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The applicant  
All local authorities  
Historic England  
Joint Nature Conservation Committee  
Kent Wildlife Trust  
Mark Chandler  
Marine Management Organisation  
Maritime and Coastguard Agency  
Natural England  
Scottish Power Renewables (UK) Limited  
Struan Robertson  
The National Trust  
The Royal Society for the Protection of  
Birds (RSPB)  
William Notcutt Estates Limited

Your Ref:

Our Ref: EN020026

Date: 21 April 2026

Via Email only

Dear Sir or Madam

## **Application by National Grid Electricity Transmission Limited for an order granting development consent for the Sea Link project**

### **Planning Act 2008 – Section 89**

### **The Infrastructure Planning (Examination Procedure) Rules 2010 – rule 17**

The Examining Authority (ExA) writes to the parties listed above, under rule 17 of the Infrastructure Planning (Examination Procedure) Rules 2010, following deadline (DL) 6 on Monday 13 April 2026. The ExA requests the following additional information and clarifications to be submitted by **DL7, Wednesday 29 April 2026**.

In addition to the matters below and for the avoidance of doubt, as per the examination timetable, the applicant is still requested to provide comments on all deadline 6 submissions for deadline 7.

#### **1. The Development Consent Order**

The following matters supplement the ExA's schedule of recommended amendments to the applicant's dDCO [PD-024] published on 17 April 2026.

## 1.1 Article 10

Suffolk County Council (SCC) at DL6 provided amended wording to article 10 in response to ExQ3GEN17 [REP6-276]. The ExA requests the applicant and all local authorities to provide comments on the amended wording.

## 1.2 Article 11

The ExA understands that the applicant remains in ongoing dialogue with SCC and does not consider that any amendments are required to article 11 at this stage [REP6-109]. Nonetheless, the ExA requests that the applicant comments on SCC's suggested amendments to article 11 [REP6-237], should agreement not be secured before the examination closes.

## 1.3 Articles 13 and 18

The ExA requests the applicant to provide comments on SCC's proposed wording for articles 13 and 18 [REP6-237].

## 1.4 Protected Trees

SCC [REP6-237] has suggested amended wording to Article 52 (trees subject to tree preservation orders) to prevent works to trees subject to a tree preservation order made after 19 September 2024 from being carried out without the prior consent of the relevant planning authority. The applicant is requested to provide comments on the implications of this amendment for the proposed development.

## 1.5 Requirement 13 - Decommissioning

The ExA requests that the applicant responds to East Suffolk Council (ESC) [REP6-261] and Friston Parish Council [REP6-262] responses to EXQ3GEN26 to fully explain why substations should be excluded from paragraph 13(1), particularly noting that the made orders for Bramford to Twinstead, Yorkshire Green, East Anglia One North and East Anglia Two do not exclude substations in their equivalent requirements.

## 1.6 Requirement 15 – Restriction on carrying out works when consented in another order

SCC [REP6-237] provided amended wording to requirement 15 in response to ExQ3GEN27. In relation to the suggested wording, the ExA considers further amendments would be necessary for clarity and precision. The ExA therefore asks SCC to consider the following questions and to provide a response and revised drafting:

- Should the requirement specifically refer to the Scottish Power Renewables (UK) Limited (SPR) projects rather than stating 'pursuant to another development consent order'?
- Should the requirement include a control mechanism or control points?
- Should detail be added to clarify what the 'alterations' would comprise or be limited to?
- Should this be an article rather than a requirement?

In answering the above, the ExA also asks SCC to provide a working example to show how this requirement would be applied and discharged in practice.

The ExA asks that the text suggested by SCC in [REP6-237], and any other amendments that SCC considers necessary in relation to the above questions, be discussed and agreed with ESC and the applicant before submission. If this is not possible, the ExA requests that any outstanding disagreements on drafting be fully explained by SCC, ESC and the applicant by DL7.

#### 1.7 Suggested new requirement – new substation at Grove Wood, Friston

Should the ExA not be minded to include the new requirement proposed by SCC (point 20 [REP6-237]) for the proposed substation at Grove Wood, Friston, can SCC and all local authorities provide further drafting, with reasons, to allay any outstanding concerns with regards to the existing requirements for the substation.

#### 1.8 New requirement suggested by Scottish Power Renewables (UK) Limited

In [REP6-155] (paragraph 2.8) SPR states that it considers there should be a requirement included with respect to compulsory acquisition (CA) powers no longer required - similar to that included within the Norfolk Boreas Offshore Wind Farm Order 2021. The ExA asks that SPR supplies suggested drafting for such a requirement, and the applicant provide comment on such a requirement being included.

#### 1.9 Schedule 4 Discharge of requirements

The ExA requests that all local authorities provide preferred timescales for schedule 4 paragraph 2 (further information) with reasons. The ExA notes that the explanatory memorandum [REP6-006] states that schedule 4 is based on the Bramford to Twinstead Order. The ExA requests the applicant to explain why the timescales in paragraph 2 (further information) are different to Bramford to Twinstead which specifies 7 and 21 business days respectively.

#### 1.10 Schedule detailing the discharging authorities for all requirements and documents

The applicant's comments on DL4 and DL5 submissions [REP6-109] notes that the applicant recognises that certainty is required by all parties over which bodies are defined as a discharging authority and that it will work with local authorities to consider further how responsibility for discharge of requirements between different bodies can be clarified. The ExA requests that the applicant provides a schedule detailing the relevant discharging authorities for all requirements.

## **2. Land Rights**

### 2.1 Ebbsfleet Minster Ltd and St Augustine's Golf Course

The DL6 submission from Mark Chandler [REP6-221] states that he has been instructed by his clients Ebbsfleet Minister Ltd and St Augustine's Golf Course to submit objections in relation to the CA of rights over Kent plots 3/46 and 3/47, and plots 3/66 and 3/99 respectively. The ExA asks that Mark Chandler provide further clarification and detail in relation to what the specific objections are and any progress towards agreement on those matters.

## 2.2 Erik and Karen Collins

The Book of Reference [REP6-014] lists Erik and Karen Collins as having category 2 interests in Kent plots 2/81 and 2/82. These plots form the access to their property. The ExA asks that the applicant explains why Erik and Karen Collins are not listed in the Schedule of Negotiations with Land Interests [REP6-012]. The ExA also asks the applicant to detail how it would ensure that there was no interference with Erik and Karen Collins' rights in relation to accessing to their property during construction.

## 2.3 Gordon Young

The Book of Reference [REP6-014] lists Gordon Young as having category 2 interests in Suffolk plots 1/2, 1/4, 1/5, 1/7, 1/8, 1/9, 1/10 and 1/11. In previous versions of the Book of Reference Gordon Young was shown to have category 3 interests. The ExA asks that the applicant explain the change in category and why Gordon Young is not listed in the Schedule of Negotiations with Land Interests [REP6-012]. The ExA also asks that the applicant supply a detailed response to Gordon Young's late DL6 submission [REP6-278].

## 2.4 Ian Rix

The ExA thanks Ian and David Rix for their submissions [REP6-210] and [REP6-198]. The ExA understands that SPR has options over some of the land plots owned by Ian Rix. Nonetheless, the ExA needs to be clear in relation to all land the applicant considers is required for this application and therefore requests that the applicant provides detailed responses to all of the points raised in the submission of Ian and David Rix.

In the response to CAH2 action point (AP) 8 [REP6-110] the applicant explains that Suffolk plots 1/93, 1/94, 1/99 and 1/100 are for a proposed hedgerow to the south of the B1119. The applicant notes that the hedgerow planting was developed as part of the iterative design and assessment process in conjunction with ESC and SCC during the pre-application phase. The ExA asks SCC and ESC to provide comments on the implications of the removal of Suffolk plots 1/93, 1/94, 1/99 and 1/100 from the book of reference and the proposed hedgerow to the south of the B1119 from the order limits, should the ExA be minded to do so.

## 2.5 Struan Robertson

The ExA thanks Struan Robertson for his submission [REP5-223]. For the ExA to fully understand any outstanding objections to the CA of land or rights we ask that Struan Robertson provide a list of any plots where there remains a specific objection in relation to the CA of land or rights be submitted. Where an objection remains the ExA asks that detail is provided to explain the reasons for the objection.

## 2.6 William Notcutt Estates Limited

The ExA thanks William Notcutt Estates Limited for their submission [REP5-210]. For the ExA to fully understand any outstanding objections to the CA of land or rights we ask that William Notcutt Estates Limited provide a list of any plots where there remains a specific objection in relation to the CA of land or rights be submitted. Where an objection remains the ExA asks that detail is provided to explain the reasons for the objection.

### **3. Landscape and visual**

#### **3.1 Landscape and Ecological Management Plans for Suffolk and Kent (LEMP)**

The outline LEMPs for Suffolk and Kent (oLEMP) [REP6-078] and [REP6-080] in paragraph 1.2.4 refer variously to a 'detailed mitigation planting scheme', 'detailed planting scheme', 'detailed planting plan', 'mitigation planting', 'landscape mitigation plans', 'mitigation planting scheme'. In order for the LEMP to be an effective mechanism to secure the submission, approval and implementation of landscape mitigation, the wording needs to be consistent throughout the document. The ExA suggests that the plan is referred to as a 'detailed mitigation planting scheme' throughout the documents. The applicant is requested to amend [REP6-078] and [REP6-080].

#### **3.2 Landscape planting**

The ExA notes that the applicant's response [REP4-086] to AP50 [EV6-033] included an updated outline landscape mitigation plan to reflect the submitted SPR landscape mitigation. Furthermore, an updated figure D-1 was provided in appendix B of [REP4-086] showing the additional interface with LionLink. When compared with the oLEMP as originally submitted [APP-348] it appears that planting to the south of High House Farm has changed from being native woodland and tree planting to just tree planting in the latest version of the oLEMP [REP6-078]. The applicant is requested to clarify whether the proposed planting has been reduced and whether the visualisation for viewpoint 6a is still accurate.

The ExA welcomes the plan at appendix D of [REP4-086] showing how Sea Link and LionLink would be accommodated. The applicant is requested to clarify whether the accommodation of LionLink cables would affect the proposed landscape planting to the south west of High House Farm as the drawing is not clear.

#### **3.3 Acid grassland**

Natural England (NE) [REP6-248] has reiterated its advice given at previous deadlines with regard to the need for further information and commitments from the applicant, which have not been provided. The applicant is requested to provide the information and commitments set out in table 4 [REP6-248] to NE and agree and submit a position statement by the close of examination. If these matters are not addressed by the close of the examination the ExA will have to consider whether the acid grassland enhancement proposal can be taken into account in its recommendation, including in relation to the s85 duty.

#### **3.4 Assessment of effects on the National Landscape**

NE [REP6-248] has reiterated its concerns with the assessment of effects on the sub-factors of the natural beauty indicators, the reliance on the temporary nature of the project and the need for trenchless crossings. The applicant is requested to engage with NE to agree and submit a position statement.

#### **3.5 Inter-project cumulative effects**

In [REP6-098] the applicant has identified that a significant cumulative effect may occur as a result of the effects of 25/00023 land to the south of River Stour on landscape character

area A2 Ash levels and viewpoint 8. The applicant is requested to engage with Thanet District Council (TDC) and Dover District Council (DDC) to agree a position statement as to whether any additional mitigation is available.

#### **4. Ecology and biodiversity**

##### **4.1 Update on access to the Sandlings Special Protection Area (SPA)**

The Royal Society for the Protection of Birds (RSPB) response to third written questions [REP6-271] suggests that no discussions have arisen regarding access within Sandlings SPA. However, RSPB's written representation [REP1-158] discusses access within RSPB North Warren, which the ExA understood to include areas within the SPA. The Register of Environmental Actions and Commitments (REAC) [REP6-134] commitment B73 suggests that this will be agreed with the RSPB. RSPB to confirm its position regarding access within the SPA, including whether commitment B73 is sufficient and if not suggest alternative REAC wording with the applicant or propose alternative requirement wording.

##### **4.2 Lighting of horizontal directional drilling (HDD) compound**

NE's response to the Report on the Implications for European Sites (RIES) question 22 [REP6-250] still considers the assessment of lighting impacts to be unsatisfactory. NE and the applicant to explain what further evidence or mitigation is necessary to address this issue. In responding, NE to confirm whether it requires approval of lighting controls for the HDD compound adjacent to the Sandlings SPA, to ensure that disturbance effects on the Sandlings SPA have been avoided. If so provide agreed REAC wording or propose requirement wording.

##### **4.3 Acid grassland functionally linked land (FLL)**

In [REP6-242] NE comments on the definition of acid grassland suggesting 7.5ha is affected. In the executive summary of the habitats regulations assessment (HRA) [REP6-050] the applicant states this is 3.5ha. The applicant to confirm the actual area of acid grassland FLL that is affected.

NE to confirm whether it agrees with the applicant's conclusion of no adverse effects on integrity (AEoI) of the Sandlings SPA, now that the HRA has been revised to remove reference to acid grassland restoration and, if not, explain what further information or mitigation is required. This should be agreed with the applicant where possible.

##### **4.4 Alde Ore Estuary (AOE) SPA, Ramsar and Alde-Ore & Butley Estuaries (AOBE) Special Area of Conservation (SAC)**

The applicant has updated the HRA Report [REP6-050] to confirm that the outfall at the Saxmundham converter station would carry surface water runoff, following attenuation and therefore would not be contaminated or contain pollutants. Does NE agree with the applicant's conclusion of no likely significant effects (LSE) to AOE SPA and Ramsar site and AOBE SAC and if not, explain why not?

Applicant to update table 3.1 in the HRA Report [REP6-050] to include AOBE SAC, and to provide the citation in Appendix B.

#### 4.5 Scope of preconstruction surveys in the outline Landscape and Ecological Management Plans

Relevant local authorities to comment on the adequacy of the scope of preconstruction surveys in the oLEMP for Suffolk [REP6-078] and Kent [REP6-080]. Requirement 5(3) of the draft Development Consent Order (dDCO) [REP6-004] states “For the avoidance of doubt, all pre-commencement operations must be carried out in accordance with the plans listed in sub-paragraph (2), the outline management plans...”. The DL6 outline onshore construction environmental management plan (oCEMP) [REP6-074] secured by requirement 6(1) includes commitment “B75: The key ecology survey updates as set out in the Kent oLEMP (specifically for schedule 1 birds, roosting bats, dormice, and riparian mammals) must be undertaken prior to vegetation clearance in those areas.” However, this provision is not mirrored for Suffolk. Applicant to update the oCEMP and REAC [REP6-134] to include a similar provision or explain why this is not necessary.

#### 4.6 Ecological clerk of works (ECoW)

NE to confirm whether it is satisfied with the REAC wording relating to the ECoW as set out in GM06 and if not, provide alternative REAC wording agreed with the applicant or alternative requirement wording.

#### 4.7 Unilateral undertaking

Applicant to confirm when the unilateral undertaking (UU) in respect of the proposed 10% biodiversity net gain commitment will be submitted to the examination. In the absence of a UU, the applicant and local authorities to provide wording for a DCO requirement to secure this commitment. The ExA notes that it would be unable to give any weight to this commitment in its recommendation without a signed UU or appropriate DCO wording.

#### 4.8 Habitat Regulations Assessment summary of concerns

NE has provided a response to RIESQ35 [REP6-250], providing its current position on the applicant's conclusions regarding likely significant effects (LSE) and adverse effects on integrity (AEol) for 4 sites assessed in the applicant's HRA Report [REP6-050]. NE is requested to confirm its position on the remaining 14 sites. If the position is correctly identified in the Report on the Implications for European Sites (Annex 1, [PD-022]) please confirm accordingly. Clarify the position for Thanet Coast SAC, Berwickshire and North Northumberland Coast SAC, Humber Estuary SAC, Southern North Sea SAC and TCSB SPA and Ramsar.

### **5. Cultural Heritage**

#### 5.1 Ebbsfleet Peninsula Multi-Period Complex

Historic England (HE) [REP6-263] has stated that the change to the setting of the Ebbsfleet complex would result in a 'Moderate Adverse' effect, as the magnitude of impact is greater than the 'Negligible' assigned by the applicant. However, HE has stated that the impact to the setting of the complex would be small. Considering the wording of the National Planning Policy Framework and for clarity, would KCC and HE consider the harm to the complex setting to constitute substantial or less than substantial harm?

For the applicant, please respond to HE's comments that the permanent residual change to the complex would have a significant effect and that the proposed mitigation would only

somewhat offset and not truly lessened by the ability to record remains prior to their removal.

### 5.2 Geoarchaeology

KCC has stated [REP6-168] that geoarchaeological monitoring is due in mid-April 2026. Can the applicant confirm whether this is to be submitted at DL7?

Can KCC confirm whether this is necessary prior to any consent for the proposed development?

### 5.3 Historic Landscape

SCC [REP6-276] has stated that it does not agree that the changes to the Suffolk historic landscape would result in a minor adverse, and therefore non-significant effect. The ExA asks SCC, what level of adverse harm would you consider likely to the historic landscape and would this be a significant level of harm?

The ExA asks the applicant, please respond to the comments from SCC in [REP6-276].

### 5.4 HDD Archaeology Management Plan

SCC has stated in [REP6-141] that the CEMP should set out the provision for an HDD archaeology management plan to be produced in relation to potential impacts of bentonite breakouts upon defined archaeological areas. The ExA requires that the applicant respond to this request and include within the CEMP or explain why this is not included.

### 5.5 Decompaction methods

Within [REP6-141] SCC states that any decompaction works following the removal of track matting has the potential to impact upon archaeological remains and therefore will need consideration as part of any decompaction methodologies. The ExA asks the applicant, to provide a response and include within the appropriate management document(s).

### 5.6 Historic Environmental Management Plan (HEMP)

SCC [REP6-141] requires that provision is made for a scheme wide HEMP which identifies the archaeological sites within the order limits which are to be preserved in situ. The ExA asks the applicant to respond to this request and include a provision for the scheme wide HEMP, or explain why this is not submitted.

### 5.7 Ponds and pipes assessment

Within [REP6-141] SCC states that all ponds, pipelines and associated drainage works should be scoped in for archaeological assessment (where located outside of areas within which evaluation has already been completed) and mitigation and secured within the outline Scheme of Written Investigation. The ExA asks the applicant to respond to this request and include a provision for the scheme wide HEMP, or explain why this is not submitted.

### 5.8 Written Scheme of Investigation

Table 3 of SCC [REP6-141] responds in detail to the submitted outline Written Scheme of Investigation (OWSI) [REP5-070]. The ExA asks the applicant, to consider the comments raised and incorporate within an amended OWSI or explain why the changes requested by SCC have not been made.

## 5.9 Land To the South of River Stour Ramsgate Road - Solar Farm

The applicant [REP6-098] assesses that the proposed solar farm at Land to the South of River Stour Ramsgate Road (25/00023) would result in a significant residual effect on Richborough Saxon Shore Fort, Roman Port, and associated remains. It states that both the proposed development and the solar farm would be visible from this heritage asset, but there is no effective mitigation that could be applied by the applicant. The applicant explains that this is because the solar farm causes the greater part of the effect and would result in a significant effect in isolation.

The ExA asks for a response to this from both HE, Thanet District Council and KCC, including whether this changes your overall assessments of the impact to the Roman Fort and whether you agree that the applicant cannot apply any effective mitigation in the circumstances.

## **6. Water Environment**

At DL6, in responding to issue specific hearing (ISH) 3 AP4 [REP6-184], SCC considers that there could be an increase in flood risk due to temporary storage of materials in areas which could be at medium / high risk of flooding. It indicates that sustainability benefits could be in the form of general compensatory activities, or a targeted commitment for those who fall in this category. For instance, it suggested that a commitment to community benefit beyond that which is already committed to by the applicant under its license with The Office of Gas and Electricity Markets (Ofgem), targeted at residents in proximity to the sites of the onshore infrastructure could satisfy 5.8.11 of Overarching National Policy Statement for Energy (EN-1).

The ExA requests that the applicant work with SCC to draft a requirement or other mechanism to secure wider sustainability benefits to community that outweigh flood risk should the Secretary of State deem it necessary to meet the requirement of the exception test.

In SCC ISH3 'Written post hearing submissions' [REP6-182] SCC express concern that it is not clear that the sequential test has been passed. They consider that it has not been demonstrated that the temporary storage of construction materials cannot be placed in areas of low surface water flood risk. The ExA ask that the applicant clearly explain why this is the case or provide a suitable commitment that such materials would be placed in areas of low surface water risk.

SCC also indicates [REP6-182] that the sequential test may not be passed due to the location of temporary access routes within Flood Zone 3 if flood resilience design measures are necessary. The ExA ask that the applicant clearly set out their reasoning in response to this matter and, in answering, seek to work together with SCC prior to the DL7 submissions to resolve all remaining issues?

## **7. Traffic and Transport**

### **7.1 Permissive paths**

Can the applicant assure the ExA that the proposed permissive paths would remain open to the public for the duration of the operational period of the proposed development? Furthermore, does there need to be additional landowner consent for these paths?

In response to ExA question 3SERT3 SCC [REP6-276] SCC has set out what it would expect from a public right of way. The ExA asks the applicant whether such standards and criteria be achieved for the proposed permissive path? If not, please explain why this could not be achieved? Furthermore, can the applicant clarify why the proposal is for a permissive path rather than a public right of way?

### **7.2 Public Right of Way (PRoW) mitigation**

For PRoW mitigation, SCC [REP6-184] has taken the view, in lieu of additional onsite mitigation/ offsetting being proposed by the applicant, that offsite measures would be the appropriate approach to secure offsetting and that this could be secured via a s106 with SCC.

The ExA asks the applicant if this could be a way of mitigating the cumulative impacts to the PROW network?

For the applicant and SCC, how would the level of contribution set within the s106 agreement be determined? If there is agreement on the provision of a s106 agreement to address this matter, please submit it at DL7 or set out a timeframe for submission.

### **7.3 Coordination to avoid significant impacts to PROWS**

SCC [REP6-184] has criticised the applicant's reliance on coordination to avoid potential significant effects for PROWs. Whilst this may be the ambition of the applicant, the ExA asks the applicant to explain if it the case that coordination cannot be relied on as it depends on the agreement of other parties?

### **7.4 Monitoring and capping of heavy goods vehicle (HGV) movements**

The submitted outline Construction Traffic Management Plans (oCTMP) for both Suffolk [REP6-062] and Kent [REP6-064] commit the applicant to monitoring Heavy Goods Vehicles (HGVs) in terms of routes taken and arrival and departure delivery times. They also state that any issues would be resolved following reporting, which would be shared with the local highway authorities. The ExA ask that the local authorities and the applicant confirm if such monitoring would have similar results to capping with this monitoring in place. Is this not similar to capping HGVs on routes and access points to ensure the assessed worst-case scenario is not breached? Is it possible to amend and add to the wording within the oCTMPs so it would reflect that agreed under the East Anglia 2 oCTMP, which sets out what is being monitored and the stages of what would happen if breaches occurred?

The ExA requires that the applicant work with the local highway authorities to agree wording on this matter.

### **7.5 Kent County Council traffic requests**

KCC has requested a full travel plan monitoring scheme and the provision of passing places on Ebbsfleet Lane North, among other requests at point 19 of [REP6-168]. The ExA

ask that the applicant commit to these requests or explain in detail why this cannot or should not be done.

#### 7.6 A12 capacity assessment

SCC [REP6-184] states that a real-time, backward-looking assessment to see changes in journey time and delays would be achievable. However, there is an issue of how to disassociate individual scheme impact, albeit this may be possible by reviewing monitoring data. The ExA asks SCC and the applicant to explain whether such an assessment is something that can be committed to and when should it be undertaken?

#### 7.7 Saxmundham junction

In the SCC response [REP6-276] to question ExQ3TT9, regarding the B1121 Main Road/ B1119 Church Street signalised junction, it welcomes the cap of HGVs, but notes there is no junction modelling. SCC mention that there was Sizewell C (SZC) modelling. The ExA asks SCC whether it can use this modelling to ascertain approximately what the driver delay impacts would be to this junction if there were an additional 10 HGVs using it for the proposed development? If possible the ExA ask for this to be submitted into Examination.

#### 7.8 Works to Benhall Railway Bridge

SCC [REP6-184] has advised there should be a prohibition of construction traffic using S-BM-09 main access off the B1121 during closure of Benhall railway bridge for works necessary for construction access, for the temporary overbridging or bridge repairs, as this would prevent adverse impacts in Saxmundham from diversion routes. Given the anticipated short period of times that the bridge would need to be closed can the applicant agree to the closure of this access during these periods and if so, explain how can this be secured?

#### 7.9 Sizewell C traffic data

SCC [REP6-184] at point 22 states that it is still struggling to reconcile the data presented in [REP4-099] with that in the SZC Consolidated Transport Assessment. The ExA requires that the applicant communicate with SCC before DL7 and for both parties to provide an explanation to the ExA regarding the situation.

#### 7.10 A12 sensitivity test

SCC [REP6-184] states that as a minimum a sensitivity test is required to assess the cumulative impact of all nationally significant infrastructure project related construction vehicles on the A12 and elsewhere. The ExA requests that SCC and the applicant discuss a sensitivity test which could address SCC concerns and submit details to the ExA.

#### 7.11 A12 cumulative impacts

SCC [REP6-184] at point 23 states that it remains concerned with the scope of assessment for the A12 and also states that mitigation for residual and/or unforeseen transport impacts could be managed and secured in a similar way to SZC, through a Contingent Effects Fund. The ExA asks that the applicant consider and respond to these comments.

#### 7.12 Suffolk junction modelling

The applicant has submitted junction capacity modelling for three junctions in Suffolk [REP6-039]. Please can SCC respond in detail to this modelling and explain how this

affects SCC's overall view of traffic and transport impacts with the proposed development and cumulatively with other projects.

## **8. Noise and vibration**

### **8.1 Temporal restrictions**

Applicant to explain how temporal restrictions would provide mitigation for properties affected by HDD installation noise, which is intended to be a continuous, 24 hour operation. Alternatively, explain whether the proposed noise mitigation for Sandlings SPA, also avoids, mitigates or minimises effects from noise exceeding the significant observed adverse effect level (SOAEL).

### **8.2 Hoverport noise assumptions**

Applicant to provide further justification for the assumption of one third vehicle movements at night in the hoverport construction access noise modelling - technical note [REP6-123] and explain whether the nighttime SOAEL could be exceeded once vehicles turn onto the Sandwich Road. In addition, the applicant to provide comment on any mitigation that would be provided to mitigate and minimise effects above the Lowest Observed Adverse Effect Level (LOAEL).

### **8.3 Noise modelling – Pegwell Bay**

Applicant to provide updated marine ornithology predicted  $L_{AFmax}$  plans (figures 6.4.4.5.7 and 6.4.4.5.7) [REP5-032] showing the hoverport modelled as hard ground rather than soft ground. Any dependent assessments should be updated where relevant.

### **8.4 Hovercraft**

NE to confirm whether commitment GG45 in the oCEMP [REP6-074] is sufficient to control noise emissions from hovercraft, or whether a specific requirement is required, in which case, suggest requirement wording. Applicant to comment on the need for a requirement or otherwise.

## **9. Socio-Economics and Tourism**

### **9.1 Tourism monitoring**

The applicant [REP6-111] has stated that tourism monitoring is unnecessary in light of the assessment showing no significant effects. 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. Furthermore, the applicant states that it would not be possible to isolate any marginal influence from the proposed development on tourism given the relatively modest scale of the proposed development in terms of extent, worker numbers and duration compared to a substantial project, such as SZC. The ExA asks all local authorities to respond to these comments and set out how in practice any results from tourism monitoring would be of value and how the impact of the proposed development could be discerned from other developments?

### **9.2 Tourism Commitments**

The ExA asks the applicant respond to ESC's [REP6-261] request for additional commitments relating to tourism industry mitigation (under 3SERT2) and include these as

secured commitments where agreed. Please explain why the applicant does not include any of these commitments.

### 9.3 Accommodation Strategy and Monitoring Plan

The ExA requires that the applicant respond to the proposed new requirement for an Accommodation Strategy and Monitoring Plan as set out by SCC [REP6-237].

### 9.4 Skills, Supply Chain and Employment Plan

The ExA asks the applicant to respond to the Skills, Supply Chain and Employment Plan requirement proposal by SCC [REP6-237] and either include this within the dDCO or explain why it is not necessary.

Furthermore, the applicant is requested to respond to point 27 of [REP6-184] where SCC sets out its comments on the currently submitted Skills, Supply Chain and Employment Plan [REP6-101].

## **10. Health and Wellbeing**

### 10.1 Core working hours

SCC [REP6-237] has suggested a revised construction hours requirement 7. The ExA requires that the applicant respond to the revised wording with any changes to requirement 7 of the dDCO that the applicant considers necessary. Where changes are not adopted, explain why this is the case.

### 10.2 Health and wellbeing monitoring

The applicant, in response to ExQ3HW3 [REP6-111] states that it does not agree to the inclusion of a mental health and monitoring plan because the applicant does not consider that such a monitoring plan is possible due to there being substantial limitations, particularly regarding attribution and follow on mitigation. For all local authorities, respond and explain how these limitations, particularly relating to attribution and follow-up mitigation, could be addressed.

### 10.3 Vulnerable groups

The ExA asks the applicant to confirm whether it has accounted for the new Special Educational Needs and Disabilities (SEND) school which would be near the B1121 and how the applicant has sought to mitigate potential impacts to vulnerable people at this school, referred to by SCC [REP6-182].

The ExA requires that the applicant provide an update on any correspondence between the applicant and the operators of Great Oaks Small School and Ebbsfleet House and Martins (High Quality Lifestyles Limited (Priory Group)).

The ExA also asks the applicant whether there are any other facilities or establishments where there are potential vulnerable groups near the proposed development that may be affected and has communications occurred? If so, please set out these facilities and any discussions.

SCC has stated at point 45 of [REP6-184] that the applicant's consideration of vulnerable groups in the Environmental Statement is minimal and that other vulnerable groups such as neurodiverse and SEND individuals do not appear to have received any consideration

in the relevant parts of the ES with such deficiencies being not resolved by the mitigations currently proposed, nor addressed further at DL5. The ExA asks the applicant to respond to these comments and include a detailed response to how such vulnerable groups have been assessed and the mitigation committed to that relates to these groups.

#### 10.4 Residential receptors near the proposed Friston Substation

SCC [REP6-184] states that there is no specific health and wellbeing mitigation confirmed for cumulative effects residential receptors near the proposed Friston Substation. The ExA asks the applicant to respond to this by either signposting where such mitigation is secured or propose additional mitigation. If no mitigation is proposed, please explain why this is the case.

#### 10.5 Radiation Emergency Plan

The applicant has included commitment GG41 to the REAC [REP6-134] for a Suffolk Resilience Forum Radiation Emergency Plan. The ExA requires that SCC and ESC provide comments on this commitment.

The ExA notes that GG41 as it stands does not include a timeframe for submission or a requirement to be agreed with SCC. The ExA requests that the applicant submits revised wording that has been agreed with SCC and ESC

#### 10.6 Mental health and wellbeing impacts from change to Order Limits

There has been the change to the order limits southeast of Friston, which was to provide flexibility in the route of an underground cable and haul road to avoid the discovered heritage asset enclosure. The ExA asks the applicant to explain in detail how the change in the order limits would have no new or different effects on health and wellbeing as a result of the proposed change when compared to the design assessed within the ES, particularly from a health and wellbeing perspective.

## **11. Marine physical environment**

### 11.1 oCEMP commitment MPE06

Noting comments about oCEMP [REP6-074] commitment MPE06 from ESC [REP6-261] and TDC [REP6-274] the ExA is considering a DCO requirement similar to that proposed by ESC. Applicant to comment on the proposed wording, propose alternative wording or explain why this is not required: “(1) No part of Work No. 6 may commence until the following have been submitted to and approved by the relevant planning authority in consultation with the relevant statutory nature conservation body and, in respect of subparagraph (a) and to the extent that it relates to works seaward of mean high water springs, the Marine Management Organisation— (a) a landfall construction method statement for the construction of that part of Work No. 6; and (b) a landfall monitoring plan which commits to monitoring of the beach profile and erosion rates across the nearshore and foreshore and comparison of collected data to baseline topographic surveys to ascertain whether any coastal change is taking place that could risk cable exposure if unmitigated.”

## 11.2 Access to Pegwell Bay

In light of TDC comments in response to AP57, AP84, AP85 [REP6-274] and in [REP4-160], which suggest that additional controls on access to Pegwell Bay should be secured, the applicant, NE, National Trust, TDC and Kent Wildlife Trust to comment on the need for a requirement as follows: “Access to Pegwell Bay (1) Vehicles and machinery must not directly traverse the edge of the concrete skirt. Access shall be via engineered ramps or temporary bridging structures designed to distribute weight and prevent direct contact with the skirt. Structures must be constructed from non-contaminating materials (e.g., geotextile-reinforced matting) and approved by an independent structural engineer prior to use. (2) The hoverport area and all access points must be pre-assessed via non-invasive surveys (e.g., ground-penetrating radar) to identify weak zones. (3) Vehicle movements shall be limited to designated structurally sound pathways within the apron, avoiding proximity to the bay edge by at least 5 meters unless bridged. (4) All entry/exit points must incorporate wheel-wash facilities (non-toxic to marine environment and aquatic organisms) or decontamination zones to prevent tracking of materials from the pad into the bay. (5) A monitoring program shall be submitted to the relevant planning authority for approval prior to construction. This shall include baseline surveys of the concrete skirt integrity, subsurface materials, and bay sediments prior to commencement. The monitoring program shall include details of the inspection frequency (which shall be at least monthly), techniques and sampling methods and trigger levels for action (based on Environment Agency (EA) guidelines).” TDC to also comment on the specific EA guidelines to be referenced.

## 11.3 Jack-up barge (JUB) footprint

NE [REP6-245] states that the applicant has not provided evidence of depth/ footprint of leg depressions from JUBs within particular habitats and cites evidence of 2 to 10 year depression from offshore wind farms (OWF). Can NE explain the relevance of impacts from jack up barges on OWF given the different water depth and energy levels between works in marine and intertidal areas?

## 11.4 Jack-up vessels

Would the applicant be able to commit to no use of jack-up vessels in intertidal areas, with the use of bottom out barges instead, as requested by NE [REP6-245]? If not explain why not.

## 11.5 Designated disposal site

It is understood that the Marine Management Organisation (MMO) and the applicant have been working to designate a disposal site within the order limits [REP6-268]. ExA requires that MMO and the applicant provide an update on this matter.

## 11.6 Chemical, drilling and debris condition

The ExA asks the applicant to respond to the proposed alternative wording for marine licence conditions 4 and 8 relating to chemical, drilling and debris set out by MMO [REP6-268].

## **12. Benthic Ecology**

### 12.1 In Principle Monitoring Plan

The ExA requests that NE and MMO respond on the submitted In Principle Monitoring Plan [REP6-116] and set out any changes that they consider should be made.

### 12.2 Natural England benthic issues

The ExA asks the applicant to clearly respond to all points raised by NE in relation to benthic ecology set out within [REP6-245], [REP6-249] and the benthic tab within [REP6-258]. Where necessary, work with NE prior to DL7 to resolve remaining issues, particularly point E1 of [REP6-258] relating to potential pathways of effects.

### 12.3 Thanet Coast SAC

NE has indicated [REP6-258] that it remains concerned about deposition impacts within Thanet Coast SAC. The ExA requests NE to provide a detailed submission to explain its position on this matter. The ExA asks NE to explain if it is its position that there would be AEoI of the SAC from this LSE pathway, taking into account previous submissions from the applicant who has set out further analysed sensitivity of the reef biotypes and retained a conclusion of no AEoI.

On this issue the ExA requires that the applicant and NE work together prior to their DL7 submissions to resolve remaining issues on this matter or explain why this cannot be achieved and what the ramifications of this would be.

### 12.4 Benthic impacts in the operational phase

NE [REP6-245] notes that there is no assessment of the activities and impacts during the operational and maintenance phase of the project within the submitted oCEMP. The ExA asks the applicant to respond to this point and provide further controls or signpost where this information is.

### 12.5 Thanet Coast Marine Conservation Zone (MCZ)

Regarding the conservation objectives for Thanet Coast MCZ, the ExA asks the applicant to clarify if it would be maintained in a favourable condition for all protected features other than ross worm reef, which is assessed to recover to favourable condition.

### 12.6 Dover to Deal MCZ

With respect to the conservation objectives for Dover to Deal MCZ the ExA ask the applicant to clarify if it would maintain in a favourable condition all protected features.

### 12.7 Cable Protection

Marine Chapter 1, Physical Environment (paragraph 1.9.112, [REP6-026]) and the Marine Conservation Zone Assessment (paragraph 1.5.32, [REP6-016]) state that if the required depth of cable lowering is not achieved, further passes would be attempted to improve depth. The ExA asks the applicant to explain the steps that would be taken to exhaust burial options before using external cable protection, and how this remediation process is proposed be secured.

The ExA notes that it is not expected there would be a requirement for additional rock protection adjacent to Goodwin Sands MCZ based on confidence in achieving burial depth. On that basis, and noting the concerns of NE about this impact pathway, the ExA

asks the applicant to explain why a commitment to no external cable protection adjacent to MCZ could not be provided?

#### 12.8 Goodwin Sands MCZ monitoring

The ExA asks the applicant to explain why the outline In Principle Monitoring Plan [REP6-116] does not include coverage of matters requested by NE to validate predicted effects to Goodwin Sands MCZ, including effects from placement of cable protection and sandbank recovery post levelling.

#### 12.9 Kentish Knock MCZ

NE has outstanding concerns about sandwave levelling resulting in impacts to Kentish Knock East MCZ (E52, E55, appendix E new issue 45 [REP6-258]). The ExA notes that Marine Chapter 2, Benthic Ecology (table 2.17, [REP6-028]) states that the maximum design scenario for pre-sweeping would be 0.35km<sup>2</sup> between KP96.32 to KP113.883 and that ES Figures Marine Benthic Ecology (6.4.4.2.7, [REP1-067]) shows Kentish Knock East MCZ at circa KP58 with no pre-sweeping in this location. However, NE (R&I log, appendix D new issue 32, [REP6-258]) has identified additional pre-sweeping proposed between KP38.7 to KP44.4 as shown on [REP5-118]. The ExA asks that the applicant explain if this additional area of pre-sweeping would have implications for the assessment and, if so, provided an updated Marine Conservation Assessment.

#### 12.10 Cumulative effects on Goodwin Sands MCZ

The ExA asks the applicant to respond to NE's request for an assessment of cumulative effects on marine processes at Goodwin Sands MCZ (R&I log appendix D, new issue 33, [REP6-258]). The ExA notes that individual cumulative projects are considered in the Marine Conservation Zone Assessment [REP6-016] but the potential for cumulation with all relevant projects is not.

#### 12.11 Screened out MCZs

The ExA asks NE to confirm if you agree with the applicant's conclusion in [REP6-016] to screen out Foreland MCZ, The Swale Estuary MCZ and Blackwater, Crouch, Roach and Colne Estuary MCZ. If not, explain your outstanding concerns.

#### 12.12 MCZ conservation objectives

The ExA asks NE to confirm if you agree with the applicant's Stage 1 assessment conclusions [REP6-016] of there being no hindrance to the conservation objectives of Dover to Deal MCZ, Orford Inshore MCZ and for smelt of the Medway Estuary MCZ. If not, explain your outstanding concerns.

#### 12.13 External cable protection adjacent to Goodwin Sands MCZ

The applicant has submitted an updated Marine Conservation Zone Assessment (MCZA) [REP6-016] setting out additional evidence in paragraphs 1.5.31 to 1.5.43 to justify why there would be no potential operational phase impacts from placement of external cable protection adjacent to Goodwin Sands MCZ, confirming there would be no impact on physical processes that could result in sediment transport change. The ExA asks NE to confirm if this addresses your outstanding concerns for Goodwin Sands MCZ in terms of sediment transport disruption leading to morphological change. If not, explain your remaining concerns. Does NE advise that this impact pathway should be assessed at Stage 1 in the MCZA?

### 12.14 Indirect effects to Thanet Coast MCZ and Kentish Knock East MCZ

Regarding NE's outstanding concerns about placement of cable protection resulting in indirect effects to Thanet Coast MCZ and Kentish Knock East MCZ, the ExA notes NE's response in (2BE19, [REP5-199]) that the applicant's updated information in [REP4-241] was not sufficient and that appendix E5 [REP5-218] set out additional evidence needed. The ExA requests a response on the following:

Noting that cable protection at the HDD exit would be buried, and that additional justification for no change in sediment transport process has been provided in paragraph 1.5.29 of the updated MCZA [REP6-016] based on the applicant's Additional Sediment Dispersion Modelling (doc 9.144) [REP6-120], the ExA asks NE to confirm if it is satisfied that placement of cable protection would not hinder the conservation objectives of Thanet Coast MCZ. If not, confirm for which protected features you are concerned and if this impact pathway should be assessed at Stage 1 in the MCZA.

The ExA also asks NE to confirm if the applicant's updates to the Marine Conservation Zone Assessment (paragraphs 1.5.22, [REP6-016]) address your concerns about impact pathways to Kentish Knock East MCZ. If not, confirm your specific concerns and what is required to address them, as the ExA is unclear from the advice provided in appendix E5 [REP5-218] given it refers to Goodwin Sands MCZ.

### 12.15 Monitoring and adaptive management at Goodwin Sands MCZ

The ExA asks NE, if the applicant commits to monitoring of any potential residual effects from placement of cable protection adjacent to Goodwin Sands MCZ and sandwave levelling recovery, together with identified adaptive management through an IPMP, is NE satisfied that this would be sufficient to avoid hindrance of the conservation objectives of Goodwin Sands MCZ.

## **13. Marine mammals**

The applicant has provided a revised in-combination assessment in paragraphs 8.3.81 to 8.3.91 of the HRA Report [REP6-050]. The daily disturbance threshold would be exceeded when the sub-bottom profiling works are taking place. The applicant states that this is based on a precautionary un-mitigated assessment of piling at offshore windfarms. The applicant states the contribution from the proposed development is negligible and would be for 6 days only. It has committed to participating in the Development Co-ordination Forum to manage effects (MM03 of the REAC) [REP6-134] and would undertake works where practicable in the summer period (MM04 of the REAC) [REP6-134].

Can the applicant engage with NE and the Joint Nature Conservation Committee (JNCC) to agree a position statement as to whether it is possible to conclude that there would be no adverse effects on integrity of the Southern North Sea SAC due to the in-combination effect of underwater sound?

## **14. Marine ornithology**

### 14.1 10dB noise reduction – Pegwell Bay

The HRA Report [REP6-050] states that a 10dB reduction through best practicable means is assumed in the modelling of construction noise impacts to Thanet Coast and Sandwich Bay SPA and Ramsar bird qualifying features but no commitment to such measures is

included in the REAC [REP6-134], with B44 relating to onshore effects only. The ExA requests the applicant to confirm how the specific noise mitigation is secured to achieve the assumed 10dB reduction in noise levels for works in Pegwell Bay, in order to avoid adverse effects on sites and features designated under the Conservation of Species and Habitats Regulations 2017.

#### 14.2 Lighting of cofferdams in Pegwell Bay

The applicant [REP4-241] confirmed that lighting would only be required during construction of the cofferdams, which would be for a maximum of 28 days.

The ExA ask NE to confirm whether it considers that any further measures are necessary to avoid impacts from lighting on birds foraging, nesting and roosting in Pegwell Bay?

NE (RIESQ28, [REP6-250]) notes that for other works in SPAs, there is a commitment to undertake these outside the sensitive period to avoid potential disturbance impacts.

The ExA ask NE to confirm what the sensitive period is for visual disturbance from lighting.

The ExA ask the applicant to comment on what the implications for the project would be to place seasonal restrictions on cofferdam construction works in Pegwell Bay.

#### 14.3 Red-Throated Diver (RTD) protocol

Applicant to update table 3.4 of the REAC [REP6-134] and any other relevant sections to reflect the fact that reference to the RTD protocol has been removed from requirement 5 of the dDCO to avoid duplication with provisions of dDML condition 4.

NE response to RIESq33 [REP6-250] considers that the report to NE following emergency works should be required for any works within the SPA plus the 2km buffer. Paragraph 1.5.12 of the RTD [REP6-090] only requires this for the SPA.

Applicant to revise the RTD protocol to include reference to reporting within the SPA and the 2km buffer.

### **15. Shipping and navigation**

#### 15.1 Recommended restricted zones

Draft Deemed Marine Licence (dDML) condition 1(3)(b) relates to exclusion zones. In response to 3SN17 the MCA [REP6-275] states that the reference to International Regulations for Preventing Collisions at Sea 1972 (COLREGs) is inappropriate as the COLREGs do not specify regarding Restricted Zones. The Maritime and Coastguard Agency (MCA) and applicant are requested to agree and submit appropriate wording.

#### 15.2 Trial trenching

The Port of London Authority (PLA) [REP6-140] has queried the removal of trial trenching from the definition of 'commence' in article 2 of the dDCO. The applicant is requested to engage with PLA to agree a position on this matter and submit to the examination.

#### 15.3 DML condition 4(1)(g) Outline Navigation and Installation Plan (oNIP)

The dDCO includes additional wording in relation to the NIP in dDML condition 4(1)(g). Can the MCA confirm whether it meets its requirements, as set out in [REP6-275]. If not, provide revised wording that would meet the MCA's requirements.

#### 15.4 Outline Navigation and Installation Plan

The MCA is requested to clarify whether the amendments made to the oNIP in [\[REP6-099\]](#) have met its concerns. If not, are these matters that could be secured in the NIP post-consent or are further amendments needed?

The applicant is requested to engage with the MCA to agree whether any amendments are needed in order for the risks to navigational safety to be considered to be as low as reasonably practicable (ALARP) and if appropriate submit agreed wording to the examination.

#### 15.5 DML condition 4(1) Cable Specification and Installation Plan

London Gateway Port Limited (LGPL) [\[REP6-267\]](#) has requested that it be a consultee on the Cable Specification and Installation Plan. The applicant is requested to engage with LGPL to agree a response and if appropriate an updated dDML.

#### 15.6 DML condition 4(4) consultation

The PLA has suggested [\[REP6-140\]](#) that dDML condition 4(4) should require the MMO to consult with the parties involved in approving the plans or protocols, statement or details referred to in condition 4 before allowing any deviation from the approved document.

The applicant is requested to engage with the relevant stakeholders (including MMO, MCA, PLA, LGPL, NE, JNCC) to agree and submit any revised wording for the DML. If this is not possible the ExA requests that any outstanding disagreements are fully explained by the parties.

#### 15.7 Post-installation cable condition surveys

The MMO [\[REP6-268\]](#) in response to ExQ3SN8 has referred to the lack of a mechanism in the dDCO/dDML to secure post-consent maintenance reports. The MMO is requested to confirm whether new condition F in the ExA's Schedule of Changes to the dDCO [\[PD-024\]](#) would provide an appropriate securing mechanism or whether an additional condition would be necessary. The MMO is requested to submit any additional condition or wording if required.

#### 15.8 Cable crossing with Gridlink Interconnector

London Gateway Port Limited (LGPL) [\[REP6-267\]](#) has suggested revised wording to requirement 17 to ensure that the crossing with Gridlink Interconnector is located in areas of deeper water depth without bringing into question the minimum depths secured by requirement 17. Applicant to provide comments on a) the need for such a provision b) the form of wording suggested by LGPL and if necessary provide an alternative form of wording.

#### 15.9 Restricted zones

LGPL [\[REP6-267\]](#) raised concerns regarding the protocols or processes to be adopted. LGPL is requested to comment as to whether the updated oNIP [\[REP6-099\]](#) provides sufficient commitment. If not, set out additional commitments that LGPL considers necessary.

#### 15.10 Cable crossings in the Sunk and Long Sand Head

LGPL [\[REP6-267\]](#) has requested a condition providing that there should be no cable crossings in these locations and has suggested the following wording:

“there are to be no cable crossings caused by the construction of Work No.6 in the Sunk Pilot Boarding area or the Long Sand Head Two-Way Route crossing area.”

The applicant is requested to provide comments on the need for such a condition and if it is necessary, the means of securing it.

## **16. Cumulative Impacts**

At DL6, in responding to issue specific hearing (ISH) 3 AP44 and AP45 [REP6-184], SCC has identified measures to address significant cumulative (intra-project) effects. These include mental health, public rights of way, landscape and socio-economic. Whilst the ExA has read the applicant's submissions in this regard submitted at DL6, could the applicant specifically respond to the matters raised by SCC and explain why these measures are not needed having regards to the requirements of the mitigation hierarchy?

In responding to ISH3 APs 44, 48 and 49 [REP6-185], TDC has stated that 'The Council is unable to update on this as discussions are yet to take place'. Can the applicant to provide an update on discussions and current position?

The applicant has provided a DL6 submission - Inter-Project Cumulative Effects Assessment Update - Technical Note [REP6-098]. In that document, it identifies the potential for three potentially significant inter-project cumulative effects because of the effects of 25/00023 with the Proposed Project. The applicant considers that there are no further mitigation measures available to address these effects. The ExA has posed specific questions regarding these findings at 3.5 and 5.9 above. Can the applicant also provide further justification that the requirements of the mitigation hierarchy have been met?

## **17. Errata**

The Agricultural Land Classification (ALC) Survey Results – Kent [REP6-125], paragraph 7.1.9 includes 'Error! Reference not found' with no reference provided. The ExA requests that the applicant correct this error.

If you have any questions about the content of this letter, please contact the case team using the details above.

Yours faithfully

*Sarah Holmes*

**Lead Member of the Examining Authority**

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