

**The Great Grid Upgrade**

Sea Link

# Sea Link

**Volume 9: Examination Submissions**

Document 9.153: Applicant's Response to the ExA's Rule 17 Letter

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**nationalgrid**

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# 0. About this Document

## 0.1 Purpose of this Document

- 0.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) responses to the ExA's Rule 17 Letter – Request for further Information [**PD-025**], received on 22 April 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.

## 0.2 Project Overview

- 0.2.1 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.
- 0.2.2 The application for development consent was accepted for Examination on 23 April 2025.
- 0.2.3 A full description of the Project is provided in Chapter 4 of the Environmental Statement: Project Description [**REP1A-003**].

## 0.3 Structure of the Document

- 0.3.1 This document is structured to align with the numbering used in the Examining Authority's Rule 17 Letter [**PD-025**]. Chapters are numbered accordingly, beginning with '1'.
- 0.3.2 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.

# 1. The Development Consent Order

**Table 1.1 The Development Consent Order**

Reference	Question	Applicant's Comments
1.1	<p><u>1.1 Article 10</u></p> <p>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.</p>	<p>The Applicant notes the additional wording proposed at Article 10(4), and agrees in respect of the wording addressing enforcement in paragraph (b). The Applicant has amended article 10 in the draft DCO submitted at Deadline 7 to include this suggested provision.</p> <p>However the further wording at (a), which refers to the function of Article 10 in terms of development consent, is not agreed, as it seems to the Applicant that the wording goes beyond the proper policy intent and could capture other consents beyond that which it should. The Applicant notes that the DCO, if made, would grant (via Article 3 and Schedule 1) development consent, but that Article 10 does not function so as to grant any consent. If other consents are granted, then they will have been so granted on their respective merits by the body with appropriate jurisdiction. Hence the additional provision is not agreed.</p>
1.2	<p><u>1.2 Article 11</u></p> <p>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.</p>	<p>The Applicant does not consider that SCC's suggested amendments to Article 11 are necessary. The Protective Provisions for the protection of the Highways Authorities contained at Schedule 15 already provide the requisite protection for the highway authority. Under the protective provisions, the Applicant is required to provide full details of the highways works for the relevant highway authority to determine. The Applicant does not agree that the powers being sought in Article 11 are in excess of those required to deliver the project and is committed to working with the highways authorities so that the highways network is managed safely and effectively. The protective provisions provide insurance provisions and indemnity provisions.</p>
1.3	<p><u>1.3 Articles 13 and 18</u></p> <p>The ExA requests the applicant to provide comments on SCC's proposed wording for articles 13 and 18 [REP6-237].</p>	<p>The Applicant does not consider that SCC's suggested amendments to Article 13 are necessary. The Protective Provisions for the protection of the Highways Authorities contained at Schedule 15 already provide the requisite protection for the highway authority. Under the protective provisions, the Applicant is required to provide full details of the highways works for the relevant highway authority to determine. The Applicant does not consider that the powers being sought in Article 13 are in excess of those required to deliver the project and is committed to working with the highways authorities so that the highways network is managed safely and effectively. The protective provisions set out insurance provisions and indemnity provisions.</p> <p>Article 18 as drafted seeks to operate in such a way as a s278 or s38 agreement would operate by creating a mechanism for any street constructed or area of street altered under the Order, to be adopted. The Protective Provisions for the protection of the Highways Authorities contained at Schedule 15 already provide the requisite protection for the highway authority. The protective provisions include clear provision for temporary works and reinstatement of the site of the highway works to the satisfaction of the relevant highway authority. The protective provisions also include provisions on insurance, costs and indemnity provisions. The Applicant considers that Article 18 should remain as drafted.</p>
1.4	<p><u>1.4 Protected Trees</u></p> <p>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</p>	<p>The Applicant does not consider that any amendment is required to Article 52. Trees which are subject to a tree preservation order made after 19 September 2024 are not listed within Schedule 14 due to the timing of the assessment of statutory and non-statutory designations relating to trees. The power within Article 52 should apply equally to both those trees listed within Schedule 14 and those trees which are subject to a tree preservation order made after 19 September 2024 as the distinction is simply due to timing.</p>

Reference	Question	Applicant's Comments
	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	<p><u>1.5 Requirement 13 - Decommissioning</u></p> <p>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.</p>	The Applicant notes the points raised by ESC and Friston Parish Councils. Therefore, to deal with these concerns around decommissioning, the Applicant has amended requirement 13 in the draft DCO to be submitted at Deadline 7 to remove the exclusion for substations. Therefore, the requirement to submit a written scheme of decommissioning at a future date, if the authorised development is to be decommissioned, will also apply to substations.
1.6	<p><u>1.6 Requirement 15 – Restriction on carrying out works when consented in another order</u></p> <p>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:</p> <ul style="list-style-type: none"> <li>• Should the requirement specifically refer to the Scottish Power Renewables (UK) Limited (SPR) projects rather than stating 'pursuant to another development consent order'?</li> <li>• Should the requirement include a control mechanism or control points?</li> <li>• Should detail be added to clarify what the 'alterations' would comprise or be limited to?</li> <li>• Should this be an article rather than a requirement?</li> </ul> <p>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.</p> <p>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.</p>	<p>The Applicant does not agree with SCC that any amendment to requirement 15 is required. It is not appropriate for the requirement to refer to Work No.1B being commenced, rather than completed, as it would not give the Applicant the necessary powers to complete the substation works should it be necessary to do so. The Applicant does not consider that the wording 'save where alterations to that Work are required for the purposes of the Authorised Project' goes far enough to provide sufficient protection against the risk that the Applicant would 'lose' the powers to complete and construct the substation, if no 'alteration' to the Work was required. The Applicant remains of the view that completion of the works is the correct criterion.</p> <p>The Applicant must be able to ensure that the substation is completed and capable of operating as part of the national transmission network, noting the Applicant's statutory duties and transmission licence obligations.</p>
1.7	<p><u>1.7 Suggested new requirement – new substation at Grove Wood, Friston</u></p> <p>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.</p>	The Applicant notes these questions directed at the local authorities. The Applicant reiterates the position set out within <b>Document 9.136 Applicant's Responses to Third Written Questions</b> . The requirement proposed is highly problematic and would prevent the delivery of Sea Link because it would require the Applicant to adhere to plans and proposals that the Applicant cannot deliver.
1.8	<p><u>1.8 New requirement suggested by Scottish Power Renewables (UK) Limited</u></p> <p>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.</p>	The Applicant notes these questions to SPR. The Applicant does not consider that such a requirement is necessary as the interface with land which the SPR parties have recently purchased will be most appropriately dealt with through the Transfer of Benefit Agreement to be entered into between the parties.
1.9	<p><u>1.9 Schedule 4 Discharge of requirements</u></p> <p>The ExA requests that all local authorities provide preferred timescales for schedule 4 paragraph 2 (further information) with reasons. The ExA notes that the</p>	The timescales in Bramford-Twinstead were amended so that the time periods were extended from 3 to 7 days. However, in the context of this project of critical national importance, the

Reference	Question	Applicant's Comments
1.10	<p>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.</p> <p><u>1.10 Schedule detailing the discharging authorities for all requirements and documents</u></p> <p>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.</p>	<p>Applicant considers that the timescales within the Sea Link DCO are acceptable and proportionate.</p> <p>The Applicant notes this comment and as requested by the ExA, it has included a new schedule within the DCO being submitted at deadline 7 which sets out the relevant discharging authority for the requirements in Schedule 3</p>

## 2. Land Rights

**Table 2.1 Land rights**

Reference	Question	Applicant's Comments
2.1	<p><u>2.1 Ebbsfleet Minster Ltd and St Augustine's Golf Course</u></p> <p>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.</p>	<p>These objections are set out in the Deadline 6 submission from Mr Chandler;</p> <p><b>Mr Edward Spanton</b></p> <p>The Applicant understands that the concern of Mr Spanton relates to the proposed extension of St Augustine's Golf Course (a matter that has been discussed at great length), hence Mr Spanton formally objects to the proposal.</p> <p>The extension to the golf course involves a number of plots, however the most pertinent are 3/50, 3/51, 3/54 &amp; 3/55. The project encompasses the importation of inert spoil to alter ground levels, including the installation of associated infrastructure. A draft Statement of Common Ground has been provided by the Applicant, The Applicant has also provided a plan showing where levels will need to be reduced from the proposed level changes over the underground cables and also confirm the restrictions that will be placed on Mr Spanton in respect of works over the easement strip.</p> <p>The Applicant notes that Mark Chandler, as agent for and on behalf of St Augustine's Golf Club (Plots 3/99 &amp; 3/66) and Ebbsfleet Minster Ltd (Plots 3/46 &amp; 3/47), also submitted objections for the same reasons as stated above.</p>
2.2	<p><u>2.2 Erik and Karen Collins</u></p> <p>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.</p>	<p>Erik and Karen Collins are listed in the Category 2 tab of the Land Rights Tracker. They are not however listed in the Schedule of Negotiations (Appendix B to the Statement of Reasons) as that document only shows those parties with whom we are negotiating with in order to secure the land rights needed by the Applicant on a voluntary basis. Erik and Karen Collins are not in a position to grant any of the rights sought by the Applicant.</p> <p>The Outline Construction Traffic Management and Travel plan (Kent) at 6.2.2 sets out the proposed use of Marsh Farm Road. It also explains that there is a daily cap of 10 HGV movements in consultation with Kent County Council to minimise any potential impact of construction traffic. In addition, HGV's will not be able to travel in both directions at the same time. Therefore with minimal movements and travel in one direction by HGV's at any time it is not envisaged there will be any impact on the Collins' use of the access.</p>
2.3	<p><u>2.3 Gordon Young</u></p> <p>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].</p>	<p>Gordon Young is both a Category 2 and Category 3 interest. From Submission to Deadline 6, Gordon Young is consistently in the Book of Reference as both as Category 2 and 3 Interests and is listed in the Category 2 tab of the Land Rights Tracker.</p> <p>Mr Young is not however listed in the Schedule of Negotiations (Appendix B to the Statement of Reasons) as that document only shows those parties with whom we are negotiating with in order to secure the land rights needed by the Applicant on a voluntary basis. Mr Young is unable to grant any of the land rights sought by the Applicant.</p> <p>A response is being provided to Mr Young's Deadline 6 submission - <b>(REF 9.149: Applicant's Comments on Other Submissions Received at Deadline 6)</b></p>
2.4	<p><u>2.4 Ian Rix</u></p>	<p>A response is being provided to both Mr Ian Rix and Mr David Rix Deadline 6 submissions. <b>(REF 9.149: Applicant's Comments on Other Submissions Received at Deadline 6).</b></p>

Reference	Question	Applicant's Comments
	<p>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.</p> <p>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.</p>	<p>The question raised on implications of removal of the hedge is for East Suffolk Council and Suffolk County Council to respond to, as the Applicant has already responded on this matter.</p>
2.5	<p><u>2.5 Struan Robertson</u></p> <p>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.</p>	<p>(Question directed at Struan Robertson)</p>
2.6	<p><u>2.6 William Notcutt Estates Limited</u></p> <p>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.</p>	<p>(Question directed at William Notcutt Estates Limited)</p>

### 3. Landscape and Visual

**Table 3.1 Landscape and visual**

Reference	Question	Applicant's Comments
3.1	<p><u>3.1 Landscape and Ecological Management Plans for Suffolk and Kent (LEMP)</u>            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].</p>	<p>The oLEMPs [REP6-078] and [REP6-080] have been updated at Deadline 7 (see <b>Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk and Kent</b>). Both submitted at Deadline 7 to provide consistent reference to a 'detailed mitigation planting scheme' throughout the documents when referring to the detailed mitigation design. Reference remains to 'outline landscape mitigation' which refers consistently to the outline stage of mitigation design presented in the oLEMPs and accompanying figures.</p>
3.2	<p><u>3.2 Landscape planting</u>            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.</p>	<p>The updated Friston Substation Outline Landscape Mitigation plan referred to in response to AP50 [REP4-063] which is contained in <b>Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk [REP6-079]</b> reflects the currently consented detailed landscape design approved pursuant to Requirement 14(1) of the East Anglia TWO DCO by East Suffolk Council (ESC) in February 2026. The consented SPR masterplan shows a native hedgerow with tree planting along the field boundary to the south of High House Farm as well as a narrow belt of woodland planting and evergreen planting to the immediate south of the High House Farm property boundary. This is replicated on Figure 5 of <b>REP6-079</b>. This planting arrangement is shown in the visualisation for Viewpoint 6a in Appendix A of <b>Application Document 9.108.1 Applicant's Response to January Hearing Action Points (CAH1 and ISH2) – Deadline 5 – Appendices [REP5-127]</b>.</p> <p>The indicative HVAC cable alignment for LionLink shown in Appendix D of [REP4-086] avoids the section of planting to the immediate south of High House Farm where the hedgerow and tree planting, woodland planting and evergreen planting is proposed and instead crosses the section of hedgerow and hedgerow tree planting which follows the field boundary to the south west of the property. It therefore avoids the section of woodland planting to the south of High House Farm which is designed to provide specific visual screening with the evergreen planting.</p>
3.3	<p><u>3.3 Acid grassland</u>            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.</p>	<p>The Applicant has provided a detailed response to [REP6-248] at Deadline 7 which can be found in <b>Application Document 9.149 Applicant's Comments on Other Submissions Received at Deadline 6</b>.</p> <p>The Applicant held a meeting with Natural England (NE) on 21 April 2026 to discuss the outstanding comments contained in Annex 1 of REP6-248. Prior to the meeting the Applicant provided NE with a full response to Table 1: Summary of outstanding concerns and advice (Annex 1 of [REP6-248]) which contained detailed signposting to the Applicant's various submissions which have been made throughout this Examination in response to NE's comments. During the meeting the Applicant set out again that the 6 ha parcel of land to be enhanced is low quality acid grassland, evidenced by its botanical characteristics (e.g. relict acid grassland species) with the degraded nature demonstrated by the structure of the vegetation (dense and tussocky) with gorse and bracken encroachment. The currently degraded nature is very clear from the photographs provided in Table 15.1 of <b>Application Document 9.36 Applicant's</b></p>

**Comments on Other Submissions Received at Deadline 2 [REP3-064].** With respect to the 6 ha area, NE identified in [REP6-247], the following outstanding information which the Applicant has provided as follows:

***The risks regarding the location of the proposed enhancement should be acknowledged and incorporated. They remain an unmitigated risk.***

The Applicant has provided additional text in Section 5.3 of **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7 which clarifies the baseline situation for the 6 ha parcel, and acknowledges that the deteriorated nature of the grassland appears to be due primarily to lack of management but accepting that the adjacent farming operation may also have contributed by increasing fertility. The Applicant has committed to pH testing to confirm the acidity of the soils as part of the detailed LEMP.

The fact the acid grassland has been able to persist despite the presence of intensive agriculture to the north, and that its degraded state is clearly primarily due to lack of management (e.g. bracken and gorse encroachment and a tall tussocky sward) indicates that the current farming operations to the north will not hinder ecological and botanical improvement of the sward through reintroduction of good management as outlined in the oLEMP. The objective to create a more diverse acid grassland sward than currently exists does not constitute an unmitigated risk.

***Acknowledgement of existing biodiversity value of the area and how this will be maintained.***

The existing biodiversity value of the 6 ha area is set out in Section 5.3 of **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** submitted at Deadline 7 which reflects information previously provided by the Applicant to NE in Table 15.1 (pages 48-51) of **Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]**. The management of the 6 ha parcel of acid grassland enhancement is also set out in Sections 5.3 and 6.13 of **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk** with monitoring protocols contained in Section 7.2.

***Understanding the pH of the soil would help understand likely success of acid grassland restoration.***

As noted above, the Applicant has committed to pH testing of the soil as part of the detailed LEMP (Section 5.3 of **Application Document 7.5.7.1 (E) Outline Landscape and Ecological Management Plan – Suffolk**) submitted at Deadline 7. This commitment to pH testing along with the existing evidence that the parcel of land contains relict acid grassland species demonstrates that the objective of this area set out in the oLEMP of creating a more diverse and well-structured acid grassland sward is both realistic and achievable. The oLEMP identifies clear management prescriptions for the enhancement of the acid grassland (Section 5.3, 6.13 and 7.2) which will be developed further in the detailed LEMP in conjunction with statutory bodies and relevant stakeholders (secured by Requirement 6 of the dDCO). Whilst the Applicant acknowledges that NE advise that the ten year management period limits the potential of this area, the Applicant cannot extend the management period due to landowner constraints. Notwithstanding this, the ten year management period will allow for a net enhancement in extent and quality of acid grassland habitat within the SECHNL of at least 6 ha of acid grassland with a further 4.05 ha of acid grassland restored to a higher quality than its current condition (west of Leiston Road).

The Applicant has demonstrated in Appendix A of **Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112]** that the mitigation hierarchy has been fully complied with respect to the SECHNL. Measures undertaken by the Applicant to avoid, reduce, mitigate and compensate are clearly identified in the above document. Complete avoidance of temporary effects on the SECHNL is not possible as the length of trenchless construction required through the SECHNL is greater than is technically feasible. However, the Proposed Project avoids any permanent effect on the SECHNL with temporary effects limited to 3-5 years (refer to paragraph 3.3.5 in **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**) until the reinstated acid grassland sward becomes indistinguishable from the grassland around it.

The Applicant has clearly quantified and audited the effects on the SECHNL and its Natural Beauty and Special Qualities Indicators and sub-factors from the Proposed Project and inter-cumulative effects, as set out in the following documents:

- Table 2.1 in **Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]**
- Assessment of effects on Natural Beauty Indicators and their Sub-Factors (**Application Document 9.73.1 Applicant's Responses to First Written Questions – Appendices [REP3-070]**).
- Assessment of effects on Special Qualities Indicators and their Sub-Factors (Table 6.1 of **Application Document 9.94 (A) Planning Statement Addendum [REP4-092]**).
- Cumulative effects on the Natural Beauty and Special Qualities Indicators of the National Landscape (**Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**).
- Cumulative effects on the Sub-Factors of the Natural Beauty and Special Qualities Indicators of the National Landscape (**Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendices [REP5-136]**).
- **Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]**.

These documents address NE's advice that effects on each of the sub-factors needs to be clearly evidenced and referenced with respect to each sub-factor. The period of reinstatement is consistently acknowledged by the Applicant in the above documentation, recognising that the reinstated areas of acid grassland will take time to fully establish as will boundary vegetation.


The use of the term 'small scale' has only been used by the Applicant with respect to the sections of acid grassland that would be temporarily impacted to facilitate the construction activity of the Proposed Project within the SECHNL (Table 15.5 at Reference 3 (page 107) contained in **Application Document 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-132]**). The description of 'small' relates to the proportion of acid grassland when considering the acid grassland cover within the SECHNL as a whole. The coverage of acid grassland within the SECHNL has been estimated to be 442.91 ha using a combination of project survey data (acid grassland on the Phase 1 Mapping) and 'Priority Habitat Inventory – Lowland Dry Acid Grassland (England)' layer on MAGIC.gov.uk. Given that an area of 7.61 ha of acid grassland would be temporarily affected by the Proposed Project (which equates to 1.72 % of the total area within the SECHNL), the Applicant considers that in this context the use of 'small' is entirely appropriate.

Reference	Question	Applicant's Comments
3.4	<p><u>3.4 Assessment of effects on the National Landscape</u> 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.</p>	<p>The Applicant's assessment material set out in the above-mentioned documents clearly acknowledges the effects on the specific natural beauty and special qualities of the receiving landscape and does not judge the effects in relation to the SECHNL as a whole. The Applicant's conclusions are thoroughly considered as evidenced by the number of individual technical assessments that have been undertaken.</p> <p>The residual effects on the SECHNL during all phases of the Proposed Project would not be significant. The Applicant recognises that there would be the potential for significant cumulative effects for a short and temporary period during construction and the early years of operation until cable corridors and landfall construction compounds are fully reinstated.</p> <p>The Applicant has provided compensation for these effects through the provision of the 6 ha parcel of acid grassland enhancement which will provide a net enhancement in extent and quality. This will fully compensate for the short term and temporary cumulative effects and provide further enhancement for the SECHNL within the operational phase of the Project. In addition, the Applicant is providing additional enhancement by way of a s106 Unilateral Undertaking which outlines the Furthering The Purposes Compensation Fund which has been submitted at Deadline 7. This additional enhancement measure will provide funding for the delivery of projects within the SECHNL. All these measures demonstrate how the Proposed Project seeks to conserve and enhance the natural beauty of the SECHNL in accordance with Section 85(A1) of the Countryside and Rights of Way Act 2000.</p> <p>It is the Applicant's opinion that the information provided to NE requested in Annex 1 of <b>REP6-248</b> adequately addresses the concerns raised (<b>Application Document 9.149 Applicant's Comments on Other Submissions Received at Deadline 6</b>). It is also the Applicant's position that there is sufficient tangible evidence that the proposed acid grassland enhancement area will be successful in delivering a net enhancement in extent and quality of acid grassland.</p> <p>The Applicant has provided a detailed response to <b>[REP6-248]</b> at Deadline 7 which can be found in <b>Application Document 9.149 Applicant's Comments on Other Submissions Received at Deadline 6</b> submitted at Deadline 7. The Applicant has provided the following supplementary assessments during the examination with respect to the Natural Beauty and Special Qualities Indicators and their sub factors:</p> <ul style="list-style-type: none"> <li>• Assessment of effects on Natural Beauty Indicators and their Sub-Factors (<b>Application Document 9.73.1 Applicant's Responses to First Written Questions – Appendices [REP3-070]</b>).</li> <li>• Assessment of effects on Special Qualities Indicators and their Sub-Factors (Table 6.1 of <b>Application Document 9.94 (A) Planning Statement Addendum [REP4-092]</b>).</li> <li>• Cumulative effects on the Natural Beauty and Special Qualities Indicators of the National Landscape (<b>Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]</b>).</li> <li>• Cumulative effects on the Sub-Factors of the Natural Beauty and Special Qualities Indicators of the National Landscape (<b>Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendices [REP5-136]</b>).</li> </ul> <p>Despite the Applicant providing a detailed explanation as to the need for a section of trenched construction within the SECHNL (<b>Application Document 9.149 Applicant's Comments on Other Submissions Received at Deadline 6</b> submitted at Deadline 7) NE maintain that the Proposed Project is not meeting the conserve aspect of the s85 duty. However, to adopt, a trenchless construction across the entirety of the SECHNL would require a larger area of temporary land take, larger permanent easement, longer programme, increased need for lighting</p>

Reference	Question	Applicant's Comments
3.5	<p data-bbox="359 863 819 890"><u>3.5 Inter-project cumulative effects</u></p> <p data-bbox="359 905 1507 1073">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.</p>	<p data-bbox="1525 174 2804 306">and greater vehicle movements. These factors were all considered by the Project ecologists and landscape architects and it was determined that the shorter disruption provided by open trenching was preferable and less disturbing overall to wildlife (particularly on the Sandlings SPA and Leiston-Aldeburgh SSSI), the Natural Beauty Indicators and users of the SECHNL.</p> <p data-bbox="1525 321 2804 695">The Applicant held a meeting with Natural England (NE) on 21 April 2026 to discuss the outstanding concerns with the assessment of effects on the sub-factors of the Natural Beauty Indicators with the desire to agree and submit a position statement. NE have since shared with the Applicant their draft Appendix H7 submission and state in their summary that '<i>In summary Natural England has detailed the areas where evidence and/or clarity is lacking in the assessment, and where further evidence is required to support the conclusion that the proposed compensation area will be successful. As such it is Natural England's current position that we agree to disagree with Applicants conclusions regarding LVIA matters until such time as this additional evidence is provided to support assessment conclusions. We welcome that the applicant is in discussion with the National Landscape and Suffolk County Council regarding additional compensation measures required to discharge the Section 85 duty.</i>'</p> <p data-bbox="1525 709 2804 842">The Applicant has set out in <b>Application Document 9.149 Applicant's Comments on Other Submissions Received at Deadline 6</b> and in section 3.3 above all the evidence to demonstrate that the proposed acid grassland enhancement area will be successful in delivering a net enhancement in extent and quality.</p> <p data-bbox="1525 863 2804 932">The applicant has engaged with both Dover District Council and Thanet District Council and can confirm the following positions.</p> <p data-bbox="1525 982 1828 1010"><u>Thanet District Council</u></p> <p data-bbox="1525 1024 2754 1094">Thanet District Council responded to say "<i>TDC does not consider that additional mitigation is available to address the identified significant cumulative effects.</i>"</p> <p data-bbox="1525 1144 1816 1171"><u>Dover District Council</u></p> <p data-bbox="1525 1186 2804 1283">Dover District Council responded to say "<i>We share the view that no further mitigation the project could provide would address the significant inter-project cumulative effect on LCA A2 Ash Levels and viewpoint 8.</i>"</p> <p data-bbox="1525 1297 2804 1535">Dover confirmed that it is not yet possible to know what mitigation may be able to be delivered as part of development 25/00023, stating, "<i>As limited information was submitted with the scoping opinion for 25/00023, it is not possible to advise if any landscape planting/buffer would be proposed within that site which would lessen or mitigate the visual impact of the developments when viewed from the west, however should a full planning application be submitted, these factors and the impact on landscape character would be considered in the assessment of the acceptability of any scheme.</i>"</p>

## 4. Ecology and Biodiversity

Table 4.1 Ecology and biodiversity

Reference	Question	Applicant's Comments
4.1	<p><u>4.1 Update on access to the Sandlings Special Protection Area (SPA)</u></p> <p>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.</p>	<p>This question is directed to RSPB.</p> <p>Access to the RSPB North Warren Reserve has been discussed with RSPB and these discussions are documented in <b>Application Document 9.43 (D) Statement of Common Ground Royal Society for the Protection of Birds</b> submitted at deadline 7. Most of the access required to the RSPB land is outside Sandlings SPA, but a short stretch of existing path (where the Applicant does not propose to undertake any works) does lie within the boundary of the SPA for approximately 70 m. The SPA is shown as green hatching in the screencap below. This is the existing track (with gates either side of the footpath/railway track) that would be the vehicle route for any emergency remediation of frac out in the unlikely event it was required:</p>  <p>This section of path has not been specifically discussed with RSPB separately from the reserve as a whole but would be captured by the broader discussions and agreements between the Applicant and RSPB as set out in <b>Application Document 9.43 (D) Statement of Common Ground Royal Society for the Protection of Birds</b> submitted at D7.</p>
4.2	<p><u>4.2 Lighting of horizontal directional drilling (HDD) compound</u></p> <p>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.</p>	<p>Natural England's response to Report on the Implications for European Sites (RIES) question 22 was submitted at Deadline 6 and therefore without reference to the changes that were made to the HRA report for Deadline 6 [<b>REP6-050</b>].</p> <p>In the Deadline 6 HRA report [<b>REP6-050</b>] paragraphs 7.2.18 to 7.2.20 contain a detailed discussion of lighting disturbance on the SPA and impacts on FLL including further reference to nightjar and set out the mitigation measures that will be put in place. In addition, lighting plans for the HDD compound have been submitted in Appendix C of the Applicant's response to the ExA's Third</p>

Reference	Question	Applicant's Comments
4.3	<p><u>4.3 Acid grassland functionally linked land (FLL)</u>            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.</p> <p>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.</p>	<p>Written Questions (<b>Application Document 9.136.1 Applicant's Responses to Third Written Questions – Appendices [REP6-112]</b>). These show the 1 lux contour does not approach Sandlings SPA. This is relevant because 1 lux is an indication of very low illumination levels, being roughly equivalent to the illumination experienced at 1 m from a candle.</p> <p>The Applicant could not agree to Natural England being in control of lighting at the HDD compound. Ultimately, the lighting requirements must be driven by engineering considerations. However, the Applicant considers that it has submitted sufficient information into the Examination to demonstrate that Sandlings SPA would not be affected by lighting.</p>
4.4	<p><u>4.4 Alde Ore Estuary (AOE) SPA, Ramsar and Alde-Ore &amp; Butley Estuaries (AOBE) Special Area of Conservation (SAC)</u>            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?</p> <p>Applicant to update table 3.1 in the HRA Report [REP6-050] to include AOBE SAC, and to provide the citation in Appendix B.</p>	<p>Table 3.1 of the HRA report has been updated to include Alde-Ore &amp; Butley Estuaries (AOBE) Special Area of Conservation (SAC) and a citation provided in Appendix B (see <b>Application Document 6.6 (I) Habitats Regulations Assessment Report</b> submitted at Deadline 7).</p>
4.5	<p><u>4.5 Scope of preconstruction surveys in the outline Landscape and Ecological Management Plans</u>            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.</p>	<p>A new REAC measure for Suffolk (measure B78) has been created to mirror measure B75 for Kent – see <b>Application Document (E) Register of Environmental Actions and Commitments (REAC)</b> and <b>Application Document 7.5.3 (E) Outline Onshore Construction Environmental Management Plan</b> submitted at Deadline 7.</p>
4.6	<p><u>4.6 Ecological clerk of works (ECoW)</u>            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.</p>	N/A

Reference	Question	Applicant's Comments
4.7	<p><u>4.7 Unilateral undertaking</u></p> <p>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.</p>	<p>A unilateral undertaking <b>Application Document 9.151.1 Unilateral Undertaking in Relation to BNG from National Grid to (1) Thanet District Council (2) Dover District Council and (3) East Suffolk Council</b> is submitted at Deadline 7.</p>
4.8	<p><u>4.8 Habitat Regulations Assessment summary of concerns</u></p> <p>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.</p>	<p>This question is addressed to Natural England, but the Applicant considers that the HRA has provided a robust assessment of both likely significant effects and adverse effects on integrity and that no adverse effects on integrity will arise from the Proposed Project alone or in combination with other plans or projects.</p> <p>The Applicant included updates at Deadline 6 (<b>Application Document 6.6 (H) Habitats Regulations Assessment Report (Tracked) [REP6-051]</b>) to address comments from Natural England regarding effects on the Southern North Sea SAC, Outer Thames Estuary SPA and TCSB SPA and Ramsar as well as other sites listed. Further updates have been included in <b>Application Document 6.6 (I) Habitats Regulations Assessment Report</b> submitted at Deadline 7 to address additional comments received from Natural England at Deadline 6.</p>

## 5. Cultural Heritage

**Table 5.1 Cultural heritage**

Reference	Question	Applicant's Comments
5.1	<p><u>5.1 Ebbsfleet Peninsula Multi-Period Complex</u></p> <p>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?</p> <p>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.</p>	<p>The Applicant acknowledges that mitigation through a programme of archaeological investigation does not reduce the magnitude of impact. The reduction in the significance of effect recognises that professional excavation and recording of archaeological remains is a compensation measure, the successful completion of which would reduce the overall harm to the asset to an acceptable level. The proposed mitigation through a programme of archaeological investigation has been agreed in principle with the Kent County Council Archaeological Officer.</p> <p>The Applicant has consulted further with HE and KCC to discuss feasible design mitigation options and has worked with its contractors to look to reduce the footprint of compounds where practicable during the detailed design process.</p> <p>Ongoing development of the design, as well as consultation with KCC, has also aimed to avoid areas considered to be of greatest sensitivity. This includes areas of Bronze Age barrows and associated enclosures, as well as the large Iron Age enclosure, where a 'preservation in situ' strategy is being developed as part of the ongoing mitigation plan so that all physical impacts on them will be avoided. This was detailed in the updated Kent OWSI submitted at Deadline 5 [REP5-072] as well as the updated OWSI submitted at Deadline 7 (see <b>Application Document 7.5.4.2 (E) Kent Overarching Written Scheme of Investigation</b>).</p> <p>As a result, the residual effects on the Ebbsfleet Peninsula Complex would be not-significant.</p> <p>HE have agreed this point in <b>Responses to ExQ3 (if required) [REP6-263]</b>, where they have stated "<i>Therefore, in this case, because steps are being taken to retain rather than remove archaeological remains, ... we agree that the residual effect for construction may be considered 'Minor Adverse' and 'Not Significant' as set out in table 3.13</i>". HE has also agreed that the 'Small' impact on the setting of the complex would amount to less than substantial harm as stated within <b>Application Document 7.4.3 (D) Statement of Common Ground Between National Grid Electricity Transmission and Historic England</b> submitted at Deadline 7.</p>
5.2	<p><u>5.2 Geoarchaeology</u></p> <p>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?</p> <p>Can KCC confirm whether this is necessary prior to any consent for the proposed development?</p>	<p>An interim report detailing the initial results has been submitted at Deadline 7 (<b>Application Document 9.152 Geoarchaeological Interim Statement</b>), with a final report (including deposit model) due to be completed in late May 2026.</p> <p>The commitment for further geo-archaeological works if needed for evaluation or mitigation is also covered in the update to <b>Application Document 7.5.4.2 (E) Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Kent</b> submitted at Deadline 7.</p>
5.3	<p><u>5.3 Historic Landscape</u></p> <p>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?</p> <p>The ExA asks the applicant, please respond to the comments from SCC in [REP6-276].</p>	<p>The Applicant acknowledges the comments raised by SCC in [REP6-276], and highlights that SCCAS note '<i>Overall, SCCAS would however agree with the conclusions made in this document</i>'. Regarding SCC comments relating to Para 3.1.8 of <b>Application Document 9.125 Assessment of Cumulative Effects on the Wider Historic Landscapes [REP5-138]</b>. Para 3.1.8 states: "<i>The key elements of the historic landscape within most of the Suffolk Onshore Scheme, including the Saxmundham Converter Station, Friston Substation and the proposed bridge over the River Fromus are therefore large open agricultural fields, most of which are arable, which have been formed through the removal of field boundaries in the second half of the 20th century.</i>"</p>

Reference	Question	Applicant's Comments
		<p>As noted by the Applicant in <b>Application Document 9.125 Assessment of Cumulative Effects on the Wider Historic Landscapes [REP5-138]</b>, this information was taken from the Historic Landscape Character assessment published by SCC which defines large areas of the Suffolk Onshore Scheme from Hazelwood/the B1069 in the east to Saxmundahm in the west as “<i>Post 1950 Agricultural Landscape</i>”, with the sub category ‘<i>Boundary Loss From Irregular Co-axial Fields</i>’, with this HLC type including the area south of Saxmundham/the Fromus Valley.</p> <p>As such, the Applicant has used data provided by SCC as part of the assessment and considers that the description of the HLC type remains accurate/appropriate.</p> <p>SCC notes that “<i>SCC would consider the key elements to include the north-south orientation of the Fromus Valley, the relatively unspoilt approach to Saxmundham from the south, the remaining elements of the former park landscape and the remaining woodland blocks and field boundary hedges both around Saxmundham and Friston. The scheme adversely affects ProW, which are also part of the historic landscape fabric</i>”.</p> <p>In <b>9.128 Applicant's Response to Nicholas Bridges Representations RR-3944 and REP3-132 and SEAS REP4-240 [REP5-141]</b>, the Applicant responded to a point raised relating to the ‘unspoilt’ nature of the area south of Saxmundham, stating “<i>One point of disagreement is the assertion that the approach is unspoilt. This is a subjective term and depends on what point in history is taken as the ‘pristine’ against which any spoiling would be measured. There are no landscapes in Britain that are unchanged by human hands and the historic development of Hurts Hall and its parkland setting throughout the 17th, 19th, 20th and into the 21st century is a prime example of that. The parkland is not a designated heritage asset as it is not of sufficient special interest, rarity and historic integrity to warrant a national designation, being too far changed by the acknowledged field boundary loss, intensive farming, presence of the cricket bat plantation, and the loss of designed tree stands. One of the most distinct changes is the transformation from the landscape of small fields dominated by pastoral activities, to the large open fields used for arable which is a result of 21st century boundary removal. The views of the remnant parkland are acknowledged as attractive, and making a positive contribution to the assets mentioned, but unspoilt is not a valid descriptor.</i>”</p> <p>Mitigation associated with field boundary replanting and reinforcement, as well as PRow and Permissive Paths are detailed in <b>Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan- Suffolk (Clean) [REP6-078]</b>.</p> <p>In response to the second point relating to the assessment of cumulative effects raised by SCC in <b>[REP6-276]</b>.</p> <p>SCC note that “<i>At paragraph 5.1.3 the assessment of the landscape character as being predominantly agricultural does not acknowledge the fact that the character is predominantly rural and that the change in character resulting from the development is large. SCC cannot follow that this change would result in a minor adverse, and therefore non significant effect. SCC considers that the Applicant overstates the element of degradation of the local landscape character and underplays the impact and scale of change resulting from the development</i>”.</p> <p>In paragraph 5.1.3 of <b>Application Document 9.125 Assessment of Cumulative Effects on the Wider Historic Landscapes [REP5-138]</b> the Applicant states “<i>The permanent above-ground components of the operational Suffolk Onshore Scheme would introduce large-scale electricity transmission infrastructure into a landscape character that is primarily agricultural. This would noticeably alter the landscape character and would therefore constitute a medium impact and a minor adverse effect.</i>”</p> <p>The Applicant remains of the opinion that this conclusion is appropriate based on the assessment undertaken. In paragraph 5.1.2 of <b>Application Document 9.125 Assessment of Cumulative Effects on the Wider Historic Landscapes [REP5-138]</b> the Applicant states “<i>The landscape character of the land in which the Suffolk Onshore Scheme would be experienced is typical of post-medieval and modern agricultural landscapes in the region, and its sensitivity to change is assessed</i></p>

Reference	Question	Applicant's Comments
5.4	<p><u>5.4 HDD Archaeology Management Plan</u></p> <p>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.</p>	<p>to be low". Based on the assessment methodology provided in <b>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [REP6-020]</b>, a medium impact on an asset of low value would result in a minor adverse (not significant) effect.</p> <p>The Applicant would also like to highlight again that SCC, in document [REP6-276] state that "Overall, SCCAS would however agree with the conclusions made in this document".</p>
5.5	<p><u>5.5 Decompaction methods</u></p> <p>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).</p>	<p>The Suffolk OWSI has been updated for submission at Deadline 7 (see <b>Application Document Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) Suffolk</b>). This includes updated text noting that decompaction measures will need to be considered, with suitable mitigation developed if required, and that decompaction will also need to be included in the HEMP.</p> <p>As such, it is considered that the OWSI, as well as the Project Wide WSI (PWWSI) and Site Specific WSIs (SSWSIs), provide control measures to avoid impacts through decompaction, or allow mitigation to be developed if there is a risk of decompaction operations.</p>
5.6	<p><u>5.6 Historic Environmental Management Plan (HEMP)</u></p> <p>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.</p>	<p>The Applicant has submitted an updated OWSI at Deadline 7 (see <b>Application Document Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) Suffolk</b>), and this includes the commitment to produce a scheme wide HEMP. This will be produced in line with Project Stages as the detailed design is developed, and as mitigation areas, including areas of Preservation in Situ, have been agreed in the Project Wide WSI (PWWSI).</p>
5.7	<p><u>5.7 Ponds and pipes assessment</u></p> <p>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.</p>	<p>The Applicant has updated the OWSI and submitted this document at Deadline 7 (see <b>Application Document Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) Suffolk</b>). This has taken into account the comments raised by SCC in REP6-141, as well as feedback from HE, and includes the commitment to produce a scheme wide HEMP. This will be produced in line with the Project Stages as the detailed design is agreed along with the Project Wide WSI (PWWSI) which will identify all mitigation areas, including areas of Preservation in Situ.</p>
5.8	<p><u>5.8 Written Scheme of Investigation</u></p> <p>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.</p>	<p>The Applicant has updated the OWSI and submitted this document at Deadline 7 (see <b>Application Document Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) Suffolk</b>). This has taken into account the comments raised by SCC in [REP6-141], as well as feedback received from HE during ongoing consultation. All comments have now been addressed and agreed, with the exception being the requirements relating to the Project Wide Written Scheme of Investigation (PWWSI) for which discussions are ongoing.</p>
5.9	<p><u>5.9 Land To the South of River Stour Ramsgate Road - Solar Farm</u></p> <p>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</p>	<p>The Applicant would like to highlight that any significant effect on the scheduled Richborough Saxon Shore Fort, Roman Port, and associated remains (NHLE 1014642) would result from the proposed solar farm, and not from the Kent Onshore Scheme.</p>

Reference	Question	Applicant's Comments
	<p>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.</p> <p>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.</p>	<p>The proposed Minster Converter Station and Substation would be located on the northern side of the former Wantsum Channel, and as such would not alter the ability to understand the original setting of Richborough Fort as a shore fort overlooking the channel, nor would it sever any intervisibility that may have existed between Richborough Fort and the Ebbsfleet Lane complex on the north side of the Wantsum Channel. A negligible magnitude of impact on an asset of high value would result in a minor adverse effect (considered 'not significant' in EIA terms). The level of harm to the designated asset is assessed in Section 7.5 (paragraphs 7.5.35 to 39) of <b>Application Document 7.1 Planning Statement [APP-319], superseded by [REP6-054]</b>, to amount to less than substantial harm at the lower end of the spectrum.</p> <p>HE have stated that '<i>We consider that a 'Minor' significance of effect is appropriate and that the harm is therefore 'Not Significant'</i>' in their '<b>Comments on any further information/ submissions received by deadline 1 and deadline 1A [REP2-052]</b>'.</p> <p>This has also been agreed in the SoCG with HE submitted at Deadline 7 (see <b>Application Document 7.4.3 (D) Statement of Common Ground Between National Grid Electricity Transmission and Historic England</b>) which states: "<i>It is considered that the disagreement between the Applicant and HE in relation to the specific magnitude of impact on the setting of Richborough Fort is a matter of professional opinion and, both parties have agreed that the resultant significance of effect would be minor and therefore 'not significant'</i>".</p> <p>As a result, any significant cumulative effect would result from the proposed solar farm, and the Proposed Project would not be required to mitigate significant impacts generated by a separate project.</p>

## 6. Water Environment

**Table 6.1 Water environment**

Reference	Question	Applicant's Comments
6	<p>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).</p> <p>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.</p> <p>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.</p> <p>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?</p>	<p>The Applicant has revised commitment W06 in <b>7.5.3 (D) Outline Onshore Construction Environmental Management Plan [REP6-075]</b> to secure that 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.</p> <p>The Applicant has also discussed and agreed a drainage design change with Suffolk County Council, whereby the one temporary drainage basin that was situated in Flood Zone 3, would be removed and replaced by a linear drainage feature, which avoids works in Flood Zone 3. This is reflected in the update of document <b>6.8 (B) Flood Risk Assessment [REP6-052]</b> and the Applicant is also submitting an updated <b>Application Document 9.171 (C) Suffolk Drainage Strategy</b> at Deadline 7 which also reflects the removal of this temporary drainage basin.</p> <p>Regarding temporary accesses, the majority forming part of the Suffolk Onshore Scheme are in Flood Zone 1 and in areas at low risk of surface water flooding. Commitment W06 has also been updated, removing reference to Flood Risk Activity Permits, and to clarify that, where (very locally, such as at watercourse crossing locations) construction access routes cross narrow areas of Flood Zone 3 and/or high risk of surface water flooding zones, no land raising would be required and there would therefore be no flood risk impacts.</p> <p>There would therefore be no potential for increases in flood risk due to temporary storage of materials and haul roads during construction of the Suffolk Onshore Scheme. As there would be no increase in flood risk, it is the Applicant's view that there is no requirement to secure community benefits to outweigh flood risk impacts.</p>

# 7. Traffic and Transport

**Table 7.1 Traffic and transport**

Reference	Question	Applicant's Comments
7.1	<p><u>7.1 Permissive paths</u></p> <p>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?</p> <p>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?</p>	<p>The Applicant has set out commitment wording in the updated version of <b>Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134]</b>. This is in the form of measure GG43 which secures delivery and maintenance of the 1.2 km permissive path and limits the circumstances under which the permissive path could be closed. It also commits to signposting and would be maintained at the expense of the applicant rather than the local highway authority. It is the Applicant's view that this would deliver a footpath of substantial equivalence to a PRow. The applicant is currently considering SCCs additional requests with respect to this permissive path.</p> <p>With respect to why the proposal is for a permissive path rather than a PRow, the Applicant's reasoning was set out in response to AP29 in Application <b>Document 9.135: Applicant's Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110]</b>. However, in summary this is for two main reasons.</p> <ul style="list-style-type: none"> <li>• Maintenance Control: The Applicant needs to retain control of the access for maintenance activities, such as work on the Fromus Bridge. A permissive path allows the Applicant to temporarily close the route for safety during more substantial maintenance activities, which would be much more legally complex for a PRow.</li> <li>• Decommissioning: In the event the authorised project is decommissioned, and the Fromus Bridge is removed, a permissive path can be removed along with the infrastructure. A PRow is a permanent legal dedication that would be difficult to extinguish if the underlying access structure no longer existed.</li> </ul>
7.2	<p><u>7.2 Public Right of Way (PRow) mitigation</u></p> <p>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.</p> <p>The ExA asks the applicant if this could be a way of mitigating the cumulative impacts to the PRow network?</p> <p>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.</p>	<p>The Applicant has set out its position regarding the need for mitigation/offsetting for PRow effects in Appendix D 3CEIntra1 PRow Effects Offsetting/Compensation of <b>Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112]</b>. It is the Applicant's view that if it is considered necessary to offset the significant intra-project cumulative effects on Bridleway 491/010/0, or to otherwise mitigate any minor effects on other PRow in the network, then this is more than achieved through the provision of a strategically valuable Permissive Path along the Saxmundham Converter Station access route off the B1121.</p> <p>The Applicant does not consider it is necessary to provide any further mitigation in the form of funding SCC to make improvements elsewhere on the network. As such the Applicant does not consider a s106 agreement to be necessary.</p>
7.3	<p><u>7.3 Coordination to avoid significant impacts to PROWS</u></p> <p>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?</p>	<p>The Applicant has previously commented on the need for coordination on the Friston (Kiln Lane) Substation site. It is the Applicant's understanding that PRow E-354/006/0 has already been permanently diverted and, as such, will not need to be permanently diverted by the Applicant under scenario 2 where the Applicant builds the Friston Converter Station. The permanent diversion of this route also means that there is no requirement for further coordination of any temporary closures on this PRow; the new</p>

Reference	Question	Applicant's Comments
		<p>route of the PRow would simply be temporarily diverted by the Applicant alone if necessary.</p> <p>The Applicant has committed to coordinating with both SPR for EA1N/EA2 and NGV for LionLink, however the ExA is correct that such coordination is dependent upon the agreement of SPR and NGV. The applicant can confirm, however, that commitments such as always providing a suitable temporary diversion for any temporarily closed section of PRow, and ensuring PRow users have priority access, will apply to all PRow affected by the Suffolk Onshore Scheme, as secured within Section 5 of <b>Application Document 7.5.9.1 Outline Public Rights of Way Management Plan – Suffolk</b> and measure GG43 as set out in document <b>9.84 Register of Environmental Actions and Commitments (REAC)</b>.</p>
7.4	<p><u>7.4 Monitoring and capping of heavy goods vehicle (HGV) movements</u></p> <p>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?</p> <p>The ExA requires that the applicant work with the local highway authorities to agree wording on this matter.</p>	<p>This request is acknowledged by the Applicant and both <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b> and <b>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent</b> have been updated and resubmitted at Deadline 7 to include further wording on monitoring and the process which will be followed should any breaches occur, as requested. This includes the process to be followed should there be any exceedances to the daily HGV caps identified within the management plans, which will be treated as a breach. This wording will be reviewed with the local highway authorities as part of the final CTMTPs and refined as necessary. National Grid will take all reasonable steps to avoid any breach of the CTMTP through the implementation of the management measures.</p> <p>Furthermore, the Applicant would draw attention to mitigation measure TT02 identified within the <b>Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan</b> which states that <i>“The contractor(s) will implement a monitoring and reporting system to check compliance with the measures set out within the Outline CTMTPs. This will include the need for a Global Positioning System (GPS) tracking system to be fitted to Heavy Goods Vehicles to check for compliance with authorised construction routes. The contractor(s) will also be expected to monitor construction vehicles and routing as set out in Section 7 of the Construction Traffic Management and Travel Plans for Suffolk and Kent and take action as described in the same section.”</i></p>
7.5	<p><u>7.5 Kent County Council traffic requests</u></p> <p>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.</p>	<p>The Applicant notes that KCC has requested the following within their Deadline 6 submission [REP6-168]:</p> <ol style="list-style-type: none"> <li>1. A 30 HGV cap on Sundays and Bank Holidays, even with Highway Authority approval for the Bank Holidays. This would need to be given on a case-by-case basis, and not as a blanket approval for Bank Holiday working.</li> <li>2. A full Travel Plan monitoring scheme with the Highway Authority, the costs of which to be borne by the applicant.</li> <li>3. The applicant has offered to limit HGV movements using K-BM04 and K-BM05 to 10 HGVs per day, with no 2-way movements within the village and movements to be outside of school peaks.</li> <li>4. Provision of passing places on Ebbsfleet Lane North where required.</li> <li>5. The proposed Delivery Management System and Traffic Management and Monitoring System should also be responsive in real-time to network conditions, and adjust the movement of HGVs as required.</li> </ol> <p>The Applicant's position on each of these points is as follows:</p> <ol style="list-style-type: none"> <li>1. <b>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent</b> includes the commitment that no HGVs will arrive or depart site on Sundays or public holidays except where a specified exception</li> </ol>

Reference	Question	Applicant's Comments
		<p>applies. In this instance, there is a further commitment that any HGV arrivals or departures on Sundays and public holidays associated with these exception activities will be limited to a maximum of 30 HGVs per day.</p> <p>2. Details on management measures and controls, as well as staff measures and controls are set out within Sections 7.4 and 7.5 of <b>Application Document 7.5.1.2 Construction Traffic Management and Travel Plan – Kent</b>. Details on monitoring and review are provided within Section 7.7 of this document, and Chapter 8 provides details on compliance, reporting and enforcement. Therefore, <b>Application Document 7.5.1.2 Construction Traffic Management and Travel Plan – Kent</b> includes a monitoring scheme which will apply to construction workers (as typically included within a Travel Plan), with the monitoring of key metrics such as construction worker vehicle numbers and car occupancy figures. The Transport Co-ordinator will prepare a monitoring report as part of the process for monitoring the final CTMTP, that will be shared with the relevant local planning authorities and relevant highway authority to ensure compliance with this document.</p> <p>3. The following daily HGV caps are included within <b>Application Document 7.5.1.2 Construction Traffic Management and Travel Plan – Kent</b> where these caps are secured:</p> <ul style="list-style-type: none"> <li>• A daily cap of ten HGV movements on Marsh Farm Road, to minimise potential impacts of construction traffic through access point K-BM04. Construction traffic HGVs through Minster will also be controlled, such that construction HGVs will not pass each other (two-way) at the same time.</li> <li>• A daily cap of ten HGV movements on Whitehouse Drove, to minimise potential impacts of construction traffic through access point K-BM05. Construction traffic HGVs along Richborough Road will also be controlled, such that construction HGVs will not pass each other (two-way) at the same time.</li> <li>• A daily cap of ten HGV movements will be imposed on Ebbsfleet Lane North, to minimise potential impacts of construction traffic through access point K-AP-6 (K-BM06).</li> </ul> <p>4. The provision of passing places on Ebbsfleet Lane North would require road closures north of the level crossing which are considered to be potentially more disruptive than the minimal movements proposed by the applicant to facilitate the construction of the A256 access. For this reason, the applicant does not support the provision of passing places on Ebbsfleet Lane North. Nonetheless, a daily cap of ten HGV movements will be imposed on Ebbsfleet Lane North, to minimise potential impacts of construction traffic through access point K-AP-6 (K-BM06), as secured within <b>Application Document 7.5.1.2 Construction Traffic Management and Travel Plan – Kent</b>.</p> <p>5. The Applicants position is set out within mitigation measure TT02 identified within the <b>Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan</b> which states that <i>“The contractor(s) will implement a monitoring and reporting system to check compliance with the measures set out within the Outline CTMTPs. This will include the need for a Global Positioning System (GPS) tracking system to be fitted to Heavy Goods Vehicles to check for compliance with authorised construction routes. The contractor(s) will also be expected to monitor construction vehicles and routing as set out in Section 7 of the Construction Traffic Management and Travel Plans for Suffolk and Kent and take action as described in the same section.”</i></p>

Reference	Question	Applicant's Comments
7.6	<p><u>7.6 A12 capacity assessment</u></p> <p>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?</p>	<p>Further to the above, <b>Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent</b> has been updated and resubmitted at Deadline 7 to include further wording to address the matters raised by KCC within [REP6-168] where necessary (see also in relation to Point 7.4 above).</p> <p>This is acknowledged by the Applicant and further details relating to the potential scope of traffic surveys (e.g. locations, timescales and frequencies) that could inform SCC's monitoring of journey times and delays on the A12 will be reviewed as part of the final Construction Traffic Management and Travel Plan (CTMTP). These traffic surveys would be carried out prior to construction (baseline) and during construction to identify any changes in traffic conditions. However, it is likely that only a small proportion of change will be attributed to the Proposed Project due to other influences on baseline traffic levels e.g. daily and seasonal fluctuations, background traffic growth and construction traffic associated with other cumulative schemes in the area (including Sizewell C and EA1N/EA2). Therefore, it will be difficult to associate any changes in traffic flows on the A12 (and knock-on effects on journey times and delays) with the Proposed Project due to these other influences, as SCC as already stated. Nonetheless, the monitoring and reporting within the final CTMTP will be the mechanism for furnishing the local highway authority with details specific to the Proposed Project such as construction vehicle numbers and timings, which along with the traffic surveys on the A12 will inform SCC's real-time monitoring. Again, the traffic surveys on the A12 will only provide an overall comparison of traffic conditions prior to and during construction but cannot in the Applicant's view be used to attribute any impacts directly to the Proposed Project, due to the reasons outlined above. In addition, the scope of the traffic surveys (locations, timescales and frequencies) will need to be proportionate focussing on a limited number of key locations on the A12 which will be utilised by construction traffic associated with the Proposed Project. Further discussions will be held with SCC Highways to review the scope of this monitoring when the final CTMTP is prepared.</p>
7.7	<p><u>7.7 Saxmundham junction</u></p> <p>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.</p>	<p>Whilst a response has not been requested from the Applicant on this point, their current position is set out below.</p> <p><b>Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan – Suffolk [REP6-062]</b> includes a daily cap of ten HGV movements through the B1121 Main Road/ B1119 Church Street signalised junction, to minimise the potential impacts of construction traffic through Saxmundham at this location (associated with works at S-BM12). Following a further meeting with SCC Highways on 22 April 2026, it is understood that this junction currently experiences capacity issues throughout the day and that SCC's main concerns relate to the inter-peak period (after the AM network peak and before the PM network peak). Construction workers will be expected to travel to/ from the Site during the shoulder peak hours (prior to the AM network peak and after the PM network peak) which will avoid the inter-peak period. Therefore, the only construction vehicles which will be expected to travel through this junction during the inter-peak would be HGVs. The daily HGV cap which is secured within <b>Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan – Suffolk [REP6-062]</b> will result in a maximum of 10 daily HGV movements through this junction, which equates to an average of <u>one</u> HGV movement through this junction per hour (over a 10-hour window). Therefore, the Applicant does not consider the request to carry out any junction modelling at this junction to be necessary, as there will be no discernible impact as a result of the Proposed Project.</p>
7.8	<p><u>7.8 Works to Benhall Railway Bridge</u></p> <p>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</p>	<p>The Applicant has already made the following commitment within paragraph 7.2.43 of Application Document 7.5.1.1 Construction Traffic Management and Travel Plan: 'during any road closures of the B1121 for the project, no HGV construction traffic associated with the Proposed Project would use diversion routes through Saxmundham. In addition,</p>

Reference	Question	Applicant's Comments
	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?	LGV usage associated with the converter station during the Benhall Rail Bridge closure would be minimal (up to 60 LGVs per day). Diversions and any temporary mitigation required as part of the traffic management for the closure of the B1121 will be agreed under SCC's permitting scheme, and National Grid's Transport Co-ordinator would also liaise with SCC, other developers and Suffolk Constabulary on the timing of any closure to minimise impacts as far as practicable.' The applicant is not able to commit to closing S-BM-09 during the closure of the Railway Bridge as this access will be needed for workers , working on the bridge to access the site, the AIL's using the overbridge to access the site and workers who are not reliant on deliveries during this period to access the site to ensure the program of the project is maintained.
7.9	<p><u>7.9 Sizewell C traffic data</u></p> <p>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.</p>	<p>The Applicant held a meeting with SCC Highways on 22 April 2026 to review this point and subsequently shared a spreadsheet containing the sources and assumptions for deriving the Sizewell C (SZC) peak construction traffic forecasts to clearly identify how these had been derived, as reported within <b>Application Document 9.105 (A) Supplement to the Preliminary Cumulative Highway Impact Assessment in Suffolk [REP4-099]</b>. The spreadsheet was shared with SCC on 24 April 2026, prior to Deadline 7.</p> <p>To avoid potential confusion, the latest version of the aforementioned document is currently <b>Application Document 9.105 (B) Supplement to the Preliminary Cumulative Highway Impact Assessment in Suffolk [REP6-096]</b> which was updated at Deadline 6 to provide further information, in response to the Examining Authority's Third Written Question 3TT1.</p>
7.10	<p><u>7.10 A12 sensitivity test</u></p> <p>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.</p>	<p>The Applicant maintains that a worst-case assessment (including sensitivity testing) has been carried out within <b>Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]</b> and <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</b> on the basis of the following (note this is not an exhaustive list):</p> <ul style="list-style-type: none"> <li>• The peak construction phase (busiest day for different parts of the network) of the Proposed Project has been assessed in terms of total construction vehicles and HGVs;</li> <li>• Sensitivity test carried out for the A12, on the basis that 85% HGVs and 63% staff/ LGVs would travel to/ from the south, and that 50% HGVs, staff and LGVs would travel to/ from the north (rather than just assessing an 85/15 or 50/50 split for example);</li> <li>• Peak construction forecasts for major NSIPs (Sizewell C, EA1N, EA2 and LionLink) have been assessed as part of the cumulative assessment, on the basis that the construction peak of the Proposed Project will directly overlap with the construction peak of Sizewell C, as well as the construction peaks of EA1N, EA2 and LionLink (which in reality is a scenario which will not arise).</li> </ul> <p>Since the DCO submission, the following has also been carried out by the Applicant during Examination following consultation with SCC Highways:</p> <ul style="list-style-type: none"> <li>• Further technical note on the traffic and transport cumulative assessment (<b>Application Document 9.26 Traffic &amp; Transport Cumulative Assessment (Suffolk) [REP1-110]</b>) to provide further information in support of <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</b></li> <li>• Junction capacity modelling (as reported in <b>Application Document 6.3.2.7.A (B) Environmental Statement Appendix 2.7.A Transport Assessment Note [REP6-039]</b>) for the A12/ B1121 Main Road junction (to the south of Saxmundham), the A1094 Aldeburgh Road/ B1121 Aldeburgh Road junction and</li> </ul>

Reference	Question	Applicant's Comments
		<p>the A1094 Aldeburgh Road/ B1069 Snape Road junction. The junction modelling includes a Sensitivity Test, to consider potentially higher Baseline traffic flows at other times of the year driven by tourism related traffic peaks in summer months. The junction modelling also includes scenarios with and without cumulative traffic.</p> <ul style="list-style-type: none"> <li>• Five updates to the Suffolk Construction Traffic Management and Travel Plan (latest version is now <b>Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Suffolk</b> submitted at Deadline 7) to include additional measures including daily HGV caps for localised parts of the highway network, to minimise potential impacts of construction traffic on the surrounding highway network.</li> <li>• Several meetings held with SCC Highways to review matters raised, including on 22 January 2026, 24 February 2026, 30 March 2026 and 22 April 2026.</li> </ul> <p>The Applicant requested SCC's latest views on the A12 sensitivity test during the meeting held on 22 April 2026. Despite all of the additional work completed by the Applicant during Examination (see above), it is understood that SCC's position has not changed from their Deadline 3 submission [REP3-101] in response to the Examining Authority's First Written Questions, which includes requests for additional junction capacity assessments and safety assessments for various junctions along the A12 outside of the Applicant's study area. The Applicant has responded to these requests throughout Examination (both during meetings and written responses) and has carried out additional work (see above) to address these points where this was considered to be necessary. The Applicant also considers requests for additional assessments beyond the study area extents to represent an extension to the scope of the work that has already been carried, rather than a 'sensitivity test'. There is insufficient information for the Applicant to carry out junction capacity modelling beyond the study area extents, as the traffic surveys (which were agreed) did not cover these locations.</p> <p>The Applicant would re-iterate that junction modelling was not required as part of the original assessment work within <b>Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]</b>. SCC's request for widespread junction modelling followed the Examining Authority's First Written Question 1TT11 in December 2025. The Applicant reviewed SCC's list of requested junctions but did not consider it necessary to carry out junction modelling at all of the junctions listed e.g. at the B1121 Main Road/ B1119 Church Street signalised junction within Saxmundham or the A1094/ B1122 roundabout junction within Aldeburgh, where there will be a maximum of 10 daily HGV movements (an average of one HGV per hour) secured through the HGV caps set out within <b>Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan – Suffolk</b>. It would also not have been possible for the Applicant to carry out junction modelling for all of the junctions requested by SCC within the Examination timescales and junction modelling was therefore completed for the critical junctions as requested by the Examining Authority. National Highways also confirmed that there was no requirement to carry out junction modelling for the Strategic Road Network (SRN) including the A12/ A14 Seven Hills Interchange.</p> <p>In view of the above, it is surprising that SCC's position has not changed to recognise the discussions held and additional work carried out by the Applicant during Examination to address the comments raised. It will no longer be possible for the Applicant to carry out any further assessment work within the remaining timescales of Examination, nor is this considered to be necessary given the above. The Applicant maintains that a worst-case assessment (including sensitivity testing) has already been carried out, including for the A12, and that there will be no significant traffic and transport effects as a result of the Proposed Project.</p>

Reference	Question	Applicant's Comments
7.11	<p><u>7.11 A12 cumulative impacts</u></p> <p>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.</p>	<p>The Applicant refers to the above responses in terms of the proposed approach for traffic monitoring along the A12 (Point 7.6) and the scope of the A12 cumulative assessment (Point 7.10).</p> <p>The Applicant will not be committing any funds to a Contingent Effects Fund as it does not believe the impacts will have significant effects.</p>
7.12	<p><u>7.12 Suffolk junction modelling</u></p> <p>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.</p>	N/A

## 8. Noise and Vibration

**Table 8.1 Noise and vibration**

Reference	Question	Applicant's Comments
8.1	<p><u>8.1 Temporal restrictions</u></p> <p>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).</p>	<p>The proposed noise mitigations for the Sandlings SPA will provide some mitigation to the affected properties in the vicinity of the HDD activities. However, it is the application of Best Practicable Means (BPM), such as acoustic screening, that will ensure that the noise effects at receptors R_17129, R_1966, R_1955, and R_1924 will be minor at most as reported in <b>6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise &amp; Vibration [AS-109]</b>.</p>
8.2	<p><u>8.2 Hoverport noise assumptions</u></p> <p>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).</p>	<p>Further consideration has been given to these points.</p> <p>Firstly, addressing traffic on Sandwich Road, an assessment of construction traffic noise is presented in <b>Application Document 6.3.3.9.C ES Appendix 3.9.C Kent Construction Traffic Noise Assessment [APP-190]</b>. The assessment included consideration of construction traffic on Sandwich Road (Link ID K-RL7) which indicates the increase in noise due to construction traffic is negligible (0.1 dB). However, this only considered the standard 18-hour period used in the Calculation of Road Traffic (DoT, 1988) (CRTN) methodology, therefore assuming all traffic is during daytime periods.</p> <p>The night-time traffic noise levels have been predicted at dwellings on Sandwich Road using the Transport Research Laboratory (TRL) (Transport Research Laboratory, 2002) method for conversion from the LA10,18h to a night-time LAeq,8h level for the baseline and do something scenarios.</p> <p>As detailed in <b>Application Document 6.3.3.9.C ES Appendix 3.9.C Kent Construction Traffic Noise Assessment [APP-190]</b>, the Basic Noise Levels on Sandwich Road were calculated as:</p> <ul style="list-style-type: none"> <li>• 63.7 dB LA10,18h for the baseline scenario; and</li> <li>• 63.8 dB LA10,18h for the do-something scenario.</li> </ul> <p>This results in a predicted noise level change of 0.1 dB (Negligible).</p> <p>Corrected for both distance to the dwellings from the road (16 m) and to a night-time level via the TRL method, the resultant noise levels are calculated based on equal spread of construction traffic over the 24 hour period:</p> <ul style="list-style-type: none"> <li>• 52.9 dB LAeq,8h for the baseline scenario; and</li> <li>• 53.0 dB LAeq,8h for the do-something scenario.</li> </ul> <p>This results in a predicted noise level change of 0.1 dB (Negligible).</p> <p>However, as a worst-case, it may be assumed that all construction traffic occurs at night. If this were the case, the following levels are predicted at dwellings on Sandwich Road:</p> <ul style="list-style-type: none"> <li>• 52.9 dB LAeq,8h for the baseline scenario; and</li> <li>• 54.6 dB LAeq,8h for the do-something scenario</li> </ul> <p>This results in a predicted noise level change of 1.7 dB (Small magnitude and not significant).</p>

Reference	Question	Applicant's Comments
8.3	<p><u>8.3 Noise modelling – Pegwell Bay</u>  Applicant to provide updated marine ornithology predicted <math>L_{AFmax}</math> 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.</p>	<p>Notably, the predicted baseline noise levels at these receptors is calculated as 52.9 dB <math>L_{Aeq,8h}</math>. This comfortably sets the threshold for potential effects, using the BS 5228-1 (BSI, 2014) 'ABC' method, as Category C at these properties during night-time periods, with a threshold of 55 dB <math>L_{Aeq,8h}</math>. The assumed 45 dB <math>L_{Aeq,8h}</math> Category A threshold was therefore worst-case for these properties.</p> <p>Addressing the first point, therefore, assuming average spread over the 24 period (as per <b>9.148 Hoverport Construction Access Noise Modelling - Technical Note [REP6-123]</b>) the predicted noise level due to traffic on the access road was 44 dB <math>L_{Aeq,8h}</math>. Assuming, as a worst-case, all construction traffic occurred at night, noise levels would be approximately 5 dB higher, and therefore approximately 49 dB <math>L_{Aeq,8h}</math>.</p> <p>This level is comfortably below both the baseline noise level, and the associated threshold for potential significant adverse effects. As such, neither adverse nor significant adverse effects are expected from construction traffic on Sandwich Road, or on the Hoverport access road during either daytime or night-time periods.</p> <p>Addressing the third point, therefore, no mitigation is required.</p>
8.4	<p><u>8.4 Hovercraft</u>  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.</p>	<p>The Applicant consider GG45 to be appropriate way to secure that the hovercraft is to be used in emergencies only.</p>

## 9. Socio-Economics and Tourism

Table 9.1 Socio-economics and tourism

Reference	Question	Applicant's Comments
9.1	<p><u>9.1 Tourism monitoring</u></p> <p>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?</p>	N/A
9.2	<p><u>9.2 Tourism Commitments</u></p> <p>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.</p>	<p>Please refer to <b>Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]</b> (see 3SERT2) which sets out the Applicant's proposed approach to both ongoing monitoring and the implementation of measures to address potential effects on the local tourism and accommodation sector. This incorporates updates made by the Applicant following the meeting held with LPAs on 1 April 2026.</p> <p>Full details of commitments relevant to tourism, including SE04 and SE05, are provided within <b>Application Document 9.84 Register of Environmental Actions and Commitments (REAC)</b>. These commitments already secure a proportionate and flexible framework for engagement, monitoring and mitigation, which the Applicant considers appropriate given the nature and scale of potential effects identified.</p> <p>Specifically, in response to ESC's [REP6-261] request for additional commitments, the Applicant provides the following comments:</p> <ol style="list-style-type: none"> <li><b><u>To work with local tourism stakeholders through the Applicant's active involvement and representation at established tourism working groups. The Councils would establish a dedicated sub-group to facilitate local stakeholder engagement and enable a structured approach to appropriate tourism related monitoring requirements, mitigation and adaptive management activities associated with the proposed project.</u></b></li> </ol> <p>Through commitment SE04 the Applicant has committed 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.</p>

Reference	Question	Applicant's Comments
9.3	<p><u>9.3 Accommodation Strategy and Monitoring Plan</u></p> <p>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].</p>	<p>The Applicant refers to its detailed response within <b>Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]</b> (see 3SERT2). This response sets out the Applicant's proposed approach to both ongoing monitoring and the implementation of measures to address potential effects on the local tourism and accommodation sector. This incorporates updates made by the Applicant following the meeting held with LPAs on 1 April 2026.</p> <p>Full details of commitments relevant to tourism, including SE04 and SE05, are provided within <b>Application Document 9.84 Register of Environmental Actions and Commitments (REAC)</b>. These commitments already secure a proportionate and flexible framework for engagement, monitoring and mitigation, which the Applicant considers appropriate given the nature and scale of potential effects identified.</p> <p>As set out in the Applicant's response to ExQ3 <b>[REP6-111]</b> (see 3SERT2), the assessment concludes that there will be no significant adverse effects on tourism or the visitor economy, either alone or cumulatively. In that context, the Applicant does not consider it necessary, justified or proportionate to secure a prescriptive requirement of the type proposed by SCC.</p> <p>More specifically, the Applicant's position on the proposed Workforce Accommodation Strategy is as follows:</p> <ul style="list-style-type: none"> <li>• There is no identified significant adverse residual effect on tourism and the visitor economy either for the Proposed Project in isolation or cumulatively.</li> </ul>

Reference	Question	Applicant's Comments
9.4	<p data-bbox="513 709 1130 737"><u>9.4 Skills, Supply Chain and Employment Plan</u></p> <p data-bbox="513 751 1347 884">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.</p> <p data-bbox="513 898 1347 1031">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].</p>	<ul data-bbox="1383 174 2813 443" style="list-style-type: none"> <li data-bbox="1383 174 2813 247">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.</li> <li data-bbox="1383 275 2813 348">Sea Link's contribution to any cumulative effects is very small relative to the contribution from Sizewell C.</li> <li data-bbox="1383 375 2813 443">The intent of the requirement is already addressed, though more proportionately, through SE04 (ongoing liaison) and SE05 (targeted monitoring), which allow for adaptive, evidence-led responses if required.</li> </ul> <p data-bbox="1383 470 2813 602">The Applicant acknowledges SCC's intention to ensure appropriate oversight and responsiveness in relation to workforce accommodation. However, for the reasons set out above, the Applicant considers that the proposed requirement does not meet the policy tests in NPS EN-1 (2023) paragraph 4.1.16 and would introduce unnecessary and disproportionate prescriptiveness.</p> <p data-bbox="1383 617 2813 684">The Applicant therefore considers that the existing commitments within the REAC, including SE04 and SE05, provide an appropriate and sufficient mechanism to address the matter.</p> <p data-bbox="1383 709 1709 737"><b>Response to REP6-237</b></p> <p data-bbox="1383 751 2813 919">The Applicant has considered SCC's proposed requirement within <b>REP6-237</b> and notes that a number of minor drafting points have been raised, which do not materially alter the Applicant's position as set out in <b>Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]</b> (see 3SERT1). The Applicant confirms that engagement with the Regional Skills Coordination Function (RSCF) is acknowledged and embedded within the SSCEP [REP6-101].</p> <p data-bbox="1383 972 1709 999"><b>Response to REP6-184</b></p> <p data-bbox="1383 1014 2813 1081">The Applicant has also considered SCCs comments on the currently submitted Skills, Supply Chain and Employment Plan in response to Action Point 27 of <b>[REP6-184]</b>. Specifically:</p> <ol data-bbox="1383 1134 2813 1938" style="list-style-type: none"> <li data-bbox="1383 1134 2813 1413"> <p data-bbox="1383 1134 2326 1161"><b><u>1. SEP could be sufficient if mitigation-focused and DCO-secured</u></b></p> <p data-bbox="1427 1176 2813 1413">As set out in <b>Application Document 6.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism</b>, the Proposed Project is not expected to give rise to significant adverse socio-economic effects, either alone or cumulatively. In accordance with national policy, mitigation is only required where significant adverse effects are identified. In this context, the Applicant does not consider a mitigation-focused Skills, Supply Chain and Employment Plan to be necessary or justified. This position is reiterated by the Applicant within <b>Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]</b> (see 3SERT1).</p> </li> <li data-bbox="1383 1465 2813 1711"> <p data-bbox="1383 1465 2169 1493"><b><u>2. SEP must be mitigation-focused, not benefits-based</u></b></p> <p data-bbox="1427 1507 2813 1711">The Applicant's Skills, Supply Chain and Employment Plan is designed to maximise positive outcomes, including local employment, skills development and supply chain opportunities. It is not intended to function as mitigation for adverse effects that have not been identified. Reframing the Skills, Supply Chain and Employment Plan as a mitigation document would be inconsistent with the conclusions of the ES and with the policy framework set out in NPS EN-1. <b>Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]</b> (see 3SERT1) further explains this position.</p> </li> <li data-bbox="1383 1764 2813 1938"> <p data-bbox="1383 1764 1852 1791"><b><u>3. Current SSCEP is insufficient</u></b></p> <p data-bbox="1427 1806 2813 1938">The Applicant does not agree that the Skills, Supply Chain and Employment Plan is insufficient. The document recognises the cumulative NSIP context, sets out clear actions, and identifies delivery mechanisms through established National Grid processes and contractor requirements. <b>Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]</b> (see 3SERT1)</p> </li> </ol>

Reference	Question	Applicant's Comments
		<p>further explains why additional governance structures, enforceable mitigation commitments or re-classification of benefit plans are not appropriate or proportionate.</p> <p><b>4. <u>Requirement for cumulative workforce modelling and scenario testing</u></b>  The Applicant does not consider detailed cumulative workforce modelling to be appropriate or proportionate. Such modelling would be highly speculative, dependent on third-party programmes, and not reflective of Sea Link's limited employment scale. <b>Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]</b> (see 3SERT1) further explains limitations of speculative modelling and reliance instead on recognised labour-market evidence and ES assessment.</p> <p><b>5. <u>Requirement for RSCF-led education and training strategy and supply-chain mitigation</u></b>  The Applicant supports engagement with the RSCF and local providers, which is already embedded in the Skills, Supply Chain and Employment Plan. However, it does not agree to a co-designed or SCC-led education or supply-chain mitigation strategy beyond this engagement. <b>Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]</b> (see 3SERT1) further explains the Applicant's position regarding alignment with existing local structures rather than creation of bespoke strategies or parallel arrangements.</p> <p><b>6. <u>Governance, monitoring, enforceable targets and DCO Requirement</u></b>  The Applicant does not consider that additional governance groups, monitoring regimes or a bespoke DCO-secured mitigation strategy are necessary. Delivery of commitments is already secured through existing contractor obligations and DCO mechanisms. <b>Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]</b> (see 3SERT1) further explains the Applicant's stance regarding unnecessary additional Requirements, working groups or approval gateways as being disproportionate.</p> <p><b>7. <u>SEP could mitigate impacts if revised; without it SCC maintains objection</u></b>  The Applicant maintains that the existing Skills, Supply Chain and Employment Plan is sufficient and policy-compliant, and that SCC's concerns stem from a disagreement on impact significance rather than shortcomings in the Plan itself. <b>Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]</b> (see 3SERT1) further sets out confirmation that residual socio-economic impacts are not significant and therefore do not require mitigation.</p>

# 10. Health and Wellbeing

**Table 10.1 Health and wellbeing**

Reference	Question	Applicant's Comments
10.1	<p><u>10.1 Core working hours</u></p> <p>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.</p>	<p>The core working hours proposed (secured via requirement 7 of <b>Document 3.2 Draft Development Consent Order</b>) are required to facilitate the delivery of the Proposed Project, a critical nationally important electricity transmission infrastructure, by 2030. This reflects the need presented in the UK Government's Clean Power 2030 Action Plan, responding to NESO's Clean Power 2030 report. The delivery of the Proposed Project in accordance with the programme set out in the Applicant's Transmission Licence, in accordance with the NESO clean power objectives, and in a way that reduces constraints costs being passed to consumers, is fundamental to the need case for the Proposed Project.</p> <p>The Proposed Project requires the ability to programme its work as necessary across a seven-day week. While it is not anticipated that Sunday and bank holiday working would be undertaken across the entire onshore elements of the project every weekend, the ability to utilise weekend days as required is critical to allow an effective delivery programme to be developed.</p> <p>Within the core working hours themselves, there are restrictions on noisy works (namely percussive piling) and on HGV movements on weekends, with neither percussive piling nor HGV deliveries occurring on Sundays or bank holidays with the exception of activities covered under requirement 7 paragraph (4). Furthermore, bank holiday weekends are excluded from the core working hours at the Suffolk converter station site and the Kent converter station and substation site, with further restrictions at Friston (Kiln Lane) substation (recognising that this is already consented via another project DCO).</p> <p>There are robust controls in a suite of management plans secured via requirements 5 and 6 of the dDCO that mitigate the effects of construction activity, noting for example <b>Document 7.5.3 Outline Onshore Construction Environmental Management Plan [REP6-074]</b>, <b>Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP6-134]</b>, and <b>Application Document 9.83 Outline Code of Construction Practice [REP4-232]</b>.</p> <p>The Applicant's position reflects that set out in its responses to <b>ExQ 1GEN49 in Document 9.73 Applicant's Responses to First Written Question [REP3-069]</b> and its responses to AP106 <b>Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) ISH2 Action Point 106 [REP4-086]</b>.</p>
10.2	<p><u>10.2 Health and wellbeing monitoring</u></p> <p>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.</p>	N/A

Reference	Question	Applicant's Comments
10.3	<p data-bbox="513 180 825 207"><u>10.3 Vulnerable groups</u></p> <p data-bbox="513 222 1397 390">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].</p> <p data-bbox="513 405 1397 537">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)).</p> <p data-bbox="513 552 1397 720">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.</p> <p data-bbox="513 735 1397 1066">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.</p>	<p data-bbox="1418 180 1783 207"><b>SEND School Near B1121</b></p> <p data-bbox="1418 222 2822 426">This receptor was identified within the Health and Wellbeing baseline as the former "SET Saxmundham School". The site is located within approximately 600m of the B1121 and the Project Order Limits. The assessment presented in <b>Application Document 6.2.2.11 (Suffolk) Chapter 11: Health and Wellbeing) [APP-058]</b> did not identify any significant residual adverse effects for this receptor, including when taking into account findings from other topic-specific assessments (e.g. traffic, noise and air quality), which also conclude no significant residual adverse effects.</p> <p data-bbox="1418 483 2822 646">Embedded mitigation measures have been incorporated into the Proposed Project to reduce potential effects during construction, operation and decommissioning. These include measures relating to noise and vibration, air quality, traffic and access, and socio-economics, which collectively minimise potential impacts on the local community and nearby facilities from a health and wellbeing perspective. Specifically, those most applicable to reducing potential impacts on the SEND school include:</p> <ul data-bbox="1418 703 2822 1791" style="list-style-type: none"> <li data-bbox="1418 703 2822 772">• <b>HW01:</b> Sensitive routeing and siting of infrastructure and temporary works to avoid or reduce impacts on health and wellbeing receptors.</li> <li data-bbox="1418 787 2822 1245">• <b>HW02:</b> <ul style="list-style-type: none"> <li data-bbox="1478 825 2822 852">○ Provision of a Community Liaison Officer (CLO) trained in mental health awareness</li> <li data-bbox="1478 867 2822 1010">○ 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).</li> <li data-bbox="1478 1024 2822 1129">○ 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.</li> <li data-bbox="1478 1144 2822 1171">○ Ensuring contractors follow mental health-aware community behaviour standards</li> <li data-bbox="1478 1186 2822 1245">○ Attend and contribute to the Sizewell Health and Wellbeing Working Group meetings, if the existing attendees are in agreement.</li> </ul> </li> <li data-bbox="1418 1260 2822 1409">• <b>NV01:</b> 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).</li> <li data-bbox="1418 1423 2822 1566">• <b>NV03 -</b> 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, and therefore whether additional measures, including site-specific Best Practicable Means (BPM), may be required.</li> <li data-bbox="1418 1581 2822 1650">• <b>NV07:</b> Saxmundham Converter Station and Friston Substation will include appropriate noise mitigation measures in the design.</li> <li data-bbox="1418 1665 2822 1791">• <b>GG37:</b> 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.</li> </ul> <p data-bbox="1418 1806 2822 1940">A detailed response regarding the existing commitments, and further proportionate measures in recognition of the LPA and community's concerns regarding health and wellbeing is set out in <b>Application Document 9.136 Applicant's Responses to Third Written Questions</b> in response to 3HW3.</p>

Reference	Question	Applicant's Comments
		<p>These measures are secured through the DCO and detailed within <b>Application Document 9.84: Register of Environmental Actions and Commitments (REAC)</b>.</p> <p>These measures provide a proportionate and flexible framework for engagement and support, while recognising that no significant residual adverse effects are anticipated. In the context of the SEND school near the B1121, the combination of embedded mitigation and additional community-focused measures ensures that any potential for disruption is minimised and that appropriate channels are in place to respond to any concerns that may arise. The Applicant is happy to engage with the school and will ensure they receive updates as appropriate during construction.</p> <p><b>Correspondence between Great Oaks Small School and Ebbsfleet House and Martins</b></p> <p>The Applicant has engaged with Great Oaks Small School on several occasions, including at non-statutory and statutory consultation events in 2022 and 2023 respectively. Further meetings were held in December 2024 and June 2025 respectively. The school is located within the Primary Consultation Zone and therefore receives copies of all newsletters the Applicant issues to the PCZ. The Applicant is committed to future engagement with Great Oaks Small School and expects to provide a further update to the school in the weeks after the Examination closes.</p> <p>Ebbsfleet House and Martins (owned by High Quality Lifestyles Limited [Priory Group]) are both within the Primary Consultation Zone, meaning that they have been within the distribution zone for newsletter updates sent by the Applicant. This includes newsletters issued at each stage of pre-application public consultation, along with newsletter updates that the Applicant has issued subsequently. The Applicant did not receive any feedback from High Quality Lifestyles Limited and has no record of any contact from them beyond their relevant representation.</p> <p>As outlined above, the Applicant has proposed embedded mitigation measures to reduce potential effects, including measures relating to noise and vibration, air quality, traffic and access, and socio-economics. The Applicant will engage with High Quality Lifestyles Limited as the project progresses beyond the Examination phase and will make contact shortly.</p> <p><b>Other Vulnerable Populations</b></p> <p>The Applicant has identified sensitive receptors, including schools, healthcare facilities and residential care settings, through the Environmental Statement and supporting assessments. Potential impacts on these receptors have been assessed within the health and well-being assessment which has drawn on the findings from the noise, visual, traffic &amp; transport and air quality topics. No facilities or establishments (including those with vulnerable groups) were assessed to have significant effects from a health and wellbeing perspective.</p> <p>Engagement has been undertaken through established consultation processes, including with local authorities and community stakeholders. No evidence has been identified through engagement or assessment to indicate that additional specific mitigation is required for particular facilities or vulnerable groups.</p> <p><b>How Vulnerable Groups Have Been Assessed</b></p> <p>The Applicant notes SCC's comments at [REP6-184] regarding the consideration of vulnerable groups, including SEND and neurodiverse individuals. The Applicant's position remains that vulnerable populations have been appropriately and proportionately assessed.</p>

Reference	Question	Applicant's Comments
10.4	<p><u>10.4 Residential receptors near the proposed Friston Substation</u></p> <p>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.</p>	<p>The Applicant maintains the Health and Wellbeing assessment in <b>Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]</b> has been undertaken in accordance with IEMA (2022) guidance, which supports the use of proportionate study areas defined at ward and district level.</p> <p>As such:</p> <ul style="list-style-type: none"> <li>• Vulnerable groups, including elderly, disabled and neurodivergent populations, are explicitly captured through baseline data and receptor sensitivity</li> <li>• Potential impact pathways (e.g. changes in traffic, noise, air quality and access) have been assessed across all topics; and</li> <li>• The findings consistently demonstrate no significant residual adverse effects on health and wellbeing.</li> </ul> <p>While ward and district level datasets are used to characterise baseline conditions, this does not preclude consideration of impacts on smaller communities. Individual sensitive receptors (such as schools and care facilities) have been identified and assessed where relevant through topic-specific assessments. The Applicant therefore considers that:</p> <ul style="list-style-type: none"> <li>• Vulnerable groups have been appropriately identified and assessed in line with good practice;</li> <li>• The level of assessment is proportionate to the scale and nature of the Project; and</li> <li>• No additional measures are required beyond those embedded measures and additional REAC commitments already secured through the DCO (see details above for measures/commitments applicable to SEND and neuro diverse individuals).</li> </ul> <p>There are two forms of intra-project cumulative effects assessment which are conflated in the SCC document. SCC initially refer to the intra-project cumulative effects assessment reported in [APP-059] where the Applicant reported the potential for significant intra-project cumulative effects on residential amenity, not health and wellbeing.</p> <p>The assessment of health and wellbeing, as reported in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] is a type of cumulative assessment that takes into account various health determinants, including noise and vibration, air quality, and transport factors. The assessment took into account various mitigation measures, as set out in the chapter, including GG02, GG03, GG04, GG05, GG10, GG12, GG20, GG21, GG24, GG27, and TT03. The assessment of health and wellbeing concluded that there would be only negligible to minor effects as a result of the Suffolk Onshore Scheme. As such no further mitigation was considered necessary.</p> <p>Since these assessments were undertaken the Applicant has provided more detail on the potential for intra-project cumulative effects on residential amenity, in <b>Application Document 9.141 Intra Project Cumulative Effect Significance - Technical Note [REP6-117]</b>. This technical note considered all individual properties within 300m of the Order Limits of the Suffolk Onshore Scheme, and it concluded that there are no individual residential properties that were anticipated to experience residential amenity effects above a minor significance; this includes properties near to the proposed Friston Substation. As a precaution, however, the effects were still reported as potentially significant, though at a moderate level at most.</p> <p>The Applicant has also added measure GG40, which requires a review of the potential for intra-project cumulative effects once more detailed information is available about the construction of the Proposed Project. The Applicant has also made updates to existing measures GG03, GG27 and NV03 to ensure they specifically respond to the potential for intra-project cumulative effects. Although these changes have been made to address the potential for intra-project effects on amenity, they will clearly also help to mitigate the same sources of effects that are considered in the assessment of health and wellbeing, even though the health and wellbeing effects were considered to be minor at most.</p>

Reference	Question	Applicant's Comments
10.5	<p><u>10.5 Radiation Emergency Plan</u></p> <p>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.</p> <p>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</p>	<p>The Applicant has updated GG41 and added a new requirement (Requirement 19) to the dDCO in relation to the Suffolk Resilience Forum Radiation Emergency Plan.</p>
10.6	<p><u>10.6 Mental health and wellbeing impacts from change to Order Limits</u></p> <p>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.</p>	<p>The Applicant initially refers to <b>Application Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]</b> (see 3HW4), which provides a response relating to the health and wellbeing implications of the changes to the Order Limits southeast of Friston. The Applicant has then also provided further elaboration to give further explanation on the assessment.</p> <p>In summary, the change comprises an extension of limits of deviation at the Friston Substation (without any change to design parameters, construction methodology or operational footprint). This change does not introduce new infrastructure types or materially alter construction activity, duration, or intensity.</p> <p>The assessment within <b>Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]</b> considered whether the Order Limits changes could result in new or different effects on health and wellbeing through changes in proximity to sensitive receptors, introduction of new receptors, or changes to key impact pathways.</p> <p>The assessment considers a range of potential health and wellbeing pathways associated with construction activities, including noise disturbance, visual amenity, air quality, community severance, and physical health outcomes such as activity and respiratory health.</p> <p>Specifically, in relation to mental health, the assessment considers a range of determinants (for example changes in landscape and visual amenity, noise, access to open space and employment, as well as physical health associated with air pollution and access to healthcare facilities). This has particular relevance for the following determinants within the health and wellbeing assessment:</p> <ul style="list-style-type: none"> <li>• <b>Access to healthcare services and other social infrastructure</b> - assessment considers socio-economic conclusions on influx of workers and demand on services, and transport conclusions on severance.</li> <li>• <b>Access to open space, leisure and play</b> - assessment considers socio- economic and transport conclusions to inform access and land use impacts.</li> <li>• <b>Transport modes, access, connections and physical activity</b> - assessment considers socio-economic and transport conclusions to inform access impacts from severance and PRow impacts.</li> <li>• <b>Social cohesion and community identity</b> - assessment considers socio- economic, transport, and L&amp;V to inform amenity impacts.</li> <li>• <b>Noise and Vibration</b> – assessment considers noise conclusions to inform assessment.</li> </ul> <p>The relevant topic-specific conclusions within <b>[CR1-055]</b> confirm the following:</p>

Reference	Question	Applicant's Comments
		<ul style="list-style-type: none"> <li>• Landscape and Visual - No new or different likely significant effects on landscape character or visual amenity.</li> <li>• Traffic and Transport – No change to the assessment and no new or different likely significant effects.</li> <li>• Noise and Vibration – The proposed change does not bring the substation closer to noise-sensitive receptors such that the ES conclusions would change.</li> <li>• Air Quality - No additional human or ecological receptors are introduced and the assessment remains unchanged.</li> <li>• Socio-economics - There are no new or different significant environmental effects to those reported in the ES chapter.</li> </ul> <p>There are no significant effects associated with construction activities in relation to general health, and also specifically in relation to mental health, quality of life, and amenity that would materially affect health and wellbeing outcomes. Specifically, all relevant technical assessments confirm that:</p> <ul style="list-style-type: none"> <li>• No new sensitive receptors are introduced within relevant study areas;</li> <li>• There is no material change in proximity or exposure to existing receptors; and</li> <li>• All effects remain within the parameters assessed under the Rochdale envelope in the environmental statement.</li> </ul> <p>Taken together, these assessments confirm that no significant adverse effects on human health and wellbeing arise. Accordingly, the potential pathways through which health and wellbeing effects could arise remain unchanged, and there is no mechanism by which the Order Limits change could give rise to new or materially different effects. The conclusions presented in <b>[CR1-055]</b> therefore remain valid, proportionate, and robust.</p> <p>All embedded mitigation measures and construction controls secured through the ES and DCO remain applicable and effective for the revised Order Limits. A detailed response regarding the existing commitments, and further proportionate measures in recognition of the LPA and community's concerns regarding health and wellbeing is set out in <b>Application Document 9.136 Applicant's Responses to Third Written Questions</b> in response to 3HW3. These measures are secured through the DCO and detailed within <b>Application Document 9.84: Register of Environmental Actions and Commitments (REAC)</b>.</p> <p>In light of the above, the Applicant considers that the conclusion that there are no significant health and wellbeing effects remains unchanged, and that the changes do not give rise to any new or different effects in this regard.</p>

# 11. Marine Physical Environment

**Table 11.1 Marine physical environment**

Reference	Question	Applicant's Comments
11.1	<p><u>11.1 oCEMP commitment MPE06</u>            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 sub-paragraph (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."</p>	<p>The Applicant confirms that Work No. 6 comprises works seaward of MHWS. The MMO are the competent authority seaward of Mean High Water Springs (MHWS) and therefore approval of plans falls within their jurisdiction. Offshore Plans listed within Condition 4 of the dML therefore need to have approval from the MMO.</p> <p>Work No. 5 in Suffolk relates to works above MHWS which falls within the jurisdiction of the Local Planning Authority.</p> <p>Condition 4 of the dML secures the following within the final CSIP (updated at Deadline 7) for Work No. 6:</p> <p><b>4(a) a Cable Specification and Installation Plan document in respect of those licensed activities, which is in substantial accordance with the principles set out in the outline Cable Specification and Installation Plan and which has been informed by a cable burial risk assessment which shall include details of—</b></p> <ul style="list-style-type: none"> <li>(i) a sediment disposal management plan;</li> <li>(ii) technical specification of offshore cables below MHWS, including a desk-based assessment of attenuation of electromagnetic deviation of the high voltage cable route, shielding and cable burial depth in accordance with industry good practice;</li> <li>(iii) proposed detailed location and route of offshore cables, including micro-siting where necessary, together with timings;</li> <li>(iv) an intertidal works methodology and mitigation plan for Pegwell Bay;</li> <li>(v) 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;</li> <li>(vi) a detailed cable protection plan;</li> <li>(vii) details of intended boulder removal;</li> <li>(viii) a marine pollution contingency plan;</li> <li>(ix) a waste management plan; and</li> <li>(x) a landfall method statement in accordance with the construction methods assessed in the environmental statement;</li> </ul> <p>Due to the dynamic nature of the marine environment, the frequency and scope of offshore monitoring, if required, needs to be informed by pre-construction surveys and the 'as-built' status of the cable.</p> <p>The In-Principle Monitoring Plan submitted into examination already secures the principles for monitoring the Offshore Scheme. This document cannot accurately move towards a final monitoring plan until the relevant data and information is available through surveys and cable installation to ensure the correct and</p>

Reference	Question	Applicant's Comments
		<p>proportionate monitoring approach is agreed. The Applicant's approach to monitoring has been set out as a new condition within the dML at Deadline 7.</p>
		<p>The Applicant confirms that an update to MPE06 has been included in the REAC at Deadline 7 to:</p> <p><i>Over the operational lifetime of the Proposed Project, monitoring of the beach profile and erosion rates will be carried out at both the Suffolk and Kent landfall sites in relation to the trenchless technique construction areas associated with the exit pits. The frequency and scope of monitoring would be dependent on the pre-construction surveys and 'as-built' status of the Offshore Scheme. The Applicant will produce a monitoring plan, in substantial accordance with the outline In-Principle Monitoring Plan to be submitted to the MMO to cover works below Mean High Water Springs within three months of the 'as-built survey' unless otherwise agreed in writing by the MMO.</i></p>
11.2	<p><u>11.2 Access to Pegwell Bay</u>            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.</p>	<p>The Applicant has included a Requirement into the DCO for Deadline 7 following the ExA's Schedule of Changes.</p> <p>The Applicant also confirms that the Outline Cable Specification and Installation Plan has been reviewed in light of this new Requirement and further discussions with Natural England regarding hoverport access in Pegwell Bay.</p>
11.3	<p><u>11.3 Jack-up barge (JUB) footprint</u>            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</p>	<p>The Applicant confirms that bottom out barges in the intertidal at Pegwell Bay is the project preference, but a Jack Up Barge has been assessed as a Worst Case Scenario to retain flexibility. It should however be noted that the proposed Jack Up Barges that would be used for Sea Link would be much smaller with much less impact in comparison to the offshore construction Jack Up Vessels used to construct Offshore Windfarms.</p> <p>Any imprints or depressions on the beach at Pegwell Bay can and would easily be backfilled by the excavators on site.</p>

Reference

Question

Applicant's Comments

the different water depth and energy levels between works in marine and intertidal areas?

An example of a JUB that would be used on the beach at Pegwell Bay:



An example of an Offshore Windfarm Construction Vessel Jack Up:



11.4

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

The Applicant confirms that bottom out barges in the intertidal at Pegwell Bay is the project preference, but a Jack Up Barge has been assessed as a Worst Case Scenario to retain flexibility at this landfall.

Reference	Question	Applicant's Comments
	instead, as requested by NE [REP6-245]? If not explain why not.	The conclusions within the Benthic Ecology Chapter have been based on the worst case scenario of a jack up barge and have concluded no significant effects. Clarification on bottom out barges has however been included within the Benthic Chapter at Deadline 7.
11.5	<p data-bbox="513 342 908 373"><u>11.5 Designated disposal site</u></p> <p data-bbox="513 384 1308 520">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.</p>	<p data-bbox="1362 342 2783 520">The Applicant confirms that the Outline Cable Specification and Installation Plan has been updated at Deadline 7. Section 8 of this document 'Sediment Disposal Management' includes the following: <i>Pre-swept material, unless otherwise advised by the MMO, will remain within the same sedimentary system and be 'intelligently' placed as far as reasonably practicable so that excavated material quickly infills the excavated depression.</i></p> <p data-bbox="1362 573 2783 741">The Order Limits are therefore considered to be the 'disposal site'. The Applicant reached out to the MMO on the 22<sup>nd</sup> April 2026 via email to confirm this position. The MMO has responded on 24<sup>th</sup> April 2026 and have confirmed that they have the required characterisation information from the Applicant to designate the areas of pre-sweeping within the Order Limits as the disposal site. The Applicant will send through a Shapefile to the MMO after Deadline 7 of the areas for designation.</p> <p data-bbox="1362 751 2783 814">Condition 8 of the DML has also been updated at Deadline 7 to revert back to previous iterations of the wording.</p>
11.6	<p data-bbox="513 846 1086 877"><u>11.6 Chemical, drilling and debris condition</u></p> <p data-bbox="513 888 1308 1024">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].</p>	<p data-bbox="1362 846 2783 909">The Applicant confirms that the proposed wording received from the MMO prior to Deadline 6 has already been incorporated into the dML.</p> <p data-bbox="1362 961 2783 1024">Minor amendments have been made to Condition 4 at Deadline 7 in response to the MMOs Deadline 6 submission.</p>

# 12. Benthic Ecology

**Table 12.1 Benthic ecology**

Reference	Question	Applicant's Comments
12.1	<p><u>12.1 In Principle Monitoring Plan</u></p> <p>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.</p>	N/A
12.2	<p><u>12.2 Natural England benthic issues</u></p> <p>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.</p>	<p>A meeting was held between Natural England and the Applicant on 16 April 2026 to discuss the following outstanding issues.</p> <p>Point E1 was included in Natural England's Relevant Representations [<b>Document RR-3920</b>] under the heading "<i>Summary of Key Concerns</i>" and stated that a number of impact pathways were missing or incomplete but gave no specific details. Instead, the detailed and specific comments were provided in the subsequent table called "Natural England's Detailed Advice and Recommendations – Benthic Ecology". Thus, the Applicant has responded to the specific queries as they were originally provided in Table 2 and in later NE Appendices, with comments either updated or more often, repeated in subsequent WRs and Appendices. It is not the Applicant's intention to respond to E1 directly as the issues require detailed responses to detailed comments/issues which are detailed below.</p> <p>It is the Applicant's understanding that all issues covered by the summary E1 comment have been addressed across a number of updates. The Applicant kindly requests Natural England's help that should it consider any remaining pathways or receptors to be missing these should be identified so they can be efficiently resolved. It is also useful to note that the Applicant only discovered somewhat already through the examination period that Natural England had not been reviewing in detail, responses provided in Applicant response documents, but instead only looking at revised chapters. In this process, many responses which did not require chapter updates were not reviewed or closed out.</p> <p>A summary of the updates made to <b>Application Document 6.2.4.2 Benthic Ecology</b> between version C [REP1-054] and that submitted at Deadline 7 are:</p> <ul style="list-style-type: none"> <li>• Significant updates to both the baseline and the impact assessments for both these soft-circalittoral rock habitats including an estimation, based on revisiting the geophysical survey reporting, of the area of these habitats that would be permanently disturbed. The most recent update with quantification is provided in <b>Application Document 6.2.4.2(F) Benthic Ecology</b> which was submitted at Deadline 7.</li> <li>• Significant updates to baseline, sensitivity ratings and impact assessments for reefs, sea caves, <i>Sabellaria spinulosa</i> and reef assessments within and without Goodwin Sands MCZ, mussel beds, peat and clay exposures, subtidal chalk, intertidal mudflats,</li> <li>• Updates to the impact pathways and areas of disturbance, particularly at Pegwell Bay intertidal construction activities and for operational areas of effect including clarification on the areas estimated as a WCS for cable protection placement,</li> <li>• Changes to sensitivity ratings for circalittoral soft rock habitats (i.e. peat and clay exposures and chalk habitats).</li> </ul>
2.3	<p><u>12.3 Thanet Coast SAC</u></p> <p>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</p>	<p>The Applicant presented the additional sediment dispersion modelling to Natural England during an online meeting on 14th April 2026. The additional information was well received, and no objections or concerns were voiced by the Natural England's physical processes expert present during the meeting but confirmed they would however review Deadline 6 submissions before commenting in detail. Unfortunately, due to lack of NE availability following a number of requests for a meeting the Applicant was only able to engage directly with NE on this issue at this late stage of the examination.</p>

Reference	Question	Applicant's Comments
	<p>position that there would be AEol 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 AEol.</p> <p>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.</p>	<p>The results of the additional sediment modelling exercise, which are reported in <b>Application Document 9.144 Additional Sediment Dispersion Modelling - Technical Note [REP6-120]</b> submitted at Deadline 6, indicate that increases in SSC and sediment deposition at the landfall locations are highly localised and have a smaller zone of influence than that determined in the original modelling for the nearest offshore release location (location 6 in Application Document 6.3.4.1.A Suspended Sediment Modelling). There is therefore, no potential for AEOsI of the Thanet Coast in relation to the protected features which are sea caves and chalk reefs. The Application Document 6.6 (G) Habitats Regulations Assessment [REP6-051], submitted at Deadline 6 was updated with this additional sediment modelling in relation to designated sites, including the Thanet Coast SAC, in Pegwell Bay.</p>
12.4	<p><u>12.4 Benthic impacts in the operational phase</u></p> <p>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.</p>	<p>The Applicant would like to clarify that Natural England's original comment in REP6-245 was for the Outline Cable Specification and Installation Plan (CSIP), and not the Outline CEMP. The Outline CSIP is not an assessment document, it is an Outline Plan. The Outline CSIP sets out the principles with which the final CSIP must substantially accord.</p> <p>All assessments for operation and maintenance activities are contained within the individual offshore EIA topic Chapters under the heading 'Assessment of Impacts and Likely Significant Effects'. Maximum Design Scenarios within each topic EIA Chapter for operation and maintenance activities are clearly set out under the heading 'Proposed Project Design and Embedded Mitigation'.</p> <p>The CSIP does however outline relevant offshore maintenance activities associated with the Proposed Project, although it is worth noting that these are substantially different to OWF project which would include much more maintenance activities within their respective CSIP. During operation the HVDC link would transmit electricity from the proposed Friston Substation to the existing network in Kent and vice versa depending on the supply and demand at the time. The cable system installation is designed such that a regular maintenance regime is not required to maintain the integrity of the link. A list of maintenance activities for the CSIP is presented in Section 6 of the Outline CSIP.</p> <p>The Applicant therefore considers that the outline information within the Outline CSIP is accurate and representative of what information needs to be secured within this document and that no further assessment of activities during operation is required.</p>
12.5	<p><u>12.5 Thanet Coast Marine Conservation Zone (MCZ)</u></p> <p>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.</p>	<p>The Applicant has updated the concluding text for the assessment in paragraph 1.7.43 of <b>Application Document 6.11 (F) Marine Conservation Zone Assessment</b> submitted at Deadline 7 to confirm the Proposed Development will not hinder the specific objectives of the Thanet Coast MCZ.</p>
12.6	<p><u>12.6 Dover to Deal MCZ</u></p> <p>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.</p>	<p>The Dover to Deal MCZ was screened in for Stage 1 of the MCZ Assessment in relation to potential indirect impacts from an increase in suspended sediment concentration and subsequent sediment deposition, and from decommissioning activities. The temporary increase in SSC and deposition in the MCZ, at a distance of 11.4 km from the Sea Link Offshore Scheme were negligible and would not have any impact on the protected benthic habitats features of the MCZ. Similarly, potential effects from decommissioning were considered to not affect features of the MCZ.</p> <p>Thus, the Applicant can confirm that the Offshore Scheme will have no impact on the protected features of the Dover to Deal MCZ and would have no effect on the current condition of the site, which is favourable or recovering to favourable (see current factsheet at: <a href="https://assets.publishing.service.gov.uk/media/5f50d7fae90e07469b7d031d/mcz-dover-deal-">https://assets.publishing.service.gov.uk/media/5f50d7fae90e07469b7d031d/mcz-dover-deal-</a></p>

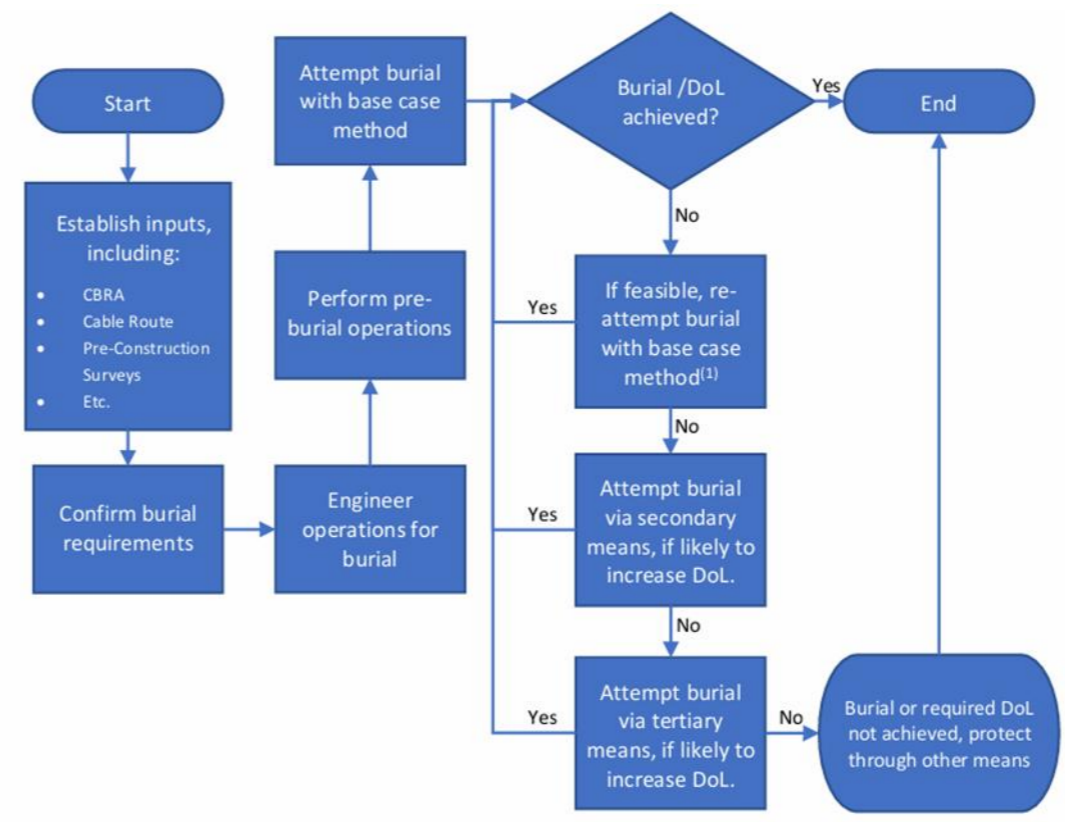
Reference	Question	Applicant's Comments
		<p>2019.pdf) as per reported in <b>Application Document 6.11 (E) Marine Conservation Zone Assessment [REP6-017]</b>, submitted at Deadline 6.</p> <p>However, to improve clarity an update to paragraph 1.7.65 in Section 1.7 of <b>Application Document 6.11 (F): Marine Conservation Zone Assessment</b> has been made and submitted at Deadline 7.</p>

12.7 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?

The Applicant confirms that a burial hierarchy flow chart and procedure has been included within the Outline Cable Specification and Installation Plan at Deadline 7.



(1) If simultaneous lay and burial is selected retrying burial with the same equipment may not be possible.

The Applicant would like to confirm that the conclusions on physical processes within **Application Document 6.11 (F): Marine Conservation Zone Assessment** submitted at Deadline 6 have been made on a worst case scenario of rock placed adjacent to the Goodwin Sands MCZ. The Applicant has supplemented this with further calculations at Deadline 7. However, acknowledging Natural England's concerns, in the absence of any additional evidence provided from them into Examination to date supplementing these concerns, the Applicant has included the below commitment at Deadline 7 into the REAC and also the Outline CSIP:

*The Applicant does not anticipate the need for continuous external cable protection adjacent to the Goodwin Sands MCZ, on the basis of confidence in achieving the required depth of cable lowering. However, if external cable protection is required locally, the Applicant commits to limiting its use to no more than 500 metres in total, whether continuous or cumulative, within sections of the offshore cable corridor adjacent to the Goodwin Sands MCZ (unless otherwise agreed with the MMO, in consultation with Natural England and the MCA). In such circumstances, the installed height of any external cable protection will be limited to a maximum of 1 metre above the surrounding seabed. Furthermore, where reasonably practicable, and in line with the Applicant's commitment to sensitive routing, the offshore cable corridor will be micro-routed to maintain a separation distance of at least 100 metres from the boundary of the Goodwin Sands MCZ.*

Reference	Question	Applicant's Comments
12.8	<p><u>12.8 Goodwin Sands MCZ monitoring</u></p> <p>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.</p>	<p>The oIPMP [<b>Application Document 9.140 Outline In-Principle Monitoring Plan [REP6-116]</b>] commits to monitoring any area within the Offshore Scheme where protected habitats (Annex 1, NERC S41), that have the potential to be impacted by the Offshore Scheme, are identified during pre-construction surveys. The Applicant confirms that a new condition for Pre-Construction Surveys and Monitoring has been included at Deadline 7 securing the above.</p> <p>As many benthic habitats are dynamic and highly variable over time identifying specific areas for survey requirements, on the basis of survey data that is now a few years old, is not possible at the pre-consent stage. This is particularly the case since the exact location of any required cable protection is also not known until the detailed pre-construction surveys have been undertaken. It is a standard process for monitoring of benthic habitats, in relation to a project such as the Offshore Scheme, to assess on a worst case scenario and finalise micro siting (as-built status of the project), cable protection locations and the determination of sensitive habitats, at the post-consent, pre-construction stage.</p> <p>A monitoring programme for subtidal effects to seabed topography, particularly within an area such as Goodwin Sands, that is characterised by highly dynamic, rapidly moving (daily), sand banks, is both neither feasible nor necessary considering the negligible scale of effect predicted. The Applicant also confirms that any monitoring for the Proposed Project would take place only within the Order Limits, and since these are outside Goodwin Sands MCZ, the Applicant does not consider it necessary to carry out monitoring inside the MCZ.</p> <p>Further quantitative analysis has also been undertaken for Deadline 7 which provides further evidence that the Proposed Project will not have adverse effects on the Goodwin Sands MCZ. The Applicant therefore considers that monitoring outside of the Order Limits based on the evidence provided within the MCZ Assessment is not proportionate or required for the Proposed Project.</p> <p>The guiding principles for monitoring are as follows:</p> <ul style="list-style-type: none"> <li>• 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) 2021 ).</li> <li>• 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.</li> <li>• 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.</li> </ul>
12.9	<p><u>12.9 Kentish Knock MCZ</u></p> <p>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&amp;I log, appendix D new</p>	<p>A full assessment of the impact of additional pre-sweeping/sand wave levelling (SWL) at the Sunk, which is being included in the project activities, at the request of the London Port Authority, in agreement with other port stakeholders, has been provided in <b>Application Document 9.126 Areas of Safeguarded Water Depth - Consideration of Additional Installation Requirements [REP5-139]</b>, submitted at Deadline 5. No habitats of conservation importance were identified within the Sunk Boarding Area (See Area of Safeguarded Water Depth Plan) and the closest MCZ designated for benthic features is 3 km away. Given the limited volumes of sediment from the Sunk Boarding Area, and that the pre-sweeping will be a one-off activity (not continuous) of short duration (days), the magnitude of impact in terms of SSC levels is not considered to lead to adverse effects in benthic habitats and species. Potential impacts on benthic habitats of in terms of SSC levels from additional pre-sweeping will be negligible to minor and not significant. However, to make this point especially clear, a reference to the additional pre-sweeping area at the Sunk (KP38.7 to KP44.4) has been identified and a cross-reference to the assessment document [<b>REP5-139</b>] has been made. See paragraph 2.9.31 of <b>Application Document 6.2.4.2(G) Benthic Ecology</b>, submitted at Deadline 7.</p>

Reference	Question	Applicant's Comments
	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	<p><u>12.10 Cumulative effects on Goodwin Sands MCZ</u></p> <p>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&amp;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.</p>	There were no other projects identified that would have an in-combination effect with the Offshore Scheme on the Goodwin Sands MCZ. Nemo Link has been fully operational since 31 January 2019 and so would have no temporal interaction with the Proposed Project, and any cumulative effects on MCZs was considered highly unlikely. However, at the request of Natural England the Goodwin Sands MCZ was screened in for an MCZ Stage 1 assessment for in-combination effects. The Nemo Link route overlaps with Goodwin Sands MCZ and following consultation, the Proposed Project, Offshore Scheme was re-routed to avoid the Goodwin Sands MCZ ( <b>Application Document 6.2.1.4 Part 1 Introduction Chapter 4 Description of the Proposed Project</b> ). Thus, the Offshore Scheme will avoid direct impacts on the site, thereby reducing the impacts to the known and potential receptors located within the area, including physical processes.
12.11	<p><u>12.11 Screened out MCZs</u></p> <p>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.</p>	N/A
12.12	<p><u>12.12 MCZ conservation objectives</u></p> <p>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.</p>	N/A
12.13	<p><u>12.13 External cable protection adjacent to Goodwin Sands MCZ</u></p> <p>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?</p>	N/A

Reference	Question	Applicant's Comments
12.14	<p data-bbox="513 180 1145 243"><u>12.14 Indirect effects to Thanet Coast MCZ and Kentish Knock East MCZ</u></p> <p data-bbox="513 258 1202 562">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:</p> <p data-bbox="513 577 1202 982">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.</p> <p data-bbox="513 997 1202 1297">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.</p>	N/A
12.15	<p data-bbox="513 1329 1145 1392"><u>12.15 Monitoring and adaptive management at Goodwin Sands MCZ</u></p> <p data-bbox="513 1407 1202 1675">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.</p>	N/A

# 13. Marine Mammals

**Table 13.1 Marine mammals**

Reference	Question	Applicant's Comments
13	<p><u>13. Marine mammals</u></p> <p>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].</p> <p>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?</p>	<p>A copy of <b>Application Document 6.6 (H) Habitats Regulations Assessment Report (Tracked) [REP6-051]</b>, submitted to PINS was also emailed to Natural England directly on the 14th April 2026 for their consideration.</p> <p>A follow-up email was sent on 22nd April following the Rule 17 letter request for engagement to ask for feedback on the in-combination assessment findings. The JNCC were also emailed on 22/04/2026 with the same information.</p> <p>A combined response from Natural England and the JNCC was received via email on 27/04/2026:</p> <p><i>'Based on the new information provided with regard to the in-combination assessment of underwater noise impacts on the Southern North Sea SAC and the management of those impacts, Natural England and JNCC are satisfied there will be no adverse effect on site integrity, provided the Applicants commitment to participate in and adhere to the Development Coordination Forum (DCF) is formally secured as a condition in the DCO/dML. This will support adherence with the noise management approach for this site and ensure the daily disturbance threshold is not breached. We also welcome the Applicants commitment to undertake SBP survey works during the summer period where practicable. We propose the following text for such a condition;</i></p> <p><i>No offshore construction or UXO removal may commence until the undertaker has provided confirmation to the MMO that they have begun participation in the Development Coordination forum. This participation must continue until agreed with the MMO in consultation with the relevant Statutory Nature Conservation Bodies'.</i></p> <p>The Applicant confirms that the above commitment has been secured within the REAC at Deadline 7 and the Offshore CEMP under Condition 4(b) of the dML.</p> <p>The Applicant therefore agrees with Natural England and the JNCC no adverse effect on site integrity on the Southern North Sea SAC.</p>

# 14. Marine Ornithology

**Table 14.1 Marine ornithology**

Reference	Question	Applicant's Comments
14.1	<p><u>14.1 10dB noise reduction – Pegwell Bay</u>            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.</p>	<p>The stated 10dB reduction through best practicable means has been assumed in the modelling of construction noise impacts from the <u>Kent Onshore Scheme</u> on Thanet Coast and Sandwich Bay SPA and Ramsar bird qualifying features to avoid the potential for a significant effect, i.e., construction noise occurring outside the SPA/Ramsar site disturbing birds within the designated site. As such, noise reduction commitments are secured for works specific to the <u>Kent Onshore Scheme</u>. When considering construction noise impacts on Thanet Coast and Sandwich Bay SPA and Ramsar bird qualifying features generated by the <u>Offshore Scheme</u>, the Applicant undertook the modelling presented in Figures 6.4.4.5.7 and 6.4.4.5.8 [REP5-032] on the basis that no additional noise mitigation measures were included. This modelling demonstrated that no significant effects on qualifying bird features would occur, i.e., disturbance at key roost and foraging locations would not occur. Therefore, no specific commitment for additional noise reduction measures as mitigation, was required.</p>
14.2	<p><u>14.2 Lighting of cofferdams in Pegwell Bay</u>            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.</p>	<p>The Applicant has assessed the impact of the temporary disturbance of the working area, including where the cofferdam will be located, on prey resource availability to waterbirds occurring within Pegwell Bay, in the context of both the temporary loss disturbance of intertidal habitat (and associated prey resource availability) (see sections 5.9.45 to 5.9.48 and 5.9.60 to 5.9.63 of ES Marine Chapter 5 Marine Ornithology and sections 7.3.67 to 7.3.73 of the Habitats Regulations Assessment Report) and the physical presence of the workforce, machinery/vehicles and works themselves through the impact pathways of visual (including lighting) and noise disturbance (see sections 5.9.22 to 5.9.36 of ES Marine Chapter 5 Marine Ornithology and sections 7.3.47 to 7.3.53 of the Habitats Regulations Assessment Report). As the area at the cofferdam has been treated in the assessment as a temporary loss of habitat, birds will not be using this area and so there will be no additional impact pathway from lighting of the cofferdam. As the Applicant has concluded no significant effects, further mitigation in the form of any seasonal restriction on coffer dam erection is not required.</p>
14.3	<p><u>14.3 Red-Throated Diver (RTD) protocol</u>            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.</p>	<p>The Applicant has updated paragraph 1.5.12 of the Red-throated Diver Protocol to include reference to reporting within the SPA and the 2km buffer.</p>

Reference	Question	Applicant's Comments
	<p>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.</p> <p>Applicant to revise the RTD protocol to include reference to reporting within the SPA and the 2km buffer.</p>	

# 15. Shipping and Navigation

**Table 15.1 Shipping and navigation**

Reference	Question	Applicant's Comments
15.1	<p><u>15.1 Recommended restricted zones</u> 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.</p>	The Applicant notes the MCA's point and will remove reference to the COLREGs as requested from the DML.
15.2	<p><u>15.2 Trial trenching</u> 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.</p>	The Applicant confirms that a definition of Trial Trenching has been included within the dML at Deadline 7. Commitments relating to Trial Trenching are also captured within the Outline CSIP, Outline NIP and PLA's Protective Provisions.
15.3	<p><u>15.3 DML condition 4(1)(g) Outline Navigation and Installation Plan (oNIP)</u> 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.</p>	N/A
15.4	<p><u>15.4 Outline Navigation and Installation Plan</u> 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.</p>	The Applicant confirms that it has made amendments to the Outline NIP to meet the MCA's concerns and has been in regular communication with the MCA regarding comments on the Outline NIP and will await the MCA's view on whether these updates have met the MCA's requirements.
15.5	<p><u>15.5 DML condition 4(1) Cable Specification and Installation Plan</u> 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.</p>	The Applicant confirms that 'Enhanced Consultation' has been included within LGPL's Protective Provisions to mirror that secured for the PLA. This specifically includes the Cable Specification and Installation Plan and well as the Navigation and Installation Plan.
15.6	<p><u>15.6 DML condition 4(4) consultation</u> 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</p>	<p>The Applicant confirms that it is not in a position to enforce Conditions on the MMO with regards to consultation outside of what is already captured in the dML. The Applicant has reached out the MMO on the PLA's suggested dML wording on the 22 April 2026. The MMO's Deadline 5 response [REP5-175] states the following:</p> <p><i>The PLA has proposed that Schedule 16, Part 2 Condition 4 (5) is amended to include "(provided that the MMO has consulted with any party that it was required to consult with in relation to a relevant plan, protocol, statement, or details pursuant to this condition 4)". The MMO does not consider this amendment appropriate and notes Condition 4 has been re-</i></p>

Reference	Question	Applicant's Comments
	the DML. If this is not possible the ExA requests that any outstanding disagreements are fully explained by the parties.	<p><i>worded during examination to include consultees including the MCA, EA and Cefas. The MMO has no issue with the inclusion of the PLA as part of the list of consultees as the MMO consult with the authority on activities that fall under their jurisdiction as standard practice.</i></p> <p>The Protective Provisions are the appropriate place to secure this PLA request and have been included for Deadline 7.</p>
15.7	<p><u>15.7 Post-installation cable condition surveys</u></p> <p>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.</p>	<p>The Applicant confirms that a monitoring condition has been included within the dML at Deadline 7.</p> <p>The requirement for Post Construction benthic monitoring will be dependent on Pre-Construction Surveys and the 'as-built' status of the cable.</p> <p>This response is also stated in <b>Application Document 9.150 Applicant's Comments on Responses to Third Written Questions</b> submitted at Deadline 7.</p> <p>The Applicant confirms that the subsea cable system is designed so routine maintenance is not required, unlike Offshore Windfarms where routine maintenance is essential. In theory, once installed, the cable could go years without any need for maintenance. Routine reports for maintenance could therefore be very limited.</p> <p>The Applicant will await the MMO's view on this matter.</p>
15.8	<p><u>15.8 Cable crossing with Gridlink Interconnector</u></p> <p>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.</p>	<p>The Applicant has updated the Areas of Safeguarded Water Depth Plan at Deadline 6 to show an "Exclusion area" where the crossing with GridLink is not permitted, based on water depths.</p> <p>The Applicant confirms that the Requirement text in the DCO was amended at Deadline 6 to account for the revised Areas of Safeguarded Water Depth Plan.</p>
15.9	<p><u>15.9 Restricted zones</u></p> <p>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.</p>	N/A
15.10	<p><u>15.10 Cable crossings in the Sunk and Long Sand Head</u></p> <p>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."</p> <p>The applicant is requested to provide comments on the need for such a condition and if it is necessary, the means of securing it.</p>	<p>The Applicant confirms that there is no existing or planned infrastructure (based on publicly available information) within the Sunk Pilot Boarding Area or Long Sands Head Two Way Crossing Area that the Proposed Project could cross. Crossings at these locations are therefore not included as part of the Proposed Project.</p> <p>However, the Applicant confirms that Condition 1 of the dML has been updated at Deadline 7 to include this commitment.</p>

# 16. Cumulative Impacts

Table 16.1 Cumulative impacts

Reference	Question	Applicant's Comments
16	<p><u>16. Cumulative Impacts</u></p> <p>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?</p>	<p>A key challenge with responding to this point is that there remains substantial disagreement between the Applicant and SCC regarding the potential for significant effects relating to PRow, health and wellbeing, and socio-economics and tourism. The Applicant has proposed mitigation in line with the mitigation hierarchy to address the effects that the Applicant has assessed and reported in the Environmental Statement submitted with the application and updated throughout the examination. SCC does not agree with Applicant's assessment findings and believes there could be unreported significant effects.</p> <p><b>AP44</b></p> <p>Mitigation measures identified by SCC in their response to AP44 are as follows:</p> <p><u>Mental Health</u></p> <ul style="list-style-type: none"> <li>• A Mental Health and Wellbeing Monitoring Plan: SCC recommend a requirement for a proportionate plan to monitor and respond to community stress and wellbeing impacts during both construction and early operation.</li> </ul> <p>The are two reasons that the Applicant challenges this request; one relates to need (therefore directly responding to the ExA's question) and the other to viability.</p> <p>The Applicant considers this measure is <b>not needed</b> because the Applicant has not identified any potential for significant effects on Health and Wellbeing as a result of the Suffolk Onshore Scheme; as such, it is not considered necessary to apply the mitigation hierarchy any further (please refer to the Applicant's response to 3GEN1).</p> <p>SCC has requested the monitoring plan because they do not agree with the assessment findings provided by the Applicant. Even if this position were accepted the Applicant does not consider that such a plan is viable for reasons set out in response to 3HW3 in <b>Application Document 9.136 Applicant's Responses to Third Written Questions</b>. The Applicant believes it would be impossible to isolate the (anticipated minor) effects Sea Link may contribute to health and wellbeing effects from those of Sizewell C. As such it would also be impossible to identify reasonable and proportionate mitigation that could be delivered by Sea Link to address Sea Link's (anticipated potentially minor) contribution to the overall effects recorded through monitoring. SCC requested</p> <p><u>Public Rights of Way</u></p> <p>SCC identify the following mitigation measures:</p> <ul style="list-style-type: none"> <li>○ Fromus Access PRow</li> <li>○ Resurfacing of Aldeburgh Path at the RSPB North Warren Reserve</li> <li>○ B1119 PRow/Bridleway,</li> </ul> <p>The applicant identified one PRow/Bridleway where it was considered there was some potential for significant intra-project cumulative effects, this being E-491/010/0; no other significant effects</p>

Reference	Question	Applicant's Comments
		<p>were identified. SCC, on the other hand, considers that there could be unreported significant effects as a result of effects on the PRoW network as a whole. The Applicant disagrees that such effects are likely for a project of the scale and nature of Sea Link, particularly given the temporary rather than permanent nature of effects on PRoW. The applicant can also find little, if any, evidence of this 'network wide' approach being taken for similar scale DCO applications (including the consented EA1N and EA2). Despite the Applicant's view that these mitigation measures are not needed, it has committed to creating a permissive path along the Fromus access and around the Saxmundham woodland planting, which would be at least 2km in length and would provide excellent connectivity to the surrounding PRoW network. The applicant is also considering ways in which the resurfacing of PRoW E-103/006/0 may be able to be delivered, though not as mitigation. If it is considered that there is a potential for an effect on the PRoW network that is over and above the effects on individual PRoW, then the Applicant believes that these proposals would be more than sufficient as an offsetting measure.</p> <p><u>Residential properties, PRoW users, and transport and road users</u></p> <ul style="list-style-type: none"> <li>• Restrict core construction hours to <b>Monday–Friday 08:00–18:00 and Saturday 08:00–13:00</b>, with no routine Sunday or Bank Holiday working to provide respite for local residents and recreational PRoW users</li> </ul> <p>The Applicant has already limited the works that can be undertaken on Saturday afternoons and Sundays. The most significant method is through the commitment, in section 3 of Requirement 7, which states that “<i>HGV deliveries are limited to 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays and may not occur on Sundays or Bank Holidays, unless otherwise approved by the relevant highway authority</i>”. Even for exempted activities, there is a limit of 30 HGVs. HGV movements are a key factor in the assessment of traffic and transport related effects, which in turn are a key contributor to intra-project effects on residential properties, PRoW users, and transport and road users. By stopping HGV movements from 5pm on Saturday to 7am on Monday morning, this key contributor is removed, and the Applicant considers that the requested respite is therefore provided every Sunday.</p> <p><b>AP45</b></p> <p>The measures identified by SCC in their response to AP45 are as follows:</p> <p><u>Landscape and Visual:</u></p> <p>SCC state that “<i>SCC considers that it would be difficult to achieve offsetting by means of landscape enhancement given the practicalities of the immediate landscape context</i>”. The Applicant agrees with this position.</p> <p>In the absence of any potential to mitigate these effects through enhancement, SCC then proposes that “<i>proportionate compensation should be offered as part of the mitigation hierarchy</i>”. The Applicant's reading of this is that that SCC are requesting a financial contribution to offset these residual effects. The applicant does not agree that making such a payment is an appropriate form of offsetting, and also disagrees that compensation is appropriate to address landscape and visual effects, for the reasons set out in <b>Document 9.136.1: Applicant's Responses to Third Written Questions – Appendices</b> (specifically <b>Appendix A: 3GEN1 Mitigation Hierarchy</b> and <b>Appendix D: 3CEIntra1 PRoW Effects Offsetting/Compensation</b>). Of note is the Bramford to Twinstead Reinforcement DCO recommendation report, where the Examining Authority agreed that the inability to fully mitigate landscape impacts does not “<i>automatically mean that some form of compensation must be provided</i>”.</p>

Reference	Question	Applicant's Comments
	<p>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?</p>	<p><u>Health and Wellbeing:</u></p> <p>The mitigation measures identified by Public Health at SCC include:</p> <ul style="list-style-type: none"> <li>• Restrictions to core working hours (please see the Applicant's response above)</li> <li>• Limiting the activities during one-hour startup and closedown periods to those that are not likely to cause disturbance to nearby residents or businesses</li> <li>• Monitoring of mental health and wellbeing and a framework for robust adaptive mitigation, (Please see the Applicant's response to these two points above) to include a dedicated fund to enable timely, proportionate, and targeted mitigation to be implemented in response to issues.</li> </ul> <p>The two measures that are not specifically addressed earlier on in this response are the activities permitted during the startup and close down periods and the provision of a fund to provide for mitigation for mental health effects.</p> <p>The activities allowed during startup and shutdown are not the typically noisy site activities; irrespective the applicant has committed to applying best practicable means to control noise during these hours.</p> <p>The applicant sets out above its challenges to the proposal for mental health and wellbeing monitoring in terms of both the need for and viability of such monitoring. Given this, the need for, and viability of, a fund is also rejected. Under this action point response SCC request that the Applicant "<i>actively seek to coordinate with other NSIP developers within Suffolk to ensure a coherent and joined up approach to monitoring across both geographical areas and project timescales</i>". This request ignores the fact that no such mental health monitoring is required for EA1N and EA2. The Applicant has committed to attending and contributing to the Sizewell Health and Wellbeing Working Group meetings and considers that through this active engagement it will be possible to identify any proportionate actions that may be able to be taken to help address any overall effects identified by group.</p> <p><u>Socio-economics and Tourism</u></p> <p>SCC requested the following mitigation:</p> <ul style="list-style-type: none"> <li>• Tourism monitoring – please see the applicant's response to point 9.1 Tourism Monitoring.</li> <li>• Accommodation monitoring – please see the Applicant's response to point 9.3 Accommodation Strategy and Monitoring Plan.</li> <li>• Skills, Supply Chain and Employment Plan – please see the Applicant's response to point 9.4 Skills, Supply Chain and Employment Plan.</li> </ul> <p>The Applicant met with TDC on 22 April 2026 to discuss these points as well as other matters arising from the Rule 17 letter issued by the ExA on 21 April 2026. TDC sent their response to the Applicant on Monday 27 April which is set out below</p> <p><u>AP44</u></p> <p><u>TDC Position:</u> It is unlikely that further mitigation measures are available to mitigate significant intra-project cumulative effects as the relevant mitigation measures have already been imposed for the relative topics. Whilst other potential mitigation measures are still being discussed for each topic. In addition, the Applicant has advised the exact intra-project impacts are not fully known at this stage and are subject to detailed design and construction programme.</p>

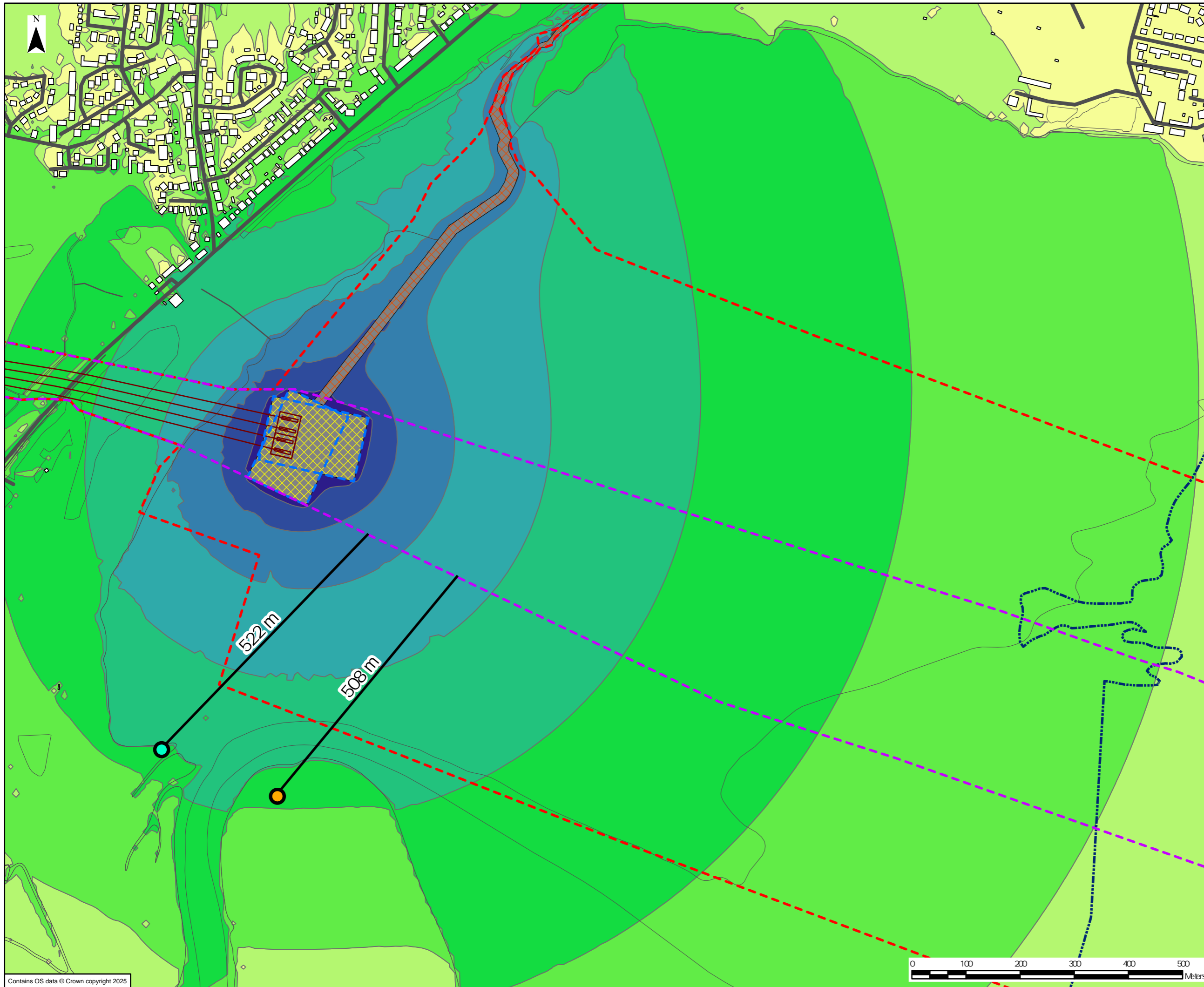
Reference	Question	Applicant's Comments
		<p><u>Applicant's Position:</u> The Applicant shares TDC's position as set out in their response above</p> <p><u>AP48</u>  <u>TDC Position:</u> The Applicant has made clear that no further mitigation is possible to reduce the significant effects on the landscape and visual amenity. This includes additional foreground planting which the Applicant concludes would conflict with the special features of the landscape character (E1 – Stour Marshes). There may be some possibility for compensatory measures in the form of landscape enhancements within Landscape Character Area E1 but this would not mitigate the impact on the landscape from the proposed development.  <u>Applicant's Position:</u> The Applicant considers that potential avoidance, reduction and mitigation measures have been deployed as fully as possible. There is no policy or legal requirement that the mitigation hierarchy requires all residual landscape and visual effects to be compensated for or that it is appropriate for alternative landscape compensation to be provided if it is accepted that there are any residual adverse landscape and visual effects that result from the Proposed Project.</p> <p><u>AP49</u>  <u>TDC Position:</u> TDC are of the view that there are additional developments within a 5km radius of the site as identified within the Inter-Project Cumulative Effects Assessment Update – Technical Note [REP6-098] which have not been shortlisted. Due to their proximity to the site, there could be likely significant cumulative effects arising from traffic and transport and landscape and visual amenity. The justification for excluding these sites from the short list given their proximity is insufficient. Therefore, TDC cannot confirm if the proposed mitigation to address the cumulative effects is sufficient. However, it is understood that relevant mitigation measures have already been imposed for the relative topics with limited additional mitigation available.  <u>Applicant's Submission:</u> It is the Applicant's position that the significant residual effects of the project have been mitigated, following the mitigation hierarchy, to the fullest extent possible. The mitigation hierarchy has been followed throughout the development of the Proposed Project and the Applicant's response to 3GEN1 in <b>Application Document 9.136 Applicant's Responses to Third Written Questions</b> demonstrates how each stage in the mitigation hierarchy has been applied to all significant residual effects as far as possible.</p>
	<p>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?</p>	<p>The effects identified <b>Inter-Project Cumulative Effects Assessment Update - Technical Note [REP6-098]</b> relate only to landscape and visual effects and effects on the setting of the Richborough Roman Fort. As such the Applicant considers that all necessary effects and associated commentary on the availability of additional mitigation are adequately covered in the responses to points 3.5 and 5.9 above and, as such, no further justification is necessary.</p>

# 17. Errata

Table 17.1 Errata

Reference	Question	Applicant's Comments
17	<u>17. Errata</u> 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 corrects this error.	The formatting error has been corrected, and the document is being resubmitted at Deadline 7 (see <b>Application Document 9.31 (C) Agricultural Land Classification (ALC) Survey Results – Kent</b> submitted at Deadline 7).

# Appendix A



Legend

- - - Order Limits
- - - Limits of Deviation
- - - Mean Low Water Spring
- Site plan
- - - HDD exit
- Illustrative access route corridor
- HDD working area
- Beach high tide roost location at mouth of River Stour
- Saltmarsh high tide roost location at mouth of River Stour

Noise level (dB) - Modelled with Hoverport as Hard Ground

- < 35
- 35 to <40
- 40 to <45
- 45 to <50
- 50 to <55
- 55 to <60
- 60 to <65
- 65 to <70
- 70 to <75

Illustrative scenario assuming piling rig (source level  $L_{A_{Fmax}}$  at 10 m 91 dB) operating anywhere in HDD exit area and construction vehicles (source level  $L_{A_{Fmax}}$  at 10 m 79 dB on access route)

Vehicle access routes are INDICATIVE ONLY for the purposes of noise modelling. The final access routes and widths will be determined pre-construction and will be informed by a pre-construction saltmarsh survey

For the purpose of completeness the modelling assumes that the vehicles will gain access to the mudflats via the front edge of the hoverport (as included in the Order Limit change)

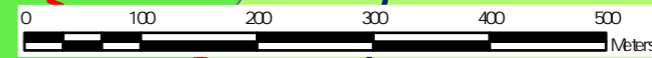
2	28/04/2026	UPDATED NOISE CONTOURS	EB	DF	SE
1	10/03/2026	UPDATED ORDER LIMITS	LB	EB	SE
0	04/12/2025	ORIGINAL ISSUE	AP	NG	SE
Rev	Date	Description	GIS	Chk	App

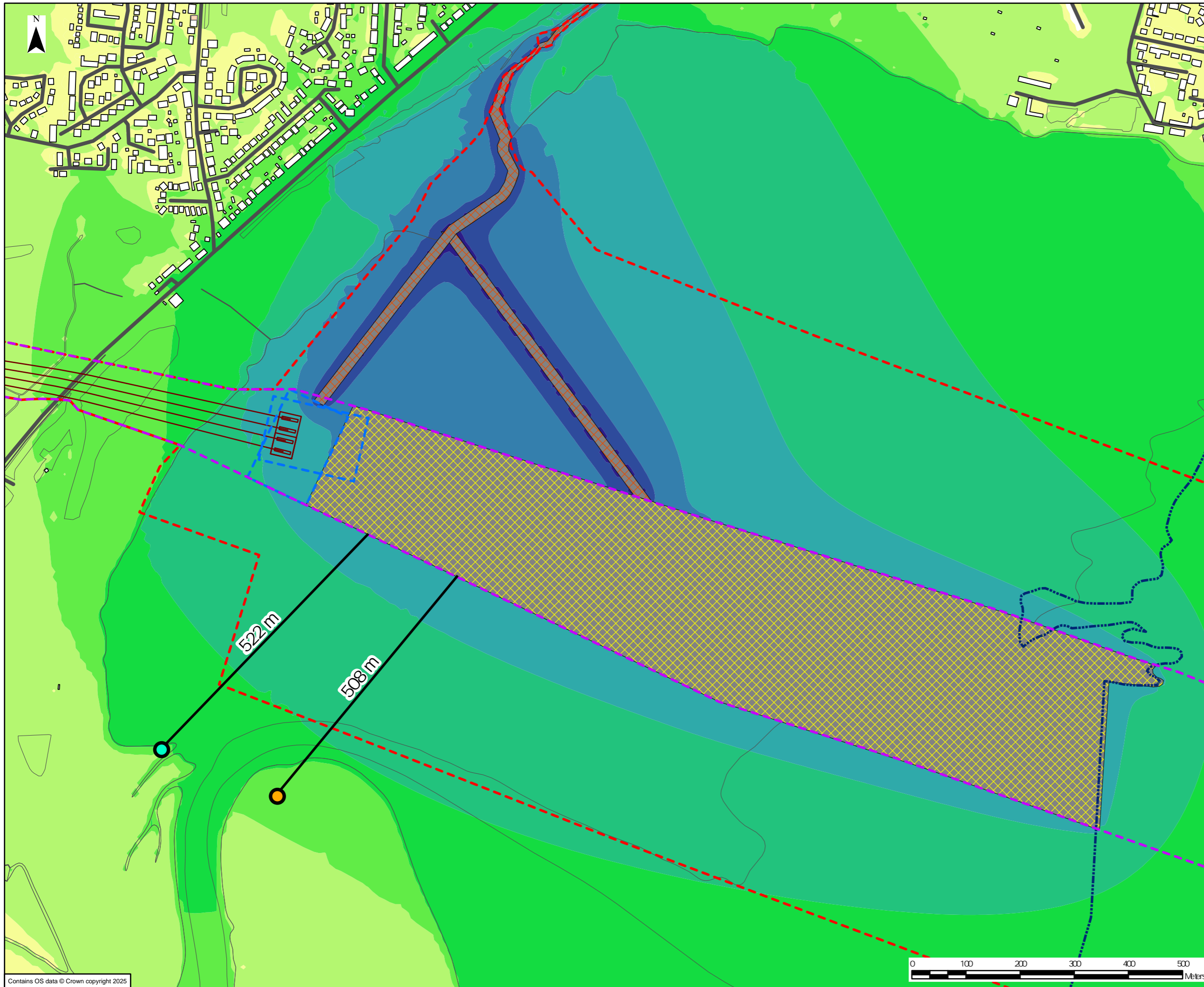
**nationalgrid**

Scheme: SEA LINK

Document Title: Predicted maximum ( $L_{A_{Fmax}}$ ) noise levels - phases 1 and 2

Creator: EB	Date: 28/04/2026	Checker: DF	Date: 28/04/2026	Approver: SE	Date: 28/04/2026
Document Ref: FIGURE 6.4.4.5.7	Scale: 1:6,500	Format: A3	Sheets: 1	Rev: 1	





Legend

- - - Order Limits
- - - Limits of Deviation
- - - Mean Low Water Spring
- Site plan
- - - HDD exit
- Illustrative access route corridor
- Cable pull in working corridor
- Beach high tide roost location at mouth of River Stour
- Saltmarsh high tide roost location at mouth of River Stour

Noise level (dB) - Modelled with Hoverport as Hard Ground

- < 30
- 30 to <35
- 35 to <40
- 40 to <45
- 45 to <50
- 50 to <55
- 55 to <60
- 60 to <65
- 65 to <70

Illustrative scenario assuming construction vehicles / excavators (source level  $L_{Amax}$  at 10 m 79 dB) operating anywhere in cable pull in area and on access routes

Vehicle access routes are INDICATIVE ONLY for the purposes of noise modelling. The final access routes and widths will be determined pre-construction and will be informed by a pre-construction saltmarsh survey

For the purpose of completeness the modelling assumes that the vehicles will gain access to the mudflats via the front edge of the hoverport (as included in the Order Limit change)

2	28/04/2026	UPDATED NOISE CONTOURS	EB	DF	SE
1	10/03/2026	UPDATED ORDER LIMITS	LB	EB	SE
0	04/12/2025	ORIGINAL ISSUE	AP	NG	SE
Rev	Date	Description	GIS	Chk	App

**nationalgrid**

Scheme: SEA LINK

Document Title: Predicted maximum ( $L_{Amax}$ ) noise levels - phases 3 and 4

Creator: EB	Date: 28/04/2026	Checker: DF	Date: 28/04/2026	Approver: SE	Date: 28/04/2026
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Document Ref: FIGURE 6.4.4.5.8	Scale: 1:6,500	Format: A3	Sheets: 1	Rev: 1
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