.4.1 (F) ES Part 2 Marine Chapter 1 Physical Environment [REP5-019]. As set out in Appendix A, the Proposed Project is not likely to result in any significant residual effect on shipping and navigation or on the physical environment including coastal erosion risk.</p> <p>Application Document 6.8 (B) Flood Risk Assessment (submitted at Deadline 6) sets out how the Proposed Project passes the Sequential Test and the Exception Test, and therefore is acceptable in terms of flood risk policy.</p> <p>The elements most vulnerable to flooding (converter stations and substations in Suffolk and Kent) are situated in Flood Zone 1 and sited to avoid areas at high risk of surface water and groundwater flooding. Most of the underground cable sections are also located in Flood Zone 1. However, as is inevitable with a linear scheme, some locations and works cross Flood Zones 2 and 3, including construction access routes and marine cables making landfall.</p> <p>As detailed in measure W06 in the Outline CoCP (Application Document 7.5.3.1 CEMP Appendix A Outline Code of Construction Practice), during construction of the Suffolk Onshore Scheme, construction materials would be stored within Flood Zone 1 and areas at low risk of flooding from surface water. For the Kent Onshore Scheme, storage of materials within Flood Zone 3 will be minimised.</p> <p>With regard to the Exception Test, the Proposed Project would provide wider sustainability benefits that outweigh the flood risk: the benefits (including need) for the infrastructure, as well as landscape and ecological enhancements (as part of Application Document 7.5.7.1 Outline LEMP – Suffolk and Application Document 7.5.7.2 Outline LEMP – Kent) and employment generation and Gross Value Added contribution during construction and safeguarding land within the design for future improvements to Public Rights of Way. In response to meeting part (b) of the Exception Test, the FRA demonstrates that with mitigation, the Proposed Project will be safe from flooding throughout its lifetime without increasing flood risk elsewhere. The Proposed Project therefore satisfies both elements of the exception test.</p> <p>Application Document 6.8 (B) Flood Risk Assessment (submitted at Deadline 6) concludes that, with flood risk management measures and good practice measures in place, the residual risk during</p>

Reference	Question to:	Question	Applicant's Comments
3GEN3.	Applicant	<p>Applicant's response to deadline 4 representations</p> <p>The applicant's deadline (DL) 5 covering letter [REP5-001] states that "the applicant has submitted comments on other submissions received at deadline 4 which comprises the</p>	<p>The Applicant's responses to other submissions received at Deadline 4 and Deadline 5 including REP4-201 are submitted at Deadline 6 as Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5.</p>

construction is low. Due to the siting of vulnerable operational infrastructure to avoid areas at a higher risk of flooding, combined with drainage control measures, the residual risk during operation is also low. The Proposed Project complies with and meets NPS policy tests associated with flood risk. Through mitigation measures, the Proposed Project would not result in an increase in flood risk elsewhere and incorporates measures to manage flood risk throughout its lifetime. The residual risk is low and would not constitute an unacceptable risk within the context of paragraph 4.2.15 of NPS EN-1 given that *"these residual impacts are unlikely to outweigh the urgent need for this type of infrastructure"* and that consent should only be withheld in *"most exceptional circumstances."*

Whilst part of the Suffolk Onshore Scheme is located within the Suffolk and Essex Coast and Heaths National Landscape, it has been demonstrated in paragraphs 7.3.27 to 7.3.35 of **Application Document 7.1 (D) Planning Statement** (submitted at Deadline 6) that exceptional circumstances exist to justify the development in this nationally designated landscape. Paragraph 4.2.17 of NPS EN-1 also confirms that, for projects which qualify as CNP Infrastructure, the Secretary of State will take as a starting point that this test is met.

The CNP policy is relevant where residual effects remain after the application of the mitigation hierarchy, but it is confirmed that the residual impacts are *"unlikely to outweigh the urgent need"* for CNP Infrastructure. The CNP policy goes on to state that *"in all but the most exceptional circumstances"* it is unlikely that consent will be refused on the basis of any such residual impacts.

None of the specific exceptions listed in paragraph 4.2.15 of NPS EN-1 apply to the Proposed Project. Paragraph 4.2.16 of NPS EN-1 goes on to state that the Secretary of State will *"take as the starting point for decision-making that such infrastructure is to be treated as if it has met any tests which are set out within the NPSs, or any other planning policy, which requires a clear outweighing of harm exceptionally or very special circumstances."*

Paragraph 4.2.17 then provides examples of where the starting point should be that the CNP infrastructure has met specific exceptional or very special circumstances policy tests. Even in these cases where exceptional circumstances are required to be demonstrated, the *"Secretary of State will take as a starting point that CNP Infrastructure will meet"* these tests.

The Proposed Project complies with both flood risk and national landscape exceptional policy tests. The CNP presumption applies *"in all but the most exceptional circumstances"*, and the residual harm associated with the Proposed Project is plainly not of a scale or nature that could reasonably be considered to constitute *"the most exceptional circumstances"*.

In summary, the Proposed Project will not give rise to any residual effects that would present unacceptable risks to, or unacceptable interferences with:

- Human health and public safety
- Defence
- Irreplaceable habitats
- The achievement of net zero
- Offshore navigation
- Flood risk
- Coastal erosion risk.

In addition, exceptional circumstance tests have been met with respect to national landscape and flood risk with residual impacts not outweighing the urgent need for the Proposed Project, such that the "presumption of consent" in CNP policy is engaged and applicable (para. 4.2.15).

Reference	Question to:	Question	Applicant's Comments
		<p>applicant's responses to selected deadline 4 submissions. These are provided where it is considered that it is helpful to do so."</p> <p>It is imperative for an effective and efficient examination that the applicant provides a response to every submission to the examination to demonstrate that they have considered every point made and to enable the ExA to understand both sides of any outstanding disagreement.</p> <p>There are a number of submissions made at DL4 to which the applicant has not responded, including the [REP4-201] from Suffolk County Council which raises a number of outstanding concerns that need to be addressed.</p> <p>Provide a response to every DL4 submission which was not included in your DL5 submission on or before DL6 and ensure complete responses are provided for all future submissions.</p>	
3GEN4.	Applicant	<p>Submission of monitoring data</p> <p>Revise relevant monitoring plans to include a commitment to submit monitoring data to The Crown Estate's Marine Data Exchange, as required by NPS EN-3 (paragraph 2.8.86). Submit updated plans by DL7.</p>	<p>The Applicant confirms that the following text has been included in Application Document 9.140 Outline In Principle Monitoring Plan, submitted at Deadline 6:</p> <p><i>All relevant survey and monitoring data will be subject to regular submission to the Marine Data Exchange and Local Environmental Record Centres as appropriate.</i></p>

1.2 Design, parameters and other details of the Proposed Development

Table 1.2 Design, parameters and other details of the Proposed Development

Reference	Question to:	Question	Applicant's Comments
3GEN5.	Applicant	<p>River Fromus Bridge</p> <p>What would be the likely implications for the construction programme if the draft Development Consent Order (dDCO) requirement required the design of the bridge to be approved by the relevant planning authority?</p>	<p>The River Fromus bridge is required for construction of the access to Saxmundham Converter Station, so is on the critical path for construction works in Suffolk. The construction programme allows very little time for discharge of requirements between consent and starting on site so any requirements that must be discharged prior to the construction of the bridge could delay the construction programme. The length of any delay due to discharge of a design requirement in particular would be dependent on the time taken to discharge other relevant requirements, the time taken to discharge the design requirement and the difference between the two. This risk would of course be even greater if there is an additional consultation stage for designs to be submitted to, reviewed by and amended by an independent design review panel.</p> <p>Further, the more subjective the matter being discharged, the greater scope there is for design changes or further information to be requested by the local authority delaying discharge of requirements. Due to the criticality of the bridge to the programme in Suffolk and the potential for disagreement over matters such as design, there is a higher risk of a requirement on the Fromus bridge design delaying the project than the risk associated with requirements on more technical matters and less programme critical elements of the construction. This is exacerbated by the fact that in the past, the local authorities and the Environment Agency have both had strong, but often opposing views on what the 'best' design might mean, particularly in terms of scale. The Applicant has had to navigate these opposing pressures.</p> <p>Notwithstanding the above, the Applicant had included provisions in Requirement 3 in the draft DCO for the local planning authority to approve the external treatment of the bridge and submit details of the</p>

Reference	Question to:	Question	Applicant's Comments
3GEN6.	Applicant	<p>Maximum parameters for lighting</p> <p>Thanet District Council (TDC) [REP5-186] sets out its requirements for maximum parameters for lighting to be agreed and for justification for the 8m high lighting columns that are proposed. Provide an update to the dDCO adding the maximum lighting parameters, or explain why it is not required, with specific reference to the findings in [REP5-137].</p>	<p>layout and scale of the bridge, demonstrate how the scale of the bridge has been minimised and submit plans, elevations and sections. These requirements focused deliberately on those elements of the bridge design that are more flexible (i.e. external treatments) and minimising scale (which could be achieved by consideration of factors like the design of parapets and railings) rather than approval of the full design, which in many respects will be determined by engineering requirements and the parameters agreed by the Environment Agency. The Applicant is confident that the provisions in the previous draft DCO would have resulted in a bridge design that minimised landscape and heritage impacts, nestled into the landscape and balanced the Environment Agency's desire for a high soft height to aid passage of macroinvertebrates with the Council's desire to minimise the height of the bridge in the landscape.</p> <p>However, given the location of the bridge within the landscape, its relatively close proximity to Hurts Hall, the positive discussions on design of the bridge that have already occurred and the uncertainty expressed by the ExA over a requirement that did not include full design approval, the Applicant has reworded Requirement 3 so that the design of the bridge will now be approved by the relevant planning authority. With this concession, it is critical that there is no increase in the time allowed for discharge of this requirement.</p> <p>Of course, the Applicant is already working hard to minimise all programme risks of this nature through working on design details now, with an aim of sharing draft designs with relevant planning authorities as far in advance as possible to enable swift discharge of requirements after a decisions is made on the application.</p> <p>The TDC response on lighting in the document referenced states: <i>'Requirement 3 only secures the details of operational lighting for the permanent buildings and not the whole operational development such as the access road, and non-buildings. A full operation lighting scheme/plan must be submitted to TDC for approval either as a standalone plan or within an appropriate existing plan.'</i></p> <p>The parties have now agreed to amend Requirement 3 to require the Applicant to submit an Operational Lighting Management Plan for approval prior to the commencement of relevant works. The Applicant has also submitted an Outline Operational Lighting Management Plan at Deadline 6 to guide development of the final plan and bring together commitments on lighting secured elsewhere in the application to make it easier for relevant planning authorities to understand proposals. The Applicant considers that this addresses the concern.</p> <p>In the 'remedy measures' column on the same issue TDC have also suggested that maximum parameters should be specified for lighting. The Applicant disagrees that this is necessary given that there are already controls agreed by the Applicant that control the environmental effects of lighting in Kent (e.g. see GG10, GG21, B49, B53, B57 and B58 in the Register of Environmental Actions and Commitments). It is best practice in major infrastructure projects to secures the outcome relevant to environmental effects rather than parameters because this gives greater certainty on the outcome and more flexibility to developers to seek the best way to deliver those outcomes. This generally results in better outcomes for the environment and more efficient and effective delivery of critical national priority infrastructure projects. In this case, it is possible for a low lighting column to have high levels of light spill and high lighting columns to have low levels of light spill, so it is not the height that determines the light spill on adjacent habitats, the impacts on dark skies etc. Therefore, securing the height of lighting columns is neither necessary, nor helpful in understanding or securing environmental effects. However, given the lighting designs would be included in the final Operational Lighting Management Plans submitted for approval under Requirement 3, in practice TDC would have input to and approval of the final lighting plans, with these plans including the final height of the lighting columns.</p> <p>The proposed operational external lighting for the Saxmundham Converter Station and Minster Converter Station and Substation set out in Section 1.4 of Application Document 9.124 Landscape and Visual Nighttime Assessment [REP5-137] reflect the outline design contained in Application Document 9.147 Outline Operational Lighting Management Plan submitted at Deadline 6. The</p>

Reference	Question to:	Question	Applicant's Comments
			findings of the landscape and visual nighttime assessment [REP5-137] would not therefore change with non-significant residual effects remaining.
3GEN7.	Applicant	<p>Permanent easement width</p> <p>Noting the National Trust comments [REP5-101] regarding an 80m permanent easement width in Pegwell Bay, update table 4.8 of Chapter 4 Description of the Proposed Project [REP1A-003] and any other parts of the application, as necessary, to reflect this and confirm whether this has any implications for the applicant's assessment findings.</p>	<p>Table 4.8 of Chapter 4 Description of the Proposed Project [REP1A-003] provided typical characteristics of HVDC underground cables, not maximum parameters for any specific sections of cable. The width of the easement in Pegwell Bay, circa 80m, has not changed and it is also not considered to be relevant to the assessment of construction or operational effects.</p> <p>At the landfall in Kent, temporary works area outside the permanent easement width is essential during the construction phase to undertake works associated with the installation and pulling of the cables and for temporary work areas for vessels to carry out intrusive and non-intrusive activities. Not for the permanent lay of the cable. The temporary works are, by their very nature, temporary and not subject to long term restrictions or effects.</p> <p>During marine cable pull-in, the marine cable will be brought to shore on a cable lay barge (CLB). The CLB must use shallow water anchors to hold position while moving to its designated locations, requiring temporary intrusive work outside the easement for anchoring. The anchors will be positioned either by an anchor handling vessel (at high tide) or may be pre-positioned on the beach at low tide using excavators. Exact locations of the CLB anchors will be determined during the engineering phase of the project.</p> <p>The easement itself is a land right and restriction on the use and activities occurring in or on the land to protect the cables. It does not have a direct impact on the construction or operational impacts, quite the reverse and it will actually limit any other activities in the vicinity.</p> <p>These parameters for both temporary and permanent works and restrictions have not changed, and the Applicant is discussing this with the National Trust to ensure that there is no misunderstanding on this point.</p>
3GEN8.	Relevant planning authorities	<p>Independent design review</p> <p>Provide suggested wording to incorporate a post consent independent design review of the converter stations, Kent substation and River Fromus bridge.</p>	
3GEN9.	Applicant	<p>Requirement 3</p> <p>Respond to Dover District Council's (DDC) request to be a consultee on the approval of the design of the converter station and substation in Kent, secured through the dDCO.</p>	<p>The Applicant is happy to add DDC as a consultee to the relevant parts of Requirement 3 and has done so in the draft DCO submitted at Deadline 6.</p>
3GEN10.	Applicant, relevant planning authorities, Dover District Council (DDC), SCC, Kent County Council (KCC)	<p>Requirement 3</p> <p>Develop an agreed form of wording for the approval of details of the above ground elements of the proposed development. If agreement cannot be reached on specific points, explain what those points are and why agreement cannot be reached.</p>	<p>A number of meetings have been held that in part or whole focused on Requirement 3, including a design focused meeting with SCC and ESC on 11 March and a further meeting that included design matters on 9 April. At present there is not an agreed form of wording between the parties as there has not been time to develop revised wording and get it agreed, particularly given staff absences in all organisations over the Easter holidays and approvals processes for all parties.</p> <p>However, the Applicant has made further concessions in an effort to reach agreement in the draft DCO at Deadline 6, including addressing a number of requests from to amend the wording. The following amendments have been made in response to comments received in meetings and submissions:</p> <ul style="list-style-type: none"> Amending requirement 3a so it now refers to the full design of the buildings being approved by the local planning authority rather than the previous wording that referred only to the external colour and finish of the buildings. The requirement now references the Critical Design Constraints and policy on the lack of flexibility in design rather than restricting approval to some elements of the design. Specifying that the design of the Fromus Bridge will now be approved by relevant planning authorities (without specifying limited aspects of design to be approved).

Reference	Question to:	Question	Applicant's Comments
3GEN11.	Applicant	<p>Requirement 3(2) Friston substation Respond to SCC's suggestion [REP5-185] that the substation should accord with all of the relevant information within the documents referred to in requirement 3(2)(a), rather than just the matters set out in (i) to (iv) inclusive.</p>	<ul style="list-style-type: none"> • Changing wording so that designs should be 'substantially' in accordance with Key Design Principles rather than in 'general accordance' with them. • Committing to provision of an Operational Lighting Management Plan to be approved by relevant planning authorities and adding Dover District Council as a consultee for design details relating the Kent Converter and Substation. <p>The Statements of Common Ground will be updated at Deadline 7 to present the final positions of all parties on this matter.</p> <p>This Applicant has provided answers to the question of why controls applied to EA1N and EA2 cannot be applied without amendment to Sea Link in responses to relevant planning authorities prior to submission of the application, to the Examining Authorities (for all Interested Parties to also review) during the Pre-Examination period (e.g. see Application Document 9.24 Friston Substation Update Letter [AS-148]) and during the Examination (e.g. see Application Document 9.73.1 Applicant's Responses to First Written Questions responses to 1GEN11 and 1LVIA15 (including Appendices C and D) [REP3-069 and REP3-070]; Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations from Statutory Consultees and Bodies [REP2-016] see page 90-91; and Application Document 9.34.5 Applicant's Response to Selected Other Relevant Representations, see particularly responses to SASES (table 6.8) [REP2-022]).</p> <p>The documents referred to within requirement 3(2)(a) are: '<i>documents submitted for the discharge of Requirement 12 of part 3 of schedule 1 to SI 2022/433</i>'. Documents submitted to discharge available currently on the ESC website include an Onshore Substation Detailed Design Report, Summary of Geotechnical Walkover Inspections, Design Appendices (e.g. on Earthworks and visuals) and a Substations Landscape Masterplan and Architectural Framework. It is not necessary or appropriate for the development of Sea Link to be secured in line with these documents because:</p> <ul style="list-style-type: none"> • The documents include details and information that has no relevance to Sea Link (e.g. details associated with elements of the offshore wind farms that are not part of Sea Link- noting the area of project overlap is very small); • Details that are relevant to Friston (Kiln Lane) substation but reference requirements and controls on the EA1N and EA2 DCOs that are not applicable to Sea Link, such as referencing SPR application documents that are not included in the Sea Link application. • This requirement is not only about design because the Scottish Power Renewables (SPR) requirements are structured differently. In particular, this requirement includes measures around landscaping that for Sea Link are secured separately under Requirement 6, specifically the Landscape and Ecological Management Plan. The requirements are therefore not directly comparable. • In some cases it is not possible for Sea Link to replicate measures in the SPR plans due to the differing Order limits, land rights and infrastructure proposed for the three projects. For example, see response to 3LVIA6 below on how the landscaping for Sea Link will not and cannot entirely align with the landscaping plan submitted under Requirement 12 (also discussed previously in Application Document 9.73.1 Applicant's Responses to First Written Questions response to 1LVIA15 (including Appendices C) [REP3-069 and REP3-070]). This is not an issue for the mitigation of environmental effects because different solutions can be developed that are equally as acceptable (and the mitigation is not designed to mitigate the same effects as the developments are different) but it is an issue if the Applicant is tied to delivering mitigation exactly as proposed by SPR. • At any point SPR could submit further documents under this Requirement or submit revised details. Whilst the Applicant does work closely with SPR, the Applicant has no control over the documents submitted to discharge requirements. It would therefore be unacceptable for the Applicant to be tied to requirements that could in the future change in any way that may frustrate or even prevent the delivery of Sea Link. Any SPR documents that are currently secured cannot be secured by Sea Link because they could change in the future (creating a situation where Sea

Reference	Question to:	Question	Applicant's Comments
3GEN12.	Applicant	<p>Design Principles</p> <p>Advise whether it is possible to update the Design Principles to be more precise and provide greater clarity, as requested by the relevant planning authorities and following the selection of a preferred bidder for the converter stations, according to TDC [REP5-186].</p>	<p>Link has secured an outdated document) and the Applicant clearly cannot commit to delivery in line with a future document that has not yet been reviewed (but could exist).</p> <p>The Applicant is, however, happy to consider adding any further measures related specifically to the design of Friston substation set out in these documents to the list of detailed in Requirement 3(2)(a). The Applicant asked SCC and ESC to specify what further measures from these plans that they would like to be secured and operational lighting was discussed. At present there is no final plan to be secured so instead the Applicant has added a further part to this requirement to require that the Applicant submits an Operational Lighting Management Plan for Friston Substation prior to installation if the substation is constructed under the Sea Link DCO.</p> <p>The Design Principles documents were developed as documents to guide the design of elements of the project, bringing in early stage architectural input, involvement of an independent design panel and significant document reviews before the document was submitted with the application. All local authorities were involved in the development and review of the document prior to submission with the application and concerns were not been raised until very recently about the precision in the document. The Design Principles documents and the Design Approach Documents demonstrate how the Applicant has and will to continue to develop designs for the development that are sensitive to the area within the constraints of designing infrastructure where there is limited flexibility in how designs can evolve. The amount of time, effort and resource put into the design of the infrastructure that is part of the Sea Link project is greater than has been invested on any other National Grid DCO consented to date and is considered by the Applicant to present a best practice approach to early consideration of design for this type of infrastructure.</p> <p>However, the Applicant did not intend for either of these documents to be secured in the draft DCO and they had not been written for this purpose. Updating these documents to provide precise, restrictions on design would change the nature and purpose of the documents in a way that is not considered beneficial or possible at this late stage in the Examination process. The detailed design of major infrastructure projects is also not carried out generally until after consent and is not available to specify at this stage.</p> <p>However, where appropriate, aspects of design are secured throughout the application documents, see particularly the Register of Environmental Actions and Commitments [Application Document 9.84] and outline management plans secured under Requirement 6. Approval for relevant details of designs is also required under Requirement 3. No further guidance on these design is therefore considered necessary, particularly given that in reality there is only limited flexibility in the design of substations and converter stations, which both predominantly comprise outdoor equipment, lighting and boundary fencing where there is often very limited or no flexibility in scale, appearance or layout.</p> <p>A suggestion from local authorities for design principles to be secured arose shortly before submission of the application and following this request, efforts were made to revisit the 'Key Design Principles' in the document to enable a section of the Design Principles document to be secured under Requirement 3 (see original draft DCO [APP-007]). This solution was offered to relevant planning authorities in an attempt to reach a compromise on the status of the documents and secure some principles of design, but given these principles were not written for the purpose of being secured in the draft DCO, the draft requirement was very carefully worded.</p> <p>Throughout Examination, the Examining Authority and Interested Parties have put extensive pressure on the Applicant for greater and greater amounts of design detail to be submitted and approved by relevant planning authorities, despite the lack of flexibility in the design, early design work and potential programme implications of further approvals. As discussed in the response to 3GEN10 above, the Applicant has made further concessions to this regard at Deadline 6 including securing that the development will be 'substantially in accordance' with the Key Design Principles. The Applicant has therefore revisited the design principles to ensure they are as clear and accurate as they can be and resubmitted the Design Principles documents at Deadline 6.</p>

1.3 Draft development consent order (dDCO)

Table 1.3 Draft development consent order (dDCO)

Reference	Question to:	Question	Applicant's Comments
3GEN13.	East Suffolk Council (ESC)	<p>General</p> <p>In your DL5 submission [REP5-172] you state 'ESC is of the view that wording is required in the dDCO to remove National Grid's right to carry out works, "without the prior approval of the relevant planning authority", where SPR has already carried out the works.'</p> <p>Provide suggested drafting or detail of any amendments you consider would address this request.</p>	
3GEN14.	ESC	<p>Article 2 (1)</p> <p>In your DL5 submission [REP5-172] you state 'The current definition of maintain is unnecessarily broad and if it is to remain, the given activities must be further defined otherwise the Applicant will effectively have been given carte blanche. In addition, ESC requires wording to be inserted in the dDCO so as to require the Applicant to serve written notice on the relevant planning authority prior to the commencement any "material" maintenance works (i.e. those that are likely to cause disturbance etc.)'.</p> <p>Provide suggested drafting or detail of any amendments you consider would address this request.</p>	
3GEN15.	Suffolk County Council (SCC)	<p>Article 2 (1)</p> <p>Following ExQ1GEN15 and the applicant's response [REP3-069] regarding Article 2(1) definition of 'maintain', provide dDCO drafting that would allay your concerns as set out in [REP4-201].</p>	
3GEN16.	ESC	<p>Article 7</p> <p>Provide suggested drafting for a requirement as requested in [REP5-172] which would give the relevant planning authority 28 days to make representations in relation to any transfer or grant made under Article 7 (Consent to transfer benefit of order).</p>	
3GEN17.	All local authorities	<p>Article 10</p> <p>Action point 115 from issue specific hearing 2 (ISH2) [EV6-033] asked all parties (applicant and councils) to meet/liaise to agree suitable wording of article 10 which all parties are content with, with an update on progress and any agreement submitted by DL4. To date no</p>	

Reference	Question to:	Question	Applicant's Comments
3GEN18.	SCC	<p>suggested alternative drafting for article 10 has been submitted into the examination.</p> <p>Given the advanced stage of this examination and the absence of agreement, it appears likely that this is a matter upon which the ExA will need to adjudicate. To assist the ExA, can SCC work with all relevant local authorities to produce amended drafting for article 10 which addresses its previously discussed concerns, for submission by DL6.</p> <p>Article 23 Following the applicant's response to the ExA's question 1GEN35 [REP3-069], do you consider there is evidence to support the inclusion of Part 4, Article 23 Removal of human remains? If so, provide reasons for the inclusion of the Article and provide dDCO wording that would satisfy your concerns raised in [REP4-201].</p>	
3GEN19.	Applicant	<p>Article 27 Change article 27(1)(a)(ii) in relation to class 10 land as suggested in [REP5-135].</p>	The Applicant has amended this wording at Article 27 in Application Document 3.1 (I) draft Development Consent Order , submitted at Deadline 6.
3GEN20.	Applicant	<p>Article 27 Provide justification for the inconsistency between the 14-day notice period in Article 27(2) and the 28-day notice period in Article 28(3) or amend the drafting accordingly.</p>	<p>Article 27 and Article 28 fulfil different functions and therefore have different timescales. Article 27 (Temporary use of land for carrying out the authorised project) allows the land set out (including Schedule 11) to be occupied temporarily by the undertaker in connection with the carrying out of the authorised project. Article 27(2) requires 14 days' notice to be given before entering on and taking temporary possession of land under this article, the undertaker must serve notice of the intended entry on the owners and occupiers of the land.</p> <p>Article 28(3) (Temporary use of land for maintaining authorised project) requires that no less than 28 days before entering upon and taking temporary possession of land under this article the undertaker must serve notice of the intended entry on the owners and occupiers of the land and that notice must explain the purpose for which entry is taken, except as provided in paragraph (11).</p> <p>The time periods are necessarily different. Article 28 relates to the maintenance period and at this stage, the Applicant should have secured the ability to carry out maintenance by virtue of land rights, either via private treaty or by using its compulsory acquisition powers, outside of the DCO powers. Therefore, the Order power is intended as a fall-back position to carry out any maintenance within the first 5 years. In the context of maintenance, 28 days is an appropriate timescale.</p> <p>However, Article 27 is a crucial power that will be exercised in the construction of the authorised project. It operates within an entirely different context to article 28 and the 14-day timeframe is considered to be necessary, appropriate and proportionate given the need for the Applicant to construct the authorised project to meet the needs case. In reality, the Applicant will be liable for compensation under this Article where compensation would be payable and so landowners will be given as much notice as is possible. However, it is essential that the programme can be adhered to, hence this minimum timescale is appropriate.</p>
3GEN21.	ESC	<p>Article 27(5) Does the removal of 'shrubs and shrubberies' from article 27(5) [REP5-006] provide sufficient reassurance that it would not prevent the replanting of hedges, as</p>	

Reference	Question to:	Question	Applicant's Comments
		requested in [REP5-184] and [REP5-172]. If not, provide suggested wording.	
3GEN22.	Applicant	<p>Requirement 4</p> <p>Respond to ESC [REP5-172] request for the alignment of the timescales of requirement 4 sub paragraphs (3) and (4) to 28 days and SCC [REP5-181] request for 28 days for responding to a notification of pre commencement operations.</p>	<p>A detailed response to Application Document East Suffolk Council's Comments on any further information/submissions received by Deadline 4 [REP-172] and Suffolk County Council's Comments on any further information submissions received by deadline 4 – Appendix C – Comments on differences between the DCOs for East Anglia One North, East Anglia Two and Sea Link [REP5-181] is provided in Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5, submitted at Deadline 6.</p>
3GEN23.	Applicant	<p>Requirement 6</p> <p>For precision can 'substantially' be removed from this requirement in relation outline management plans to be approved. If not explain why not.</p>	<p>The Applicant considers that the current drafting which includes 'substantially' in accordance remains the most appropriate and proportionate approach. The various outline management plans contain indicative details and plans, from which the final management plans are to be developed, in consultation with the bodies as directed in the requirement and ultimately will be approved by the relevant planning authorities or relevant discharging authority. It is important, therefore, that the final management plans are to be "substantially" in accordance with the outline plans to provide sufficient flexibility to enable them to be developed from an outline document into a final document. The safeguards in place, in particular, the requirement to consult on those plans and for them to be approved, are sufficient. Throughout the examination process, the Applicant has agreed with various stakeholders such as the Environment Agency and Natural England to be consulted on particular documents. This approach recognises the balance to be struck between ensuring that the final management plans should comply with the indicative details contained within the outline plans but whilst recognising that the indicative details may present one solution rather than the only solution which may evolve, and so allows for sufficient flexibility to include the most appropriate solution within the final management plan.</p> <p>The inclusion of 'substantially' is a recognised, established mechanism for securing compliance with the outline document where a final version is to be approved post-consent which has been used and accepted by the Secretary of State in other DCOs, for example, the A122 (Lower Thames Crossing) Development Consent Order 2025, the A12 Chelmsford to A120 Widening Development Consent Order 2024 and the Longfield Solar Farm Order 2023.</p>
3GEN24.	Applicant	<p>Requirement 6</p> <p>SCC [REP5-181] states when commenting on requirement 15 of the SPR DCOs in appendix C of [REP3-070], the applicant implies that its commitment is stronger than SPR's on account of the longer maintenance period: "... planting related to the mitigation of effects associated with Friston Substation (which would be within work 33 of SPRs consents) would be maintained for the lifetime of the asset if implemented by the Sea Link team, committing to a longer period in the Sea Link application than is referenced in SPR's requirement 15." However, SCC consider that this is apparently contradicted by the DCO wording which suggests failed planting will only be replaced if it falls within a five-year period after planting. SCC considers that the DCO wording should be amended to reflect LV03 to ensure it is clear that failed planting will be replaced throughout the lifetime of the permanent infrastructure.</p>	<p>The management periods for the different planting areas are set out in Section 6.2 of Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk submitted at Deadline 6. All planting areas are subject to a five-year establishment maintenance period which is specific to ensuring that the early stages of growth are appropriately maintained to achieve successful establishment with failed or defective plants replaced. The establishment maintenance principles and outline prescriptions are set out for each planting type in Sections 6.5. to 6.14 of the oLEMP.</p> <p>The long-term maintenance and management for all areas which will be managed for the lifetime of the infrastructure (all mitigation planting and habitat associated with the permanent access road, River Fromus bridge, Saxmundham Converter Station and Friston Substation under Scenario 2 and skylark nesting habitat) are set out in Sections 6.5 to 6.14 of the oLEMP. These sections identify the specific management interventions for each planting or habitat type. Once planting is established, management typically comprises annual condition assessments and a programme of works to address changes in condition and site requirements. This may include replacement of failed plants, however, such replacement is typically addressed during the establishment maintenance period, when it is most critical to achieving the required establishment, growth and the intended planting function.</p> <p>In addition, all planting areas are covered by the requirement for adaptive management and monitoring (Section 7.3 of the oLEMP). This allows for the establishment maintenance period to be 'paused' or 'accelerated' for a particular planting or grassland area as agreed with the local planning authority to ensure that all planting establishes satisfactorily. This could mean that the establishment maintenance period could extend beyond five years. Adaptive management measures could include replacement of failed trees and shrubs with different species if repeated failure of species is occurring along with other remediation measures to improve growth including but not limited to watering, targeted weeding and soil</p>

Reference	Question to:	Question	Applicant's Comments
		<p>ESC in [REP5-172] suggest the following wording should be added to requirement 6:</p> <p>“Any replacement planting will be subject to the same management and monitoring arrangements (including management periods) as agreed for original planting through the approval of the Landscape and Ecological Management Plans under sub-paragraph (1)”.</p> <p>Provide drafting to ensure that it is clear that failed planting related to the mitigation of effects associated with Friston substation would be replaced throughout the lifetime of the permanent infrastructure.</p>	<p>analysis. This is set out in the oLEMP and the detail will be developed further in the full LEMP which is secured by Requirement 6. On this basis the wording suggested by ESC in [REP5-172] is not required.</p>
3GEN25.	Thanet District Council (TDC)	<p>Requirement 6</p> <p>In response to ExQ2 2GEN26, TDC [REP5-207] suggested that an Operational Management Plan should be secured through the dDCO via requirement 6 to capture the operational commitments and mitigation that are not secured elsewhere in management plans or requirements.</p> <p>Provide suggest additional drafting for requirement 6 which would address your concerns.</p>	
3GEN26.	ESC	<p>Requirement 13</p> <p>The applicant's submission [REP3-069] sets out that substations are excluded from paragraph 13(1) because they form part of the wider transmission network and therefore would be required to remain in operation even if the proposed development were to be decommissioned.</p> <p>Explain your submission [REP5-172] where you consider that the dDCO must include a substation decommissioning requirement.</p>	
3GEN27.	SCC Applicant	<p>Requirement 15</p> <p>SCC [REP4-201] and [REP5-185] suggests that requirement 15 should be reworded.</p> <p>The ExA request that SCC and the applicant work together to agree alternative dDCO wording for requirement 15. If agreement cannot be reached then both parties to submit suggested wording by DL6.</p>	<p>A response to the points raised by SCC is provided in Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5, submitted at Deadline 6.</p>
3GEN28.	Marine Management Organisation (MMO)	<p>Draft Deemed Marine Licence (dDML) Part 2 Condition 4</p> <p>Confirm whether the Marine Management Organisation (MMO) agrees with Natural England's (NE) suggested additional wording for Condition 4 (1) (a) an intertidal works methodology and mitigation plan [REP5-199]. If so, confirm whether the suggested wording is</p>	

Reference	Question to:	Question	Applicant's Comments
		satisfactory or explain why not and, where relevant provide alternative wording.	
3GEN29.	ESC Friston Parish Council (FPC) Applicant	<p>New Requirement – new substation at Grove Wood, Friston</p> <p>SCC [REP5-181] suggests the following drafting for a new requirement which they consider would be effective to 'import' the controls of the EA2 DCO into Schedule 3 of the Sea Link DCO and ensure that the Friston/Kiln Lane substation could not be provided without compliance with the terms of the EA2 DCO. SCC considers that such a requirement would eliminate the risk of derogation or regression without consent.</p> <p>'Requirement [x] (new substation at Grove Wood, Friston, Suffolk)</p> <p>(1) Unless otherwise approved by the relevant planning authority, the Suffolk Substation (Work No. 1B) must be constructed in compliance with each Requirement applicable to Work No.41 of the East Anglia TWO Offshore Wind Farm Order 2022 ("SI 2022/433"), as if Work No.1B were constructed under SI 2022/433.</p> <p>(2) In so far as any Requirement of SI 2022/433 ("the 2022/433 Requirement") entails the making of an application by the undertaker for the purposes of Work No. 41 or the approval of an application by the discharging authority for the purposes of that work, and at the date when the undertaker intends to carry out works comprised in Work No. 1B no application has been made and no approval of an applications has been given, the 2022/433 Requirements are deemed to be Requirements of this Schedule for all purposes concerned with their discharge and the undertaker is deemed to be a person entitled to apply for their discharge and the relevant planning authority is deemed to be the discharging authority.</p> <p>(3) The discharge of a 2022/433 Requirement by the relevant planning authority in accordance with paragraph (2) is conclusive evidence that that Requirement has been discharged for the purposes of this Schedule.'</p> <p>East Suffolk Council (ESC) and Friston Parish Council (FPC): Do you consider the new requirement, as drafted by SCC, would allay your concerns on this matter. If not please provide alternative drafting with reasons.</p> <p>Applicant: Do you consider the new requirement, as drafted by SCC, could be added to the dDCO. If not explain why not, including any alternative drafting.</p>	<p>The control suggested by SCC would prevent the delivery of Sea Link because it would require the Applicant to adhere to plans and proposals that the Applicant cannot deliver because, for example, the Applicant does not have the powers required to do so or proposals conflict with Sea Link (see also response to 3GEN11 and 3LVIA6).</p> <p>The Applicant does not consider any drafting of this nature to be appropriate or necessary. Requiring a developer to adhere to the requirements placed on a consent for a different project with only a minor area of overlapping works is highly problematic and no clear rationale has been presented by any party setting out why this should be required.</p> <p>The Applicant has already agreed to numerous changes to documents to address requests that approaches, documents and controls are as similar as possible. For example, at Deadline 6 the Applicant has further limited construction working hours at Friston substation to make it clear that construction of ancillary works (e.g. drainage) will also align to the working hours in the SPR consents (see amendment to Requirement 7 in the draft DCO). However, where the projects do not align, it is because there is a good reason they do not; such as because the developments proposed are different, the measures to mitigate effects are different, the programmes are different, the Order limits are different or that the projects have sought different ways of achieving the same outcome.</p> <p>The Applicant has explained this point throughout the Pre-Examination and Examination process, for example see:</p> <ul style="list-style-type: none"> • Application Document 9.24 Friston Substation Update Letter [AS-148]; • Application Document 9.73.1 Applicant's Responses to First Written Questions responses to 1GEN11 and 1LVIA15 (including Appendices C and D) [REP3-069 and REP3-070] • Application Document 9.34.1 Applicant's Detailed Responses to Relevant Representations from Statutory Consultees and Bodies [REP2-016] see page 90-91); • Application Document 9.34.5 Applicant's Response to Selected Other Relevant Representations, see particularly responses to SASES (table 6.8) [REP2-022].

Reference	Question to:	Question	Applicant's Comments
3GEN30.	SCC	<p>New Requirement – lighting management plan</p> <p>In [REP5-181] SCC notes that requirement 3 of the most recent draft of the DCO [REP4-235] requires approval for operational lighting of the converter station but not the Friston substation. SCC does not see why this project would be justified in deviating from the Scottish Power Renewables (SPR) consent in this way. SCC notes ESC's concerns (e.g. within [REP3-085]) over the control of lighting and supports their ask for an appropriate requirement for a lighting management plan.</p> <p>Provide suggested drafting that you consider would address this matter.</p>	
3GEN31.	SCC Applicant	<p>New Requirement – installation of cable ducts</p> <p>In [REP5-181] SCC requests a similar requirement to that in the EA1N/EA2 made DCOs to be inserted into the Sea Link dDCO in relation to Lion Link on account of the overlapping cable routes. SCC considers that this would make progress towards compliance with relevant parts of the NPS for energy, such as paragraph 3.3.80 of EN-1 concerning the avoidance of unnecessary impacts where avoidable through coordination.</p> <p>SCC: Provide drafting for the new requirement with reasons to explain why you consider it necessary.</p> <p>Applicant: Do you consider a new requirement could be added to the dDCO. If so, engage with SCC to provide agreed suggested drafting, if not explain why not.</p>	<p>The Applicant has met with SCC from the early stages of the Proposed Project to discuss the feasibility of this approach, and has explained that the Applicant considers that it is not possible or appropriate to include such a requirement within the DCO.</p> <p>The rationale for this is presented in Application Document 7.11 Coordination Document [APP-363] which addresses the reasons why the Proposed Project cannot consent or commit to delivering elements of the proposed LionLink project.</p> <p>By way of further explanation in the context of the SCC suggestion of a requirement, the EA1N and EA2 projects were progressed by the same applicant (SPR) using the same programme, and were consented in parallel. SPR can decide to construct the ducts for one of its projects at the same time as another and has the consents and land rights to permit this because both applications are consented. Of course, if one of the SPR projects had not been consented, SPR would have not been able to install the ducts for the refused project. The Applicant has not investigated whether or not this would have meant the consented project would have been undeliverable or not.</p> <p>The Applicant and National Grid Ventures (NGV) are separate organisations, and National Grid Electricity Transmission (NGET) has no control over the processes of NGV and vice versa. The Sea Link application does not include a work to install ducts for Lionlink and the Applicant therefore does not have the powers and consents necessary for their installation as part of the Sea Link project. In this context, the requirement would impose a duty on the Applicant that was not possible for the Applicant to achieve. This alone means this requirement cannot be imposed on the Sea Link DCO.</p> <p>Even in a hypothetical scenario where NGET had sought to consent part of a separate interconnector project as part of the Sea Link DCO (and gained consent for part of a project, which it is far from clear is possible), it would not have been possible to include these works in the DCO because the final location of the Lionlink cables are not yet known. The Sea Link application was submitted nine months before Lionlink launched their statutory consultation on the project and the cable route alignments for the project are still not set in April 2026. It is therefore far from clear where NGET would need to install ducts to ensure they connected to the final Lionlink project.</p> <p>Finally, NGET and NGV are not 'sister' organisations in the way that some organisations are when under one umbrella organisation because NGET is a regulated business and under the terms of its licence cannot subsidise any commercial project or treat any commercial project differently from another. This means NGET must be able to transparently demonstrate that it treats NGV in the same way as any other developer; and would make any proposal where NGET is building part of NGV's project challenging from a legal perspective without clear agreements where NGV fund any consenting, land and physical works associated with their connection. No agreements are in place of this nature, nor would it be easy for them to be so given the stage of the Lionlink project.</p>

Reference	Question to:	Question	Applicant's Comments
			<p>At an earlier stage of the Sea Link project it was considered possible that the programmes for the two projects may be closer together than they are now. High level discussions have taken place between NGET and NGV on whether ducts could be installed at the same time to minimise cumulative effects through active coordination. For example, it was discussed whether the NGV DCO could include provisions that would enable powers to be transferred to NGET so that, in the event that Lionlink was consented, NGET could use the powers from the Lionlink DCO to install Lionlink ducts at the same time as Sea Link ducts. This approach has been taken on solar projects in Lincolnshire where a shared cable corridor was agreed (e.g. see Article 33 in the Gate Burton Energy Park Order 2024). However, given the programme for Lionlink is now at least 20 months behind Sea Link and the programme for Sea Link is urgent and challenging, it is now considered unlikely that the construction periods would overlap in a way that makes this possible.</p> <p>NGV has also been working positively with NGET and SPR to consider whether it might be possible to fix part of the project (the cables where they connect at Friston) in advance of the rest of the project to aid all parties in developing final landscape mitigation plans for the site. However, at the time of writing agreements are in principle only. The organisations have positively worked together to site the converter stations together to minimise cumulative impacts and the Applicant continues to work closely with NGV to minimise the impact of both projects.</p>
3GEN32.	SCC ESC Applicant	<p>New Requirement – control of development during operational phase SCC [REP5-181], ESC [REP5-172] and FPC [REP5-212] consider that a requirement akin to requirement 44 of the made orders for EA1N and EA2 is necessary for the Sea Link DCO.</p> <p>SCC, ESC and FPC: Provide drafting for the new requirement.</p> <p>Applicant: Do you consider a new requirement could be added to the dDCO. If so, engage with SCC and ESC to provide agreed suggested drafting, if not explain why not.</p>	<p>The Applicant does not consider that such a requirement is appropriate or necessary. No robust justification has been provided for why permitted development rights should not apply in the normal way. The Town and Country Planning (General Permitted Development) (England) Order 2015 (GPDO) is a piece of legislation that grants permitted development rights for works that are sufficiently minor and low impact as to not require a planning application. The legislation is updated regularly and undergoes significant scrutiny to ensure there are appropriate restrictions, exclusions and conditions so that works with greater scope of environmental impacts would require an application or submission of relevant details. The GPDO contains provisions explicitly written to apply to electricity undertakings, with consideration given specifically to requirements for the type of infrastructure being developed as part of Friston Substation. Of course, these permitted development rights enable the efficient and economic progression of works to maintain and improve substations that is essential to National Grid.</p> <p>In this context, the Applicant does not agree that there is a justification for a requirement like 44 to be included in the Sea Link DCO that would interfere with National Grid's permitted development rights.</p>

2. Landscape and Visual

Table 2.1 Landscape and visual

Reference	Question to:	Question	Applicant's Comments
3LVIA1.	Applicant	<p>Advance planting</p> <p>ESC [REP5-172] set out its concerns in relation to "a significant watering down by the applicant of its previous commitments to advance planting." Explain in detail the reasons for the change in approach to advance planting and whether the caveat "where planting areas do not conflict with construction compounds and activities" within outline Landscape and Ecological Management Plan (oLEMP) paragraph 5.8.1 would provide adequate safeguards against any instances of pre-commencement planting interfering with works. If not, why not?</p> <p>Provide a detailed response to ESC requirements in paragraphs 5.4 and 5.5 of [REP5-172].</p>	<p>Advance planting as identified in section 5.8 of the oLEMP (Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk submitted at Deadline 6) will be undertaken during construction and in advance of operation. It is not a watering down by the Applicant of its previous commitments to advance planting, as the commitment remains secured by Requirement 6, that advance planting will be undertaken during construction where planting areas do not conflict with construction compounds and activities. This will enable the early establishment of plants before remaining areas are planted once construction is complete.</p> <p>Advance planting should not be added to the list of pre-commencement works because the Applicant is not intending to undertake advance planting during this period. Adding it to the list of pre-commencement works could be seen as deliberately misleading in this context. The reasons why advance planting will not be undertaken as a pre-commencement activity are set out below.</p> <p>The criticality of the programme for the Project, means that the Applicant would aim for the pre-commencement period to be as short as possible. The purpose of pre-commencement works is to enable some initial, low impact operations to begin in advance of discharge of significant documents for approval, in particular, under Requirement 6. Introducing an approval into the pre-commencement period would work against a key purpose of pre-commencement works.</p> <p>Given that the intention is for the pre-commencement period to be very short, if there was a document to be submitted and approved prior to landscaping works carried out in this period, then any planting that was specified in this document would not likely take place further in advance than works undertaken following commencement, making two approval processes for landscaping inefficient but of no benefit in terms of delivering planting at an earlier stage. This position is of course for projects such as EA2 and EA1N that were consented in 2022.</p> <p>The landscape proposals are intended to be developed holistically for each stage of the project in the final LEMP to be discharged under Requirement 6. Any planting in advance of operation would be most appropriately set out and discharged as part of this document. The final LEMP will be developed and informed by detailed designs and additional surveys; some of which would be carried out during the pre-commencement period.</p> <p>The Applicant has revisited the wording in the oLEMP to avoid any ambiguity on this point.</p>
3LVIA2.	Applicant	<p>Outline lighting management plan</p> <p>ESC [REP5-184] sets out its requirement for the submission of an outline lighting management plan. Provide an outline lighting management or explain in detail why such a plan is not required, given that the applicant considers that insufficient information is currently available to provide night-time photomontages [REP5-137]. Add the outline lighting management plan to the dDCO and list of documents to be certified.</p>	<p>See Application Document 9.147 Outline Operational Lighting Management Plan submitted at Deadline 6. The plan has also been secured in Requirement 3, with a further requirement to submit a final Operational Lighting Management Plan to local planning authorities for approval prior to installation of operational lighting. The outline plan has also been added to the list of certified documents in the draft DCO.</p>
3LVIA3.	Relevant planning authorities	<p>Lighting</p> <p>The dDCO includes a provision in requirement 3 for the submission and approval of details of operational lighting. Does this meet your requirements or do you consider that</p>	

Reference	Question to:	Question	Applicant's Comments
		an outline lighting management plan and/ or maximum parameters for lighting are still required? If so, explain why and provide suggested wording.	
3LVIA4.	Applicant	<p>Landscape mitigation for Saxmundham converter station</p> <p>Provide a detailed response to the suggestions made by SCC in [REP4-150] for additional planting to mitigate landscape and visual effects.</p>	<p>SCC in REP4-140 under Agenda Item 9.5.3 set out the potential for additional landscape planting in relation to the following areas: in the vicinity of the Saxmundham Converter Station referring to three areas identified by ESC (Areas A, B and C) and in respect to Viewpoints 1, 4 and 21. The Applicant has provided a detailed response to these areas in relation to AP39 and AP40 within Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]. The Applicant is not repeating the detailed response contained in document REP4-086 but has instead provided a summary of key points below.</p> <p><u>Additional Landscape planting in the vicinity of the Saxmundham Converter Station</u></p> <p>SCC state that a multi-layered approach to mitigation planting is required. The Applicant considers that a multi-layered approach to the outline landscape design is set out within the objectives of the landscape and ecological strategy set out in the oLEMP (Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan – Suffolk [REP4-065]). This has been delivered through belts of native woodland planting, native hedgerow and tree planting along with areas where existing vegetation is strengthened with native species, reinforcing and responding to the existing layered vegetation network present within the landscape. The landscape mitigation planting has been developed collaboratively with other specialists (particularly heritage, ecology and arboriculturists) and by iteratively reviewing the level of effect on sensitive receptors in the local and wider landscape, which is considered to be standard practice as advocated for in GLVIA3. The Applicant disagrees that additional landscape planting is able to be provided within the Order Limits or in the wider landscape that would have any additional mitigatory effect or, be appropriate, proportionate or which does not conflict with other considerations such as co-location of LionLink and existing underground services.</p> <p><u>ESC Area A</u></p> <p>The Applicant's position that this additional area of planting would conflict with the historic landscape pattern and result in adverse cultural heritage effects is shared by ESC [Reference D5.3.03 in REP5-184] who consider that this additional area of planting no longer needs to be pursued. SCC agree that woodland planting may not be appropriate here but request strengthening of planting between Bloomfield Covert and Wood Farm. The Applicant considers that this has been provided with extensive native woodland planting between these locations as shown on Figure 1 of the oLEMP (Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan – Suffolk [REP4-065]) in which a continuous, deep belt of woodland is proposed, only broken in a small section by the permanent access road which will be lined at this point by woodland planting.</p> <p><u>ESC Area B</u></p> <p>The Applicant has reviewed whether blocks of tree or shrub planting could be planted along the PRoW which would mitigate the visual amenity of recreational users and considers that this would be unlikely to provide a material improvement in the visual amenity for recreational users for this short section of the PRoW as the route is orientated directly towards the converter station. Furthermore the presence of services along with the need to retain the corridor for utility supply connections to the converter station would restrict the ability to plant trees to sufficiently filter views towards the converter station. This is further explained within Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086].</p> <p><u>ESC Area C</u></p>

Reference	Question to:	Question	Applicant's Comments
			<p>The planting proposals along the B1119 were updated in the Deadline 4 version of Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan – Suffolk [REP4-065]. The widening of the Order Limits associated with the Change Request provided the opportunity to incorporate additional planting within the Order Limits along part of the B1119 following stakeholder requests. The 8.5 m depth of woodland planting is considered to represent an additional, strengthening of the layered vegetation network of the surrounding landscape and is comparable in width to other belts of planting in the local landscape.</p> <p><u>Viewpoint 1</u></p> <p>The Applicant notes the agreement with the assessment of visual effects. The Applicant considers that the substantial belts of woodland planting both around the converter station and set back from it along with the use of earth bunds provides integration within views whilst maintaining consideration of co-location requirements with LionLink. This is further explained within Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086].</p> <p><u>Viewpoints 4 and 5</u></p> <p>The Applicant notes the agreement with the assessment of visual effects. Boundary planting is already proposed along the B1119 adjacent to Viewpoint 4 comprising a hedgerow and hedgerow trees which combined with the existing field boundary planting present between this viewpoint and the converter station collectively provides a strong layered approach to mitigation planting. Further strengthening of this field edge with additional mitigation planting either by increasing the depth of planting or extending it along the bridleway is not possible due to landowner constraints which have been set out at CAH2 and CAH3.</p> <p>The addition of a field boundary hedge along the bridleway represented by Viewpoint 5 would have a limited effect in reducing visual effects for users, primarily due to the lower elevation of this viewpoint in comparison to the converter station site. It is also important to note that views towards the converter station from the bridleway are oblique to the direction of travel and that horseback users would see over a field boundary hedge. Furthermore, the Applicant has had to balance the benefits of positioning the converter station as far south within the site with drainage requirements and has consequently extended the Order Limits south acquiring additional land to provide a substantial belt of woodland to the south of the converter station. This is further explained within Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086].</p> <p><u>Viewpoint 21</u></p> <p>The Applicant disagrees that a single feature approach with the mitigation planting has been adopted as it includes two separate substantial belts of woodland planting along with earth bunds to the north of the converter station as well as hedgerow, hedgerow tree and woodland planting along part of the B1119. The addition of a hedgerow along the PRow as suggested by SCC would not further mitigate visual effects from this location as it would not appear within this view. This is further explained within Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086].</p> <p><u>Comparison to LionLink's landscape mitigation</u></p> <p>The outline landscape mitigation for the Saxmundham Converter Station site has been designed collaboratively and in response to landscape, visual, heritage and ecological effects. It has also importantly been designed to enable co-location with LionLink (reflected in the 'NGV Coordination Suffolk Masterplan' forming Appendix A of Application Document 7.10 Coordination Document</p>

Reference	Question to:	Question	Applicant's Comments
3LVIA5.	Applicant	<p>Cumulative landscape effects Provide a detailed response to the suggestions made by ESC and SCC in [REP5-204]</p>	<p>[APP-363]) which has necessitated consideration of this in the extent of the landscape framework proposed and associated land take. LionLink is positioned in an entirely different part of the site to the Proposed Project and therefore a comparison is not possible nor appropriate. LionLink is in a much more visually prominent part of the site, closer to sensitive receptors and therefore necessitates a different approach to the level of landscape and visual mitigation which is reflected in LionLink's outline landscape mitigation plan.</p> <p>The Applicant submitted a detailed inter-project cumulative assessment on the sub-factors of the Natural Beauty and Special Quality Indicators at Deadline 5 which is contained within Appendix A in Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendices [REP5-136]. ESC concluded that they were satisfied that the provision of acid grassland enhancement, together with full landscape restoration post-construction as defined in the oLEMP was sufficient in addressing the effects on the Natural Beauty Indicators and that no additional mitigation or compensation is required.</p> <p>SCC made comments with respect to each of the Natural Beauty Indicators which the Applicant has addressed in detail below. SCC acknowledge that there is little scope to further reduce the adverse effects due to the nature of the works, however, they identify the potential for offsite commitments to be made to enhance the affected Natural Beauty Indicators including through legal agreements to contribute to appropriate schemes.</p> <p>As a result of the ongoing dialogue between the Applicant, the Suffolk & Essex Coast & Heaths National Landscape Partnership (SECHNLP) and SCC the Applicant has drafted a s106 Unilateral Undertaking which outlines the Furthering The Purposes Compensation Fund which the Applicant has agreed to provide for the purpose of funding and delivering projects within the National Landscape. This was first issued to SECHNLP and SCC on 24 March 2026 and re-issued on 30 March 2026 incorporating comments received from SECHNLP.</p> <p>The Applicant has provided a response below to the specific comments from SCC on the Natural Beauty Indicators:</p> <ul style="list-style-type: none"> • Landscape quality – Regarding the size of the 6 ha acid grassland enhancement this was presented at Deadline 1 within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120] and is considered to be a proportionate and appropriate response which was discussed at pre-application meetings with the SECHNLP. The habitats contained within the 6 ha acid grassland enhancement land were recorded by the Applicant's experienced botanist and are set out within Reference 3 in Table 15.1 contained within Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]. Regarding the timing of the acid grassland enhancement works, as shown on Plate 3.1 [REP1-120], this would occur prior to the temporary removal of existing acid grassland east of Leiston Road within the construction phase and this has been reflected within Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan - Suffolk submitted at Deadline 6. In addition, the oLEMP sets out the measures necessary for the successful enhancement of the acid grassland (Section 6.13) along with the required monitoring (Section 7.2) and procedures for non-compliance (Section 7.4). Finally, as stated in REP1-120, for approximately five to seven years there would be both the restored functional grassland and the enhanced grassland in parallel. The 10-year period for the management of the acid grassland is an agreed time period with the landowner and cannot be extended. Notwithstanding the Applicant's position regarding the s85 duty as set out in REP1-120, the Applicant has drafted a s106 Unilateral Undertaking which outlines the FTP Compensation Fund which the Applicant has agreed to provide for the purpose of funding and delivering projects within the National Landscape.

Reference	Question to:	Question	Applicant's Comments
3LVIA6.	Applicant	<p>Friston substation</p> <p>Provide confirmation that all of the landscape mitigation approved for the SPR East Anglia One North (EA1N) and East Anglia Two (EA2) consents would be secured and can be implemented for the proposed development. If there are differences explain what these are and how they affect the achievement of mitigation.</p> <p>Provide a detailed explanation and plan indicating whether the landscape mitigation referenced above can be accommodated within the order limits.</p>	<ul style="list-style-type: none"> • Scenic quality – The Applicant set out the mitigation measures undertaken to address the cumulative effects on the Scenic Quality Indicator and its sub-factors in Appendix A of Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendices [REP5-136]. Without prejudice to this, the Applicant has drafted a s106 Unilateral Undertaking as noted above in response to the enhanced s85 duty. • Relative wildness - The Applicant set out the mitigation measures undertaken to address the cumulative effects on the Relative wildness Indicator and its sub-factors in Appendix A of Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendices [REP5-136]. Without prejudice to this, the Applicant has drafted a s106 Unilateral Undertaking as noted above in response to the enhanced s85 duty. • Relative tranquillity – It is not considered that further mitigation is achievable than is already secured within the REAC (Application Document 9.84 (C) Register of Environmental Actions and Commitments (REAC) [REP5-115]) with regard to the factors contributing to the temporary significant cumulative effects on the SECHNL. Such mitigation measures include limiting construction activity and compound size to the minimum required within the SECHNL (Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendices [REP5-136]). • Natural heritage features – comment acknowledged that effects would not be significant adverse. <p>The currently consented detailed landscape design was approved pursuant to Requirement 14(1) of the East Anglia TWO DCO by East Suffolk Council (ESC) in February 2026.</p> <p>The currently approved landscape design includes a greater degree of planting in certain areas than required by Requirement 14 of the SPR DCO (noting that the Outline Landscape and Ecology Strategy (OLEMS), which is the outline landscape design secured on the face of the SPR DCO, is not itself incompatible with the Proposed Project). The recently approved design will need to be updated to effectively coordinate with Sea Link. Notwithstanding the extent of planting in the recently approved design, the necessary update does not require a reduction in planting area, but instead a change in species mix in discrete areas of the SPR planting design (from deep rooted to shallower rooted species).</p> <p>This change in species mix has been shown on Figure 5 of the oLEMP (Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan – Suffolk [REP4-065]) comprising a shallow rooted scrub mix replacing the woodland mix across the Sea Link HVAC and HVDC cable corridors. This change would not alter the functionality of the planting as effective mitigation. This change in species mix reflects the discussions held between the Applicant and SPR with respect to the updates that will be made as part of the resubmitted landscape design which will accommodate Sea Link. The same planting mix cannot be adopted for Sea Link because trees cannot be planted over the cables.</p> <p>The means by which the detailed landscape design will be updated to accommodate Sea Link is via a resubmitted landscape design pursuant to Requirement 40 of the SPR DCO. ESC has directed SPR and the Applicant to progress the landscape update in this manner, and the SPR requirement 14(1) was discharged by ESC in this context. The SPR Requirement 14(1) submission, and the associated ESC decision report, identify this as the correct mechanism to update the design to accommodate Sea Link. The Applicant continues to engage with SPR to agree the approach to updating the landscape design, including on the nature of any engagement required before submission of a revised landscape design</p> <p>Regarding the SPR landscape mitigation more broadly, at Deadline 4 the Applicant updated Figure 5 of the oLEMP (Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan – Suffolk [REP4-065]) which reflects the planting areas contained in the currently consented</p>

Reference	Question to:	Question	Applicant's Comments
			<p>detailed landscape design except for one area of woodland which sits outside the Sea Link Order Limits. This is the linear woodland belt which extends to the east of Little Moor Farm to the immediate north of the Public Right of Way (PRoW). Sea Link's Order Limits were developed based on SPR's OLEMS which in this area showed the woodland belt to the immediate south of the PRoW. SPR have since changed the approach to planting in this area and in their consented detailed landscape design show a hedgerow to the south of the PRoW with the woodland belt to the north of the PRoW. Consequently, Figure 5 of the oLEMP, reflects a hedgerow to the south of the PRoW (consistent with the consented detailed landscape design) but not the woodland belt to the north of the PRoW as this falls outside the Sea Link Order Limits, for the reasons set out above. This is the only area of planting which can't be accommodated (under Friston Scenario 2) and it is not considered to compromise the desired mitigation outcomes as a hedgerow to the south of the PRoW will provide the same degree of screening in views from recreational users as required by SPR's consented detailed landscape design which shows a hedgerow in the same location.</p>

3. Ecology and Biodiversity

Table 3.1 Ecology and biodiversity

Reference	Question to:	Question	Applicant's Comments
3ECOL1.	Applicant	<p>Noise contour map and lighting plan – Suffolk HDD compound</p> <p>Provide a detailed noise contour map for the Suffolk HDD compound (similar to those provided for the converter stations) showing predicted worst case LAmax and LAeq levels. Also provide an indicative lighting plan for the compound.</p>	<p>A detailed noise contour plan for the Suffolk HDD compound has been provided in Appendix B within Application Document 9.136.1 Applicant's Response to Third Written Questions – Appendices submitted at Deadline 6.</p> <p>An indicative lighting plan is provided in Appendix C within Application Document 9.136.1 Applicant's Response to Third Written Questions – Appendices submitted at Deadline 6.</p>
3ECOL2.	Applicant	<p>Access routes for vehicles within Sandlings Special Protection Area (SPA) and Leiston-Aldeburgh Site of Special Scientific Interest (SSSI)</p> <p>Provide evidence of a signed legal agreement with RSPB regarding vehicle and pedestrian access at the SPA and SSSI or make provision for specified routing and access arrangements to be agreed with RSPB within the Register of Environmental Actions and Commitments (REAC) or dDCO.</p> <p>RSPB may wish to comment on progress towards an agreement or the necessary wording for a REAC or dDCO commitment.</p>	<p>A signed legal agreement is not yet available. However, a new REAC measure has been submitted at Deadline 6: 'B73 - Routes and access arrangements for vehicle and pedestrian access to Sandlings SPA and Leiston-Aldeburgh SSSI will be agreed with RSPB'.</p>
3ECOL3.	Applicant	<p>LionLink cumulative assessment</p> <p>Explain why LionLink would not give rise to cumulative impacts due to hedgerow fragmentation. This is alluded to in the first column of Appendix table C.1 [REP5-127] but not concluded on. Where cumulative fragmentation impacts are confirmed, incorporate drafting for appropriate mitigation within the control documents or dDCO.</p>	<p>The updated assessment in Appendix Table C.1 of REP5-127 was only intended to discuss changes since the previous cumulative assessment was undertaken (as presented in APP-060). Regarding gaps in hedgerows, any cumulative impact would be addressed by each project delivering their own mitigation to ensure significant fragmentation does not arise. With regards to the Proposed Project, it would be reducing temporary gaps in hedgerows to a maximum of 10 m at night through use of hurdles or other features referenced in the oLEMP and REAC commitment B53, while in the long-term habitat creation around the Saxmundham Converter Station and Friston Substation mean that there will be a net increase in woodland, wetland, grassland and hedgerow due to the Suffolk Onshore Scheme, all of which will considerably improve the value of the landscape for all species of bat compared to the current arable setting. This is set out in Application Document 7.5.7.1 (D) Landscape and Ecological Management Plan – Suffolk submitted at Deadline 6.</p>
3ECOL4.	Scottish Power Renewables (SPR)	<p>Ecological Management Plan</p> <p>Does SPR consider that all relevant ecological mitigation measures secured by its ecological management plan (as referenced in table 3.5, item 3.5.3 of the draft statement of common ground) have been addressed by the applicant. If not, explain what additional provisions it considers are necessary to be secured by the application and provide drafting.</p>	
3ECOL5.	Forestry Commission	<p>Incursion into veteran tree root protection areas</p>	

Reference	Question to:	Question	Applicant's Comments
		Confirm whether the applicant's response in [REP2-016] provides sufficient comfort that long term effects on veteran trees are unlikely and if not, explain why not.	
3ECOL6.	Applicant	<p>Environmental net gain</p> <p>Paragraph 4.6.15 of NPS EN-1 requires that applications should be accompanied by a statement demonstrating how opportunities for delivering wider environmental net gains have been considered. Paragraph 4.6.13 distinguishes between environmental and biodiversity net gain (BNG). The applicant has provided a BNG feasibility report. Provide commentary on any wider environmental net gain measures delivered by the proposed development and where this is set out in a statement.</p>	<p>Where on-site opportunities are limited, the Proposed Project will deliver a significant proportion of Environmental Net Gain off-site by working with registered commercial providers and trusted partners through National Grid's Qualifying Utilities Dynamic Market. 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.</p> <p>Importantly, these requirements extend to supporting environmental education, learning, and skills, ensuring that the benefits of ENG reach beyond biodiversity alone.</p> <p>As part of this commitment, habitats delivered through proposed landscaping around the converter stations and at the River Fromus will establish new areas of woodland, which contribute to carbon sequestration, air quality improvement, habitat connectivity, and recreational opportunities.</p> <p>The creation and enhancement of species-rich grasslands will support pollinators, improve soil health, regulate water flow, and contribute to the landscape's character and educational use. In addition, the Applicant will implement drainage solutions such as bioswales and riparian planting, which are designed to regulate water quality, reduce flood risk, and provide valuable wetland habitats for wildlife.</p> <p>Collectively, these measures will deliver a range of ecosystem services, including air and water quality improvement, carbon storage, flood attenuation, erosion control, enhanced recreational spaces, educational opportunities, increased access to nature, habitat connectivity, pollinator support, and soil formation.</p> <p>All of these requirements are set out within National Grid's policy framework and are secured through robust contractual obligations to ensure long-term delivery and monitoring.</p>
3ECOL7.	Natural England (NE)	<p>Downgrading of bat assemblage</p> <p>Provide comment on the applicant's downgrading of the importance of the bat assemblage in [REP4-025] and [REP5-017] from national to regional based on level of use.</p>	
3ECOL8.	Applicant	<p>Bird diverters</p> <p>Either draft a requirement to secure the use of bird diverters that are active for the duration of the night period, or update the REAC [REP5-115] provision B55 to include reference to 'low light and night conditions'.</p>	<p>REAC measure B55 has been updated at Deadline 6 to include reference to 'at night' (see Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 6).</p>
3ECOL9.	Applicant	<p>Mitigation for deer in Suffolk</p> <p>Include a commitment to detailed construction fencing plans being submitted for approval as part of the LEMP, or through a separate DCO requirement as suggested in ESC's response to ExQ2 question 2LVIA8 [PD-021] or explain why this is not necessary.</p>	<p>Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan - Suffolk has been updated for Deadline 6 to include this commitment.</p>
3ECOL10.	KCC	<p>Reptile Surveys</p> <p>KCC's response to 2ECOL29 [REP5-195] suggests that updated surveys for reptiles should be undertaken 'where necessary'. Can KCC confirm whether surveys would be necessary in this location based on the applicant's</p>	

Reference	Question to:	Question	Applicant's Comments
		proposed scope of works. Where relevant, provide drafting for a requirement or REAC provision to secure the relevant detail for the scope and methodology of surveys.	
3ECOL11.	Applicant	<p>Environmental Clerk of Works</p> <p>As requested in 2ECOL2 [PD-021], explain why the outline Offshore Construction Environmental Management Plan (oOCEMP) [REP5-066] now refers to an environmental clerk of works rather than an ecological clerk of works as the skillset of the two roles may be quite different, for example an environmental clerk of works may not have the same depth of ecological knowledge. The response to 2ECOL2 confirmed the change, rather than answering the specific question.</p>	<p>The Applicant acknowledges that the skillset of an Environmental Clerk of Works is different to that of an Ecological Clerk of Works. An Environmental Clerk of Work has a broader understanding and knowledge of all environmental impacts that are relevant to the Offshore Scheme, rather than focusing only on ecological impacts. The role of the Environmental Clerk of Work will be to monitor compliance with commitments that have been agreed for all marine receptors. Where additional technical knowledge and experience is required, this will be provided by a dedicated marine ecologist with respect to ecological concerns or other specialists as appropriate.</p> <p>For clarity the Applicant has updated Application Document 7.5.2 (D) Outline Offshore Construction Environmental Management Plan and Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 6 to include the following commitment GM06</p> <p><i>“A suitably experienced Environmental Manager will be appointed for the duration of the construction phase who can cover both onshore and intertidal requirements. In addition, a qualified and experienced Environmental Clerk of Works (ECoW) will be assigned to Pegwell Bay during the construction phase to advise, supervise and report on the delivery of the mitigation methods and controls outlined in the Offshore CEMP. The ECoW will monitor that the works proceed in accordance with relevant environmental DML requirements and adhere to the required good practice and mitigation measures. ed wording is still in the works”.</i></p> <p>This commitment is consistent with existing commitment GG04 included in Application Document 7.5.3 (C) Outline Onshore Construction Environmental Management Plan [REP5-068] and Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 6 which, in addition to an Environmental Manager, commits to the provision a qualified and experienced Environmental Clerk of Works (ECoW) during the construction phase to advise, supervise and report on the delivery of the mitigation methods and controls outlined in the Onshore CEMP.</p>
3ECOL12.	ESC, SCC, TDC, KCC, National Trust	<p>Outline Offshore Construction Environmental Management Plan, outline Construction and Environmental Management Plan (oCEMP) [REP5-068] and REAC – Environmental Clerk of Works</p> <p>Do the local authorities or the National Trust have any concerns relating to the use of an Environmental Clerk of Works as opposed to an Ecological Clerk of Works to oversee works, noting that ecology and biodiversity measures originally referred to use of an Ecological Clerk of Works and the term ECoW is used interchangeably within the document? It is noted that REAC [REP5-115] provision B48 still refers to an ecological clerk.</p>	
3ECOL13.	Applicant ESC, SCC, TDC, KCC	<p>oCEMP [REP5-068] provision B02 – vegetation removal</p> <p>Confirm whether the provision should read ‘Wherever possible’ rather than ‘The assumption will be’ and if not, suggest alternative wording.</p>	<p>The Applicant agrees that the commitment should be revised to say ‘Where possible’. REAC measure B02 has been updated accordingly in Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 6).</p>

Reference	Question to:	Question	Applicant's Comments
3ECOL14.	Applicant TDC, KCC	oCEMP [REP5-068] provision B04 – invasive non-native species For transparency should the list of invasive non-native species also refer to Nuttall's waterweed and if not, why not?	The Applicant agrees to add Nuttall's waterweed to the commitment. REAC measure B04 has been updated accordingly in Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 6).
3ECOL15.	Applicant ESC, SCC, TDC, KCC	oCEMP [REP5-068] provision B05 – two stage habitat manipulation Should this provision refer to 'reptiles' rather than 'common reptiles' and if not, why not?	The phrase 'common reptiles' is used because this is a recognised way of referring to common lizard, slow worm, adder and grass snake collectively. This therefore encompasses the three species of reptile recorded in Kent surveys (adders have never been recorded and would not be expected). The term excludes the two rarer native reptile species (smooth snake and sand lizard) neither of which have been found, or would be expected to be found, during surveys for the Proposed Project.
3ECOL16.	Applicant ESC, SCC, TDC, KCC	oCEMP [REP5-068] provision B07, B36, B53 – hedgerow gap filling Should 'where practicable' be removed or an alternative form of wording adopted to ensure that the conclusions of the environmental impact assessment in respect of bats and dormice can be relied on and if not, why not? Where relevant provide alternative wording.	For B07 and B36 the Applicant agrees to remove the phrase 'where practicable'. REAC measures B07 and B36 have been updated accordingly in Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 6). For B53 the phrase 'where practicable' is used when referring to reducing hedgerow gaps to <u>less than</u> 10m. This will not always be practicable as the haul road will often need to remain open and has a width of 10m including drainage. Retaining 'where practicable' in B53 would not affect the ecological impact assessment or its conclusions because that assessment is based on reducing hedgerow gaps to a maximum of (i.e. no more than) 10m, rather than entirely closing hedgerow gaps in all circumstances.
3ECOL17.	Applicant	oCEMP [REP5-068] provision B38 – bat impacts Confirm whether this provision can be updated to take account of the measures outlined in SCC's DL5 appendix B [REP5-180], such as full hedgerow surveys, provision of a colour coded map of important hedgerows and coppicing rather than removal and if not, why not?	SCCs DL5 appendix does not take account of the fact that full hedgerow surveys have already been undertaken, and a colour-coded map produced showing important hedgerows, classified using the criteria listed in REP5-180. This is contained within Application Document 6.4.2.2.A (B) Phase 1 Habitat Survey Report (including Badgers and Important Hedgerows) [AS-028], Figure 6.4.2.2.A.7 and includes hedgerows of both historical and ecological importance. A table accompanying this figure explaining which criteria have led to the classification of each hedgerow as important is provided in Table 1.6 of Application Document 6.3.2.2.A (B) ES Appendix 2.2.A Extended Phase 1 Habitat Survey Report (Redacted) [AS-004]. This document also includes the requested photographs. The Applicant believes SCCs DL5 Appendix B [REP5-180] may have been produced by SCC landscape team who potentially did not previously notice the Important Hedgerow information already submitted into the Examination (as noted above). This has been drawn to their attention in meetings since they submitted their D5 response. With regard to SCC's request in REP5-180 to ' <i>Confirm how adverse impacts on hedgerows are minimised, for example by defining a minimum width for the cable corridor, when crossing hedges or coppicing, rather than removing hedgerows from temporary visibility splays. This should be individual for each hedgerow (as circumstances may differ).</i> ' Information on this has already been submitted into the Examination e.g. how the width of the cable corridor has been minimised at all hedgerows and why HDD has not been chosen as a crossing method and this was also discussed at ISH3. In deciding whether a trenchless crossing methodology should be used to install the cables the following factors were considered: <ul style="list-style-type: none"> • Temporary land take – for high voltage cables, trenchless methods need much more land than open cut trenching due to the need for drive and receptor compounds and laydown areas. The Suffolk HDD compound provides an example of size; while any hedgerow HDD compound would be smaller, it would not be a great deal smaller.

Reference	Question to:	Question	Applicant's Comments
			<ul style="list-style-type: none"> • Larger permanent easement - trenchless methods need to be installed at greater depths than open cut, which requires cables to be separated further from each other to avoid affecting electrical capacity. A wider easement is also needed to allow for any variation in the alignment during the installation process. • Longer programme – for high voltage cables, it generally takes much longer to HDD under a hedge than to open trench through it. Open cut trenching may take days to a week; HDD may take a month or more in each case, including compound set up and demobilisation. • Increased need for lighting - once an HDD drill starts it must continue until it is finished, meaning greater potential for night working than with open trenching. • Greater vehicle movements – trenchless construction requires additional vehicle movements due to the specialist plant and the need to service the drilling. <p>These factors were all considered by the project ecologists. It was determined that the shorter disruption provided by open trenching was preferable and less disturbing overall to wildlife including bats.</p>
3ECOL18.	Applicant TDC KCC	oCEMP [REP5-068] provision B44 – noise fencing Should this article be updated to refer to all relevant named designated sites and if not, why not?	There is only one SSSI of relevance to this provision which is Sandwich Bay to Hacklinge Marshes SSSI. REAC measure B44 has been updated to make this explicit in Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 6.
3ECOL19.	NE ESC SCC	Outline Landscape and Ecological Management Plan Should the Suffolk oLEMP [REP4-065], or another control document, be updated to identify sensitive areas for wolverine or the need for a watching brief within Leiston-Aldeburgh SSSI to minimise risks of impacts in the event of frac out and if not, why not?	
3ECOL20.	NE	Outline Landscape and Ecological Management Plan – Functionally Linked Land Confirm whether the oLEMP [REP4-067] provides sufficient detail regarding the management and monitoring of the proposed functionally linked land at Great Stonor. If not, confirm any additional provisions that should be secured and provide suggested drafting.	
3ECOL21.	NE	REAC [REP5-115] provision AQ11 Is Natural England satisfied that the provisions of AQ11 relating to location of generators are sufficient to avoid significant effects on the Sandwich Bay to Hacklinge Marshes SSSI.	
3ECOL22.	Applicant NE	REAC [REP5-115] provision B65 - Sandwich Bay and Hacklinge Marshes SSSI tree height reduction It is noted that although tree height reductions in operation now avoid the March to August period, it is unclear from the wording whether there are now no controls on tree height reduction during construction. Provide alternative wording to clarify this or robust justification to explain why this wording is appropriate. NE may wish to comment.	There have never been any proposals for tree height reduction in the SSSI during construction, hence why B65 only covers operation. This is discussed in 2.9.14 of Application Document 6.2.3.2 (G) Environmental Statement Part 3 Kent Chapter 2 Ecology and Biodiversity submitted at Deadline 6 as follows: <i>'During construction, there will be no requirement for tree height reduction in Management Unit 11 of Sandwich Bay to Hacklinge Marshes SSSI, where it runs parallel to the railway line, even though the new section of overhead line traverses this area. These trees are 6m height, and vegetation can reach almost 10m before it requires pruning to avoid interference with the overhead line'</i> . It would therefore not be appropriate for the Applicant to put forward REAC measures for activities that are not part of the proposals.

4. Cultural Heritage

Table 4.1 Cultural heritage

Reference	Question to:	Question	Applicant's Comments
3CH1.	SCC KCC HE	<p>Assessment of heritage assets</p> <p>Is there sufficient evidence and level of assessment for the impact from the proposed development on all heritage assets (scoped in and out of the Environmental Statement (ES) assessment)?</p> <p>Furthermore, to clarify, is there any heritage asset (designated or non-designated) where your assessment conclusions would differ from that of the applicant?</p>	
3CH2.	SCC KCC HE	<p>Cumulative assessment of heritage assets</p> <p>Has the applicant provided a sufficient cumulative assessment on heritage assets, considering not just the impacts to heritage assets from just the proposed development but from other projects in the areas too? Provide reasons for your response.</p>	
3CH3.	Applicant	<p>Design of River Fromus Bridge</p> <p>Within the dDCO [REP5-005], requirement 3(3) refers to the bridge over the River Fromus. It states that "Development of the bridge crossing of the River Fromus (part of Work No. 3a) must not commence until details of the layout and scale of the bridge have been submitted to the relevant planning authority." However, details of the final design of the bridge (not just the scale and layout) are not mentioned in this requirement for agreement with the planning authority.</p> <p>Given the sensitive location in terms of landscape and heritage, the ExA requires that the requirement be amended to require details of the bridge design to also be submitted for agreement by the local planning authority.</p>	Requirement 3(3) within the dDCO submitted at Deadline 6 has been updated to accommodate this request.
3CH4.	KCC HE	<p>Richborough Saxon Shore Fort Scheduled Monument and Grade I listed buildings</p> <p>For the Richborough Fort complex, do you agree with the applicant [APP-063] that "the magnitude of impact is considered to be negligible. On an asset of high value this would result in a minor adverse effect which is not considered significant"? If not, set out how you would conclude the potential impact to this asset.</p>	
3CH5.	KCC HE	<p>Ebbsfleet Peninsula Multi-Period Complex</p> <p>After a programme of archaeological excavation which the applicant has committed to for this asset the applicant has</p>	

Reference	Question to:	Question	Applicant's Comments
3CH6.	KCC SCC HE	<p>assessed the residual impact to be minor adverse [APP-063]. Considering all mitigation proposed, do you agree with the applicant's assessment of residual impact on this complex? If not, explain how you would assess the residual impact.</p> <p>Wider Historic Landscapes</p> <p>The applicant has submitted the Assessment of Cumulative Effects on the Wider Historic Landscapes [REP5-138].</p> <p>The ExA requests that you respond to this document and inform as to whether you agree with the conclusions of minor adverse effect for Suffolk and negligible effect for Kent. If not, explain why, and how you would evaluate the cumulative impact to the wider historic landscapes.</p>	

5. Water Environment

Table 5.1 Water environment

Reference	Question to:	Question	Applicant's Comments
3WE1.	Applicant	<p>Sequential Test</p> <p>In responding to 2WE2 [REP5-178], SCC disagree that it is necessary to relocate the particular drainage pond out of flood zone 3. Clearly explain why this is not feasible.</p>	<p>The Applicant confirms that the basin was sited and the Order Limits defined tightly around it prior to the update to the Flood Map for Planning; the land was previously classified as being located in Flood Zone 1. The basin is placed in a topographical low point to facilitate drainage by gravity, and the Order Limits were tightly defined around it to minimise temporary disruption to the land owner, hence there is insufficient space to relocate it.</p> <p>To provide further context, the basin is situated adjacent to the upstream reach of the small stream (which drains to the River Fromus) and the update to the Flood Map for Planning extended the mapped extent of Flood Zone 3 upstream to cover the land in which the basin is proposed. The Applicant has undertaken further assessment to characterise the nature of flooding in this location. The land is not at risk of flooding during the 3.33% (1 in 30) annual exceedance probability event. In events of a large magnitude flooding is predicted, however flood water depths are shallow (within the range of 75mm to 200mm). As a consequence of the shallow depths, the temporary loss of floodplain storage would be small (up to a maximum of 50m³) and impact on existing flood flow routes and third party flood risk would be minor. Flood flows would continue to route from north to south around the basin, with a small increase in flood depths upstream of the pond, on land within the Order Limits.</p> <p>Where compensatory floodplain storage is stipulated as necessary by the Environment Agency, the Applicant would provide this, secured by a suitable commitment within 9.84 (C) Register of Environmental Actions and Commitments (REAC).</p> <p>However, 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 has therefore been removed from the drainage plans within the Suffolk Drainage Strategy, that is 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, although formal agreement has not been possible prior to Deadline 6 due to the timescales involved.</p>
3WE2.	Applicant	<p>Water Framework Directive</p> <p>Regulation 19 of The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 allows for derogations (exemptions) from WFD environmental objectives. If the Secretary of State determines that these objectives are not met, clearly set out how the requirements of regulation 19 have been satisfied.</p>	<p>The Applicant is confident that the Proposed Project does meet with the environmental objectives of the Water Framework Directive. The Applicant is seeking to evidence this via a joint position reached by the Applicant and the Environment Agency on this matter prior to the conclusion of the examination.</p> <p>Nevertheless it is set out below how the requirements of Regulation 19 would be satisfied:</p> <p>Regulation 19 (1) sets out two scenarios (a and b) when a failure to achieve good groundwater status, good ecological status or good ecological potential or to prevent deterioration in the status of the body of surface water or groundwater is not a breach of the WFD objectives:</p> <p>(a) the failure is the result of new modifications to the physical characteristics of a body of surface water or alterations to the level of the body of groundwater</p> <p>b) the following conditions are met:</p> <ul style="list-style-type: none"> all practicable steps are taken to mitigate the adverse impact on the status of the body of water (mitigation measures should be technically feasible; not lead to disproportionate costs; and be compatible with the new modification or sustainable human development activity) <p>The Applicant notes that it has identified what it considers to be all practicable mitigations in Section 4 and Appendix A of document 6.9 WFD assessment [APP-293] and these are secured as noted in 9.84</p>

Reference	Question to:	Question	Applicant's Comments
			<p>(D) Register of Environmental Actions and Commitments and 7.5.3 (D) Outline Onshore Construction Environmental Management Plan, both submitted at Deadline 6.</p> <p>The whole lifecycle of the Proposed Project has been considered in relation to design, construction, operation, maintenance and decommissioning where these phases are relevant to WFD status and WFD quality elements.</p> <ul style="list-style-type: none"> the reasons for the modifications or alterations, or for the sustainable development activities, are of overriding public interest; and /or the benefits to the environment and to society of achieving the environmental objectives are outweighed by the benefits of the new modifications or alterations, or of the sustainable development activities, to human health, to the maintenance of human safety, or (in the case of modifications or alterations) to sustainable development. For derogation, either one or both of these criteria need to be satisfied. <p>The Applicant does not accept that there would be WFD deterioration, however, were it to be found that there was, changes would be localised and temporary and the Applicant would submit that this is most likely outweighed by the need for the Proposed Project as a whole and the very substantial policy support demonstrating the overall public benefit of this project and its contribution to achieving net zero. The Applicant refers to the need case for the authorised development set out in Application Document 7.1 (C) Planning Statement [AS-057], Application Document 9.129 Applicants Response to 2GEN1 and 2GEN2 in respect of Need [REP5-142] and Application Document 7.2 Strategic Options Back Check Report [APP-320]; and the considerable policy support for it set out in 7.1 (C) Planning Statement [AS-057].</p> <ul style="list-style-type: none"> the beneficial objectives served by the modifications or alterations, or by the sustainable development activities, cannot, for reasons of technical feasibility or disproportionate cost, be achieved by other means which are a significantly better option. <p>The Applicant has set out its options appraisal in Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] and stands by that assessment.</p> <p>Regulation 19 (2) sets out that a breach of the WFD objectives due to activities that might lead to deterioration from high status to good status may also be subject to a derogation. However, this is not applicable as no waterbodies within the Proposed Project's Zone of Influence are at high status.</p> <p>It is also pertinent to note that any temporary impacts that may arise are a result of a new modification which would have no long-term adverse consequences are not classified as deterioration under the WFD legislation and the Regulation 19 tests would not be required. Therefore, any potential temporary construction, operational or decommissioning phase impacts would not trigger a WFD non-compliance assessment in relation to the Application.</p>
3WE3.	SCC	<p>Flood Risk Assessment</p> <p>Does the applicant's Surface Water Flood Risk and Climate Change - Technical Note [REP5-134] address all outstanding concerns with respect to the applicant's Flood Risk Assessment? If not, what concerns remain and what additional information is required?</p>	
3WE4.	Environment Agency (EA) KCC	<p>Groundwater Flood Risk at the Minster Converter Station Site</p> <p>The applicant has submitted a report [REP5-122] to address the DL4 submission Application Document: Video evidence of the extent of the flooding on Minster Marshes on the area of the Converter Station build [REP4-146], Save Minister Marshes.</p>	

Reference	Question to:	Question	Applicant's Comments
3WE5.	EA	<p>Do the Environment Agency (EA) and KCC agree with the findings of the applicant's response, or if not, why not?</p> <p>Sequential and Exception Test</p> <p>In their response to 2WE1, ExQ2 [REP5-192] the EA did not provide a response regarding the sequential and exception test. Could the EA respond set out all reasonings relating to NPS EN1, paragraph 5.8.36?</p>	
3WE6.	EA	<p>Water Framework Directive</p> <p>Provide an update as to whether you believe that the proposed development is capable of meeting the objectives of the Water Framework Directive (WFD) and include a full commentary setting out any remaining concerns with respect to the relevant River Basin Management Plans?</p>	

7. Agriculture and Soils

Table 7.1 Agriculture and soils

Reference	Question to:	Question	Applicant's Comments
3AS1.	Relevant planning authorities Applicant	<p>Reinstatement of field drains</p> <p>Relevant planning authorities: Commitment W10 of the REAC states that field drains will be permanently reinstated or rerouted ensuring their existing function is maintained. Provide comments as to whether this is sufficient to ensure that agricultural land drainage is adequately reinstated, taking into account the provisions of requirement 10 of the dDCO. If this commitment is insufficient, explain what measures are required.</p> <p>Applicant: Provide an update to the response given to Suffolk Energy Action Solutions (SEAS) in [REP3-064] table 29.1 in relation to obtaining details of current land drainage systems.</p>	<p>The response provided in REP3 – 064 is still the applicants position and is in line with the approach taken on similar projects.</p> <p>Firstly, the information is requested from the landowner, this is standard under CDM requirements, along with the request for knowledge of any services on site that may or may not appear on statutory searches such as private water mains or irrigation pipes.</p> <p>If not information or limited information is available with regards to the Services on site the Applicant will use HSG47 safe digging practice to ensure any services are identified in a safe way during construction. For land drainage a qualified consultant will then be employed at the appropriate point to fill and gaps and confirm the information provided by the landowner.</p>
3AS2.	Applicant	<p>Requirement 13 of the dDCO</p> <p>As the requirement in relation to decommissioning excludes substations, clarify whether this has been taken into account in the calculation of best and most versatile (BMV) land that would be reinstated through decommissioning. If it has not been taken into account, update the relevant chapters accordingly.</p>	<p>The submitted assessments, as set out in 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils [PDA-19] and 6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023] were based on the assumption that, should decommissioning be undertaken comprised all land required permanently, including the substations, would be reinstated. This assumption was based on the submitted version of 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project [APP-045] which set out a scenario that “<i>In the event that, at some future date, the authorised development, or part of it, is to be decommissioned ...</i>” and as such made the assumption that there is the possibility that the entire Proposed Project could be decommissioned. In light of the current wording set out in Requirement 13 of the dDCO this will need to be reassessed on the basis that a large proportion of land taken permanently would not be reinstated. This re-assessment will be submitted at Deadline 6 and will also account for any potential change to the assumption made around the ecological mitigation land as discussed in 3AS3.</p>
3AS3.	Applicant	<p>Decommissioning</p> <p>In paragraph 6.9.26 of [PDA-019] it is stated that 11.47ha of BMV land would be reinstated if the project is decommissioned. In paragraph 6.9.27 of [PDA-023] it is stated that 12.21ha of BMV land would be reinstated. These figures are based on the entire above ground development being removed, including the land labelled ‘ecological change’ and the substations. Clarify whether the land labelled ‘ecological change’ includes the landscape and ecological mitigation land, and whether the intention is that the landscape mitigation would be removed? Confirm that this has been taken into consideration in relation to other topics. If not, why not?.</p>	<p>As set out in 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils [PDA-019] and 6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023] the extent of ecological mitigation land identified in the assessment in Suffolk comprises 1.56 ha and in Kent comprises 2.20 ha. These areas comprise design features such as attenuation ponds which are closely (from a spatial perspective) associated with the infrastructure. As such, should decommissioning happen, they may be affected by decommissioning works or may have to be removed and so were included in the potential extent of land which could be reinstated. In the event that, at some future date, the authorised development, or part of it, is to be decommissioned, as set out in 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003], a written scheme of decommissioning would be submitted for approval to the relevant planning authority at least six months prior to any decommissioning works, as set out in Requirement 13 in Schedule 3 of 3.1 Draft Development Consent Order [AS-012]. The decommissioning works would follow National Grid’s processes at that point in time, for assessing and mitigating any environmental impacts, and this would include assessment of and plans for any ecological mitigation areas developed as part of the authorised development. The only other topic for which this could be a consideration is Ecology and Biodiversity; in Application Document 6.2.2.2 Part 2 Suffolk Chapter 2 Ecology and Biodiversity within which it is stated that ‘<i>Decommissioning impacts are</i></p>

Reference	Question to:	Question	Applicant's Comments
			<p>considered largely similar to those identified during the assessment of construction phase impacts... There would be no overall habitat loss as a result of decommissioning because while there would be temporary habitat losses for compounds, the decommissioning would result in an overall increase in habitat by permanently removing above-ground built structures’.</p>
3AS4.	Applicant	<p>Reinstatement of agricultural land over cables In the applicant’s response to ExA question 1AS3 in [REP3-069] it is not clear whether the actual depth of burial may limit reinstatement and achievement of the pre-development agricultural land classification. Provide a more detailed explanation as to whether cable burial depths may affect the ability to achieve best and most versatile land at reinstatement, for example through the inability to reinstate field drainage.</p>	<p>As set out in 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003], depth of burial will be to a minimum of 0.9m to top of protective tile but could be deeper in some instances. Aspects of cable design would be needed to inform any proposals for deeper burial (noting also that deeper burial would require a wider trench (width at ground level) resulting in an increased extent of ground disturbance through both topsoil and subsoil layers). Following completion of the detailed Agricultural Land Classification surveys (as reported in 9.30 Agricultural Land Classification (ALC) Survey Results – Suffolk [REP5-090] and 9.31 Agricultural Land Classification (ALC) Survey Results – Kent [REP5-091]) the data is now available to enable sensitivity testing of the data to assess the potential effects of reducing the soil profile from 120cm (where currently present) to 90cm. An initial reprocessing of the data has been undertaken to look at the effect of this change at point locations. In Suffolk this shows a potential reduction in auger points assessed as Grade 2 and a similar increase in points assessed as Grade 3a. In Kent the data shows a small reduction in points assessed as Grade 1, a reduction in points assessed as Grades 2 and 3a and an increase in points assessed as Grade 3b. All changes would result from an increased droughtiness limitation (i.e. soil depth reduction decreasing the amount of available soil water). More work is required to further assess any potential changes in terms of depth limitations and aerial extent, and this will be used to support the detailed design process and identification of any areas where a cable burial depth of >90cm to top of protective tile would be needed to achieve the reinstatement objectives,</p> <p>Were cable burial interacts with the land drainage in the area, the land drainage will be reinstated appropriately to achieve the effect of the installed drainage system.</p>
3AS5.	Applicant	<p>Minimise impacts on best and most versatile land Following submission of the Agricultural Land Classification survey results for Suffolk [REP5-090] and Kent [REP5-091], provide an update as to how the applicant has sought to minimise the effects on BMV, including how the highest grades of land have been avoided.</p>	<p>The overall extent of the land required has been minimised through the evolution of the design of the Project. The presence of Provisionally graded BMV land formed part of the initial siting and routing assessments as detailed in Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]. The results presented in the Agricultural Land Classification Survey Reports (9.30 Agricultural Land Classification (ALC) Survey Results – Suffolk [REP5-090] and 9.31 Agricultural Land Classification (ALC) Survey Results – Kent [REP5-091]) confirm similar grades to those identified and considered during the initial siting and routing process. As set out in 7.1 (C) Planning Statement [AS-057], the presence of BMV land had to be balanced against other key environmental and engineering constraints and that the benefits provided by the Proposed Project outweigh the resultant loss of BMV agricultural land. Given the similarity in grades there is considered to be no need provide any updates.</p>
3AS6.	Applicant	<p>Aftercare management plan In [REP3-069] in response to ExA question 1AS2, it is stated: “The oSMPs also commit to an Aftercare Management Plan being produced by the Contractor which will detail the aftercare period, monitoring frequency and interventions which may be required depending on issues highlighted by monitoring during construction; the aftercare plans are adaptive, as the measures implemented will be based on the monitoring and assessment of recovery of the soils. A commitment to what the</p>	<p>Further detail on the content of what will be included in the Aftercare Management Plan(s) is contained in the updated Outline Soil Management Plans submitted at Deadline 6 (7.5.10.1 Version B Outline Soil Management Plan – Suffolk and 7.5.10.2 Version B Outline Soil Management Plan – Kent)</p>

Reference	Question to:	Question	Applicant's Comments
		<p>Aftercare Management Plan(s) will include will be submitted for Deadline 4.”</p> <p>Signpost to where this information was provided, or if it was not provided, submit at DL6.</p>	
3AS7.	Relevant planning authorities	<p>Outline Soil management plan (oSMP)</p> <p>Would the oSMP make adequate provision for the reinstatement of land, soil management and handling? If not, explain why not and provide suggested wording for additional provision.</p>	
3AS8.	Relevant planning authorities	<p>Reinstatement to pre-development agricultural land quality</p> <p>Provide comments as to whether the measures included in the oSMP would ensure that land would be restored to its pre-development agricultural grade. If not, provide details and suggested wording of additional measures or commitments.</p>	
3AS9.	Relevant planning authorities	<p>oSMP</p> <p>Would the measures set out in the oSMP section 9. table 9.1 monitoring requirements be sufficient to ensure soil structures would not be detrimentally affected? Does this take into account the sandy soil types in Suffolk and the salt and marshy soil types in Kent?</p>	
3AS10.	Applicant	<p>Coordination with other projects</p> <p>Provide an explanation of the opportunities to minimise the temporary and permanent use of BMV through coordination with other projects, including LionLink.</p>	<p>Co-ordination between the applicant and other projects is ongoing and will seek to minimise the impact on all land, including agricultural land and BMV land. Where shared sites and routes are technically feasible, they will be explored to ensure any impacted area is as small as possible and any land required temporarily will be returned to its previous use as soon as practicable.</p> <p>Application Document 7.10 Coordination Document [APP-363] sets out ways that the permanent use of land has been reduced through coordination. This includes the use of the already consented National Grid substation at Friston as the network connection point (as opposed to alternatives which may have included constructing a new substation between Sizewell and Bramford).</p> <p>Regarding the reduction of land take through coordination with LionLink specifically, the Proposed Project includes a permanent construction, operational and maintenance phase access off the B1121, which could be shared by LionLink subject to the access strategy and design requirement identified by that project. This would therefore provide a coordinated shared access rather than the creation of additional access for LionLink.</p> <p>The Proposed Project includes three possible locations for the construction compounds at the Suffolk converter station site, to allow ongoing coordination with LionLink (which is at a significantly less advanced stage of its pre-construction phase than the Proposed Project). This, as well as the assumed proximity of other elements of the two projects (albeit recognising the earlier stage of the LionLink design) presents opportunities for certain construction-phase temporary works to be shared wholly or partially between projects during overlapping construction periods, and/or for certain construction phase temporary works left in-situ by the Proposed Project for the future delivery of Lion Link. It should be noted that the feasibility of these approaches would be subject to various delivery-stage considerations but offer opportunities for reducing construction-phase land take.</p>

Reference	Question to:	Question	Applicant's Comments
3AS11.	Applicant	<p>Inter-project cumulative effects</p> <p>Update tables 13.30 and 13.40 of [APP-073] to take into consideration other planned projects such as LionLink and the Suffolk Water Recycling, Transfer and Storage Project.</p>	<p>The cumulative assessment for LionLink for agriculture and soils has been updated and is detailed in Document 9.108.1: Applicant's Response to January Hearing Action Points (CAH1 and ISH2) - Deadline 5 – Appendices [REP5-127].</p> <p>The Suffolk Water Recycling, Transfer and Storage Project is still at the routing and siting stage with multiple pipeline route options and overly wide corridors which will be narrowed down as the design progresses. The tables cited by the ExA (tables 13.30 and 13.40) are those covering Ecology and Biodiversity. It is not considered necessary to update Tables 13.33 or 13.43 which report the Agriculture and Soils effects because even if a route option was selected that was within the ZOI for Agriculture and Soils, it is only the pipeline element that would need to be considered and it is expected that land will be returned to its previous BMV status on completion of the construction of the Suffolk Water Recycling, Transfer and Storage Project meaning there would be no permanent loss of BMV.</p>
3AS12.	Applicant	<p>Link boxes and link pillars</p> <p>Provide clarification as to whether the effects of these elements have been taken into consideration in the assessment of the loss of BMV land as there is no reference to them in the Agriculture and Soils chapters in the ES [PDA-019] and [PDA-023]. If not, why not.</p>	<p>The final location of the link boxes and link pillars will not be known until the final cable design is complete, however they will be located at field boundaries where possible to minimise the impact on any land parcels.</p> <p>It should be noted that link boxes and link pillars are only required on the AC cable route between Friston Substation and Saxmundham converter station. DC cable joints do not require link boxes or link pillars. There is no AC cable in Kent, and the DC cable joints will also not require link boxes or link pillars.</p>
3AS13.	Applicant	<p>Micro-siting</p> <p>In terms of micro-siting, provide an explanation of how areas of higher quality land have been avoided in preference of poor quality, in the absence of detailed surveys?</p>	<p>The overall extent of the land required has been minimised through the evolution of the design of the Project. The presence of Provisionally graded BMV land formed part of the initial siting and routing assessments as detailed in Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]. The results presented in the Agricultural Land Classification Survey Reports (9.30 Agricultural Land Classification (ALC) Survey Results – Suffolk [REP5-090] and 9.31 Agricultural Land Classification (ALC) Survey Results – Kent [REP5-091]) confirm similar grades to those identified and considered during the initial siting and routing process.</p>
3AS14.	Applicant	<p>Economic and other benefits of the land</p> <p>Explain how the economic and other benefits of the land have been taken into account, having regard to NPS EN-1 paragraph 5.11.34.</p>	<p>The extent of BMV land within the Order Limits is reported in the Agricultural Land Classification Survey Reports [REP5-090 and REP5-01]. An assessment of the likely impacts on this BMV land is presented in the Agriculture and Soils Chapters [PDA-019 and PDA-023] and mitigation measures have been identified within Application Document 9.83 (b) Outline Code of Construction Practice [REP4-232] to minimise the effects. The overall extent of the land required has been minimised through the evolution of the design of the Project. The presence of Provisionally graded BMV land, along with all other aspects of the land which might give rise to 'economic and other' benefits, formed part of the initial siting and routing assessments as detailed in Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]; as such the economic and other benefits of the land were accounted for as required by NPS EN-1 paragraph 5.11.34 .</p> <p>As set out in Application Document 6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023] and 6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture and Soils [PDA-024], some aspect relating to the economic benefits from agricultural land were scoped out in agreement with PINS (for example, both temporary and permanent removal of land from agricultural production) on the basis that all land required temporarily would be reinstated, the footprint of the permanent infrastructure is limited and impacts on agricultural operations will be dealt with through compensation agreements which lie outside of the ES process. Other benefits from land, for example in relation to biodiversity, landscape and water have been dealt with in the respective chapters where the land and associated soils play a role in supporting those aspects of the natural environment.</p>

8. Traffic and Transport

Table 8.1 Traffic and transport

Reference	Question to:	Question	Applicant's Comments
3TT1.	Applicant	<p>Timing of peak traffic flows</p> <p>The Supplement to the Preliminary Cumulative Highway Impact Assessment in Suffolk [REP4-099] shows the total cumulative traffic flows, both including and excluding the proposed development construction traffic. It uses a 2028 baseline for heavy goods vehicles (HGVs) and for total vehicles for various road links and road junctions. However, whilst the overall peak of traffic may be in 2028, this does not mean that 2028 would be the busiest time for traffic on all the listed road links and junctions, due to different phases of development for example. Therefore, submit an additional set of tables in the form of those submitted with [REP4-099] highlighting only those links and junctions which would have their peak levels of cumulative traffic (with and without the proposed development) in years other than 2028.</p>	<p>This request is acknowledged by the Applicant, which was also discussed during Issue Specific Hearing 3 (ISH3). The Applicant has updated Application Document 9.105 (A) Supplement to the Preliminary Cumulative Highway Impact Assessment in Suffolk [REP4-099] and resubmitted this at Deadline 6, to include the following additional information as requested:</p> <ul style="list-style-type: none"> Appendix A Total Cumulative Traffic Flows Excluding the Suffolk Onshore Scheme – these Tables have been updated to identify the main cumulative schemes which are expected to contribute to the forecast cumulative traffic flows for each part of the highway network, and the forecast year(s) when peak cumulative traffic flows are expected to arise, <u>excluding</u> the Suffolk Onshore Scheme. This includes 2028 where applicable, as well as any years before or after 2028, depending on the timing of the peak construction traffic forecasts of the various cumulative schemes. Appendix B Total Cumulative Traffic Flows Including the Suffolk Onshore Scheme (Peak Construction) – these Tables have been updated to identify the forecast peak year(s) across the highway network as a result of construction traffic associated with the Suffolk Onshore Scheme, acknowledging that whilst the overall construction peak will be 2028, this will vary by access point/ construction activity and therefore across the network. The overall peak cumulative year(s) <u>including</u> the Suffolk Onshore Scheme have then been identified and compared back to the above, to determine whether the peak cumulative year is expected to change for different parts of the highway network, following the inclusion of peak construction traffic associated with the Suffolk Onshore Scheme.
3TT2.	SCC Applicant	<p>A12 enhancements</p> <p>From our March unaccompanied site inspections([EV1-022] and [EV1-023]), the ExA noted the works currently being undertaken along the A12, particularly the junctions at Friday Street A1094 and Yoxford B1122. Provide details of these works and any others along the A12 within the area of the proposed development and set out how they could benefit construction phase traffic for the proposed development, particularly in regard to driver delay.</p>	<p>The Applicant held a further Traffic and Transport focussed meeting with SCC Highways on 30 March 2026 when SCC confirmed that following the works, Friday Street (A12/ A1094 junction) had been opened that morning, and that Yoxford (A12/ B1122 junction) would be opened the day after on 31 March 2026. Therefore, whilst there will be ongoing landscaping works at these junctions into the summer of 2026, there will be no overlap between these specific junction works and the Suffolk Onshore Scheme. The improvements will increase the Baseline capacity of the highway network, reducing existing levels of Driver Delay and providing a benefit to existing road users, as well as construction traffic associated with the Suffolk Onshore Scheme, particularly at Friday Street (A12/ A1094 junction) which is one of the principal access routes from the A12.</p> <p>The Applicant is aware that these roundabouts are associated with wider works being undertaken by Sizewell C (SZC), namely the Two Village Bypass and the Sizewell Link Road. The Two Village Bypass will largely be constructed offline with the exception of an additional new roundabout to be built on the A12 at the junction with Tinker Brook. These works are expected to be completed in 2026 and are therefore not anticipated to impact construction traffic associated with the Suffolk Onshore Scheme. The Sizewell Link Road is expected to be completed in 2027 and will be a 6.5km new road bypassing the local villages of Theberton and Middleton Moor, with new junctions at each end including a new roundabout on the A12. The Sizewell Link Road will be built largely offline to limit the impact on A12 traffic. The Proposed Project's Transport Co-ordinator (secured within Application Document 7.5.1.1 (D) Construction Traffic Management and Travel Plan Suffolk [REP5-064]) will liaise with SZC on their programme so that the contractor is aware of any road closures of the A12 during final connection works of this roundabout. The additional junctions associated with the Sizewell Link Road are on the</p>

Reference	Question to:	Question	Applicant's Comments
			<p>B1122 which is proposed as an Abnormal Indivisible Load (AIL) access route for the Suffolk Onshore Scheme. These AIL movements (which will be limited in number) will be planned to align with SZC's programme, noting that the majority of these would not occur until after the 2027 completion date.</p> <p>The Applicant is also aware of SCC's A12 Major Road Network (MRN) scheme on the A12 to south of study area. Whilst the A12 MRN scheme will partially overlap with the construction phase of the Suffolk Onshore Scheme, it is understood that these works will be planned by SCC and contractors to minimise A12 disruption e.g. overnight/ weekend works. The Proposed Project's Transport Co-ordinator will liaise with SCC and other developers in the area to understand when the works are being carried out and to manage construction traffic accordingly.</p> <p>Again, the above highway improvements will increase the Baseline capacity of the highway network, reducing existing levels of Driver Delay and providing a benefit to existing road users, as well as construction traffic associated with the Suffolk Onshore Scheme.</p>
3TT3.	SCC KCC	<p>Cumulative assessments</p> <p>With the submission of the junction modelling for Kent [REP5-029] and the submission of the junction modelling for Suffolk due at DL6, is it the Council's view that there is sufficient information and a robust cumulative assessment of highway impacts for the construction phase of the proposed development? If not, detail what still needs to be submitted from the applicant to provide this robustness.</p>	
3TT4.	SCC KCC	<p>Junction modelling response</p> <p>Provide a response to the junction modelling undertaken by the applicant, particularly with regards to what the results suggest about driver delay and highway safety (see [REP5-029] for Kent). Also confirm whether there was agreement on the junctions modelled.</p>	
3TT5.	SCC KCC	<p>Significance of highway impacts</p> <p>Given all the information and assessment submitted to date from the applicant, as highway authorities would you consider that the highway impacts from the proposed development, both alone and in cumulatively with other projects, would be significant in any way? If so, explain how and why, along with any mitigation considered necessary to address significant impacts and how this could be secured.</p>	
3TT6.	Applicant	<p>Monitoring of HGV numbers</p> <p>Outline Construction Traffic Management Plan (oCTMP) [REP5-064] section 7.7 explains the use of monitoring of HGVs by the Transport Co-Ordinator. For clarity, does this include tracking of HGV numbers using certain routes?</p> <p>If greater numbers of HGVs used particular road links and junctions than anticipated in the ES assessed worst-case scenario, what action would be taken and</p>	<p>To confirm, the routing of HGVs will be monitored using Global Positioning System (GPS) data, to check that HGV drivers are complying with the routes within Suffolk as shown on the HGV Routing Plan within Application Document 6.4.2.7 ES Figures Suffolk Traffic and Transport [APP-234], as well as the routes within Kent as shown on the HGV Routing Plan within Application Document 6.4.3.7 ES Figures Kent Traffic and Transport [APP-266]. HGV arrivals and departures will also be monitored at each access point, to record the timing and number of HGVs associated with the Proposed Project each day. The number of vehicles using junctions that are subject to caps in the oCTMTP will be recorded and monitored to ensure these caps are not exceeded.</p> <p>The Transport Co-ordinator will report and share the results of the above with National Grid, the Local Highway and Planning Authorities (namely, SCC and ESC in Suffolk, as well as KCC, TDC and DDC in Kent) to identify any issues which need to be resolved with regard to compliance with the oCTMTP and</p>

Reference	Question to:	Question	Applicant's Comments
		would it involve the County Councils as local highway authorities?	<p>any additional measures to be implemented to prevent these from arising again, for review and agreement with SCC and KCC.</p> <p>The above is secured as part of Application Document 7.5.1.1 Construction Traffic Management and Travel Plan – Suffolk and Application Document 7.5.1.2 Construction Traffic Management and Travel Plan – Kent, which have both been updated at Deadline 6 to include further measures and commitments, following further consultation with key stakeholders, including SCC Highways and Aldeburgh Town Council in Suffolk, and KCC Highways in Kent.</p> <p>For avoidance of doubt, the Applicant does <i>not</i> intend to monitor vehicle numbers using different accesses and routes for the purpose of controlling those movements except where required to monitor compliance with routes and caps specified in the oCTMTP as above. This is because doing so would be grossly disproportionate given the level of traffic, the lack of significant effects and the cost and practical implications of undertaking this monitoring and management.</p>
3TT7.	KCC SCC	<p>Capping of HGV numbers</p> <p>If capping of construction vehicles were considered necessary, would this be for HGVs or all forms of construction traffic? If considered necessary, which road links and/or road junctions should such caps be applied to?</p> <p>Finally, if the Highway Authorities considered capping of construction traffic as necessary to be secured within the DCO, provide suggested drafting for a requirement which would require capping and also sets out the process if the vehicle numbers exceeded these caps.</p>	
3TT8.	Applicant	<p>Core hours impacts on peak traffic numbers</p> <p>What would be the implications of more restrictive working hours on traffic level peak times, such as if core hours were restricted to Monday to Friday and then Saturday mornings?</p>	<p>The potential implications of more restrictive working hours on traffic level peak times would be to displace construction traffic to other hours of the day, or to other parts of the construction programme. This could therefore increase potential impacts at other times of the day, as well as potentially increase peak construction traffic levels if works are restricted and need to be completed in shorter working window. Alternatively, this could delay construction of this Critical National Priority infrastructure project and elongate the construction programme, by reducing the amount of works completed on a day-by-day basis and by displacing construction traffic to other parts of the programme. In summary, this would not be supported by the Applicant as these disadvantages would outweigh any benefits of reducing construction traffic levels at peak times. The working hours are already designed to minimise additional construction worker vehicle trips on the surrounding highway network at the busiest times, during the network peak hours.</p>
3TT9.	SCC ESC Saxmundham Town Council	<p>HGV cap for B1121 and B1119 junction</p> <p>Within the submitted CTMP [REP5-064] the applicant states that there would be daily cap of ten HGV movements imposed at the B1121 Main Road/ B1119 Church Street signalised junction within Saxmundham, to minimise potential impacts of construction traffic at this location (associated with works at S-BM12). Respond to this commitment and state whether this would overcome concerns with regards to traffic at this junction?</p>	
3TT10.	Network Rail	<p>Rail works process</p> <p>Typically, how long would it take for Network Rail to agree to applications for works like those suggested as</p>	

Reference	Question to:	Question	Applicant's Comments
		possible at Benhall Railway Bridge? Is it possible that the request could be denied?	
3TT11.	Applicant	<p>Layout plan for Benhall Railway Bridge work options</p> <p>Provide an indicative layout of the proposed Benhall Railway Bridge works within order limits for Options 1 and 2, which should include the layout of a 'mini-bridge' and its base, works compounds, welfare areas and storage areas.</p>	Indicative drawings showing the working areas for option 1 and option 2 at the Benhall Rail Bridge have been provided in Appendix E to this response document.

9. Air Quality

Table 9.1 Air quality

Reference	Question to:	Question	Applicant's Comments								
3AQ1.	Applicant	<p>Cost of SF₆-free assets</p> <p>Provide evidence to demonstrate the 60% uplift in cost of SF₆-free equipment compared with SF₆-containing assets referenced in your response to 2AQ1 [REP5-135].</p>	<p>The Applicant is unable to provide any quotations or manufacturers' pricing due to commercial sensitivities and confidentiality agreements, but has provided the below information to provide some further detail on that provided in 2AQ1. The below costs are for the purchase of the items only and do not include installation costs.</p> <p>The shift from SF₆ to non-SF₆ technologies has led to notable increases in the costs associated with high voltage switchgear, particularly for Gas Insulated equipment. This rise in costs is largely attributed to various engineering modifications, including the creation of new modules for switching operations that impact essential components like circuit breakers. Additionally, the need to accommodate higher operational pressures has necessitated enhancements to enclosures, ensuring they can withstand these elevated conditions. Other factors contributing to cost increases include the introduction of new bursting discs, gas connections, and absorber solutions, as well as advanced corrosion protection painting systems.</p> <p>The costs associated with each substation will differ depending on the equipment manufacturer and the specific engineering solutions tailored to the site,</p> <p>However, a general evaluation reveals the cost increases related to a typical breaker configuration as shown below:</p> <table border="1" data-bbox="1430 1262 2674 1472"> <thead> <tr> <th>Gas Insulated switchgear module</th> <th>Procured cost per bay SF₆ (£k)</th> <th>Procured cost per bay non-SF₆ (£k)</th> <th>Percentage increase</th> </tr> </thead> <tbody> <tr> <td>GIS Bus-section Bay with CB per busbar</td> <td>£900</td> <td>£1,500</td> <td>60%</td> </tr> </tbody> </table>	Gas Insulated switchgear module	Procured cost per bay SF ₆ (£k)	Procured cost per bay non-SF ₆ (£k)	Percentage increase	GIS Bus-section Bay with CB per busbar	£900	£1,500	60%
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GIS Bus-section Bay with CB per busbar	£900	£1,500	60%								
3AQ2.	SEAS ESC	<p>Model adjustment factors</p> <p>SEAS: In [RR-5210] and [REP2-121] SEAS made comments on the use of an adjustment factor of 3.79. In response, the applicant has explained why it considers this adjustment factor is appropriate. Does SEAS remain concerned regarding the adjustment factor and if so, can it explain what additional sensitivity testing or verification it considers to be necessary and why?</p> <p>ESC: May wish to comment.</p>									
3AQ3.	Applicant ESC	<p>Modelling parameters</p>	<p>Surface roughness values differ between Application Document 9.123.1: Applicant's Responses to Second Written Questions - Appendices [REP5-186] and Application Document 6.3.3.8.B ES Appendix 3.8.B Air Quality Modelling Methodology [APP-186] because the two assessments relate</p>								

Reference	Question to:	Question	Applicant's Comments																				
TDC		<p>Explain why there is a difference in approach to surface roughness parameters and NO_x to NO₂ conversion in the updated appendix B technical note [REP5-136] compared with the original modelling report [APP-186]?</p> <p>The ExA notes that surface roughness parameters have changed from 0.5 to 0.3 m and the updated technical note uses a NO_x to NO₂ conversion rate of 70%, whereas the original assessment applied the Defra calculator. ESC and TDC may wish to comment.</p>	<p>to different environments. The operational back-up generator assessment (Application Document 9.123.1: Applicant's Responses to Second Written Questions - Appendices [REP5-186]) covers the proposed Minster Substation and Converter Station area, which is predominantly agricultural. Within the model ADMS, agricultural land corresponds to surface roughness values of up to 0.3 m, so a value of 0.3 m was selected as the most appropriate representation of local conditions. The table below presents the surface values that are available for selection in the ADMS model.</p> <table border="1"> <thead> <tr> <th>Land Use</th> <th>Surface Roughness (m)</th> </tr> </thead> <tbody> <tr> <td>Large urban areas</td> <td>1.5</td> </tr> <tr> <td>Cities, woodlands</td> <td>1</td> </tr> <tr> <td>Parkland, open suburbia</td> <td>0.5</td> </tr> <tr> <td>Agricultural areas (max)</td> <td>0.3</td> </tr> <tr> <td>Agricultural areas (min)</td> <td>0.2</td> </tr> <tr> <td>Root crops</td> <td>0.1</td> </tr> <tr> <td>Open grassland</td> <td>0.02</td> </tr> <tr> <td>Short grass</td> <td>0.005</td> </tr> <tr> <td>Sea</td> <td>0.0001</td> </tr> </tbody> </table> <p>The construction traffic assessment (Application Document 6.3.3.8.B ES Appendix 3.8.B Air Quality Modelling Methodology [APP-186]) covers Richborough Way and Sandwich Road, where the surroundings include buildings, trees and transport infrastructure. In the model ADMS, these characteristics align with a surface roughness value of 0.5 m, which is typical of parkland or open suburban environments. The difference therefore reflects the differing physical characteristics of the two modelled areas.</p> <p>The approaches to NO_x to NO₂ conversion also differ due to the sources that are being modelled and the guidance that informs the conversion from modelled NO_x to NO₂ concentrations. The construction traffic assessment (Application Document 6.3.3.8.B ES Appendix 3.8.B Air Quality Modelling Methodology [APP-186]) requires the modelling of road traffic emissions, and the modelled NO_x is converted to NO₂ in accordance with Defra's Local Air Quality Management Technical Guidance (TG22) utilising the Defra NO_x to NO₂ calculator.</p> <p>The operational back-up generator assessment (Application Document 9.123.1: Applicant's Responses to Second Written Questions - Appendices [REP5-186]) concerns modelled emissions from diesel back-up generators, which are point sources. For these sources, the conversion of NO_x to NO₂ is based on the appropriate advice which is within the Environment Agency's <i>Guidance on how to do detailed air quality modelling for specified generators</i>. This guidance advises applying a 70% NO_x to NO₂ conversion ratio when comparing against long-term averaging standards (such as annual means).</p> <p>The assessment is therefore consistent with the relevant guidance for the source that is being modelled.</p>	Land Use	Surface Roughness (m)	Large urban areas	1.5	Cities, woodlands	1	Parkland, open suburbia	0.5	Agricultural areas (max)	0.3	Agricultural areas (min)	0.2	Root crops	0.1	Open grassland	0.02	Short grass	0.005	Sea	0.0001
Land Use	Surface Roughness (m)																						
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Sea	0.0001																						

3AQ4.	ESC TDC	Outline Air Quality Management Plan (oAQMP) and other air quality control measures (REAC and oCEMP)	
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Reference	Question to:	Question	Applicant's Comments
	Royal Society for the Protection of Birds (RSPB) NE	Comment on whether any further amendments to the oAQMP [REP5-074], [REP5-076] or other air quality controls are required and propose alternative drafting where relevant.	

10. Noise and Vibration

Table 10.1 Noise and vibration

Reference	Question to:	Question	Applicant's Comments
3NV1.	Applicant	<p>Whitearch Park Residential Park Homes</p> <p>Respond to SCC comments [REP3A-031] that residential park homes represent a particularly vulnerable receptor due to likely lower acoustic insulation and therefore whether there remains potential for adverse effects on the residential park from works at Benhall Bridge.</p>	<p>The Applicant responded to SCC's REP3A-031 within Application Document 9.91 Applicant's Comments on Change Request (CR1) Relevant and Written Representations [REP4-089].</p> <p>Residential park homes are residential receptors and their sensitivity are classed accordingly as per the methodology set out within Application Document 6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise & Vibration [AS-109]. As stated in Application Document 976.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055], whilst the proposed Benhall Railway Bridge works would bring temporary construction works close to noise sensitive receptors on Shotts Meadow and Whitearch Park Residential Park Homes; however, the distance is sufficient that likely significant adverse effects are not expected during construction works, particularly with the implementation of best practicable means to reduce effects. Mitigation will be determined following detailed construction noise assessment committed to via commitment NV03 within REAC [REP5-115] and will be in accordance with the Application Document 7.5.8.1 (C) Outline Construction Noise and Vibration Management Plan – Suffolk submitted at Deadline 6. [</p>
3NV2.	ESC TDC	<p>Night time working controls for arrivals and departures from site</p> <p>The applicant's response to 2NV2 [REP5-135] suggests that day time controls in the REAC [REP5-115] or the outline Construction Noise and Vibration Management Plan (oCNVMP) [AS-131] [AS-133] are sufficient to control arrival/departure noise for 24 hour working. Notwithstanding the councils' position on working hours, are the councils satisfied that the proposed control measures would otherwise be sufficient to control night time noise? If not, suggest drafting for any other controls that might be required.</p>	
3NV3.	Applicant	<p>Friston substation – clarification regarding transformers</p> <p>Paragraph 1.2.1 of the Friston Substation and OHL Operational Noise Information (Informative) [AS-121] states "<i>There would be no sources of noise during the normal operation of the proposed Friston Substation because there are no transformers proposed, which are typically the only source of noise at such sites. There would, however, be a backup generator, and gas insulated switchgear (GIS).</i>"</p> <p>The design and layout plan figure DCO/S/DE/SS/1206 (GIS terminal option) [APP-037] includes a capacitive voltage transformer. Explain why this would not act as a source of operational noise and, if necessary, update</p>	<p>Friston substation would include inductive and capacitive voltage transformers (CVT). These are not the same as power transformers (of which none are proposed at Friston substation) and are quiet during operation.</p> <p>The main part of the CVT is a stack of capacitors connected between the line terminal and earth; these are housed inside the hollow main insulators. Capacitors do not rely on electromagnetic coupling and are silent in operation. A connection is made close to the bottom of the capacitor stack which is taken to a small low-power transformer housed in a steel box at the base of the unit, the secondary of this transformer then feeds the measurement circuits. The transformer in the box is small and very low power, so is virtually silent in operation. Therefore the conclusions of the Environmental Statement remain valid and there is no need to update the noise and vibration chapter [AS-109] as a result.</p>

Reference	Question to:	Question	Applicant's Comments
		the noise and vibration chapter to reflect this potential source.	
3NV4.	Applicant ESC TDC	oCEMP [REP5-068] measures NV04 and NV05 Can the applicant include reference to the British standard methodology (or its successor) that would be followed in these measures and if not, why not? ESC and TDC may wish to comment.	Assessment of noise and vibration from maintenance activities (principally substantial activities, such as reconductoring, or transformer replacement) and from decommissioning activities would be assessed in accordance with BS 5228:2009+A1:2024 Code of practice for noise and vibration control on construction and open sites – Part 1: Noise, and Part 2: Vibration (or any successors). It is expected that routine maintenance activities would not generate high levels of noise or vibration and would not require assessment. Measures NV04 and NV05 have been updated accordingly within Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) and Application Document 7.5.3 (D) Outline Onshore Construction Environmental Management Plan submitted at Deadline 6.
3NV5.	ESC TDC RSPB NE	Outline Construction Noise and Vibration Management Plan and other noise control measures (REAC and oCEMP) Comment on whether any further amendments to the oCNVMP or other noise controls are required and propose alternative drafting where relevant.	

11. Socio-economics, Recreation and Tourism

Table 11.1 Socio-economics, recreation and tourism

Reference	Question to:	Question	Applicant's Comments
3SERT1.	Applicant	<p>Skills and Employment Plan</p> <p>Respond to SCC's suggested DCO requirement for a Skills and Employment Plan, as set out in [REP5-204]. Provide alternative wording if you do not agree to this.</p>	<p>The Applicant has submitted a final Skills, Supply Chain and Employment Plan (SSCEP) at Deadline 6 to accompany the Application for a Development Consent Order (DCO) for the Sea Link project.</p> <p>The SSCEP was informed by consultation with relevant local authorities, including Kent County Council, Dover District Council, Thanet District Council, Suffolk County Council and East Suffolk Council. Consultation meetings were held on 20 and 23 March, in advance of which the Applicant circulated a draft SSCEP. At each meeting, the Applicant presented an overview of the draft SSCEP, followed by discussion and initial feedback. Local authority participants were subsequently invited to provide written comments. Initial verbal feedback and written comments were considered as part of the finalisation of the SSCEP.</p> <p>Need for Mitigation of Cumulative Impacts</p> <p>As set out in the SSCEP Section 1.1, the purpose of the final SSCEP is to maximise the economic benefits of the Proposed Project for the local community, rather than to mitigate adverse effects. Application Document 6.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism and Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-Economics Recreation and Tourism assessed that the Proposed Project is not expected to give rise to significant adverse socio-economic effects. The ES identifies the residual socio-economic effects of employment and GVA as beneficial, temporary, and non-significant in both Suffolk and Kent. Consistent with SSCEP Section 1.2, the Applicant maintains that no mitigation is required in relation to skills, employment or supply chain matters.</p> <p>Skills and Employment Plan as Cumulative Labour-Market Mitigation</p> <p>As above, the Applicant maintains that no mitigation is required in relation to skills, employment or supply chain matters. Specifically, the Applicant does not agree that the SSCEP is required to mitigate cumulative skilled-labour shortages, workforce displacement or labour competition.</p> <p>The scale and duration of employment associated with the Proposed Project is modest. The Proposed Project is estimated to support around 35 net additional jobs per year within a 60-minute drive time of the construction compounds, 20 in Suffolk and 15 in Kent, including 23 net direct roles (13 in Suffolk and 10 in Kent) and 12 indirect roles (7 in Suffolk and 6 in Kent) (SSCEP Section 2.3; Table 2.1). The ES socio-economic assessments (Application Document 6.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism and Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-Economics Recreation and Tourism) identify the residual socio-economic effects of employment and GVA as beneficial, temporary, and non-significant in both Suffolk and Kent.</p> <p>While SSCEP Section 3.7 recognises the presence of other NSIPs, the Sea Link project has a significantly smaller workforce profile compared with major schemes such as Sizewell C and requires a high proportion of specialist roles sourced through established national and international supply chains (SSCEP Sections 4.3–4.4). The potential for local labour displacement or cumulative labour-market distortion is therefore very limited in the context of the Suffolk labour market.</p> <p>As detailed within Section 7.3 of the SSCEP, communication with other NSIPs will be made where necessary to minimise any potential issues that may arise from competition for workers from other projects in the area at the same time.</p> <p>Education and Training Capacity</p>

Reference	Question to:	Question	Applicant's Comments
			<p>The Applicant does not consider that the Proposed Project will place material cumulative pressure on Further Education, Higher Education or private training providers.</p> <p>The SSCEP identifies an established and diverse skills and training ecosystem across Suffolk and Kent (SSCEP Section 4.2) and adopts an approach based on collaboration and alignment with existing provision, policy and National Grid's established programmes (SSCEP Section 6.2). No new training demand of a scale requiring mitigation is identified.</p> <p>The SSCEP nevertheless sets out skills actions (see SSCEP Section 6.2 and Section 6.5 Table 6.1, Actions 1–6) focused on benefit-maximisation, including:</p> <ul style="list-style-type: none"> • Signposting local authorities, colleges and schools to National Grid's Pathways to Progress programme and STEM outreach conducted by National Grid. • Providing Tier 1 contractors with information on local apprenticeship and vocational training providers. • Sharing details of National Grid's existing apprenticeship programmes. • Supporting suppliers in identifying suitable apprenticeship opportunities. • Making use of local platforms in Kent and Suffolk to promote apprenticeships to local people and local employers. • Where relevant and beneficial, engagement with local providers will take place in advance of construction (during 2026–2027). <p>In addition, the Applicant (under the employment theme- see SSCEP Section 6.3 and Section 6.5, Table 6.1, Action 11) will signpost contractors to local training and employability services (e.g., FE colleges, Apprenticeships Suffolk, Kent Training & Apprenticeships) to support inclusive and local recruitment pathways.</p> <p>Supply Chain Competition and SME Displacement</p> <p>The Applicant does not agree that the Proposed Project will give rise to significant cumulative effects relating to contractor competition, inflationary pressure or SME displacement.</p> <p>As set out in SSCEP Sections 3.3 and 4.5, core project components are procured through framework-based national and international supply chains. Compared with other NSIPs, the Sea Link project has a modest procurement footprint (SSCEP Section 4.7).</p> <p>The SSCEP appropriately focuses on maximising opportunities through proportionate supply-chain engagement actions (SSCEP Section 6.4), which includes:</p> <ul style="list-style-type: none"> • Signposting local suppliers to opportunities using existing regional partners, including Kent and Suffolk Chambers of Commerce. • Holding Meet the Buyer style engagement, including engagement with Chambers of Commerce organisations, where proportionate and aligned with Proposed Project procurement timelines. • Directing contractors to National Grid's Supplier Code of Conduct, sustainable procurement standards, and other existing framework requirements. • Encouraging contractors to consider local and diverse suppliers when procuring goods and services, consistent with contractual and social value expectations. <p>Workforce Information, Monitoring and Governance</p> <p>The SSCEP summarises likely workforce demand (Section 2.3 Tables 2.1 and Section 2.5 Table 2.3) and sets out the approach to engagement within Section 7.3.</p> <p>Under SSCEP Section 7.3, engagement with local authorities will include annual strategic meetings and operational updates to share workforce and recruitment information as it becomes available. Ongoing engagement will support workforce planning, skills development and local supply chain access, including Meet the Buyer activity and early discussions with training providers where appropriate. Regular internal coordination, including with the Community Benefits Scheme team, will support</p>

Reference	Question to:	Question	Applicant's Comments
			<p>consistent messaging and complementary activity. The Applicant will focus on delivery of agreed actions using existing project and supplier reporting, without fixed numerical targets (SSCEP Section 6).</p> <p>Governance arrangements are proportionate to the scale of the project and are delivered through existing National Grid structures, as set out in Section 7.2 of the SSCEP.</p> <p>At this stage in the Proposed Project's procurement, detailed information on workforce modelling is not available, as is typically the case with NSIPs at pre-consent stage. However, as set out within Section 7.2 of the SSCEP regular touchpoints will be used to share workforce forecasts, engagement plans and local intelligence, helping ensure that information provided to councils, providers and community partners is coherent and aligned.</p> <p>DCO Securing Mechanism</p> <p>The final SSCEP is secured through Requirement 5 of the draft DCO, as confirmed in SSCEP Sections 1.1 and 7. Requirement 5 requires all works, including pre-commencement operations, to be carried out in accordance with the approved plans and strategies listed under Requirement 5(2), unless otherwise agreed with the relevant planning authority. This provides an appropriate and enforceable mechanism. A bespoke requirement is not justified.</p> <p>The final SSCEP is designed to proactively maximise skills, employment and supply chain opportunities arising from the Proposed Project, in a manner proportionate to its scale, duration and workforce profile. The Plan focuses primarily on construction phase activity associated with the Kent and Suffolk Onshore Schemes, while also capturing relevant opportunities linked to offshore works in respect of supply chain participation. The plan is grounded in, and aligned with, the socio-economic study areas defined in the Environmental Statement.</p> <p>The SSCEP establishes a clear, structured approach to supporting local benefit realisation through the use of established National Grid programmes, existing contractual mechanisms, and the well-developed regional skills, employment and business support infrastructure across Suffolk and Kent. It brings together evidence on workforce demand, local skills assets and supply chain strengths.</p> <p>The Plan identifies a suite of practical and deliverable actions centred on engagement, coordination, signposting and information sharing. These actions are intended to enable local authorities, education and training providers, employability services and local businesses to engage effectively with the project where opportunities arise, using existing platforms and partnerships. The actions of the Plan will be secured through Requirement 5 of the draft DCO. The SSCEP provides an appropriate and enforceable mechanism to ensure these actions are implemented post-consent, while remaining flexible and responsive to evolving project needs and local circumstances.</p>
3SERT2.	<p>Applicant KCC SCC East Suffolk Council Thanet District Council Dover District Council</p>	<p>Tourism monitoring and contributions SCC [REP5-185] has stated that the applicant should commit to monitor effects on accommodation capacity and tourism in coordination with cumulative developments. SCC also suggests a proportionate contribution to foster tourism, similar to the fund created by Sizewell C, if further embedded mitigation is not feasible.</p> <p>Applicant: The ExA requires that the applicant commit within the DCO to monitoring of tourism impacts (including the availability of accommodation) through the construction and into the operational phases. Could this include a tourism fund, if the monitoring demonstrates significant tourism impacts? If this is not included, provide reasons why not.</p>	<p>The Applicant retains the position that there will not be significant adverse effects on socio-economics and tourism resulting either from the Proposed Project alone or cumulatively. Whilst Interested Parties have asserted there will be significant adverse effects arising from Sea Link individually and cumulatively, no robust evidence has been presented that this will be the case; it is not sufficient for a party to simply assert that there will be greater impacts without a robust justification and evidence.</p> <p>Paragraph 5.13.8 of NPS EN-1 states that: 'The Secretary of State should consider whether mitigation measures are necessary to mitigate any adverse socio-economic impacts of the development'. In the absence of significant adverse socio-economic effects, we do not consider that this paragraph applies.</p> <p>However, as in all areas of the development, the Applicant has considered whether further mitigation or enhancement would nonetheless be beneficial and can be incorporated and it is on this basis that a commitment to monitor effects on accommodation capacity within Suffolk coastal areas has been offered to provide reassurance that the perceived level of impact will not occur. This commitment (SE05) was updated following a meeting with East Suffolk Council (ESC), Suffolk County Council (SCC), Local Destination Management Organisation (DMO) and the Local Visitor Economy Partnership (LVEP) on Wednesday 1st April with up-to-date wording included in the REAC as part of the Applicant's Deadline 6 submission.</p>

Reference	Question to:	Question	Applicant's Comments
		<p>All County and District Councils: The ExA require that the Councils work together to provide wording for a requirement for the applicant to monitor the effects of the proposed development on tourism and accommodation, with adaptive management/mitigation if required.</p>	<p>In addition, the Applicant via SE04 is committing to further liaison with local planning authorities and tourism organisations during construction to discuss how potential impacts on tourism could be minimised and benefits be maximised. Liaison, where practical, will be ongoing through existing working groups which were established for the Sizewell C project. The SE04 commitment was updated following the meeting on Wednesday 1st April with up-to-date wording included in the REAC as part of the Applicant's Deadline 6 submission.</p> <p>The Applicant does not consider it necessary, justified or proportionate to commit to broader monitoring of tourism impacts – both because it is unnecessary in light of the assessment showing no significant effects and in any event the Applicant does not consider that this would be possible to robustly monitor, particularly given the lack of a clearly evidenced pathway for how these adverse effects would occur. Whilst the Applicant absolutely accepts that academic studies could be completed on this, it is not the kind of monitoring that fits neatly into a DCO requirement.</p> <p>Even if it were possible for the Applicant to find a simple way to monitor the cumulative construction effects on tourism in the Suffolk Coastal area, which the Applicant does not believe there is given the large number of factors that might affect travel choices, it would not be possible to isolate any marginal influence from the Proposed Project on tourism given in particular the relatively modest scale of SeaLink in terms of extent, worker numbers and duration compared to a substantial project, such as Sizewell.</p> <p>On this, the Applicant would note that:</p> <ul style="list-style-type: none"> - The Sea Link socio-economic, recreation and tourism assessment concludes that there are no significant effects on tourism or the visitor economy. Additional evidence was submitted at Deadline 3 through the Visitor and Tourism Assessment Technical Notes for Suffolk and Kent (Application Documents 9.40 and 9.41) which supports this conclusion. - Tourism metrics are subject to several factors which makes it difficult to isolate the impact of the Sea Link project from both other projects and other external factors, for example: <ul style="list-style-type: none"> o Measuring visitor numbers via footfall, it will be impossible to reliably attribute changes to the Sea Link project and not to Sizewell or other cumulative schemes. o Additionally, numerous external factors such as interest rates, weather conditions, UK economy all have the potential to influence visitor numbers which makes it very challenging to establish a robust counter-factual position to measure impact against. o Visitor perception surveys would not be able to accurately 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. - Sea Link's contribution to any cumulative effects is very small relative to Sizewell C. Sizewell C has peak worker numbers of c.7,900 and approx. 10 year build programme. In comparison, Sea Link's peak year (2028) has an average of 164 FTE workers and a considerably shorter construction programme. - National policy in NPS EN-1 (2023) para 4.1.16 provides that "The Secretary of State should only impose requirements in relation to a development consent that are necessary, relevant to planning, relevant to the development to be consented..., precise and reasonable in all other respects." That policy test is not met by a requirement to monitor tourism impacts, beyond the new SE05 commitment to monitor worker accommodation. <p>On a similar basis, the Applicant does not consider it necessary, justified or proportionate to contribute to a tourism fund.</p> <p>It should be noted during discussions on the Applicant's accommodation commitment that construction workers provide income to the accommodation provider and that particularly during off-peak periods, this could help support businesses. It was also noted that there are ways to further increase these benefits by, for example, offering vouchers for workers to eat at local restaurants. Therefore, whilst on balance the views received by the Applicant is that the relevant authorities would prefer to discourage</p>

Reference	Question to:	Question	Applicant's Comments
			construction workers from staying in the Suffolk Coastal Area and the Applicant has agreed to manage this, the Applicant has not accepted that construction workers from Sea Link would have an adverse effect.
3SERT3.	Applicant KCC ESC SCC	<p>Permissive Paths</p> <p>Within the REAC [REP5-115] the applicant has stated under LV13 that it would consider opportunities to provide permissive access across the Saxmundham Converter Station site and establishing an attractive amenity value for users of the permanent PRow diversions.</p> <p>Applicant: Provide a plan of the potential permissive paths. Furthermore, explain why a permissive path rather than a public right of way is proposed.</p> <p>SCC and ESC: Comment on the use of permissive paths as opposed to public rights of way, in terms of value for users and functionality for example.</p>	<p>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 temporarily 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, an example of potential routes has been included in Figure 1 of Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk, submitted at Deadline 6.</p>
3SERT4.	Applicant	<p>Community Benefit</p> <p>Thanet District Council [REP5-186] have requested that the applicant engage with the Council and the local community to identify appropriate projects and secure community funds. Provide a response to this request.</p>	<p>The Applicant will follow government guidance which sets expectations for how community benefit funds should be delivered for transmission infrastructure projects.</p> <p>As set out in Application Document 9.73 Applicant's Response to First Written Questions, response 1GEN1, the Applicant will follow government guidance which sets expectations for how community benefit funds should be delivered for transmission infrastructure projects.</p> <p>In line with Government guidance, if the Proposed Project gets consent, The Applicant will deliver a Community Fund of over £2m.</p> <p>This will deliver over £1m in the Suffolk area, relating to the Saxmundham converter station and the Kiln Lane substation (should this be delivered under the Proposed Project DCO. Although this is not anticipated), and over £1m in the Thanet and East Kent area relating to the Minster converter station and Minster substation.</p> <p>The Proposed Project's community benefit funding will be secured through a modification of the Applicant's Electricity Transmission Licence with Ofgem.</p> <p>Separate to, and outside of the planning process, the Applicant will undertake engagement with local communities and stakeholders in 2026 to understand what is important to them. This engagement will inform the development of the community benefit programme for the Proposed Project. Thanet District Council will be invited to partake in this engagement.</p> <p>Government guidance sets out principles for delivering community benefits, from the point of construction, providing flexibility over the types of investment that can be delivered through the funding (e.g. access to community grants, direct investment in local projects or outreach and educational training opportunities).</p>
3SERT5.	Applicant	<p>A Supply Chain Plan</p> <p>East Suffolk Council [REP5-184] has requested submission of a Supply Chain Plan that helps local businesses identify opportunities for gaining contracts within the supply chain during the construction, operation, and decommissioning phases of the Suffolk Onshore Scheme.</p>	<p>The Applicant has provided detailed response to this matter in 3SERT1.</p>

Reference	Question to:	Question	Applicant's Comments
		Provide a Supply Chain Plan or explain why one is not required.	

12. Health and Wellbeing

Table 12.1 Health and wellbeing

Reference	Question to:	Question	Applicant's Comments
3HW1.	Great Oaks Small School	<p>Great Oaks Small School</p> <p>Considering the commitments and responses made by the applicant up to DL5, does the school have any remaining concerns from a health and wellbeing perspective? If so, explain how these concerns could be suitably addressed.</p>	
3HW2.	Ebbsfleet House and Martins - High Quality Lifestyles Limited (Priory Group)	<p>Ebbsfleet House and Martins - High Quality Lifestyles Limited (Priory Group)</p> <p>Considering the commitments and responses made by the applicant up to DL5, do you have any remaining concerns from a health and wellbeing perspective? If so, explain how these concerns could be suitably addressed.</p>	
3HW3.	Applicant	<p>Mental Health and Wellbeing Monitoring Plan</p> <p>SCC [REP5-178] considers that the applicant should develop and implement a proportionate but robust Mental Health and Wellbeing Monitoring Plan for the duration of the proposed development (construction and early operation), with clear reporting routes and defined review points. The ExA requires the applicant to commit to such a monitoring plan. If the applicant does not agree to this, explain in detail why.</p>	<p>The Applicant does not agree with committing to a mental health and wellbeing monitoring plan. This is partly because the Applicant has not identified any potential for significant effects on mental health and wellbeing (see later section of this answer), but also because the applicant does not consider that such a monitoring plan is possible due to there being substantial limitations, particularly with regard to attribution and follow on mitigation.</p> <p>Monitoring Limitations</p> <p>The primary reason why monitoring of mental health and wellbeing effects is not deemed possible relates to attribution, in that it would be impossible to monitor the health and wellbeing effects of the Sea Link project in isolation without capturing the impact of the substantially larger Sizewell C project, or indeed other cumulative schemes. The Applicant would anticipate the majority of any recorded effects to be as a result primarily of SZC and it would be impossible to isolate any Sea Link specific effects. For example, it would be impossible via a questionnaire to robustly gauge the impact of the Proposed Project on an individual's wellbeing when the impact may actually be related to SZC or SPR. Additionally, if data sourced from local health services (such as community referrals) was used for monitoring purposes and to demonstrate potential impact, there would be significant limitations with this approach because the data would be high-level (for patient confidentiality) and hence it would not be possible to identify if referrals related to a specific infrastructure project or indeed whether they were influenced by wider personal, social, global or environmental factors.</p> <p>As 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 the Applicant to address the Proposed Project's contribution to the overall effects reported.</p> <p>Notwithstanding the absence of significant effects and taking into account the existing embedded mitigation commitments set out in the REAC and as stated below, the Applicant has identified further proportionate measures in recognition of SCC and the community's concerns regarding mental health and wellbeing. These are intended to provide reassurance and support where feasible, while</p>

Reference	Question to:	Question	Applicant's Comments
			<p>acknowledging that no significant residual effects are anticipated. These proposed measures are included as measure HW02 and comprise the following commitments:</p> <ul style="list-style-type: none"> • Provision of a Community Liaison Officer (CLO) trained in mental health awareness • Meet the Project events in Saxmundham and Aldeburgh – one-to-one surgeries where people can meet National Grid's community liaison officer in a neutral space to ask questions and make suggestions without having to travel to the main construction compound - which may be intimidating and not practicable for safety reasons. • Providing a community contact phone line and email address where people can go with any queries which we will aim to respond to personally rather than generically. Ensuring that these contact details are widely displayed and included on all community updates. • Ensuring contractors follow mental health-aware community behaviour standards • Attend and contribute to the Sizewell Health and Wellbeing Working Group meetings, if the existing attendees are in agreement. <p>Assessment findings</p> <p>The Applicant's health and wellbeing assessment has been undertaken in accordance with the IEMA Guide to Effective Scoping of Human Health in EIA (2022) and is presented within Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] and Application Document 6.2.3.11 (B) Part 3 Kent Chapter 11 Health and Wellbeing [AS-003] conclude that neither the Suffolk nor Kent Onshore Schemes would give rise to significant adverse effects on health and wellbeing. Mental health is considered through assessment of relevant health determinants, including access to services and open space, transport and connectivity, social cohesion, and environmental factors such as noise, visual amenity and disruption. Concerns raised by stakeholders were considered and it was concluded that the themes identified are already captured within the adopted methodology and did not require changes to the assessment approach. The assessment concludes that no significant adverse effects on mental health are anticipated. The cumulative effects associated with health and wellbeing are also assessed in Application Document Part 2 Suffolk Chapter 13 Inter-Project Cumulative Effects [APP-060]. The assessment draws upon the conclusions of other relevant environmental aspects, including traffic and transport, air quality, noise and vibration, socio-economics, recreation, and tourism. No significant effects were identified within the respective cumulative effects assessments of these relevant environmental disciplines. Therefore, the health and wellbeing cumulative effects assessment concludes no significant adverse effects on mental health due to community severance, reduced visual amenity, noise disturbance, or physical health outcomes such as levels of physical activity or respiratory health.</p> <p>Embedded mitigation measures are incorporated into the Proposed Project to reduce construction, operational and decommissioning effects, such as noise and vibration, air quality, transport and access and socio-economics. This will in turn mitigate the effects on the local community and existing facilities from a human health and wellbeing perspective. Measures to address disruption and potential effects on mental health and wellbeing arising from construction activities are secured within Application Document 9.84 Register of Environmental Actions and Commitments (REAC) to reduce or avoid adverse human health and wellbeing related impacts during the development. This includes addressing concerns raised regarding working hours, noise and vibration, and the impact of construction traffic on mental health including but not limited to:</p> <ul style="list-style-type: none"> • HW01: Sensitive routeing and siting of infrastructure and temporary works to avoid or reduce impacts on health and wellbeing receptors. • NV01: Construction working will be undertaken within the agreed working hours set out within the DCO. Best practicable means (e.g. screening) to reduce construction noise will be set out within the CEMP and Construction Noise and Vibration Management Plan (NVMP), which will be substantially in accordance with the Outline Construction Noise and Vibration Management Plan (OCNVMP).

Reference	Question to:	Question	Applicant's Comments
			<ul style="list-style-type: none"> • NV07: Saxmundham Converter Station and Friston Substation will include appropriate noise mitigation measures in the design. • SE03: Utility trenching works within 150 m of Great Oaks Small School will be programmed to occur in school holidays or as otherwise agreed with Great Oaks Small School to avoid impacts on users of the community facility receptor. • GG02: A detailed CEMP, Landscape and Ecological Management Plan (LEMP) and Construction Traffic Management and Travel Plan (CTMTP) will be produced and submitted to the relevant authority for approval prior to construction of the relevant stage of the Proposed Project to which it relates. • GG05: Construction workers and maintenance staff will undergo training to increase their awareness of environmental issues as applicable to their role on the project. • GG27: Members of the community and local businesses will be kept informed regularly of the works through active community liaison. This will include notification of noisy activities, heavy traffic periods and start and end dates of key phasing. A contact number will be provided which members of the public can use to raise any concerns or complaints about the Proposed Project. This measure has also been updated to specifically recognise intra project cumulative effects. • GG37: National Grid have aligned working hours for the Proposed Project's Works No. 1A and 1B (the National Grid substation at Friston Kiln Lane and associated overhead line works) set out in Application Document 3.1 draft Development Consent Order with the working hours secured in the SPR East Anglia One (North) and East Anglia Two DCOs. • GG44: 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. 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. 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 • TT03: All designated Public Rights of Way (PRoWs) will be identified, and any potential temporary and/or permanent diversions applied for/detailed in the DCO. PRoWs will be kept open as far as possible and, where crossed by a construction access, priority will be given to PRoW users over construction traffic the shortest period necessary to allow construction activities to occur. Any required diversions will be clearly marked at both ends with signage explaining the diversion, the duration of the diversion (for temporary diversions) and a contact number for any concerns. This is outlined in the Outline Public Rights of Way Management Plans. <p>In addition, given the similarity between the assessment of intra-project cumulative effects on amenity and the effect relating to Health and Wellbeing, the additional and updated commitments relating to cumulative effects are also relevant. These are set out below:</p> <p><i>“GG40 Once detailed design is complete and detailed construction and programme information is available, the undertaker commits to undertaking a review of the intra-project cumulative effects</i></p>

Reference	Question to:	Question	Applicant's Comments
			<p>assessment submitted with the application (as amended during the Examination) in collaboration with the relevant local authorities to consider:</p> <p>a) if the significant intra-project cumulative effects are still considered likely to occur; and</p> <p>b) if they are still considered likely to occur, what additional appropriate mitigation measures may be applied to reduce their significance; and</p> <p>c) if no such mitigation measures are available, what additional appropriate offsetting measures may be applied following the mitigation hierarchy.</p> <p>d) any such mitigation or offsetting measures must be agreed with the relevant local authorities, including a timetable for their implementation, and once agreed shall be implemented in accordance with the terms of such timetable.”</p> <p>“GG03 - The CEMP shall include measures to manage dust, waste, water, noise, vibration and soil during construction. The contractor(s) shall undertake daily site inspections to check conformance to the Management Plans. The title and contact number of person(s) accountable for issues relating to dust, waste, water, noise, vibration and soil will be displayed at site boundary. Should any concerns be raised about site emissions contributing to intra-project cumulative effects on the amenity of residential receptors, road users or PRow users, these will be considered by the contractor, who will seek to implement measures to further mitigate the emissions contributing to the cumulative effects. A response will be provided either directly or through existing community liaison notifications.”</p> <p>“NV03 - The contractor will conduct detailed construction noise and vibration assessments to determine whether there are likely to be any new or different significant adverse effects at noise and vibration sensitive receptors, including nocturnal protected species, and therefore whether additional measures, including site-specific Best Practicable Means (BPM), may be required. Should the reassessment of intra-project cumulative effects (see commitment #) indicate that significant effects are likely to occur, the contractor will consider if there are proportionate and practicable ways to reduce potential noise effects that contribute to any such effects to a greater degree than BPM. The contractor will update the OCNVMP into the CNVMP and include site specific noise and vibration mitigation, as may be required.”</p> <p>In summary, the Applicant is not predicting significant health and wellbeing effects for either the Proposed Project alone or with cumulative projects although it does recognise that it may contribute to impacts, even if not significantly and to a very small extent compared to Sizewell C, an exponentially larger project.</p>
3HW4.	Applicant	<p>Order limit change – health and wellbeing impacts</p> <p>SCC [REP5-178] stated that the extension of the Order Limits materially changes receptor proximity, bringing construction activities closer to residential properties that were not previously assessed within the ES. SCC requests that a proportionate and comprehensive approach would be to formally review the relevant ES chapters. Respond to these points made by the SCC in detail, including how such changes to impacts have been considered.</p>	<p>The health and wellbeing implications of the proposed changes were assessed within Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055], in November 2025, building on the established methodology and findings presented within the ES. The changes referenced by Suffolk County Council comprise:</p> <ul style="list-style-type: none"> • Change 2 (Friston Substation): This involves an extension of the limits of deviation within the existing Order Limits. There is no alteration to the scale, height (maximum 18m), layout principles, or construction methodology of the substation as previously assessed. • Change 5 (B1119 Hedgerow Strip): This represents a minor, localised extension of the Order Limits to facilitate planting and ongoing maintenance. No new infrastructure is proposed, and no substantial construction activity is introduced. <p>The health and wellbeing assessment has been undertaken using a robust, topic-based methodology consistent with recognised good practice and the original ES. Specifically:</p> <ul style="list-style-type: none"> • The assessment draws upon the findings of the relevant technical chapters, including Landscape and Visual, Traffic and Transport, Air Quality, Noise and Vibration, and Socio-economics.

Reference	Question to:	Question	Applicant's Comments
			<ul style="list-style-type: none"> • Study areas have been defined in accordance with each technical discipline, ensuring that all relevant receptors, including those within or adjacent to the revised Order Limits, are appropriately captured. • The ES adopts a Rochdale Envelope approach, assessing reasonable worst-case parameters. The proposed changes fall within these established parameters and do not exceed the previously assessed design envelope. <p>The review confirmed that the amended Order Limits do not give rise to new or materially different likely significant environmental effects compared to those reported in the ES. In particular:</p> <ul style="list-style-type: none"> • Change 2: The extension of limits of deviation does not materially alter the proximity of the development to sensitive receptors beyond that already assessed. As such, no new exposure pathways are introduced. • Change 5: Although the Order Limits are extended locally, the nature of the activity (i.e. planting and maintenance) is low intensity and does not generate notable emissions, noise, or traffic movements. Consequently, there is no meaningful change in exposure for nearby receptors. <p>Across both changes, there are no additional sensitive receptors introduced into the relevant study areas. Effects relating to air quality, noise, landscape and visual amenity, and access (including Public Rights of Way) remain consistent with those previously assessed. Therefore, the magnitude, duration, and nature of health-related impact pathways, such as noise disturbance, air quality effects, traffic disruption, and access changes, remain unchanged and within the bounds of the original ES conclusions. Given the absence of any material change in impact pathways or receptor exposure, the assessment concludes that there is no change in predicted health outcomes.</p> <p>The findings of this Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055] are considered robust, proportionate, and aligned with the original ES methodology and conclusions. The proposed changes do not alter the significance of previously assessed effects on health and wellbeing. All previously secured mitigation measures and construction controls have been reviewed and remain applicable and effective, including those designed to protect nearby and more sensitive receptors. The Applicant will continue to implement these measures to minimise potential effects on local communities throughout construction and operation.</p>

13. Onshore Cumulative Effects (Intra-Project)

Table 13.1 Onshore cumulative effects (intra-project)

Reference	Question to:	Question	Applicant's Comments
3CEIntra1.	Applicant	<p>Application of the Mitigation Hierarchy</p> <p>Does the applicant agree that they should deliver and secure the mitigations outlined in the deadline 5 submissions by the Councils, in order to have met the requirements of the mitigation hierarchy?</p> <p>Clearly set out your case for each individual mitigation requested including your reasoning if it is not deemed necessary.</p>	<p>Each of the mitigation measures proposed to address intra-project cumulative effects is identified below, with a measure specific case given as to whether the measure is proposed to be adopted and, if not, why this still meets the mitigation hierarchy.</p> <p><u>PRoW mitigation/offsetting (SCC)</u></p> <p>PRoW related mitigation proposed by SCC included:</p> <ul style="list-style-type: none"> • Fromus Access PRoW • Resurfacing of Aldeburgh Path at the RSPB North Warren Reserve • B1119 PRoW/Bridleway, • Request that the proposed diversions of footpaths E-354/006/0 and E-460/023/0 be upgraded to bridleway status. • Additional PRoW measures from Table A6 of SCC's [REP2-062] <p>Please see Appendix D of Application Document 9.136.1 Applicant's Responses to Third Written Questions – Appendices which sets out the applicant's response to each of the PRoW related mitigation requests made by SCC. The Applicant has also provided responses in the form of the response to Action Point 44 as set out in Application Document 9.135 Applicant's Response to March Hearing (CAH2 and ISH3) Action Points.</p> <p>In summary the Applicant is committing to create a permissive path along the Fromus Access. 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 Applicant has included the following commitment in Section 1 of the REAC:</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> <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>

Reference	Question to:	Question	Applicant's Comments
			<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 considers that this commitment is sufficient and it is not necessary to make this access a formal PRow.</p> <p>Regarding the resurfacing of the Aldeburgh Path at the RSPB North Warren Reserve, although the Applicant is unable to undertake the works under the Sea Link DCO the Applicant is happy to discuss other ways in which this enhancement could be delivered, such as through a change to the heads of terms. This is not considered to be necessary mitigation as impacts on PRow in this location are primarily avoided through the use of a trenchless technique to install the cable.</p> <p>The Applicant has added all of SCCs proposed PRow measures from Table A6 of SCC's [REP2-062] to the Suffolk Outline PRow Management Plan and can confirm that no PRow will be closed without a suitable diversion being provided.</p> <p>Given the Applicant's proposal to provide a 1.2 km permanent permissive path along the Fromus Access, which would provide one of the few east west crossings of the Fromus Valley south of Saxmundham, as well as additional permissive paths within the woodland planting at the Saxmundham site, and all of the measures identified by SCC in Table A6 of SCC's [REP2-062] it is not considered necessary or proportionate to also provide the 1.2 km PRow/permissive path along the B1119.</p> <p><u>Restriction of Core Construction Hours (SCC, ESC, TDC)</u> Please see the response provided to question 3CEIntra3.</p> <p><u>Provision of a Mental Health and Wellbeing Monitoring Plan (SCC, ESC)</u> Please see the response provided to question 3HW3.</p>
3CEIntra2.	Applicant, All Councils	<p>REAC commitment (GG40) to review / mitigate significant intra-project cumulative effects</p> <p>Do you agree with the proposed wording for REAC commitment GG40 offered by SCC in answering ExA question 2CEIntra2 in [REP5-204]?</p> <p>In responding clearly explain your reasoning for your position and provide/justify any changes to the wording.</p>	<p>Yes, the Applicant agrees to this wording and has updated the REAC and oCEMP as appropriate. Measure GG40 now includes items c) and d) as proposed by SCC:</p> <p>GG40 Once detailed design is complete and detailed construction and programme information is available, the undertaker commits to undertaking a review of the intra-project cumulative effects assessment submitted with the application (as amended during the Examination) in collaboration with the relevant local authorities to consider:</p> <p>a) if the significant intra-project cumulative effects are still considered likely to occur; and b) if they are still considered likely to occur, what additional appropriate mitigation measures may be applied to reduce their significance; and</p>

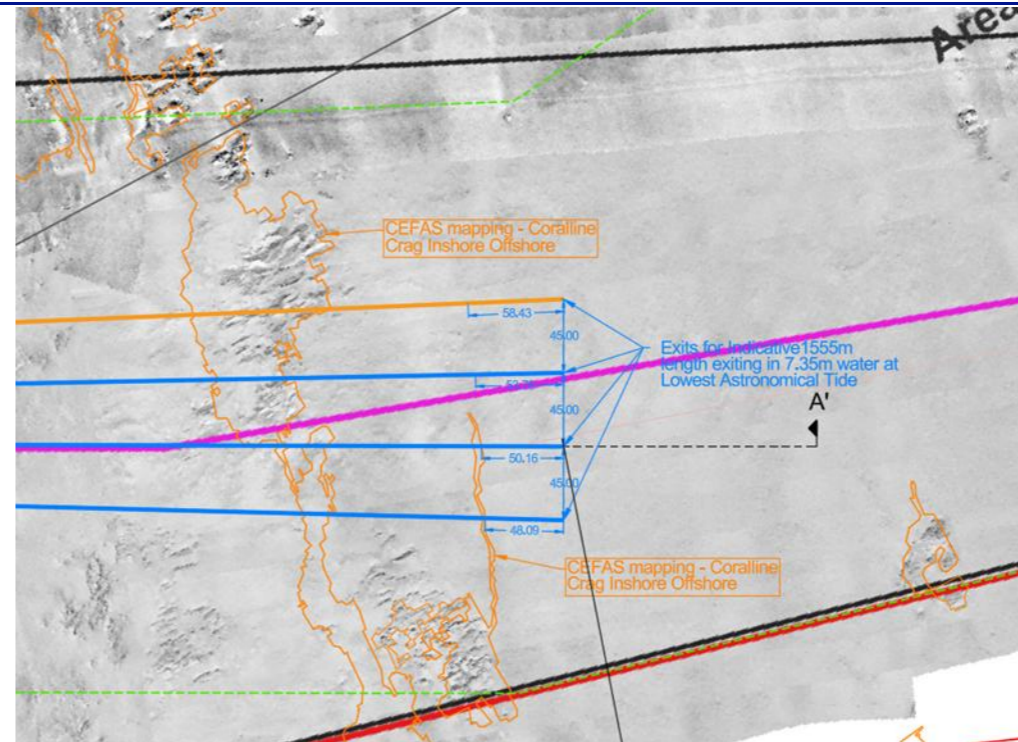
Reference	Question to:	Question	Applicant's Comments
3CEIntra3.	Applicant	<p data-bbox="694 375 1181 403">Construction Core Working Hours</p> <p data-bbox="694 417 1486 516">Does the applicant accept the proposed core working hours suggested by SCC in order to protect public health in responding to ExA question 2CEIntra2 in [REP5-204]?</p>	<p data-bbox="1540 174 2813 239"><i>c) if no such mitigation measures are available, what additional appropriate offsetting measures may be applied following the mitigation hierarchy.</i></p> <p data-bbox="1540 249 2813 348"><i>d) any such mitigation or, if possible, offsetting measures must be agreed with the relevant local authorities, including a timetable for their implementation, and once agreed shall be implemented in accordance with the terms of such timetable</i></p> <p data-bbox="1540 375 2813 474">As the Applicant's assessment of impacts on Health and Wellbeing has not identified any potential for significant effects on public health, it is not considered necessary to accept the core working hours suggested by SCC.</p>

15. Marine Physical Environment

Table 15.1 Marine physical environment

Reference	Question to:	Question	Applicant's Comments
3PE1.	MMO	Designated dredge disposal area Provide suggested dDML wording to secure a defined dredge disposal area.	
3PE2.	NE Applicant	Cross Ledge, Goodwin Sands and Aldeburgh Napes NE has highlighted a number of concerns regarding impacts on sand banks including Cross Ledge, Goodwin Sands and Aldeburgh Napes [REP5-217]. Explain whether the updated Marine Chapter 1 [REP5-019] addresses NE's concerns or detail the necessary information required to be supplied by the applicant. The ExA suggests that a further meeting may help to agree the necessary information requirements, where they remain outstanding. The applicant may wish to comment.	<p>The Applicant can confirm that Application Document 6.2.4.1 (F) Environmental Statement Part 4 Marine Chapter 1 Physical Environment (Tracked) [REP5-020] was updated to include further information on potential impacts on the Cross Ledge, Goodwin Sands and Aldeburgh Napes sandbanks. The additional information provided supports the conclusions that there will be no likely significant effects from the Proposed Project on these sandbank features.</p> <p>Further updates have also been included in Application Document 6.2.4.1 (G) Environmental Statement Part 4 Marine Chapter 1 Physical Environment submitted at Deadline 6 on the assessed maximum design scenario for rock protection (berm dimensions) to further support conclusions that that the height of any rock protection berms above the seabed would not cause any significant interference with flow dynamics or sediment transport patterns on a scale that would lead to the change in morphology of the Cross Ledge, Goodwin Sands and Aldeburgh Napes sandbank features.</p>
3PE3.	Applicant	Coralline Crag mapping Provide more detailed/higher resolution mapping/chart information to enable greater resolution of the proposed HDD exit locations.	<p>The Applicant confirms that the existing Cefas mapping is based on surveys conducted in 2016 and 2018 using multibeam and side scan sonar data. The Applicant's recent 2023 offshore survey data (Application Document 9.80) confirms the Cefas mapping extents, although the thin spur of Coralline Crag is absent from the Applicant's most recent surveys. The Proposed Project's 2023 offshore survey shows sand 45m west of the HDD exits, whereas CEFAS show the thin spur of Coralline Crag. Therefore, the Cefas mapping is being taken as the current 'worst-case' and the commitments within the REAC have been based on this worst-case extent of the Coralline Crag outcrop.</p> <p>Plate 2.3 in 9.113 (A) The Coralline Crag Technical Note [REP4-102] (also provided below) shows the difference in the bathymetry between the CEFAS Mapping and the Proposed Project's 2023 data.</p>

Reference	Question to:	Question	Applicant's Comments
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The Applicant will conduct and review pre-construction survey data to confirm the extent of the Coralline Crag outcrop prior to starting works. These surveys are already secured within the outline In-Principle Monitoring Plan (**Application Document 9.140**), outline Cable Specification and Installation Plan (**Application Document 9.92**) and outline Construction Environmental Management Plan (**Application Document 7.5.2**) under Condition 4 of the dML to ensure that the existing REAC commitment GH14 is adhered to.

3PE4.	ESC, TDC, EA, MMO	Outline Offshore CEMP [REP5-066] provision MPE06 Confirm whether the beach profile and erosion rates monitoring provision in MPE06 should be subject to the caveat 'where rock bags are planned to be placed' and if not, suggest alternative wording.	
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3PE5.	Applicant	Cable burial risk assessment (CBRA) and REAC consistency NE [REP5-217] noted that commitment MPE07 to avoid installation of cables at the Coralline Crag without pre-cut trenches is not reflected in the CBRA [PDA-039], which states that in competent bedrock (Coralline Crag, Chalk, and flint beds) subcrops or outcrops, the preferred method of protection is by mechanical trenching. Update the CBRA to ensure consistency with the REAC, and any other relevant control documentation, or provide robust justification for the alternative approach.	<p>The Cable Burial Risk Assessment (CBRA) is a FEED-stage design document, prepared at a specific point in the design process. It was not intended to, and would not reasonably be expected to, reflect the detailed wording of the REAC, oCEMP, or other plans, which have been developed and refined through the Examination.</p> <p>The CBRA was submitted into the examination to demonstrate that the proposed burial depths are technically achievable and risk-based, and to support discussions with the MMO, SNCBs, MCA and relevant port authorities.</p> <p>Therefore, a direct comparison of the CBRA, oCEMP and other plans is not appropriate at this stage, save for the purpose of demonstrating that the Applicant has applied, and will continue to apply at detailed design stage, a sufficiently robust technical and risk-based approach to justify the proposed depth of cable lowering along the route.</p> <p>The Applicant confirms that it has already committed within outline Cable Specification and Installation Plan (Application Document 9.92) to review and update the <i>current CBRA [PDA-039] post-consent and prior to construction</i>.</p> <p>The Outline Cable Specification and Installation Plan (oCSIP) is the appropriate mechanism for securing the cable installation methodology, including depths of lowering, informed by the final Cable Burial Risk</p>
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Reference	Question to:	Question	Applicant's Comments
3PE6.	TDC, EA, NE, MMO	<p>Outline Offshore CEMP [REP5-066] provision MPE09 Should the need for further monitoring after five years in MPE09 be subject to agreement with relevant stakeholders?</p>	<p>Assessment. The oCSIP is secured through the DML under Condition 4 and will be approved by the MMO in consultation with the listed stakeholders, in accordance with the relevant Requirements and the commitments set out in the REAC, including commitment MPE07.</p> <p>The Applicant confirms that Commitment MPE09 has been updated in agreement with the Environment Agency as outlined within Issue Specific Hearing 3 and within Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC), submitted at Deadline 6. The River Stour Channel within Pegwell Bay will be monitored throughout the operational life of the asset. Monitoring will be undertaken annually for the first five years following installation of the cable, after which the frequency and scope of monitoring will be reviewed in consultation with the Environment Agency.</p>

16. Benthic Ecology

Table 16.1 Benthic ecology

Reference	Question to:	Question	Applicant's Comments
3BE1.	Applicant	<p>Monitoring programmes</p> <p>NPS EN-3 states the following: “Applicants must develop an ecological monitoring programme to monitor impacts during the pre-construction, construction and operational phases to identify the actual impacts caused by the project and compare them to what was predicted in the EIA/HRA” (paragraph 2.8.193).</p> <p>Set out in detail how the applicant considers it has complied with this policy with regards to the offshore proposed development. The applicant’s response should include all relevant topic areas in addition to benthic ecology.</p>	<p>Throughout the Environment Impact Assessment (EIA) process, the Applicant has taken steps to avoid or reduce significant effects either through the iterative process of project design (embedded mitigation) or by ‘additional’ mitigation measures which would be applied during the construction, operation and maintenance or decommissioning stages of the Proposed Project.</p> <p>The guiding principles for monitoring which apply to the Proposed Project are as follows:</p> <ul style="list-style-type: none"> • All consent conditions, which would include those for monitoring, should be “necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects” as set out in Paragraph 56 of the National Planning Policy Framework and referred to as the ‘six tests’ (Ministry of Housing, Communities and Local Government (MHCLG) 2021¹). • In line with good practice, monitoring must have a clear purpose in order to provide answers to specific questions where significant environmental impacts have been identified. As such, monitoring proposals should have an identified aim, end date and confirmed outputs, which provide, as far as possible, statistically robust data sets, as applicable to the hypothesis being tested. • Monitoring should be targeted towards significant evidence gaps or uncertainties, which are relevant to the project and can be realistically delivered by project level monitoring, as well as those receptors considered to be the most sensitive to project specific impacts including those of conservation, ecological and/or economic importance. The presence of a significant impact should not, on its own, necessarily lead to a requirement for monitoring. • Proposals for monitoring should be based, where relevant, on best practice and the latest environmental data associated with post-consent monitoring of subsea cables. • The scope and design of all monitoring work should be finalised and agreed following review of the results of any preceding survey and/or monitoring work (i.e., an adaptive approach), including those surveys conducted in support of the environmental impact assessment (EIA). <p>With the above in mind and noting the Examining Authority’s questions and discussion at ISH2/ISH3, the Applicant confirms that Application Document 9.140 Outline In Principle Monitoring Plan (oIPMP) , proportionate to the Proposed Project, has been submitted at Deadline 6. This oIPMP will outline the approach to the following relevant topics and / or receptor groups based on the general guiding principles outlined above and recent DCO submissions, namely Five Estuaries and North Falls Offshore Wind Farms:</p> <ul style="list-style-type: none"> • Marine Physical Environment; • Benthic and Intertidal Ecology; • Fish and Shellfish Ecology;

¹ Ministry of Housing, Communities and Local Government, Ministry of Housing, Communities & Local Government (2018 to 2021) Use of Planning Conditions <https://www.gov.uk/guidance/use-of-planning-conditions>

Reference	Question to:	Question	Applicant's Comments
			<ul style="list-style-type: none"> • Marine Mammals; • Offshore Ornithology; • Commercial Fisheries; and • Marine Archaeology. <p>Due to the unavailability of Natural England during Examination to attend a Thematic Meeting up to this point, the above document will be discussed with Natural England at their earliest availability, which they have confirmed as the 16th April 2026.</p> <p>The Applicant would however, like to re-iterate that the need for an Outline IPMP should be dependent on the type of activity and associated impacts and not because the Project is applying for DCO consent as a Nationally Significant Infrastructure Project. The most recent offshore projects which have applied for DCO consent are Offshore Windfarms. The magnitude of impacts associated with Offshore Windfarms are very different to a bundled HVDC subsea cable such as that comprised in the Proposed Project in terms of construction footprint, volumes of sediment disturbance, noise profiles, vessel activity, permanent subsea infrastructure and programme.</p> <p>Recent Major UK Subsea Cable only projects consented though Marine Licences and DCO's, with a similar Project Description to the Proposed Project, which have <u>not</u> submitted a specific Outline IPMP prior to consent include:</p> <ul style="list-style-type: none"> • Eastern Green Link 1 • Eastern Green Link 2 • Aquind • Greenlink • Neuconnect <p>In light of the information set out above and in the submission of the oIPMP at Deadline 6, the Applicant considers that it has complied with the policy set out at paragraph 2.8.193 of NPS EN3.</p>
3BE2.	MMO Natural England Applicant	<p>Benthic surveys</p> <p>Within the outline Cable Specification and Installation Plan (oCSIP) [REP5-117] under section 3.2 it states that the applicant would undertake pre-construction surveys. For benthic ecology it suggests the use of drop down video or remotely operated vehicle.</p> <p>MMO and NE: Are these suitable forms of potential pre-construction benthic surveys? Should pre-construction benthic surveys be secured with a condition within the DML? If so, how should this be worded and would the details of the survey need by be agreed prior to the undertaking of these surveys?</p> <p>Applicant: The oCSIP only suggests what pre-installation surveys may be included. The ExA</p>	<p>As outlined above and secured within Application Document 9.140 Outline In Principle Monitoring Plan under Condition 4 of the DML, geophysical and geotechnical survey data will be collected pre-construction to inform detailed engineering design and will also inform pre-construction identification and mapping of features of importance in relation to benthic ecology. Where required, habitat identification and mapping of features will be undertaken using drop down video to investigate potentially sensitive features observed in the remote sensing data.</p> <p>Post construction survey proposals will be informed by the final engineering design of the project and any need for cable burial depth monitoring; and potential for impact on features of ecological sensitivity identified during the pre-construction surveys.</p> <p>This approach follows the same principles applied in other recent DCOs namely Five Estuaries and North Falls.</p>

Reference	Question to:	Question	Applicant's Comments
		requests that the applicant set out how pre-installation benthic surveys are secured.	
3BE3.	MMO Natural England	<p>Final cable route condition</p> <p>If the final route of the offshore cable (including micro-siting) should be agreed prior to installation (informed by a pre-installation survey) then how should this be secured? If it is considered that a condition within the DML is most suitable, provide wording for this.</p>	
3BE4.	Applicant	<p>Post-installation surveys</p> <p>Would the Benthic Mitigation Plans referred to within the oCEMP [REP5-066] and the subsequent In-Principle Monitoring Plan (IPMP) (BE05 and BE06) necessitate post-construction surveys? If these surveys and monitoring showed impacts greater than anticipated should adaptive management be necessary and how would this be secured and agreed by the MMO?</p>	<p>As outlined above and secured within the Application Document 9.140 Outline In Principle Monitoring Plan under Condition 4 of the DML, geophysical and geotechnical survey data will be collected pre-construction to inform detailed engineering design and will also inform pre-construction identification and mapping of features of importance in relation to benthic ecology.</p> <p>Post construction survey proposals will be informed by the final engineering design of the project and any need for cable burial depth monitoring; and any potential for impacts on features of ecological sensitivity identified during pre-construction surveys.</p> <p>The requirement for post-construction benthic survey will be informed by the results of pre-construction surveys and the final engineering design of the project.</p> <p>If no benthic habitats of principal importance are identified during the pre-construction survey of the proposed works area, no benthic post-construction monitoring will be required for the Proposed Project.</p> <p>Where benthic habitats of principal importance (qualifying as Annex 1 or NERC) are identified during pre-construction surveys (engineering surveys and UXO) and there is potential for an impact on these habitats, the Applicant will prepare a Benthic Mitigation Plan, in consultation with the MMO and SNCBs for submission to the MMO for approval secured within the Application Document 9.140 Outline In Principle Monitoring Plan under Condition 4 of the DML and the REAC.</p> <p>The scope and design of all monitoring work will be finalised and agreed following review of the results of any preceding survey (i.e., an adaptive approach), including those surveys conducted in support of the environmental impact assessment (EIA). This includes the potential for survey requirements to be adapted based on the results of the monitoring, including in the event that unforeseen effects arise, which may in turn give rise to the need for adaptive management measures to be considered.</p> <p>In the event that a review of the construction monitoring results shows a greater impact than that assessed in the ES, the Applicant will use an adaptive management approach. Within any monitoring report, the Applicant will provide a review of the monitoring results to determine where identified impacts are either within or greater than those in the ES, with justification of this conclusion supported by an interpretation of the monitoring results. Where the Applicant considers that the monitoring results show an impact greater than that assessed in the ES, the monitoring report will include proposals for remedial action and/or additional monitoring that the Applicant will submit to the MMO and SNCBs for further discussion. It is expected that these further discussions will result in an agreed action plan for the exploration of the results observed, in addition to the agreement of plans for further monitoring or remedial actions as deemed necessary. Where it has been agreed that there are no significant effects,</p>

Reference	Question to:	Question	Applicant's Comments
			<p>monitoring need not be conditioned through the DML. This approach is set out within Application Document 9.140 Outline In Principle Monitoring Plan submitted at Deadline 6.</p> <p>This approach follows the same principles applied in other recent DCOs in the area namely Five Estuaries and North Falls.</p>
3BE5.	MMO NE	<p>Benthic Mitigation Plans and monitoring conditions</p> <p>Should the Benthic Mitigation Plans referred to with within the oCEMP [REP5-066] and the subsequent IPMP (BE05 and BE06 of the REAC [REP5-115]) be secured as a condition within the DML? If so, provide wording for the condition.</p> <p>Furthermore, should there be an agreement with MMO or NE as to whether a Benthic Mitigation Plan and associated IPMP is necessary, based on pre-installation surveys and the proposed final cable route? If so, incorporate this into your suggested wording.</p>	
3BE6.	Applicant	<p>Thanet Coast MCZ</p> <p>NE [REP5-218] have stated that there has been no evidence that rock placed 0.5m below the seabed would remain buried over the lifetime of the project and is unlikely to impact on Thanet Coast MCZ. Provide evidence to support the applicant's conclusions.</p>	<p>An assessment of flooding and erosion risk provided in Application Document 9.20.2 Landfall Sediment Modelling Report Pegwell Bay [PDA-038] shows elevations of the intertidal mudflats within Pegwell Bay have been subject to natural variability within the range of approx. ±0.25 m over a period of 15 years (2007 to 2023) which is expected to continue. In the future, bed levels are also predicted to rise following the long-term trend in sea levels due to the corresponding increase in accommodation space. This evidence of historical behaviour combined with the predicted future response provides assurance that the rock protection placed on the buried cable at the HDD exit pit, placed 0.5 m below the current seabed surface, can be expected to remain buried for the lifetime of the Proposed Project.</p>
3BE7.	Natural England MMO	<p>Cable protection removal</p> <p>In the applicant's response to ExA question 2BE7 [REP5-135] in relation to the removal of cable protection at decommissioning stage, the applicant states that removability of cable protection can be a factor in the final choice of cable protection used for the proposed development in some cases, although engineering and other sea users will also be a key factor in cable protection decisions. For example, the applicant states that to protect cable integrity at cable crossings, cable protection may not be removed at these locations. With the applicant committed to having removability of cable protection as a factor at decommissioning, is this a satisfactory approach?</p>	
3BE8.	Natural England MMO	<p>Drill fluid management</p> <p>Within the offshore CEMP [REP5-066] the applicant has included details of drilling fluid management. From a benthic ecology perspective, does this</p>	

Reference	Question to:	Question	Applicant's Comments
3BE9.	Natural England	<p>address any concerns about potential drill fluid impacts to benthic ecology?</p> <p>Jack-Up vessels</p> <p>The applicant [REP5-135] has stated that there may be some faunal mortality due to the use of grounded or jack-up vessels during construction, but this is anticipated to be limited. Provide a response to these points and whether NE agrees with the conclusions on this issue.</p>	

18. Marine Mammals

Table 18.1 Marine mammals

Reference	Question to:	Question	Applicant's Comments
3MM1.	Applicant	<p>Quantification of effects of disturbance on harbour and grey seals</p> <p>Provide an update to ES part 4 chapter 4 Marine Mammals [REP5-023] in response to NE's comments at [REP5-219] to address the lack of quantification of effects of disturbance on harbour and grey seals.</p>	<p>The Applicant has provided an update to estimate the density of harbour and grey seals and a precautionary quantification of the effects of disturbance on them in Application Document 6.2.4.4 (I) Environmental Statement Part 4 Marine Chapter 4 Marine Mammals, submitted at Deadline 6.</p>
3MM2.	Kent Wildlife Trust Applicant	<p>Kent Dolphin Project</p> <p>Kent Wildlife Trust to provide the applicant with a copy of the Kent Dolphin Project report as requested in [REP5-132] and the applicant to provide an updated ES part 4 chapter 4 Marine Mammals [REP5-023] including qualitative data from marine mammal observations in the area.</p>	<p>The Applicant has updated the baseline for marine mammals, making reference to the sightings records reported by the Kent Dolphin Project (KDP) online, in Application Document 6.2.4.4 (I) Environmental Statement Part 4 Marine Chapter 4 Marine Mammals for submission at Deadline 6.</p> <p>At the time of submission for Deadline 6 the Applicant has not received a copy of the KDP report. If the Applicant does subsequently receive this from Kent Wildlife Trust the report can be reviewed and further updates to the baseline, as appropriate, made for Deadline 7.</p>
3MM3.	Applicant	<p>Goodwin Sands</p> <p>With reference to the depths below chart datum in the vicinity of Goodwin Sands, explain the minimum depths at which cable installation vessels will operate, and why this can only be achieved at high tide.</p>	<p>The Applicant has updated Application Document 6.2.4.4 (I) Environmental Statement Part 4 Marine Chapter 4 Marine Mammals for submission at Deadline 6. Following further review and discussion there is potential for cable installation works to take place at any tidal state (as some cable lay vessels have a very small draft) and thus the impact assessment has also been amended. However, since the northern most extent of the Goodwin Sands sandbanks and possible haul-out location is at least 1.22 km from the Offshore Scheme, and mostly much further than this, disturbance from the presence of vessels is considered to be minor and so the significance of the impact has remained as previously determined.</p>
3MM4.	Joint Nature Conservation Committee (JNCC), Applicant	<p>Southern North Sea Special Area of Conservation</p> <p>Applicant to provide the information requested by Joint Nature Conservation Committee (JNCC) [REP5-194] in its response to 2MM5 [PD-021] in relation to the additional detail on the scale of impact for impact pathways relating to prey species.</p>	<p>The Applicant has provided additional information in relation to the scale of impact pathways relating to prey species in paragraph 4.9.37 of Application Document 6.2.4.4 (I) Environmental Statement Part 4 Marine Chapter 4 Marine Mammals, submitted at Deadline 6.</p>
3MM5.	NE	<p>Underwater noise modelling</p> <p>Does the information provided by the applicant in [REP5-132] deal with the concern expressed in [REP5-199]. If not, explain what further information is required from the applicant.</p>	
3MM6.	NE	<p>In-combination effects</p> <p>Has the information provided by the applicant in [REP5-135] addressed the concerns of NE expressed in [REP5-219]? If not, explain what additional information is required.</p>	<p>The Applicant advises the ExA that additional analysis in relation to the in-combination assessment, for the underwater sound impact pathway in the Southern North Sea SAC has now been provided in Application Document 6.6 (G) Habitats Regulations Assessment Report, submitted at Deadline 6.</p>

19. Marine Ornithology

Table 19.1 Marine ornithology

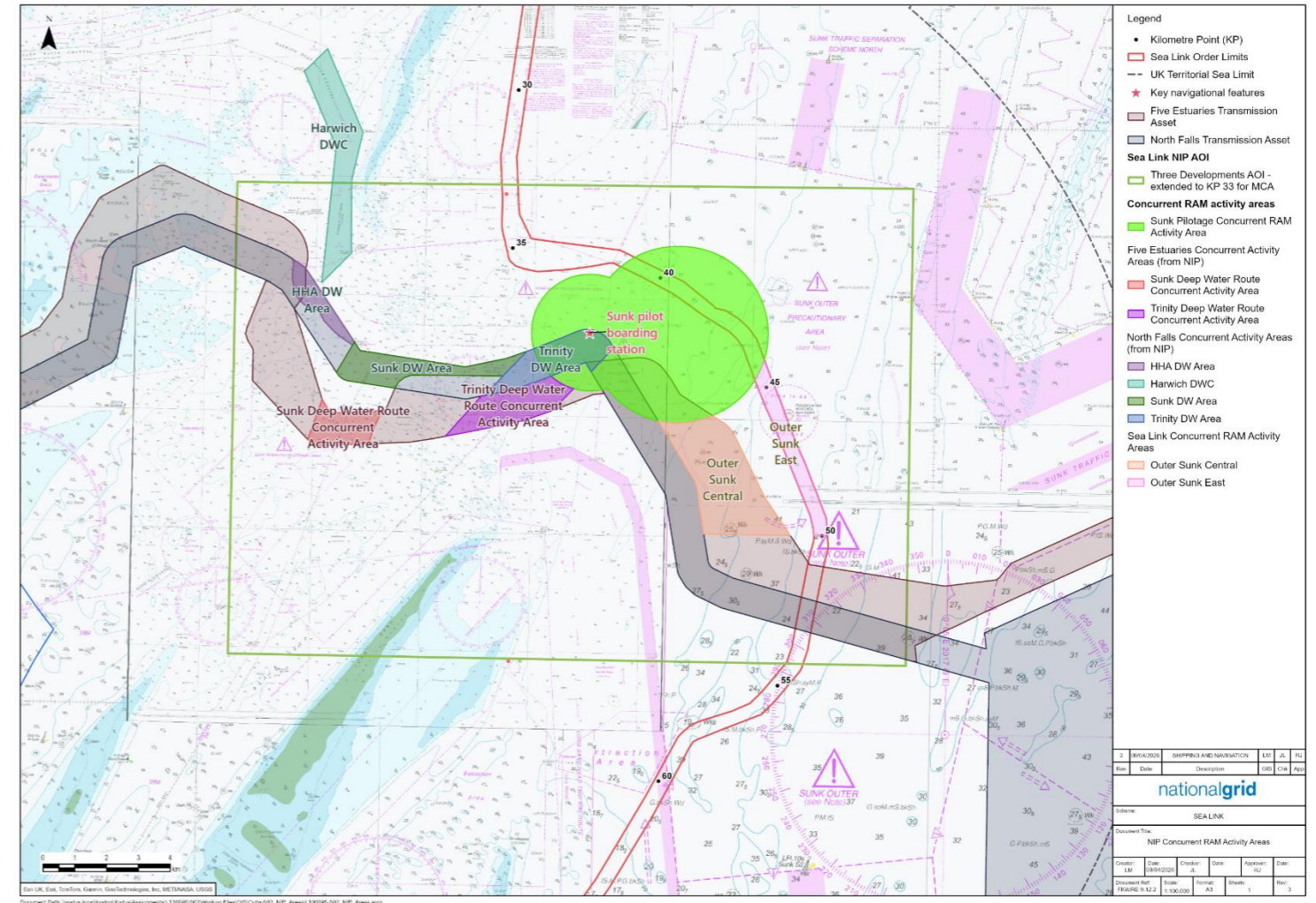
Reference	Question to:	Question	Applicant's Comments
3MO1.	NE	<p>Reach et al. (2013) methodology Provide a copy of the Reach et al. (2013) methodology to the applicant to allow calculation of the proportion of 'bird (Red-Throated Diver) days' lost to enable the applicant to assess and quantify the implications for the Outer Thames Estuary by DL6. Otherwise provide an alternative methodology to achieve the same outcome or explain why this is not possible.</p> <p>If a methodology is not available, should the applicant provide information reasonably required to assess a potential derogation under the Habitats Regulations as soon as is reasonably possible and before the close of examination as set out in section 5.4 of NPS EN-1 and if not, why not?</p>	
3MO2.	NE Applicant	<p>Emergency operation and maintenance activities in the Outer Thames Estuary Explain whether a strategic compensation mechanism, such as the Offshore Wind Environmental Improvement Package, could be used as a mechanism to secure compensation in the event that longer term operation and maintenance activities are required in the designated site during the winter period that have potential to give rise to adverse effects on integrity.</p> <p>The applicant may wish to comment.</p>	<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 (including routine maintenance) 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.</p> <p>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.</p> <p>A series of commitments have been agreed between the Applicant and Natural England which would be implemented should any unplanned emergency repair be required:</p> <ol style="list-style-type: none"> 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,

Reference	Question to:	Question	Applicant's Comments
3MO3.	NE	<p>Displacement effects</p> <p>NE [REP5-199] has provided a substantial number of references that demonstrate the potential for displacement due to vessel movements. Can NE signpost to specific references to demonstrate that harm is likely from a small number of isolated vessel movements (as opposed to continuous offshore windfarm construction vessel traffic).</p>	<p>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.</p> <p>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.</p> <p>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. The Applicant will continue to discuss with Natural England as to whether these may give rise to AEoI. The Applicant will update on further outcome of these discussions at Deadline 7.</p> <p>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.</p> <p>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.</p>

21. Shipping and Navigation

Table 21.1 Shipping and navigation

Reference	Question to:	Question	Applicant's Comments
3SN1.	Applicant Maritime and Coastguard Agency (MCA)	<p>Concurrent restricted in ability to manoeuvre (RAM) vessel activities</p> <p>Maritime and Coastguard Agency (MCA):</p> <ul style="list-style-type: none"> • Explain whether there has been a change in circumstance that has led to the request for an enlarged area of interest (set out in figure 1 of your response to ISH2.09 in [REP4-164] and your response to action points in [REP4-165], if so, provide any additional information to explain what has led to the change in circumstances. • Explain the implications of concurrent RAM vessel activities in terms of safety and the economy and whether any residual effects would be significant/ As Low As Reasonably Practicable (ALARP). • Provide suggested wording and plans to secure the concurrent RAM restrictions that the MCA seeks and the means of securing it, whether through the dDCO/dDML or a control document such as the Outline Navigation and Installation Plan (oNIP). <p>Applicant: Clarify the implications for the proposed development of restricting concurrent RAM activities in the area of interest requested by the MCA.</p>	<p>The Applicant confirms that a call was held with the MCA on 30 March 2026 to discuss their request for additional 'concurrent RAM and Restricted Visibility Stop SimOps Areas' and associated commitments. The further MCA clarified that in terms of concurrent RAM activity areas their concern relates specifically to risks associated with maintaining sea room in the south.</p> <p>In addressing this concern and others the Applicant has,</p> <ul style="list-style-type: none"> • Added two additional concurrent RAM activity areas, 'Outer Sunk East' and 'Outer Sunk Central', to Plate 3.1 (provided below for ease) and associated commitments in section 3.3 of the oNIP, to directly address the MCA's concern regarding risk associated with adequate sea room to the south. • Added the relevant concurrent RAM activity areas for North Falls and Five Estuaries to Plate 3.1 to illustrate Sea Link's coordinated approach to concurrent RAM operations within the Sunk region; noting that only some of these areas are directly relevant to Sea Link. • Added a section 3.4 to the oNIP dealing with 'Weather Constraints and a HAZOP Workshop' including the clause 'The HAZOP workshop will also define weather limits, and associated risks to project vessel and/ or third-party vessel operations, including visibility thresholds (2 Nautical Miles)'. This is to directly address the MCA 'Restricted Visibility Stop SimOps Areas'.



3SN2.	Applicant	<p>Outline Navigation and Installation Plan The oNIP is referred to as 'outline navigation installation plan' in the dDCO but the document itself is titled 'outline navigation and installation plan'. Either amend the document title or the wording in the dDCO so that there is consistency between the dDCO and the document.</p>	<p>The Applicant confirms that the oNIP title has been updated within the Application Document 3.1 (I) draft Development Consent Order to ensure consistency between the two documents. This update has been submitted at Deadline 6.</p>
3SN3.	Applicant	<p>Outline Navigation and Installation Plan The oNIP is listed in schedule 16 dDML in the definitions in paragraph 1(1) as a document certified under article 60. However, it is not listed in schedule 19 as a certified document under article 60. Amend the dDCO to include the oNIP in schedule 19.</p>	<p>The Applicant confirms that Schedule 19 has been updated to include the oNIP as a Certified Plan. This update has been submitted at Deadline 6.</p>
3SN4.	MMO	<p>Cable burial Has the applicant's response in [REP5-132] to your concern in relation to cable burial depths from KP 96.343 to 113.83a [REP4-126]</p>	<p>Following a call with the MCA on 30 March 2026 the following further clarification and justification was provided by the Applicant to the MCA on this topic,</p> <p><i>The final cable trenching methodology for KP 96.343 to KP 113.883 has not yet been confirmed and will be informed by the Main Works Contractor's detailed design, including engineering surveys and a burial</i></p>

Reference	Question to:	Question	Applicant's Comments
		<p>provided sufficient information? If not, what more do you require and why.</p>	<p><i>assessment study. As described in DCO Document 6.2.1.4, Part 1, Chapter 4 (Description of the Proposed Project), four generic types of cable trenching equipment have been assessed at the application stage. Within the KP range 96.343 to 113.883, the ground model indicates the presence of sand waves and chalk bedrock, and the preferred installation approach is likely to involve pre-sweeping followed by mechanical trenching. Following further engineering assessment within the North East Spit Area, and specifically to maintain the Safeguarded Water Depth required by the ports, the Applicant has identified that the use of a backhoe deployed from a spud barge may be required over a limited section between KP 102.4 and KP 104.4. Over this restricted KP range, the installation methodology may involve pre-sweeping followed by backhoe trenching in order to achieve the depth of lowering required.</i></p> <p><i>The proposed target depth of lowering of 0.5 m for KP 96.343 to KP 113.83 assumes competent chalk bedrock at seabed level and is considered appropriate for these ground conditions. This target depth of lowering should be regarded as a minimum, noting that the actual depth required may be greater depending on the thickness of surficial sediments and the degree of weathering of the upper chalk. The final target depth of lowering will be confirmed through the Main Works Contractor's detailed design, informed by engineering surveys and the burial assessment study. The Applicant does not consider it appropriate at this stage to commit to a greater depth of lowering. Notwithstanding this, the Applicant has committed to updating the Cable Burial Risk Assessment (CBRA) post-consent. The final depth of lowering will be secured through the Cable Specification and Installation Plan (CSIP), which is in turn secured under DML Condition 4, and will be approved by the MMO prior to cable installation. The MCA is a named consultee for the CSIP and all relevant marine plans.</i></p>
3SN5.	<p>Applicant MMO and other relevant stakeholders</p>	<p>Outline Cable Specification and Installation Plan [REP4-090]</p> <p>In the MMO's comments in [REP4-126] it is stated that the oCSIP will need to be compared to the CBRA.</p> <p>Has the comparison been undertaken and what is the outcome?</p> <p>Provide details of any concerns the MMO (or other stakeholder) have and any suggested remedy.</p>	<p>The Sea Link Cable Burial Risk Assessment [PDA-039] is a FEED-stage design document, prepared at a specific point in the design process. It was not intended to, and would not reasonably be expected to, reflect the detailed wording of the REAC, oCSIP, oCEMP, or other plans, which have been developed and refined through the Examination. The CBRA was submitted early into the examination to demonstrate that the proposed burial (lowering) depths are technically achievable and risk-based, and to support discussions with the MMO, SNCBs, MCA and relevant port authorities.</p> <p>Therefore, a direct comparison of the CBRA with the oCSIP (and other plans) is not appropriate at this stage, save for the purpose of demonstrating that the Applicant has applied, and will continue to apply at detailed design stage, a sufficiently robust technical and risk-based approach to justify the proposed depth of cable lowering along the route.</p> <p>The Applicant confirms that it has already committed within outline Cable Specification and Installation Plan (Application Document 9.92) to review and update the <i>current CBRA [PDA-039] post-consent and prior to construction.</i></p> <p>The Outline Cable Specification and Installation Plan (oCSIP) is the appropriate mechanism for securing the cable installation methodology, including depths of lowering, informed by the final Cable Burial Risk Assessment. The oCSIP is secured through the DML under Condition 4 and will be approved by the MMO in consultation with the listed stakeholders, in accordance with the relevant Requirements and the commitments set out in the REAC.</p> <p>In respect of the MCA's concerns in respect of reduction in navigable depth by more than 5%, the Applicant can confirm that this is addressed in the dDML. Condition 4 (1) (a) (v) of the dML in Application Document 3.1 (H) draft Development Consent Order [REP5-005] states:</p>

Reference	Question to:	Question	Applicant's Comments
			<p>a detailed cable laying and burial plan, incorporating a burial risk assessment encompassing the identification of any cable protection that exceeds 5% of navigable depth referenced to Chart Datum and, in the event that any area of cable protection exceeding 5% of navigable depth is identified, details of any steps (to be determined following consultation with the MCA and Trinity House) to be taken to ensure existing and future safe navigation is not compromised or similar such assessment to ascertain suitable burial depths and cable laying techniques, including cable protection;</p> <p>Furthermore, Application Document 9.96 (B) Water Depth Baseline Study – Shipping and Navigation Technical Note [REP5-120] provides a high level indicator of where the water depths and the MCA 5% / crossings protective berms may require specific discussion, which ties into the Condition 4(1) (a) (v) of the dML.</p>
3SN6.	MCA MMO PLA LGPL HHA	<p>Anchor strike risk</p> <p>Provide clarification as to whether concerns regarding anchor strike risk, particularly in relation to the Sunk anchorage would be adequately mitigated by the mitigation measures including the target depth of lowering and external cable protection details set out in the oCSIP [REP4-090]. If not, provide details of any remaining concerns and/ or additional measures that would be required.</p>	<p>Following a call with the MCA on 30 March 2026 the following further clarification and justification was provided by the Applicant to the MCA on this topic,</p> <p><i>The Applicant has considered the risks associated with the deep-water anchorage when defining the target depth of lowering between KP 33 and KP 38. Within this 5 km section and from KP35, approximately 2.9 km adjacent to the deep-water anchorage has a target depth of lowering of 2.0 m. The Applicant does not consider it appropriate at this stage to commit to a greater target depth of lowering; for reasons described above in respect of the Contractors detailed design. Notwithstanding this, the Applicant has committed to updating the CBRA post-consent in consultation with the MCA, and approval by the MMO. The final depth of lowering will be secured through the Cable Specification and Installation Plan (CSIP), which is in turn secured under DML Condition 4, and will be approved by the MMO prior to cable installation. The MCA is a named consultee for the CSIP and all relevant marine plans.</i></p>
3SN7.	Applicant	<p>Cable exposure</p> <p>The MCA [REP1-162] requested amended wording in condition 3(12) of the dDML in order to further mitigate the risks of large container ships anchoring in the Sunk deepwater anchorage experiencing anchor snagging on temporarily exposed cables. The applicant responded in [REP2-034] that the revised wording of the condition would be considered.</p> <p>Provide an update as to whether the revised wording suggested by the MCA can be incorporated into the dDCO, and if not, why not.</p>	<p>The Applicant would like to confirm that since receipt of Application Document Written representations (WR) and summaries for any that exceed 1500 words [REP1-162], a Requirement securing Areas of Safeguarded Water Depth has been included into the Application Document 3.1 (H) draft Development Consent Order [REP5-005]. These three areas have been identified by the Port Authorities in discussion with the MCA.</p> <p>With the above in mind, and given the already defined Areas of Safeguarded Water Depth received from the Port Authorities, the Applicant suggests the following amendment to the text presented by the MCA which will be included within the updated Application Document 3.1 (I) draft Development Consent Order, submitted at Deadline 6:</p> <p><i>(12) In case of exposure of cables on or above the seabed, the undertaker must, within five days following identification of a cable exposure, and as soon as reasonably practicable within the Areas of Safeguarded Water Depth, notify mariners and Port Authorities by issuing a notice to mariners and by informing Kingfisher Information Service of the location and extent of exposure. Copies of all notices must be provided to the MMO, MCA, Trinity House, Kingfisher Information Service of Seafish and UK Hydrographic Office within seven days of the exposure identification.</i></p> <p>Notwithstanding the above, the Applicant is considering options to further articulate the MCA's key areas of concern, including the potential use of kilometre post (KP) ranges to more clearly define the area adjacent to the Sunk Deep Water Anchorage.</p>
3SN8.	MMO	Post consent monitoring	

Reference	Question to:	Question	Applicant's Comments
		[REP3-033] indicates that the MMO's request for regular post-construction maintenance reports and a separate section in the DML to be included for post consent monitoring has not been agreed by the applicant. Provide an explanation for the request including the implications of not including provision for post-construction maintenance reports and monitoring, and if necessary suggested wording for a section in the DML in relation to shipping and navigation matters.	
3SN9.	MMO MCA Port of London Authority (PLA) London Gateway Port Ltd (LGPL) Harwich Haven Authority (HHA) Applicant	dDML conditions 4 and 12 Do conditions 4(6) and/ or 12(3) need to be amended to apply only to areas outside of the areas where the safeguarded depths are being agreed. If so, provide amended wording. If not, explain why not.	The Applicant considers that for Condition 4(6) this is already specific to KPs located outside the Areas of Safeguarded Water Depth. Additionally, the Applicant also considers Condition 12(2) (in the Deadline 6 update) also is still applicable to the entire Offshore route following advice from the MCA.
3SN10.	Applicant	Proximity of the route to buoys and other aids to navigation Provide further detail in response to the concern of Trinity House in [REP4-204] regarding the status of the route and its proximity to buoys and other aids to navigation.	<p>The Applicant confirms that Application Document 7.4.12 (D) Statement of Common Ground Between National Grid Electricity Transmission and the Trinity House [REP5-058] was issued to Trinity House for comment and review prior to its submission at Deadline 5.</p> <p>As noted in the SoCG, Trinity House has suggested generally that the cable should be routed 200 m away from buoys, but that there is a grade of flexibility on this. The Applicant confirms that where practicable, a 200 m closest point of approach to Aids to Navigation along the cable route would be maintained. Where this is not possible, discussions with Trinity House will take place to reach an agreed offset, as has taken place regarding Sunk Whiskey 1 buoy, where a minimum of 151 m from the cable route was agreed with Trinity House as being acceptable. In the event that subsequent re-routeing during the detailed engineering phase would bring the proposed route closer to buoyage, this will be addressed with Trinity House on a case-by-case basis.</p> <p>The Applicant confirms that REAC commitment SN31 applies, such that the Proposed Project cable will not be routed any closer to the Sunk W1 buoy than the minimum separation distance of 151 metres currently proposed and agreed with Trinity House.</p> <p>In addition, the Applicant also confirms that the following REAC commitment SN36 submitted at Deadline 6:</p> <p><i>Where practicable, a 200 m closest point of approach to Aids to Navigation along the cable route would be maintained. Where this is not possible, discussions with Trinity House will take place to reach an agreed acceptable distance. In the event that subsequent re-routeing during the detailed engineering phase would bring the proposed route closer to buoyage, this will be addressed with Trinity House on a case-by-case basis.</i></p> <p>This is to secure the general position agreed with Trinity House.</p>

Reference	Question to:	Question	Applicant's Comments
3SN11.	Applicant	<p>Marking of cable crossings and cable lay</p> <p>Provide an update as to the status of discussions with Trinity House regarding the marking of cable crossings and cable lay [REP4-204].</p>	<p>The Applicant confirms that Application Document 7.4.12 (D) Statement of Common Ground Between National Grid Electricity Transmission and the Trinity House [REP5-058] was issued to Trinity House for comment and review prior to its submission at Deadline 5.</p> <p>As noted in the SoCG with Trinity House at Ref 3.3.8, Trinity House has advised that they do not recommend the use of buoyage to mark hazards except in extreme cases as these Aids to Navigation (AtoN) can become a hazard in themselves. Therefore, the Applicant's current position with this matter is that other mitigation methods will be used and physical buoyage or marking is not required, but that any potential scenarios where the introduction of an AtoN, including any virtual AtoN, is considered that this will be raised with Trinity House for further discussion and agreement.</p>
3SN12.	GridLink MMO MCA PLA LGPL HHA	<p>Planned cable crossing within North East Spit</p> <p>Provide your comments on the securing mechanisms included in requirement 17(2) [REP5-006] for safeguarding water depths in relation to the potential crossing with the planned GridLink cable.</p>	
3SN13.	MMO MCA PLA LGPL HHA	<p>Cable crossings</p> <p>Provide your comments on the applicant's proposed mechanisms for safeguarding water depths at the point of cable crossings. If you consider that the proposed mechanism is not appropriate, provide a detailed explanation of why not, suggest a more appropriate mechanism and suggested wording, unless already provided.</p>	
3SN14.	MMO MCA PLA LGPL HHA	<p>Planned cable joints within the three areas of safeguarded depth (ASD) on plate 1.2 of [REP4-090]</p> <p>The oCSIP sets out in section 4.4 that there will be no planned cable joints in the three ASDs. Is this sufficient to minimise risks to shipping and navigation to ALARP and mitigate any likely significant effects on shipping. If not, explain the additional measures that are required, and if appropriate provide suggested wording.</p>	
3SN15.	Applicant	<p>Areas of interest and areas of safeguarded depth plan</p> <p>The ExA understands the safeguarded depth plan to be [REP4-098]. The dDCO [REP5-005] defines areas of interest as being shown in [REP4-098] but that document does not indicate the areas of interest, only the areas of safeguarded water depth.</p>	<p>The Applicant confirms that the 'Areas of Interest' listed within Application Document 3.1 (H) draft Development Consent Order [REP5-005] refer to the same three areas that are presented in Application Document 9.104 (A) Areas of Safeguarded Water Depth Plan [REP4-098], and not those listed within plate 1.1 of Application Document 9.12 (B) Outline Navigation and Installation Plan [REP4-075].</p> <p>To avoid confusion with Application Document 9.12 (B) Outline Navigation and Installation Plan [REP4-075], the Applicant will amend the wording in the dDCO/DML from 'Areas of Interest' to 'Areas of Safeguarded Water Depth'.</p>

Reference	Question to:	Question	Applicant's Comments
		Clarify whether areas of interest are those that are shown in plate 1.1 of [REP4-075]. If necessary provide an additional plan to be certified in the dDCO indicating the areas of interest.	A separate plan is therefore not required to show the Areas of Interest which are presented in Application Document 9.12 (B) Outline Navigation and Installation Plan [REP4-075] as these are secured solely within this document and not specifically referenced within Application Document 3.1 (H) draft Development Consent Order [REP5-005] .
3SN16.	MMO MCA PLA LGPL HHA	<p>Unplanned cable joint repairs</p> <p>Condition 12 of the dDML [REP5-005] sets out that 'maintenance' includes cable repairs. REAC provision SN33 states that unplanned cable repair joints will be avoided in the Sunk, so far as practicable, but if such a scenario is unavoidable, the project shall consider potential collision risk and minimize time spent during maintenance in this region as much as possible. The oCSIP [REP4-090] sets out in section 4.4 further detail of the procedure for cable jointing and unforeseen repairs within the three areas of safeguarded water depth. Consider whether these provisions provide adequate safeguards to minimise risks to shipping and navigation to ALARP in this regard, and if not explain why not and suggest alternative or additional measures.</p>	
3SN17.	MCA	<p>Exclusion zones</p> <p>Clarify whether the inclusion of reference to exclusion zones in dDCO/dDML condition 3 is sufficient. If not, why not.</p>	
3SN18.	MCA	<p>Magnetic compass deviation</p> <p>The dDCO [REP5-005] includes condition 6 of the dDML in relation to compass deviation. Advise whether this meets your requirements. If it does not, explain why not and suggest how this could be overcome.</p>	
3SN19.	Applicant	<p>Vessel management plan (VMP)</p> <p>Address comments made by the PLA [REP5-201] in response to 2SN4 setting out why a VMP is required in relation to vessel operation movements and communications. Consider whether they can be incorporated into the oNIP as overarching measures that apply for all offshore vessel activities and would not be restricted to the Areas of Interest.</p>	<p>The Applicant notes the comments made by the PLA in response to 2SN4, noting that they state "<i>The Sea Link oNIP now contains a similar requirement [to the Five Estuaries oNIP] for a process flow chart, but only refers to agreement how activities within the five AOI will be notified to stakeholders, but not agreement on how they will be managed. This is definitely an improvement, but there is a subtle difference in the wording which is not acceptable to the PLA</i>".</p> <p>The Applicant will therefore update the wording of the Sea Link oNIP accordingly to add reference to "agreement of how activities will be managed".</p> <p>It is the Applicant's view that this update would resolve the PLA's request here, and that therefore there is not a need to apply further overarching measures to all offshore vessel activities.</p>

Reference	Question to:	Question	Applicant's Comments
3SN20.	Applicant	<p>Consistency</p> <p>Ensure that there is consistency between documents regarding safeguarding water depths, as set out in comments made by LGPL in [REP5-174].</p>	<p>The Applicant confirms that the consistency references outlined by LGPL in [REP5-174] have now been rectified. The Applicant confirms that an updated version of the documents highlighted by LGPL will be provided at Deadline 6.</p>
3SN21.	<p>MCA</p> <p>MMO</p> <p>PLA</p> <p>LGPL</p> <p>HHA</p>	<p>Schedule of outstanding matters</p> <p>Provide a schedule of outstanding matters with a clear explanation of the implications (likely significant effects or ALARP) in terms of shipping and navigation if these matters remain unresolved at the close of examination. Where DCO/DML drafting could resolve these matters please provide suggested wording.</p>	

22. Commercial Fisheries

Table 22.1 Commercial fisheries

Reference	Question to:	Question	Applicant's Comments
3CF1.	Applicant	<p>Thames Estuary Cockle Fishery Order (TECFO)</p> <p>Further to your response to ExA question 2CF14, explain whether the new TECFO has any implications for the assessment of effects on commercial fisheries, and if so provide an amended assessment.</p>	<p>As set out in the response to ExA Question 2CF14, the Thames Estuary Cockle Fishery (No. 2) Order 2024 (TECFO) has been updated by The Thames Estuary Cockle Fisheries (No. 2) (Variation) Order 2025.</p> <p>The update is specifically in relation to article 5(12) of the 2024 Order concerning eligibility for a licence to dredge, fish for or take cockles within the regulated fishery. The change is set out below:</p> <p><u>The Thames Estuary Cockle Fishery (No. 2) Order 2024 Article 5</u></p> <p>Article 5 (12) Where a transitional period licence is issued to a company under article 6, any person who was a shareholder or officer of that company on 30th January 2024, is not eligible to be granted a licence under this article or a transitional period licence under article 6, whether as an individual or as a shareholder or officer of another company.</p> <p><u>The Thames Estuary Cockle Fisheries (No. 2) (Variation) Order 2025.</u></p> <p>Article 5 (12) A person (“P”) is not eligible to be issued with a licence or to have a licence renewed under this article for a period of 7 years beginning with the 18th December 2024 if— (a) P, or a shareholder or officer of P, was on 30th January 2024 a shareholder or officer of a company (“C”); and (b) C has been issued with a transitional period licence under article 6.”</p> <p>As set out in Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries [REP1A-009] paragraph 8.2.15 the TEFCO sets a Total Allowable Catch (TAC) for cockles based on the previous year’s stock assessment. The fishery typically opens in June and shuts once the TAC has been reached, commonly in September or October. Fishers must hold a licence to access the TEFCO and are also subject to annual and per-trip landings weight restrictions.</p> <p>The Applicant can confirm that the change relates specifically to the licensing of vessels that are eligible to dredge, fish for or take cockles within the regulated fishery rather than introducing any changes to the function of the TEFCO or calculation of the TAC.</p> <p>Furthermore, as set out in Application Document 6.2.4.8 (B) Part 4 Marine Chapter 8 Commercial Fisheries [REP1A-009] paragraph 8.7.20 and 8.9.8 the offshore scheme does not overlap the TECFO cockle fishing grounds.</p> <p>Given that the TEFCO does not overlap the Offshore Scheme and that the change to the TEFCO does not change the boundaries of the TEFCO or the calculation of the annual TAC, the Applicant can confirm that the change in vessel licensing will not have any implications for the assessment of effects on commercial fisheries.</p>

28. Other

Table 28.1 Other

Reference	Question to:	Question	Applicant's Comments
3OTH1.	Applicant	<p>Deposit of plastic and synthetics at sea</p> <p>Part 1(7)(e) of the dDML sets out that plastic and synthetics are authorised for deposit at sea. NPS EN-1 5.15.11 states that assessment should include other uses of material before disposal to sea.</p> <p>Applicant:</p> <ul style="list-style-type: none"> • Confirm whether this assessment has been carried out or whether it would be secured through a control document. • Provide an estimate of quantities and likely locations. <p>MMO/NE: Comment as to whether this is acceptable.</p>	<p>NPS EN-1 5.15.10 states <i>'If the applicant's assessment includes dredged material, the assessment should also include other uses of such material before disposal to sea, for example through re-use in the construction process'</i>. The Applicant confirms that is not dredging material from the seabed and depositing elsewhere in the marine environment as part of the Proposed Project. Any disturbance to sediment will be suspended and deposited locally as part of construction activities. As there is no extraction/removal of sediment from the seafloor, there is no opportunity to re-use this sediment elsewhere during the construction process.</p> <p>NPS EN-1 5.15.11 states <i>'The UK is committed to transitioning to a circular economy, a future where resources are kept in use for longer, and waste is reduced; we accelerate the path to net zero, we see investment in critical infrastructure and green jobs, our economy prospers, and nature thrives. Where possible, applicants are encouraged to source materials from recycled or reused sources and use low carbon materials, sustainable sources and local suppliers. Construction best practices should be used to ensure that material is reused or recycled onsite where possible'</i>. The Applicant confirms that within Applicant Document 9.92, paragraph 5.1.5 it states <i>'The Applicant will ensure that the contractor considers measures to avoid use of microplastics where possible'</i>. The use of any plastic and synthetics, outside of sheathing options for the cable itself, will be limited to the areas of external cable protection presented within Plate 5.1 of Application Document 9.92 and HDD exit pits as required and are typically included within Concrete mattresses and rock bags.</p> <p>Plastic and synthetic material in external cable protection offers stability, durability, flexibility and resistance to water. The inclusion of this Condition is common to all recently submitted DCOs. The Applicant would also like to draw attention to the MMO's Deadline 4 response:</p> <p><i>Following review, the MMO confirms that we have no major concerns regarding the generation of microplastics from rock armour solutions for this project, however, we note that the introduction of microplastics into the water column should be avoided where possible.</i></p>

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