

The Great Grid Upgrade

Sea Link

Sea Link

Volume 7: Other Documents

Document 7.4.7: Statement of Common Ground Between National Grid Electricity Transmission and Kent County Council.

Planning Inspectorate Reference: EN020026

Version: E

April 2026

Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 Regulation 5(2)(q)

Page intentionally blank

Contents

1.	Introduction	1
1.1	Overview	1
1.2	This Statement of Common Ground	1
1.3	Role of Kent County Council in the DCO Process	2
1.4	Description of the Proposed Project	2
	The Suffolk Onshore Scheme	3
	The Offshore Scheme	3
	The Kent Onshore Scheme	3
1.5	Format of Document and Terminology	4
2.	Record of Engagement	7
2.1	Summary of discussions	7
3.	Areas of Discussion Between the Parties	8
3.1	Policy, need, coordination and site selection	8
3.2	Draft DCO	9
3.3	Consultation	10
3.4	Landscape and Visual	11
3.5	Ecology and Biodiversity	14
3.6	Marine Ecology	23
3.7	Cultural Heritage	27
3.8	Water Environment and Flood Risk	28
3.9	Geology and Hydrogeology	30
3.10	Agriculture and Soils	31
3.11	Traffic and Transport	32
3.12	Air Quality	42
3.13	Socioeconomics, Recreation and Tourism	43
3.14	Health and Wellbeing	45
3.15	Cumulative Effects	46
4.	Approvals	48
5.	References	49

Table of Tables

Table 1.1 Abbreviations	4
Table 3.1 Policy, need, coordination and site selection	8
Table 3.2 Draft DCO	9
Table 3.3 Consultation	10
Table 3.4 Landscape and Visual	11
Table 3.5 Ecology and Biodiversity	14
Table 3.6 Marine Ecology	23
Table 3.7 Cultural Heritage	27
Table 3.8 Water Environment and Flood Risk	28
Table 3.9 Geology and Hydrogeology	30
Table 3.10 Agriculture and Soils	31
Table 3.11 Traffic and Transport	32
Table 3.12 Air Quality	42
Table 3.13 Socioeconomics, Recreation and Tourism	43
Table 3.14 Health and Wellbeing	45
Table 3.15 Cumulative Effects	46

Version

Date	Version	Status	Description / Changes
March 2025	A	DRAFT	Issued with DCO application
November 2025	B	DRAFT	Issued to PINS for Deadline 1
January 2026	C	DRAFT	Issued to PINS for Deadline 3
March 2026	D	DRAFT	Issued to PINS for Deadline 5
April 2026	E	FINAL	Issued to PINS for Deadline 7

1. Introduction

1.1 Overview

- 1.1.1 This Statement of Common Ground (SoCG) has been prepared to support the application (“The Application”) for the Sea Link Project (“Proposed Project”) made by National Grid Electricity Transmission Ltd (“the Applicant”). The Application was submitted to the Secretary of State for a Development Consent Order (DCO) and accepted for examination on the 23 April 2025.
- 1.1.2 A Statement of Common Ground (SoCG) is an established means in the planning process of allowing all parties to identify and focus on specific issues that may need to be addressed during the Examination. It is prepared jointly between the Applicant and another party(s) and sets out matters of agreement between both parties, as well as matters where there is not an agreement. It also details matters that are under discussion.
- 1.1.3 The aim of a SoCG is to help the Examining Authority manage the Examination Phase of a DCO application. Understanding the status of the matters at hand will allow the Examining Authority to focus their questioning and provide greater predictability for all participants in Examination. A SoCG may be submitted prior to the start of or during Examination and then updated as necessary or as requested during the Examination Phase.

1.2 This Statement of Common Ground

- 1.2.1 This SoCG has been prepared between the Applicant and Kent County Council (KCC). It has been prepared in accordance with the guidance published by the Ministry of Housing, Communities and Local Government (Ministry of Housing, Communities and Local Government, 2024).
- 1.2.2 An early draft (Version A) of the SoCG was prepared by the Applicant to submit with the Application, based on engagement with KCC throughout development of the Proposed Project. Since the submission of the Application, the Applicant continued to work with KCC to resolve issues as the Proposed Project progressed through the Pre-Examination and Examination phases, with Version A of the SoCG further shared with KCC during the Pre-Examination phase to enable them to review and update their position. A further iteration of the SoCG was sent to KCC, incorporating matters raised in KCC’s Principal Areas of Disagreement Summary Statement (PADSS) as well as issues discussed during ongoing thematic meetings, ahead of Deadline 1. As it was shared shortly before the deadline, no comments had been received from KCC as of 17 November, and their position therefore remained unchanged from the previous Version A of **Application Document 7.4.7 Draft Statement of Common Ground Kent County Council [APP-328]**. KCC subsequently reviewed the SoCG and returned comments on the 18 December. The SoCG was therefore updated to reflect their current position and submitted at Deadline 3 as Version C. Following further discussions with KCC, the SoCG (Version D) was reshared with KCC on 26 February 2026 and they subsequently reviewed and updated their position where required and returned comments on 5 March 2026. Version D of the SoCG was subsequently submitted at Deadline 5. Since Deadline 5, matters previously marked as “under discussion” have been further progressed in order to determine whether common ground can be reached between KCC and the Applicant and the final SoCG (Version E) was reshared with KCC for final sign off ahead of

submission at Deadline 7. This has been fully reviewed and agreed by both Parties and is submitted at Deadline 7, although is missing KCC's signature. A version signed by both Parties will be re-submitted before the end of Examination.

1.2.3 For the purpose of this SoCG, the Applicant and KCC are jointly referred to as the "Parties". When referencing KCC alone, they are referred to as "the Consultee".

1.3 Role of Kent County Council in the DCO Process

1.3.1 KCC is a local authority for the purposes of section 42(1)(b) of the Planning Act 2008 as some of the land within the Order limits for the project is within its local authority area. Pursuant to Section 42 of the Planning Act 2008, the Applicant must consult local authorities if the project is in a local authority's area.

1.3.2 The Planning Inspectorate sets out the role of local authorities in the DCO process in Advice Note 2: The role of local authorities in the development consent process (The Planning Inspectorate, 2015). The role and responsibilities of KCC, and local authorities in general, extend throughout the DCO process from pre-application to post decision as set out in the PINS Advice Note 2 and can include:

- Providing the local perspective at the pre-application stage, in addition to any views expressed directly to the developer by residents, groups and businesses.
- Preparing written representations, SoCGs and Local Impact Reports ready for examination.
- Attending and participating in hearings and/or accompanied site visits.
- Discharging many of the requirements associated with a DCO if consent is granted.
- Monitoring and enforcing many of the DCO provisions and requirements

1.4 Description of the Proposed Project

1.4.1 The Proposed Project is a proposal by the Applicant to reinforce the transmission network in the South East and East Anglia. The Proposed Project is required to accommodate additional power flows generated from renewable and low carbon generation, as well as accommodating additional new interconnection with mainland Europe.

1.4.2 The Applicant owns, builds and maintains the electricity transmission network in England and Wales. Under the Electricity Act 1989, the Applicant holds a transmission licence under which it is required to develop and maintain an efficient, coordinated, and economic electricity transmission system.

1.4.3 This would be achieved by reinforcing the network with a High Voltage Direct Current (HVDC) Link between the proposed Friston substation in the Sizewell area of Suffolk and the existing Richborough to Canterbury 400kV overhead line close to Richborough in Kent.

1.4.4 The Applicant is also required, under Section 38 of the Electricity Act 1989, to comply with the provisions of Schedule 9 of the Act. Schedule 9 requires licence holders, in the formulation of proposals to transmit electricity, to:

1.4.5 Schedule 9(1)(a) '*...have regard to the desirability of preserving natural beauty, of conserving flora, fauna and geological or physiological features of special interest and*

of protecting sites, buildings and objects of architectural, historic or archaeological interest; and

1.4.6 Schedule 9(1)(b) ‘...do what [it] reasonably can to mitigate any effect which the proposals would have on the natural beauty of the countryside or on any such flora, fauna, features, sites, buildings or objects’.

1.4.7 The Proposed Project would comprise the following elements:

The Suffolk Onshore Scheme

- A connection from the existing transmission network via Friston Substation, including the substation itself. Friston Substation already has development consent as part of other third-party projects. If Friston Substation has already been constructed under another consent, only a connection into the substation would be constructed as part of the Proposed Project.
- A high voltage alternating current (HVAC) underground cable of approximately 1.9 km in length between the proposed Friston Substation and a proposed converter station (below).
- A 2 GW high voltage direct current (HVDC) converter station (including permanent access from the B1121 and a new bridge over the River Fromus) up to 26 m high plus external equipment (such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, similar small scale operational plant, or other roof treatment) near Saxmundham.
- A HVDC underground cable connection of approximately 10 km in length between the proposed converter station near Saxmundham, and a transition joint bay (TJB) approximately 900 m inshore from a landfall point (below) where the cable transitions from onshore to offshore technology.
- A landfall on the Suffolk coast (between Aldeburgh and Thorpeness).

The Offshore Scheme

- Approximately 122 km of subsea HVDC cable, running between the Suffolk landfall location (between Aldeburgh and Thorpeness), and the Kent landfall location at Pegwell Bay.

The Kent Onshore Scheme

- A landfall point on the Kent coast at Pegwell Bay.
- A Transition Joint Bay (TJB) approximately 800 m inshore to transition from offshore HVDC cable to onshore HVDC cable, before continuing underground for approximately 1.7 km to a new converter station (below).
- A 2 GW HVDC converter station (including a new permanent access off the A256), up to 28 m high plus external equipment such as lightning protection, safety rails for maintenance works, ventilation equipment, aerials, and similar small scale operational plant near Minster. A new substation would be located immediately adjacent.
- Removal of approximately 2.2 km of existing HVAC overhead line, and installation of two sections of new HVAC overhead line, together totalling approximately 3.5 km,

each connecting from the substation near Minster and the existing Richborough to Canterbury overhead line.

- 1.4.8 The Proposed Project also includes modifications to sections of existing overhead lines in Suffolk (only if Friston Substation is not built pursuant to another consent) and Kent, diversions of third-party assets, and land drainage from the construction and operational footprint. It also includes opportunities for environmental mitigation and compensation. The construction phase will involve various temporary construction activities including overhead line diversions, use of temporary towers or masts, working areas for construction equipment and machinery, site offices, parking spaces, storage, accesses, bellmouths, and haul roads, as well as watercourse crossings and the diversion of public rights of way (PROWs) and other ancillary operations.

1.5 Format of Document and Terminology

- 1.5.1 Section 2 of this SoCG summarises the engagement the Parties have had with regard to the Proposed Project.
- 1.5.2 Section 3 of this SoCG summarises the issues that are ‘agreed’ (green), ‘not agreed’ (red) or are ‘under discussion’ (orange). ‘Not agreed’ indicates a final position where the Parties have agreed to disagree, whilst ‘Agreed’ indicates where the issue has been resolved.
- 1.5.3 Abbreviations used within the SoCG are provided in Table 1.1 below.

Table 1.1 Abbreviations

Abbreviation/Term	Definition
AILs	Abnormal Indivisible Loads
BTNO	Bramford to Twinstead Reinforcement
CA	County Archaeologist
CEMP	Construction Environmental Management Plan
CTMP	Construction Traffic Management Plan
DCO	Development Consent Order
DDC	Dover District Council
DMRB	Design Manual for Roads and Bridges
EA	Environment Agency
EIA	Environmental Impact Assessment
ES	Environmental Statement

Abbreviation/Term	Definition
FEED	Front-End Engineering Design
FRA	Flood Risk Assessment
GI	Green Infrastructure
HDD	Horizontal Direct Drilling
HGV	Heavy Goods Vehicle
HRA	Habitats Regulations Assessment
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
KCC	Kent County Council
LCA	Landscape Character Areas
LEMP	Landscape and Ecology Management Plan
LGV	Light Goods Vehicle
LLFA	Lead Local Flood Authority
LPA	Local Planning Authority
LVIA	Landscape and Visual Impact Assessment
MoU	Memorandum of Understanding
NE	Natural England
NPS	National Policy Statement
OHL	Overhead Line
OWSI	Outline Onshore Overarching Written Scheme of Investigation
PCZ	Primary Consultation Zone
PEIR	Preliminary Environmental Information Report
PINS	Planning Inspectorate
PPA	Planning Performance Agreement

Abbreviation/Term	Definition
PRoW	Public Rights of Way
PRoW MP	Public Rights of Way Management Plan
REAC	Register of Environmental Actions and Commitments
RSA	Road Safety Audi
SCZ	Secondary Consultation Zone
SoCC	Statement of Community Consultation
SoCG	Statement of Common Ground
SoS	Secretary of State
SPA	Special Protection Area
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
SRN	Strategic Road Network
SSSI	Sites of Special Scientific Interest
SuDs	Sustainable Drainage System
TA	Transport Assessment
TAN	Transport Assessment Note
TDC	Thanet District Council
TJB	Transition Joint Bay
TTM	Temporary Traffic Management
VP	Vantage Point
WSI	Written Scheme of Investigation

2. Record of Engagement

2.1 Summary of discussions

- 2.1.1 Appendix A summarises the consultation and engagement that has taken place between the Parties.

3. Areas of Discussion Between the Parties

3.1 Policy, need, coordination and site selection

Table 3.1 Policy, need, coordination and site selection

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.1.1	N/A	DCO consenting route	The Consultee agreed with the DCO consenting route for the Proposed Project.	On 31 March 2022, the Secretary of State (SoS) issued a direction under Section 35 of the Planning Act that the Sea Link Project is to be treated as a proposed application for which development consent is required. In making the direction, the SoS is of the view that the Project is nationally significant.	Agreed
3.1.2	N/A	National Policy Statements	The Consultee agreed that the Proposed Project would be determined in accordance with the National Policy Statements (NPSs) (EN-1, EN-3 and EN-5).	Section 104 of the Planning Act 2008 requires that the SoS decides the application in accordance with National Policy Statement for Energy (EN-1) (NPS EN-1), National Policy Statement for Renewable Energy Infrastructure (NPS EN-3), and National Policy Statement for Electricity Networks Infrastructure (EN-5) (NPS EN-5).	Agreed
3.1.3	N/A	Local Development Plan	The Consultee has identified the Kent Minerals and Waste Local Plan 2013-2030 (as amended by Early Partial Review), September 2020 and Kent Mineral Sites Plan 2013-2030, September 2020 as relevant policies.	While the assessment of the application for development consent for the Proposed Project should be made against the NPSs referred to above, the Development Plan for each Local Authority is likely to be an important and relevant consideration.	Agreed
3.1.4	N/A	Development Plan allocations	The Consultee agrees with National Grid's conclusions that there are no KCC Development Plan Allocations that overlap with the Order Limits,	The Applicant has not identified any Development Plan Allocations from the Consultee that would overlap with the draft Order Limits, which has been confirmed by the Consultee.	Agreed
3.1.5	Application Document 7.1(D) Planning Statement [REP6-054]	Need for the project	The Consultee agrees to the identified need of the Proposed Project as set out by National Grid.	The need for the Proposed Project is set out in Section 1.2 of Application Document 7.1(D) Planning Statement [REP6-054] .	Agreed
3.1.6	Application Document 7.2 Strategic Options Back Check Report [APP-320] Application Document 8.3 Strategic Options Report (October 2023) [APP-370]	Strategic Options	The Consultee agrees with the process, methodology and outcome of the strategic options appraisal (Application Document 7.2 Strategic Options Back Check Report [APP-320]).	The process, methodology and outcome of the strategic options appraisal presented in Strategic Option Report, version A, October 2023, included as part of Statutory Consultation, is agreed (see Application Document 8.3 Strategic Options Report (October 2023) [APP-370]).	Agreed
3.1.7	Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]	Site Selection	The Consultee agrees with the methodology and outcome of the site and route selection presented in the Option Selection and Design Evolution Report Version A, October 2023.	The methodology and outcome of the site and route selection presented in the Option Selection and Design Evolution Report, Version A, October 2023, included as part of Statutory Consultation, is agreed (see Application Document 8.2	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
				Options Selection and Design Evolution Report (October 2023) [APP-369]).	
3.1.8	Application Document 3.1 (J) draft Development Consent Order submitted at Deadline 7.	Size of Order Limits	The Consultee was previously concerned that dropping areas of the Order Limits reduced flexibility where compounds could go if needed to move. The Consultee has confirmed this has now been agreed.	The Applicant is content that there is sufficient flexibility within the Order Limits as now presented in Application Document 3.1 (J) draft Development Consent Order submitted at Deadline 7.	Agreed

3.2 Draft DCO

Table 3.2 Draft DCO

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.2.1	Application Document 3.1 (J) draft Development Consent Order submitted at Deadline 7.	Art 2 (1) (interpretation)	The Consultee agrees with the interpretation of a watercourse as contained within the Part 1 Preliminary section of the draft DCO, this reflects the legal definition and is purposefully not specific as channel type, shape and size depends on the variables of the site. If there is a channel and water flows through it, it is likely to be an ordinary watercourse, the current definition serves to start conversations where definition is ambiguous to the landowner allowing us to ensure the appropriate response or arrange a site visit to further understand land and channels therein.	The Applicant notes the Consultee's position and agrees.	Agreed
3.2.2	Application Document 3.1 (J) draft Development Consent Order submitted at Deadline 7.	Art. 20 (discharge of water)	<p>There was an issue previously raised with section 9 of chapter 19 of part 4 relating to the discharge of water with regards to the amount of time for a reply to be given to an application for consent to discharge to a watercourse being set at 28 days. The Land Drainage Act (1991) sets the time for response at 60 days, 28 days as proposed was not considered to be enough time when demand is high for services given the Consultee's SuDS team are such a small team. The Consultee had requested that this be amended to 60 days reflecting the Land Drainage Act (1991).</p> <p>This is now considered to be no longer relevant – decided at a meeting on the 12 of February with the Applicant's project team that this is an issue for the River Stour Internal Drainage Board (IDB), not KCC.</p>	There is precedent for deviating from the Land Drainage Act 1991 to include shorter timescales in DCOs. For example, the Bramford to Twinstead DCO states 35 days in article 19(9) and Yorkshire Green DCO varied the Land Drainage Act to insert 28 days. The timescale of 35 days has been retained here, reflecting the precedent set in the Bramford to Twinstead DCO.	No further comments to be given – deferred to River Stour Internal Drainage Board

3.2.3	Application Document 3.1 (J) draft Development Consent Order, submitted at Deadline 7	Schedule 3 (requirements): Management Plans	<p>The Consultee advised that whilst an EIA is referred to within the DCO and it is assumed that an Environmental Statement will be included therein which will contain a Flood Risk Assessment, the Consultee is concerned that there was no mention to Flood Risk specifically given within the document or the requirement for Lead Local Flood Authority (LLFA) approval in relation there to.</p> <p>The Consultee raised the question about whether it would be possible for National Grid to include either within the body of the document itself, or as a standalone schedule, criteria in relation to flood risk and the requirement for any of the works referred to in schedule 1 to comply with the approved flood and water management strategy document.</p> <p>The Consultee has confirmed this has now been agreed.</p>	Requirement 6 states that a Flood Management Plan will be secured by requirement, requiring submission to and approval by the relevant authority. A Flood Risk Assessment is appended to the Environmental Statement (Application Document 6.8 (B) Flood Risk Assessment [REP6-052]).	Agreed
-------	--	---	--	--	--------

3.3 Consultation

Table 3.3 Consultation

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.3.1	N/A	Consultation Strategy	The Consultee agrees to the Consultation Strategy as set out by National Grid.	The Consultation Strategy was prepared taking account of input from the Consultee. The final version was issued to the Councils on 20 October 2022. The approach and content are agreed to be adequate and represent a satisfactory approach to consultation.	Agreed
3.3.2	N/A	Consultation Zones	The Consultee agrees to the consultation zones as set out by National Grid.	Primary Consultation Zones (PCZ) and Secondary Consultation Zones (SCZ) identified for the purpose of non-statutory consultation are adequate and satisfactory	Agreed

3.4 Landscape and Visual

Table 3.4 Landscape and Visual

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.4.1	Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061] and Application Document 6.3.3.1.C ES Appendix 3.1.C Landscape Designation and Landscape Character Assessment [APP-145]	Landscape Character baseline	The Consultee has raised no concerns on the landscape and visual baseline in meetings on the basis of the landscape assessment as set out in the PEIR and acknowledged that the ES will provide further information. The Consultee confirmed that they would be deferring comment to the District Councils.	The Landscape Character Areas (LCAs) were set out in the baseline section of the PEIR. The Statutory Consultation responses from the Consultee and the Kent LPAs required further detail of the key characteristics of the LCAs which have been included within the ES (Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061] and Application Document 6.3.3.1.B ES Appendix 3.1.B Landscape Baseline [APP-144]).	No further comments to be given – deferred to District Council
3.4.2	Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]	Visual Amenity baseline	The Consultee’s role within meetings with the Applicant on landscape and visual matters has been to respond to PRow and where necessary, biodiversity matters and raised no concerns regarding the representative viewpoint selection. The Consultee confirmed that they are deferring comment to the District Councils.	The representative viewpoints were set out in the baseline section of the PEIR and have been set out in the ES (Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]).	No further comments to be given – Deferring to District Councils
3.4.3	Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]	Assessment of effects	The Consultee confirmed that they are deferring comment to the District Councils.	The assessment of effects on landscape character and visual amenity were presented within the PEIR. The PEIR is a preliminary assessment and effects on landscape character and visual amenity has been further assessed with more detail within the ES chapter (Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape & Visual [APP-061]) in line with the methodology and professional judgement. This has also included an assessment of effects at operation year 15.	No further comments to be given – deferring to District Councils
3.4.4	Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]	Study Area	The Consultee’s role within the meetings on landscape and visual matters has been to respond to PRow and where necessary, biodiversity matters, and the Consultee has raised no concerns to the approach. The Consultee confirmed that they are deferring comment to the District Councils, but they should still be consulted with on this topic.	The Study Area was set out within the PEIR and is the same for the ES (Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]).	No further comments to be given – deferring to District Councils.

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.4.5	Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]	Growth rates of mitigation planting and photomontages	<p>The Consultee's role within the meetings on landscape and visual matters has been to respond to PRoW and where necessary, biodiversity matters. There have been no concerns raised about the year 1 and year 15 photomontage approach and no further comments from the Consultee have been received.</p> <p>The Consultee confirmed that they are deferring comment on additional materials and information to the District Councils, but they should still be consulted with on this topic.</p>	The Applicant has discussed the growth rates of mitigation planting with the Consultee and the photomontages have been produced for the ES at year 1 and year 15 of operation.	No further comments to be given – deferred to District Councils
3.4.6	Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]	LVIA methodology	<p>The Consultee's role within the meetings on landscape and visual matters has been to respond to PRoW and where necessary, biodiversity matters, and the Consultee has not raised any further concerns on the LVIA methodology.</p> <p>The Consultee confirmed that they are deferring comment to the District Councils, but they should still be consulted with on this topic.</p>	The LVIA methodology was set out within the PEIR and is the same for the ES with minor amendments following the published GLVIA3 Clarifications Technical Guidance Note.	No further comments to be given – deferred to District Councils
3.4.7	Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]	Photomontage methodology	<p>The Consultee's role within the meetings on landscape and visual matters has been to respond to PRoW and where necessary, biodiversity matters, and no further concerns have been raised on the photomontage methodology.</p> <p>The Consultee confirmed that they are deferring comment to the District Councils, but they should still be consulted with on this topic.</p>	The photomontage methodology was updated following the PEIR and is the same for the ES.	No further comments to be given – deferred to District Councils
3.4.8	Application Document 7.11.2 Design Approach Document – Kent [REP1A-031] and Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061]	Design principles and landscape strategy and mitigation plans	<p>The Consultee is aware of the ongoing design process and expressed an interest to be involved. This has been covered in thematic meetings when discussing the proposed landscape strategy.</p> <p>The Consultee has confirmed this has now been agreed.</p>	<p>The design principles are contained within Application Document 7.12.2 (B) Design Principles – Kent [REP6 058] which applies to the Kent Converter Station and Substation.</p> <p>Requirement 3 within Application Document 3.1 (J) draft Development Consent Order, submitted at Deadline 7 includes the substation and specifics around operational lighting. The outline landscape mitigation proposals are contained within Figure 1 of Application Document 7.5.7.2 (E) Outline Landscape and Ecological Management Plan – Kent submitted at Deadline 7.</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.4.9	Application Document 7.5.7.2 (E) Outline Landscape and Ecological Management Plan – Kent submitted at Deadline 7	Outline Landscape and Ecology Management Plan	The Consultee has confirmed this has now been agreed.	Application Document 7.5.7.2 (E) Outline Landscape and Ecological Management Plan – Kent submitted at Deadline 7 has been submitted with the DCO application. The latest version of this document should be referred to at Application Document 7.5.7.2 (E) Outline Landscape and Ecological Management Plan – Kent submitted at Deadline 7.	Agreed
3.4.10	Application Document 3.1 (J) draft Development Consent Order, submitted at Deadline 7.	Indicative Species Mix	The Consultee has confirmed this position has been agreed.	The Applicant requires agreement from the Consultee on the indicative species mixes (detailed within Application Document 7.5.7.2 (E) Outline Landscape and Ecological Management Plan – Kent submitted at Deadline 7. The species mixes include a variable distribution across the species to increase future resilience. The indicative species mix can be agreed at the detailed design stage as part of approval of the detailed LEMP under Requirement 6, Schedule 3 of the draft DCO (Application Document 3.1 (I) draft Development Consent Order , submitted at Deadline 7).	Agreed
3.4.11	N/A	Photosheet template	The photosheet template for site photos and images was issued to the Consultee by National Grid on 2 August 2024, but the Consultee confirmed that they were deferring comments to the District Councils.	The photosheet template (which is not an application document but was shared for reference during discussions within the pre-application period within thematic meetings) was issued by the Applicant to the Consultee and requested comments on the template. However, the Consultee confirmed that comments would be deferred to the District Councils, so agreement from the Consultee is no longer required.	No further comments to be given – deferred to District Councils
3.4.12	N/A	Cumulative sequential visual assessment	The Consultee received the Sequential Cumulative Visual Assessment document from National Grid for review and comment on 28 August 2024. The Consultee confirmed to National Grid that they were deferring comment on the document to the District Councils.	The Sequential Cumulative Visual Assessment document (which is not an application document but was shared for reference during discussions within the pre-application period within thematic meetings) was issued by the Applicant to the Consultee and requested comments on the document. However, the Consultee confirmed that comments would be deferred to the District Councils, so agreement from the Consultee is no longer required.	No further comments to be given – deferred to District Councils
3.4.13	N/A	Landscape and Visual value judgements	The Consultee received the Kent L&V Value document from National Grid for review and comment. The Consultee confirmed to National Grid that they were deferring comment on the document to the District Councils.	The Kent L&V Value document (which is not an application document but was shared for reference during discussions within the pre-application period within thematic meetings) was issued by the Applicant to the Consultee and requested comments on the document. However, the Consultee confirmed that comments would be deferred to the District Councils, so agreement from the Consultee is no longer required.	No further comments to be given – deferred to District Councils

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.4.14	N/A	Landscape and visual sensitivity ratings	The Consultee received the Sensitivity Ratings document from National Grid for review and comment. The Consultee confirmed to National Grid that they were deferring comment on the document to the District Councils.	The Sensitivity Ratings document (which is not an application document but was shared for reference during discussions within the pre-application period within thematic meetings) was issued by the Applicant to the Consultee and requested comments on the document. However, the Consultee confirmed that comments would be deferred to the District Councils, so agreement from the Consultee is no longer required.	No further comments to be given – deferred to District Councils
3.4.15	N/A	Visual Appendix Structure Example	The Consultee received, on 28 August 2024, the Visual Appendix Structure Example - BTNO1 and 2 document from National Grid for review and comment. The Consultee confirmed to National Grid that they were deferring comment on the document to the District Councils.	The Visual Appendix Structure Example - BTNO1 and 2 document (which is not an application document but was shared for reference during discussions within the pre-application period within thematic meetings) was issued by the Applicant to the Consultee and requested comments on the document. However, the Consultee confirmed that comments would be deferred to the District Councils, so agreement from the Consultee is no longer required.	No further comments to be given – deferred to District Councils

3.5 Ecology and Biodiversity

Table 3.5 Ecology and Biodiversity

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.5.1	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology & Biodiversity, [REP6-024]	HVDC cable crossing of Thanet Coast & Sandwich Bay Special Protection Area (SPA) and Ramsar site	The use of trenchless solution for Thanet Coast and Sandwich Bay SPA was previously under discussion with the Consultee and National Grid as the Consultee required further information on the trenchless methodologies from National Grid. The further information provided is acknowledged.	<p>The trenchless solution has been confirmed as the approach to be taken by the Applicant as set out in Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003].</p> <p>As stated in Application Document 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-132] the Applicant has confirmed that open cut trenching of the saltmarsh habitat does not form part of the Proposed Project Maximum Design Scenario (MDS) assessed as part of the DCO application and therefore would not be a consented activity under the Development Consent Order for the Proposed Project. The contingency options in Pegwell Bay in the unlikely event horizontal directional drilling (HDD) fails at Pegwell Bay is to use Direct Pipe or Microtunnelling, both of which are still trenchless installation methods which have been assessed within the MDS in the ES. It should be noted that whilst the trenchless solution will completely avoid saltmarsh habitat,</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
				<p>exiting approximately 105 - 140 m down shore of this habitat, it will exit within intertidal mudflats within the Thanet Coast and Sandwich Bay SPA, as addressed within Application Document 6.6 (H) Habitats Regulations Assessment Report [REP6-050].</p> <p>Application Document 7.5.2 (D) Outline Offshore Construction Environment Management Plan [REP6-072], Application Document 9.84 (E) Register of Environmental Actions and Commitments submitted at Deadline 7 and Application Document 9.92 (D) Outline Cable Specification and Installation Plan submitted at Deadline 7 all include several commitments relating to the use of a trenchless technique at the Kent Landfall. These include: B42, B59, B61, B67, B68, B69 and GM06.</p>	
3.5.2	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP6-024]	Horizontal Direct Drilling (HDD)	<p>This matter had been under discussion with the Consultee and National Grid as the Consultee required further information of the HDD from National Grid.</p> <p>The Consultee has confirmed this has now been agreed.</p>	The Applicant has provided further information on the location and impacts of the use of a jack up barge included in Application Document 9.13 (D) Pegwell Bay Construction Method Technical Note [REP6-104]	Agreed
3.5.3	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP6-024] Application Document 6.6 (I) Habitats Regulations Assessment Report submitted at Deadline 7.	Golden Plover Offsetting Land in Kent	The Consultee notes the strategy has been discussed with Natural England and agreed in principle with them. The Consultee notes Natural England have primacy on this issue since it is an HRA matter.	The Applicant confirmed that the golden plover mitigation area has been subject to wintering bird survey which has recorded use by golden plover. The Golden Plover offsetting has been set out in Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP6-024] and Application Document 6.6 (I) Habitats Regulations Assessment Report submitted at Deadline 7 with the strategy being agreed with Natural England. This has been presented to the Consultee, who note the agreement from Natural England and confirm that Natural England have primacy on this issue.	Agreed
3.5.4	Application Document 9.84 (E) Register of Environmental Actions and Commitments submitted at deadline 7	Collision risk from new overhead line	The Consultee agreed with the approach to collision risk from new overhead line and agreed with the conclusion made by Natural England.	The Applicant confirmed collision risk assessment has concluded no significant collision risk for birds and has been supported by 12 months of vantage point surveys of the line location, and carcass searches of the existing OHL. Mitigation has been included in the form of hanging bird diverters which have been set out in Application Document 9.84 (E) Register of Environmental Actions and Commitments submitted at deadline 7. Collision risk assessment has been reviewed by Natural England who agree with its basic conclusion.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.5.5	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology & Biodiversity, [REP6-024]	Recovery of mudflats	The Consultee states that National Grid need to ensure recovery of the mudflats in the intertidal zone from the HDD connection works.	The Applicant have provided details on mudflat recovery in Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP6-024] .	Agreed
3.5.6	Application Document 9.84 (E) Register of Environmental Actions and Commitments submitted at deadline 7	Riparian mammal habitat continuity	The Consultee had stated that National Grid needed to provide details of the type of culvert to be used to ensure no disruption of connectivity in ditches. The Consultee has confirmed this has now been agreed.	The Applicant confirms that the type of culvert has been set out in the DCO and the REAC Application Document 9.84 (E) Register of Environmental Actions and Commitments submitted at deadline 7. This has been designed to preserve the bed of the ditch and allow connectivity for riparian mammals.. Regular engagement has been undertaken with the Environment Agency, Lead Local Flood Authority (LLFA) and the Internal Drainage Board (IDB) on key design principles.	Agreed
3.5.7	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP6-024]	Ecology - reptiles	The Consultee had previously raised the submission did not adequately demonstrate that reptile populations will not be impacted by the proposed development. More information was required to enable them to be satisfied that appropriate consideration can be given to the impact on reptiles. There was insufficient information on the proposed mitigation to demonstrate it is achievable. The Consultee has confirmed the additional information provided means this has now been agreed.	Further information was provided, referencing Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP6-024] , Application Document 7.5.7.2 (E) Outline Landscape and Ecological Management Plan – Kent submitted at Deadline 7 was also updated to include outline information to address the points raised, which will be expanded upon for the final LEMP. It is noted that both Parties are now agreed.	Agreed
3.5.8	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP6-024] .	Ecology – breeding birds (insufficient land for mitigation)	The Consultee had previously commented that there was insufficient land proposed for the mitigation requirements for farmland birds. The Consultee has confirmed they are now agreed with the Applicant's position, subject to the finalised mitigation strategy being informed by breeding bird surveys.	It is noted that with the further information that had been provided, it is now agreed by both Parties that there is sufficient land proposed for the mitigation requirements for farmland birds.	Agreed
3.5.9	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP6-024]	Ecology – breeding birds (requirement for further survey)	The Consultee has confirmed they are now agreed with the Applicant's position.	The measures proposed for the mitigation land will fundamentally change how that land functions for birds. Therefore, a breeding bird survey now would give limited information regarding the extent to which the area can support breeding birds following the changes to farming practices. The Proposed Project is resulting in the loss of a 12 ha arable field that happens to be suitable for farmland birds but has no restriction on management such that it can be rendered unsuitable at any time. In contrast, the mitigation delivers a 10 ha field that is being managed specifically for farmland birds and being secured in favourable management for the lifetime of the converter	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
				station (40-80 years) which is not the case for the mitigation land at present.	
3.5.10	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP6-024]	Ecology – breeding birds (mitigation for loss of gull foraging habitat)	The Consultee has confirmed they are now agreed with the Applicant's position.	The Applicant does not consider specific mitigation for loss of gull foraging habitat is required. Gulls have large foraging ranges and are very adaptable to a wide range of habitats; there is no shortage of suitable habitat around Minster Marshes, Ash Level and beyond. The loss of a single arable field will not have a significant impact. Moreover, there are no gull colonies identified near to the converter station field.	Agreed
3.5.11	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity, [REP6-024]	Ecology – breeding birds (operational disturbance of ornithology)	The Consultee has confirmed they are now agreed with the Applicant's position.	Operational disturbance of ornithology is set out in paragraph 3.9.220 of the Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP6-024] . This is agreed with the Consultee.	Agreed
3.5.12	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity, [REP6-024]	Ecology – breeding birds (functionally linked land)	It continues to be KCC EAS's view that breeding bird surveys are required on the proposed functionally linked land to fully understand the baseline and understand what mitigation can be implemented. KCC EAS are supportive that they have securable farmland sites but if the mitigation land cannot accommodate increased breeding populations then there is nowhere for the displaced/lost territories to disperse to.	It should be noted that the mitigation field for functionally-linked land is not currently farmed in a favourable way for golden plover or other farmland birds, including use of bird scarers. Regarding breeding bird surveys, the Applicant is currently undertaking further breeding bird surveys to inform subsequent monitoring of the enhanced area as part of the suite of pre-construction surveys.	Agreed
3.5.13	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity, [REP6-024].	Ecology – wintering birds (surveys and mitigation land)	KCC confirms the survey effort for wintering birds is overall adequate. There are two seasons' worth of data (2022/23 and 2023/24) with visits spaced out by one month (Oct-Mar) which consider high and low tide wintering bird assemblages, as well as nocturnal surveys which are spatially comprehensive with one exception (the proposed mitigation site). The Consultee has previously raised concerns in terms of insufficient information being provided to demonstrate if mitigation for Functional Linked Land is appropriate, and requesting certainty that tunnelling rather than open trenches will be used. The Consultee has confirmed they are now agreed with the Applicant's position on all these matters relating to wintering birds.	The Applicant can confirm wintering bird surveys of the fields have identified presence of wintering waders in the area (including golden plover) but no significant use of the fields for roosting or foraging as they are currently farmed. It should be noted that functional linkage of the field to the Special Protection Area (SPA) would in any event not necessarily be negative since the proposals for the site involve entirely changing the way the land is farmed specifically geared to maximise suitability for golden plover. The mitigation area measures 10 ha whereas the area strictly calculated to be needed for golden plover mitigation is approximately 3.8 ha. The field is therefore much larger than is required purely to address the impact on golden plovers. Prescriptions for how this land will be managed for golden plover and skylark are provided in Section 6.10 of the Application Document 7.5.7.2 (E) Outline Landscape and Ecological Management Plan – Kent submitted at Deadline 7.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
				<p>The Applicant can confirm that the farmland mitigation area is sufficiently large to support both wintering golden plover and a range of other farmland birds, including skylark.</p> <p>The DCO only seeks consent for HDD (tunnelling) as a method for crossing the saltmarsh. Therefore, it would not be legally possible for open trenching to be used in this location without a material amendment to the DCO being obtained. It should be noted that whilst the trenchless solution will completely avoid saltmarsh habitat, exiting approximately 105 - 140 m down shore of this habitat, it will exit within intertidal mudflats within the Thanet Coast and Sandwich Bay SPA, as addressed within Application Document 6.6 (H) Habitats Regulations Assessment Report [REP6-050].</p>	
3.5.14	Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]	Compensation Site	<p>KCC EAS previously stated: "<i>Other consultees have queried whether [the compensation site's] location next to a business park and railway (as well as a potential solar farm to the south-west, see DDC 23/01363) is appropriate as this may indicate elevated levels of light/noise pollution</i>"</p> <p>The Consultee has confirmed they are now agreed with the Applicant's position.</p>	<p>See Line 2.8.13 of the Applicant's Response to Kent Wildlife Trust in Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014] regarding the suitability of the identified mitigation land for golden plover, including noise and lighting disturbance and proximity to Discovery Park and a proposed solar farm.</p>	Agreed
3.5.15	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity, [REP6-024].	Ecology – riparian mammals (surveys)	<p>It had previously been commented that that insufficient information had been provided demonstrating if all watercourses/waterbodies/habitat, including those within the proposed habitat enhancement areas for golden plover and skylark/along the River Stour have been surveyed for riparian mammals.</p> <p>Information provided by the Applicant has confirmed that only ditches to be impacted by the works were surveyed. KCC EAS highlighted that it may have been useful to have an increased understanding of how water vole were using the whole site rather than just the ditches to be directly impacted however we accept that no further surveys are needed.</p> <p>The Consultee has confirmed they are now agreed with the Applicant's position.</p>	<p>The Applicant can confirm that all watercourses where work is proposed within the Order Limits have been subject to riparian mammal survey. The ditches within the golden plover mitigation land have not been subject to riparian mammal survey as there are no proposals to undertake any works to these watercourses, or to bring the footprint of the farmed area closer to these watercourses than is currently the case. The proposals for the golden plover/skylark mitigation land are restricted to farming the land in a particular way (e.g. including skylark plots, reducing use of pesticides, omitting use of fertiliser).</p>	Agreed
3.5.16	N/A	Ecology – riparian mammals (beavers)	<p>KCC has previously commented that it was unclear whether habitat within the golden plover and skylark habitat enhancement area/River Stour improvement areas had been surveyed, or whether habitat changes proposed in these areas could have any adverse effects on beaver. Adverse impacts may be unlikely, but needed to be clarified.</p>	<p>The habitat in the River Stour Enhancement Areas was included in the beaver surveys and no evidence was found in those locations. The ditches within the golden plover mitigation land have not been subject to riparian mammal survey as there are no proposals to undertake any works to these watercourses, or to bring the footprint of the farmed area closer to these watercourses than is currently</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
			The Consultee has confirmed they are now agreed with the Applicant's position.	the case. The proposals for the golden plover/skylark mitigation land are restricted to farming the land in a particular way (e.g. including skylark plots, reducing use of pesticides, omitting use of fertiliser).	
3.5.17	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity, [REP6-024].	Ecology – riparian mammals (water voles)	<p>The Consultee had previously commented that there was no information provided on the relative population size of water voles across the survey area in line with the latest guidelines or why this was not carried out.</p> <p>The Consultee has confirmed they are now agreed with the Applicant's position.</p>	<p>Water vole population assessment is not something included in presence/absence reports as standard, although it would be necessary for a mitigation licence application if such a licence were sought. Since the impact assessment and mitigation proposals are based on the lengths of ditch affected rather than water vole population estimates and are precautionary (assuming water voles could be present on the network in other locations – and thus greater numbers - than recorded), a population estimate would not affect the impact assessment in the ES. However, using guidance on water vole population assessment, the populations resolve as Low where there are records.</p> <p>The mink record was at reference grid reference 632967, 163235, and was a visual sighting of 5 black mustelids (concluded most likely to be American mink) seen on the field margin, which quickly disappeared into marginal vegetation. No other evidence or sightings were recorded during surveys.</p>	Agreed
3.5.18	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity, [REP6-024]	Ecology – riparian mammals	<p>The Consultee had previously commented there was insufficient information provided assessing the impact the American mink population will have on the proposed water vole mitigation and if the proposed compensation habitat will be suitable for colonisation by the local water vole population. KCC EAS subsequently advised that if the DCO is granted there will be a requirement for ongoing monitoring to be carried out and measures to address any increase in American mink population if identified during surveys.</p> <p>KCC EAS also suggested that plans for new water vole habitat include habitat elements known to reduce the effects of American mink predation such as maintaining good connections between the surrounding habitat and as much dense vegetative cover (including reedbeds) for water voles as possible to reduce their exposure to predators. This point can be addressed within the LEMP and a monitoring plan.</p>	<p>Regarding whether it is appropriate to deliver water vole mitigation where there is mink, a quote from Strachan has been provided by KCC in their Principal Areas of Disagreement Summary Statements (PADSS): <i>'in cases where some coexistence between mink and water vole has been observed, this has been because the habitat was extremely extensive and not optimal for mink'</i>. This would apply to Minster Marshes and Ash Levels where the habitat available for riparian mammals is very extensive consisting of many kilometres of ditch. Moreover, since the water voles and mink already co-exist, and only one record of mink was made during surveys, it is not considered inappropriate to deliver the mitigation habitat in this location, particularly since a considerable increase in the amount of habitat will result, compared to the amount to be lost.</p> <p>The Applicant agrees that the water depth in the ponds will be managed to a height that can support the water vole population as set out in Paragraph 5.2.11 of Application Document 7.5.7.2 (E) Outline Landscape and Ecological Management Plan – Kent submitted at Deadline 7. The Applicant can confirm that the attenuation ponds will be connected to the ditches to the west, east or</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
			<p>Further, whilst there are increased pressures from construction activities on the local water vole population, it may also be sensible to consider adding a mink control programme to the proposed mitigation measures for the project, or a financial contribution to an existing mink control programme (if possible). The Applicant has detailed that this can be addressed as part of a LEMP however we advise that if a financial contribution is required that will have to be agreed as part of any Legal Agreement.</p> <p>The Consultee has confirmed they are now agreed with the Applicant's position as set out in the Applicant's Current Position column.</p>	<p>north (depending on pond) and these ditches do contain suitable habitat for water voles. There is no reason to believe water voles will not find the attenuation ponds. The precise shape of the balancing ponds and precise distance of the balancing ponds from the ditches to which they are connected is not set by the DCO and is a matter of detail that can be resolved as part of detailed LEMP preparation and detailed design prior to construction.</p> <p>Mink was not recorded in the area proposed for the new balancing ponds around the Converter Station and Substation.</p>	
3.5.19	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity, [REP6-024]	Ecology – riparian mammals (water vole licence)	<p>The Consultee has previously commented that there was insufficient information on the proposal to use Class Licence (CL31) for the water vole mitigation rather than an A11 licence. They previously requested confirmation that this licence is going to be suitable as an A11 licence may be more appropriate given the assumption that water voles are likely to make use of all suitable habitat to be affected by works, and/or if in the future, water voles are found across greater parts of the site.</p> <p>The Applicant has detailed that which licence to apply for will be reviewed following updated surveys if the DCO is granted – the Consultee accepts this approach.</p>	<p>A water vole specialist with Class Licence 31 has been involved in the Proposed Project and it is considered that the works can be undertaken under a class licence based on the amount of vegetation removal on each watercourse where water vole burrows have been recorded within the works footprint. However, given the ability of water voles to redistribute annually, pre-construction update surveys for riparian mammals will be undertaken in line with paragraph 7.1.1 of the Application Document 7.5.7.2 (E) Outline Landscape and Ecological Management Plan – Kent submitted at Deadline 7, and a watching brief applied for vegetation clearance on ditches as per measure B46 of Application Document 9.83 (B) Code of Construction Practice [REP4-232]. The appropriate licensing route will be kept under review based on those results and is not a fundamental matter for the DCO.</p>	Agreed
3.5.20	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity, [REP6-024]	Ecology – riparian mammals (otter surveys)	<p>KCC accepts that no updated otter surveys on the development footprint are required at this stage.</p>	<p>The field signs referenced were mammal runs in tall grass. As discussed in Application Document 6.3.3.2.H ES Appendix 3.2.H Riparian Mammal Survey Report [APP-154], these signs could have been caused by otter, or by other mammals or by a large wading bird. Since they were not clear otter signs they were not mapped but were mentioned in the report for completeness. A complete otter survey was undertaken in line with guidance as acknowledged in KCC's review, and given the nature and ambiguity of the mammal runs, further survey would have no certainty of resolving the matter to species. Pre-construction update surveys will be undertaken in line with paragraph 7.1.1 of the Application Document 7.5.7.2 (E) Outline Landscape and Ecological Management Plan – Kent submitted at Deadline 7.</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.5.21	Application Document 6.3.2.2.D ES Appendix 2.2.D Riparian Mammals Survey Report [APP-102]	Ecology – riparian mammals	<p>KCC previously stated that it was unclear whether habitat within the golden plover and skylark habitat enhancement area/River Stour improvement areas have been surveyed, or whether habitat changes proposed in these areas could have any adverse effects on otter.</p> <p>The Consultee has confirmed they are now agreed with the Applicant’s position as set out in the Applicant’s Current Position column.</p>	<p>The habitat in the River Stour Enhancement Areas was included in Application Document 6.3.2.2.D ES Appendix 2.2.D Riparian Mammals Survey Report [APP-102] and no evidence was found in those locations. The ditches within the golden plover mitigation land have not been subject to riparian mammal survey as there are no proposals to undertake any works to these watercourses, or to bring the footprint of the farmed area closer to these watercourses than is currently the case. The proposals for the golden plover/skylark mitigation land are restricted to farming the land in a particular way (e.g. including skylark plots, reducing use of pesticides, omitting use of fertiliser).</p>	Agreed
3.5.22		Ecology – riparian mammals (water depth in ponds)	<p>KCC understand that the balancing ponds will be designed to be of value to riparian mammals by retaining an earth ledge and sloping bank above a shallow, permanent water level. The ledge is to be planted with emergent riparian vegetation. The banks will need to have suitable substrate for water voles to burrow into.</p> <p>It is generally recognised that optimal water depth would be over 1m deep (Strachan et al., 2011). The created habitat needs to be made optimal for water vole colonisation, especially given the known presence of American mink in the landscape. KCC accept that the water depth is a matter which can be managed within the detailed design and implementation of a suitable management plan if the DCO is granted. However there has to be an agreement at this stage that the water will always be managed to a height that can support the water vole population.</p>	<p>The Applicant agrees that the water depth in the ponds will be managed to a height that can support the water vole population.</p>	Agreed
3.5.23	Application Document 7.5.7.2 (E) Outline Landscape and Ecological Management Plan – Kent submitted at Deadline 7	Ecology – riparian mammals	<p>KCC EAS previously advised that the new ponds should also ensure that they are within sufficient proximity to nearby ditches to allow their natural colonisation. It is not exactly clear how close the ponds are proposed to be from nearby ditches (or the habitat suitability of those ditches), although plans do suggest a relative proximity. Water voles tend to prefer to stay within 5m of a watercourse or other waterbody (Strachan et al., 2011). In the absence of suitable habitat and sufficient cover between the adjacent ditches and the newly created habitat, water voles may struggle to naturally colonise the new habitat.</p> <p>The Consultee has confirmed they are now agreed with the Applicant’s position.</p>	<p>Paragraph 5.2.11 of Application Document 7.5.7.2 (E) Outline Landscape and Ecological Management Plan – Kent submitted at Deadline 7 states <i>‘the attenuation ponds will be connected to the existing ditch network in Minster Marshes by pipes such that the invert level of the pipe can be set so as to retain some water permanently, and this will also facilitate water vole colonisation from elsewhere on the ditch network.’</i> The Applicant can confirm that the attenuation ponds will be connected to the ditches to the west, east or north (depending on pond) and these ditches do contain suitable habitat for water voles. There is no reason to believe water voles will not find the attenuation ponds. The precise shape of the balancing ponds and precise distance of the balancing ponds from the ditches to which they are connected is not set by the DCO and is a matter of detail that can be resolved as part of detailed</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
				LEMP preparation and detailed design prior to construction.	
3.5.24	Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity,[REP6-024].	Ecology - Bats	<p>The Consultee had previously commented that bat assessment had been limited to roost assessment and assessment of habitats and that more information was required to justify the survey area as not all areas impacted by the proposal had been assessed.</p> <p>KCC now accept this point and no further information on bats are required at this point.</p>	<p>Extensive bat activity surveys were also undertaken as documented in Application Document 6.3.3.2.L ES Appendix 3.2.L Nighttime Bat Walkover and Static Detector Report [APP-158].</p> <p>The Applicant can confirm that all trees proposed for removal have been surveyed and the bat activity survey also adequately covered the areas where works could affect features used for bat commuting and foraging. This was sufficient to judge the value of the Order Limits for bats. Areas within the Order Limits that were not subject to bat activity survey were locations that did not present suitable habitat, where there are existing tracks that will be used for access but not be subject to any development work, or in the golden plover/skylark mitigation area where no works are proposed to features that would be used by foraging or roosting bats.</p>	Agreed
3.5.25	Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025]	Ecology - BNG	<p>A BNG assessment has been submitted and detailed that the proposal will result in a loss of BNG for habitats, linear features and water course units.</p> <p>The Consultee had previously commented that insufficient information had been provided detailing how the Applicant had reached these conclusions. The submitted information had not provided details of the condition assessments or how additionality has been taken into account. Habitat creation or enhancement cannot fully count towards a BNG if it is also required for protected species mitigation or mitigation for a designated site. A metric had not been submitted to review as part of the BNG assessment therefore it was not understood what the trading rule impacts were. The submitted information had not confirmed that the habitat creation required as part of the proposal will be implemented in Kent.</p> <p>The Consultee has confirmed they are now agreed with the Applicant's position.</p>	<p>Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025] was updated in response to the Section 89(3) letter from PINS. The updated version which includes all the appendices is Application Document 6.12 (C) Biodiversity Net Gain Feasibility Report [REP1A-025].</p> <p>Condition assessment data for baseline habitats will be issued in due course.</p> <p>Species specific mitigation and/or mitigation for designated sites has not been incorporated into the BNG Parameters Line and is therefore not included in the BNG Assessment.</p> <p>As detailed within the Application Document 6.12 (C) Biodiversity Net Gain Feasibility [REP1A-025] (Section 2.1 and paragraph 2.3.3) <i>"There is currently no guidance for BNG and NSIP's. As such this BNG assessment follows the BNG guidance created for TCPA where suitable. The following deviations from the SBM guidance have been made:</i></p> <ul style="list-style-type: none"> <i>Trading rules have not been accounted for when undertaking this assessment. It is considered that this would result in an unwieldy BNG requirement and may result in the Proposed Project being constrained in delivering its BNG requirement. This is not to say that trading summaries are to be ignored when exploring options for BNG delivery, the</i> 	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
				trading rules summaries are to be used as a guide for habitats and/or distinctiveness levels that the Proposed Project aspires to deliver.”	

3.6 Marine Ecology

Table 3.6 Marine Ecology

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	Applicant’s Current Position	Status
3.6.1	<p>Application Document 6.2.4.2 (G) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 7</p> <p>Application Document 9.13 (D) Pegwell Bay Construction Method Technical Note [REP6-024]</p>	Marine Ecology – assessment of benthic ecology	<p>The Consultee are not experts in Marine Ecology and defer to the expertise of Natural England.</p> <p>The Consultee has confirmed they are agreed with the Applicant’s position in terms of the assessment of construction impacts on intertidal and subtidal benthic habitats.</p>	<p>The Applicant has prepared Application Document 9.13 (D) Pegwell Bay Construction Method Technical Note [REP6-024] to provide a detailed description of construction activities at Pegwell Bay.</p> <p>In addition, the Applicant has consulted with Natural England, and responded to their relevant representations regarding the assessment of benthic features and updates have been made where required in Application Document 6.2.4.2 (G) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 7 as a result.</p>	Agreed
3.6.2	<p>Application Document 6.2.4.2 (G) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 7</p>	Marine Ecology – benthic ecology	<p>The Consultee has previously commented there has been an underestimation of sensitivity and potential colony abundance of the blue mussel <i>Mytilus edulis</i> and ross worm <i>Sabellaria spinulosa</i>. Therefore, underestimating the impacts and mitigation requirements.</p> <p>The Consultee has confirmed they are now agreed with the Applicant’s position.</p>	<p>This was reviewed with the sensitivity updated to medium. This was updated in Application Document 6.2.4.2 (G) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 7.</p>	Agreed
3.6.3	<p>Application Document 6.2.4.2 (G) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 7</p> <p>Application Document 6.11 (F) Marine Conservation Zone Assessment,</p>	Marine Ecology – benthic ecology	<p>The Consultee had previously commented that the offshore section in Kent needs consideration for marine ecology for Thanet Coast MCZ, 1.2km north from the landfall site.</p> <p>The Consultee has confirmed they are now agreed with the Applicant’s position.</p>	<p>The Thanet Coast MCZ and its protected features have been considered in detail in both Application Document 6.2.4.2 (G) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 7 and Application Document 6.11 (F) Marine Conservation Zone Assessment, submitted at Deadline 7. Due to the distance of the Thanet Coast MCZ from the Offshore Scheme Boundary, no direct temporary or long term habitat loss will occur. The potential for effects from increased suspended sediment concentration (SSC) and associated deposition has been considered in detail and due to the minimal depth of sediment deposition (0.5mm) is unlikely to affect the conservation objectives of the site.</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	Applicant's Current Position	Status
	submitted at Deadline 7.				
3.6.4	<p>Application Document 6.2.4.2 (G) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 7</p> <p>Application Document 6.2.4.1 (H) Marine Chapter 1 Physical Environment submitted at Deadline 7</p>	Marine Ecology – benthic ecology	<p>The Consultee had previously commented that the Kent benthic ecology for the application site has predominately sublittoral mixed and coarse sediments, infralittoral fine or muddy sand and mediterranean moderate energy circalittoral rock. As there is presence of dynamic mobile sediments, consideration is needed for any impacts of cable trenching/laying, protective measures such as rock armour, marine protection structures, temporary anchor moorings, scouring and accretion of sediments, smothering of habitats/species, or other changes, including to the hydrodynamics, that may affect the designated features of the protected areas noted above.</p> <p>The Consultee has confirmed they are now agreed with the Applicant's position.</p>	<p>The benthic environment at the Kent landfall has been considered in detail in both Application Document 6.2.4.1 (H) Marine Chapter 1 Physical Environment submitted at Deadline 7 and Application Document 6.2.4.2 (G) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 7.</p> <p>Cable laying, placement of protective measures, temporary anchoring, scouring and changes in hydrodynamics result in highly localised impacts which are either temporary habitat disturbance or permanent habitat loss and limited to within the Offshore Scheme Boundary. The Offshore Scheme does not overlap with any MCZs and therefore there is no direct impact to the designated features of the MCZs in the Study Area resulting from these construction activities.</p> <p>Increased SSC and associated deposition and smothering could occur across the Study Area and therefore within the MCZs. However, deposition in the Study Area is expected to be less than 0.5 mm on the seabed and is not expected to result in detectable changes in sediment bound contaminants above background levels.</p>	Agreed
3.6.5	<p>Application Document 6.2.4.2 (G) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 7</p> <p>Application Document 6.11 (F) Marine Conservation Zone Assessment, submitted at Deadline 7.</p>	Marine Ecology – benthic ecology (MCZ assessment)	<p>The Consultee highlighted that in Natural England's (NE) response Benthic Ecology, NE, 23/6/25 they had raised concerns regarding the MCZ assessment and the construction impacts on the intertidal and subtidal benthic habits and communities and there was a risk that priority habitats will be impacted. They had requested updated documents to consider all the potential pathways of effect. KCC deferred to the specialist knowledge and detailed advice provided by NE and agreed with the recommendations provided. It was considered that the underestimation of sensitivity and potential colony abundance of the species blue mussel <i>Mytilus edulis</i> and ross worm <i>Sabellaria spinulosa</i> was a concern to fully understand and mitigate the impacts of the project, for the protected areas.</p> <p>The Consultee has since confirmed they are now agreed with the Applicant's position as provided in the Applicant's Current Position.</p>	<p>In response to relevant representations from Natural England the baseline in Application Document 6.2.4.2 (G) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 7 was updated to provide greater clarity to the location of these sensitive habitats within the Offshore Scheme.</p> <p>Habitats within Goodwin Sands MCZ will be avoided by any cable installation and as such potential impacts are limited to the deposition of sediments disturbed during cable installation. This impact pathway has been considered in full in both Application Document 6.2.4.2 (G) Part 4 Marine Chapter 2 Benthic Ecology submitted at Deadline 7 and Application Document 6.11 (F) Marine Conservation Zone Assessment, submitted at Deadline 7. As the sandy sediments settle rapidly any deposition within the MCZ were predicted to be minor, at 0.5 mm depth, significantly lower than the thresholds for mussels and <i>Sabellaria</i> and thus impacts found to be minor, including after amending the sensitivity rating for both habitat types. In addition, no <i>Sabellaria</i> reef or Annex 1 mussel beds were present in the Offshore Scheme.</p>	Agreed
3.6.6	Application Document 6.2.4.2 (G) Part 4 Marine Chapter 2 Benthic	Marine Ecology – benthic ecology (monitoring programme)	The Consultee considers that a regular monitoring programme for the seafloor along and adjacent to the cabling route should be in place, especially on the section adjacent to Goodwins Sands MCZ, to ensure there are no	Natural England have also requested that an In Principal Monitoring Plan (IPMP) is developed to monitor the impacts (temporal and spatial changes) on residual concerns in relation to protected habitats and those of conservation	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	Applicant's Current Position	Status
	<p>Ecology submitted at Deadline 7</p> <p>Application Document 9.84 (E) Register of Environmental Actions and Commitments submitted at deadline 7</p>		<p>negative impacts to the condition status for blue mussel and ross worm communities and the MCZ overall. Measures are in place for depth of burial surveys (MPE05) and this could be an additional action within the Offshore CEMP (Doc 7.5.2), carried out for the lifetime of operation and decommissioning.</p> <p>The Consultee has confirmed they are now agreed with the Applicant's position.</p>	<p>importance. A response to this Written Question was provided at Deadline 1 in Application Document 9.73 Applicant's Responses to First Written Questions [REP3-069].</p> <p>As such, the Applicant is not intending to prepare an outline IPMP. However, the Applicant can confirm that pre-commencement surveys will be undertaken to inform routing for the marine cable burial, as included within the DML, and sensitive routeing and siting of infrastructure and temporary works is also a commitment (GM04) within Application Document 9.84 (E) Register of Environmental Actions and Commitments submitted at deadline 7. The Applicant will engage further with Natural England to consider further the requirements for monitoring and an IPMP following the pre-commencement surveys if any habitats of principal importance are identified and there is potential for adverse effects on these habitats.</p>	
3.6.7	<p>Application Document 6.2.4.4 (J) Part 4 Marine Chapter 4 Marine Mammals submitted at Deadline 7</p>	<p>Marine Ecology – marine mammals</p>	<p>The Consultee has previously commented that there may be a lower presence within the Kent scheme area but they consider the harbour porpoise should still be fully considered in the mitigation for the Kent scheme. NE have highlighted the survey timings were not optimum as the Special Area of Conservation (SAC) is designated for winter, Oct – Mar presence.</p> <p>The Consultee has since confirmed they are now agreed with the Applicant's position as provided in the Applicant's Current Position.</p>	<p>Detailed responses to these comments, which were raised by Natural England in their Relevant Representations can be found in Application Document 9.34.1 (B) Applicant's Comments on Relevant Representations [REP2-014].</p> <p>Application Document 6.2.4.4 (J) Part 4 Marine Chapter 4 Marine Mammals, submitted at Deadline 7 was updated at Deadline 1 to include Winter SCANS density data for harbour porpoise, following a request by Natural England in Relevant Representation Ref-F2 to provide a worst-case assessment for harbour porpoise in the Southern North Sea SAC. Updated density estimates for harbour porpoise were carried through to the impact assessment and it did not change the overall outcomes of the assessment.</p> <p>Harbour porpoise are included in mitigation commitments MM01 and MM02 in Application Document 9.84 (E) Register of Environmental Actions and Commitments submitted at deadline 7 which state adherence to JNCC (2025) guidelines regarding the minimisation of impacts from underwater sound generated from known project activities and JNCC (2020) guidance for assessing the significance of noise disturbance against conservation objectives of the Southern North Sea Special Area of Conservation (SAC). Adherence to these guidelines will be in place across the Offshore Scheme Boundary construction. However, most construction activities associated with the Kent portion of the Offshore Scheme will be occurring at low tide on intertidal habitat in Pegwell Bay when harbour porpoise will not be present.</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	Applicant's Current Position	Status
3.6.8	<p>Application Document 6.2.4.4 (J) Part 4 Marine Chapter 4 Marine Mammals, submitted at Deadline 7.</p> <p>Application Document 7.5.11 (D) Outline Marine Mammal Mitigation Plan [REP6-070]</p>	Marine Ecology – marine mammals	<p>The Consultee has previously commented that as noted above, NE queried some survey timings and JNCC has queried the narrow range of data sources, and therefore a presence for harbour porpoise and seasonal restrictions required for mitigation. In section 4.9.42 (Doc ref 6.2.4.4 Ver C) consideration has been given to the seasonal variation and works will avoid the winter period for the cable corridor SNS SAC. It was noted the Marine Mammal mitigation plan (Doc 7.5.11) had not yet been updated to reflect that timing requirement.</p> <p>The Consultee has confirmed they are now agreed with the Applicant's position as provided in the Applicant's Current Position.</p>	<p>As stated in 6.2.4.4 (J) Part 4 Marine Chapter 4 Marine Mammals, submitted at Deadline 7, the construction works are anticipated to occur between April and October (inclusive) and therefore they are expected to avoid the winter period when harbour porpoise are present in higher numbers in the Southern North Sea SAC.</p> <p>However, a seasonal restriction is not required for mitigation due to the small number of harbour porpoise expected to be affected in the Southern North Sea and subsequent non-significant effects. In JNCC's most recent response to ExA Written Questions, received in January 2026, JNCC have stated that they do not require a seasonal restriction for the Southern North Sea SAC.</p> <p>As a result, this has not been included in Application Document 7.5.11 (D) Outline Marine Mammal Mitigation Plan [REP6-070] as it does not form part of the mitigation adopted for harbour porpoise.</p>	Agreed
3.6.9	<p>Application Document 6.2.4.4 (I) Part 4 Marine Chapter 4 Marine Mammals, submitted at Deadline 7.</p> <p>Application Document 7.5.11 (D) Outline Marine Mammal Mitigation Plan [REP6-070]</p>	Marine Ecology – marine mammals (mitigation for cabling trenching/levelling activities)	<p>The Consultee has previously commented that the offshore cabling trenching/levelling activities are noted (Table 1.2 Doc ref 7.5.11) as low intensity and no mitigation is stated as required. The Consultee disagreed that no mitigation was required and expected this to state a competent marine mammal observer should be present on the cabling works vessels, or a nearby safety vessel, as a precautionary measure for harbour porpoise and any other marine mammals that may be in/passing through the works area.</p> <p>The Consultee has confirmed they are now agreed with the Applicant's position as provided in the Applicant's Current Position.</p>	<p>The requirement for a Marine Mammal Observer (MMOb) to be onboard a vessel during geophysical activities is led by best practice measures outlined in the JNCC guidelines for minimising the risk of injury to marine mammals from geophysical surveys (JNCC, 2025) and JNCC guidelines for minimising the risk of injury to marine mammals from explosive use in the marine environment 2025.</p> <p>The primary role of MMOb's is to ensure that no marine mammals are observed within a specified area before a noisy activity begins, thus reducing the potential for injury to negligible levels from underwater sound. The JNCC guidance is provided for those activities and sound sources known to have the potential for injury such as geophysical and seismic sound sources, impact piling and UXO clearance, not cable installation activities like sandwave levelling, ploughing and jetting methods for cable burial.</p> <p>The Applicant is following the most up to date guidance in its proposed mitigation and use of MMOb's. Of the Proposed Project activities which occur within the hearing range of marine mammals, the highest peak pressure is expected to come from any sub-bottom profiler works during pre-installation geophysical surveys. This sound source is impulsive in nature and is known to represent a higher risk of injury. For activities using sub-bottom profilers, the Applicant has committed to using the above best practice guidance in its control and management measures which includes an MMOb. Adherence to appropriate JNCC guidelines for geophysical sound sources (JNCC, 2017; JNCC, 2025) will minimise injurious impacts to marine mammals. Other</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	Applicant's Current Position	Status
				activities, such as cable lay and associated tasks, have a much lower sound intensity and are non-impulsive in nature. Whilst these activities do occur for longer the sound source is not stationary and so the overall sound exposure duration for mobile species is expected to be very limited. Therefore, in adherence to the JNCC best practice guidance above, the use of a MMOB is not required for cable lay activities and associated tasks.	

3.7 Cultural Heritage

Table 3.7 Cultural Heritage

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.7.1	Application Document 6.3.3.3.D ES Appendix 3.3.D Geophysical Survey Report [APP-164]	Geophysical Survey scope	The Consultee approved the Geophysical Survey scope through Written Scheme of Investigation (WSI).	The Applicant has agreed this with the Consultee through discussions in early 2023, and via a WSI (Application Document 7.5.4.2 (E) Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Kent , submitted at Deadline 7).	Agreed
3.7.2	Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]	Photomontage locations	The Consultee agrees to the photomontages and has not requested any beyond those that were requested by Historic England	The Applicant held discussions with the Consultee on site and via email in early 2023 where it was confirmed that the Consultee's Archaeologist (the County Archaeologist) did not have any other requests for photomontages beyond those that were requested by Historic England.	Agreed
3.7.3	Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]	Assessment of effects	The Consultee acknowledged and agreed the approach to the assessment of affects within their response to the PEIR. This also applies to the ES.	The assessment of effects on Cultural Heritage were initially presented within the PEIR. The PEIR is a preliminary assessment, and effects have been further assessed with more detail presented within the ES chapter (Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-063]) in line with the methodology and professional judgement.	Agreed
3.7.4	N/A	Location of Archaeological Evaluation Trenches	The Consultee agreed trench locations via email in March 2024.	The location of the first phase of archaeological evaluation trenches were discussed at the virtual thematic group meeting in February 2024 and agreed via email in early March 2024.	Agreed
3.7.5	Application Document 7.5.4.2 (E) Outline Onshore Overarching Written Scheme of Investigation (OWSI) –	Archaeological Evaluation Trenching	The Consultee agreed/approved the WSI supplied by archaeological subcontractor in June 2024.	Works associated with undertaking the archaeological trenching was fully agreed by a WSI. This has been included in the DCO application as Application Document 7.5.4.2 (E) Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Kent , submitted at Deadline 7.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
	Kent, submitted at Deadline 7.				
3.7.6	N/A	Geo-Archaeological Desk Based Assessment	The Consultee agreed scope of geo-archaeological desk-based assessment with archaeological subcontractor in September 2024.	The scope of a geo-archaeological assessment examining the Wantsum Channel was agreed with the Consultee and Historic England.	Agreed

3.8 Water Environment and Flood Risk

Table 3.8 Water Environment and Flood Risk

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	Applicant's Current Position	Status
3.8.1	N/A	Project responses to statutory consultation comments	The Consultee agreed that National Grid's responses to the statutory consultation comments were appropriate.	Comments from the statutory consultation relating to flood risk, land drainage and hydrology within the Kent scheme were presented with individual responses from the Applicant showing how these will be addressed going forward.	Agreed
3.8.2	Application Document 6.8 (B) Flood Risk Assessment [REP6-052]	Flood Risk Assessment (FRA) approach	The Consultee agreed that the proposed scope of the FRA is suitable.	The proposed scope of the FRA is set out in Application Document 6.8 (B) Flood Risk Assessment [REP6-052] .	Agreed
3.8.3	Application Document 6.8 (B) Flood Risk Assessment [REP6-052] and Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064]	Groundwater flood risk at Kent converter station site	The Consultee agreed with the approach to groundwater monitoring and FRA for groundwater flood risk.	A project-specific groundwater monitoring at the converter site has been undertaken along with a FRA to gain a better understanding of groundwater flood risk on Site. This concluded that there was an overall low risk of groundwater emergence at the Site.	Agreed
3.8.4	Application Document 6.8 (B) Flood Risk Assessment [REP6-052]	Flood risk and surface water drainage	The Consultee has previously commented that revised submissions on flood risk and surface water drainage were required. Submission of a revised FRA that contains the following was required: <ul style="list-style-type: none"> • A location plan • A site layout 	The location and site layout plans are provided as Appendix A of Application Document 6.8 (B) Flood Risk Assessment [REP6-052] . Application Document 9.4 Supplementary Environmental Information – Flood Risk Assessment [AS-099] sets out a comparison and appraisal of the update to the Environment	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	Applicant's Current Position	Status
			<ul style="list-style-type: none"> • A drainage proposal schematic or sketch • A clear description of key drainage features within the drainage scheme (e.g. attenuation volumes, flow control devices etc.) • Information to support any key assumptions (e.g. impermeable areas, infiltration rates etc.) • Supporting calculations to demonstrate the drainage system's operation and drainage model network schematic • Drainage strategy summary form (from our Drainage and Planning Policy Statement) • Consideration of key questions and / or local authority planning policy requirements. <p>The Consultee is now agreed with the Applicant's position on flood risk and surface water drainage matters.</p>	<p>Agency Flood Map for Planning, setting out how the Proposed Project interacts with Flood Zone 3b.</p> <p>The Applicant is aware that the National Standard for Sustainable Urban Drainage was published in June 2025. The Applicant has assessed the impacts of these updated standards and can confirm that the standards do not change any of the drainage principles or assumptions on which the ES is based. The Applicant updated the Drainage Strategy in line with these revised standards – see Application Document 9.17.2 (B) Kent Drainage Strategy [REP5-085]. It includes the information on key design assumptions, calculations and a clear description of key drainage features.</p>	

3.9 Geology and Hydrogeology

Table 3.9 Geology and Hydrogeology

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.9.1	N/A	Minerals Safeguarding Area	<p>The Consultee’s response to Statutory Consultation indicated concern whether the Proposed Project is within a mineral safeguarding area.</p> <p>The Consultee agreed that a figure in the ES showing the protected geology, and the Proposed Project interacting would be adequate and agreed to the approach that National Grid would not be making further minerals assessment due to the Proposed Project being outside the Minerals Safeguarding Area.</p>	<p>The Applicant presented a slide showing a snip from the Minerals Plan indicating the sand beach gravel deposits are the strata that are protected by the minerals safeguarding areas are to the south of the Proposed Project. Therefore, the Proposed Project would not interact with minerals safeguarding area.</p> <p>The Applicant has not been required to provide any further minerals assessment within the ES.</p>	Agreed
3.9.2	Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065]	Assessment methodology presented in the ES	<p>The Consultee has reviewed the assessment methodology following the submission of the DCO application.</p> <p>The FRA contains a specific section which considers groundwater flood risk which has been considered as part of the Consultee’s Local Impact Report. The Consultee is satisfied that groundwater flood risk has been suitably considered and have no ‘under discussion’ requirements in relation to Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065].</p> <p>Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065] and Application Document 6.3.3.5.B ES Appendix 3.5.B Qualitative Groundwater Risk Assessment [APP-170] do include substantial comments with regards to contamination concerns and methodologies proposed to protect groundwater but this is outside the Consultee’s remit as LLFA and are deferred to the EA to comment on.</p>	The Applicant has provided the final geology and hydrogeology assessment methodology set out in Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065] .	Agreed (deferred to the EA on contamination matters)
3.9.3	Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065]	Mitigation presented in the ES and Outline Soil Management Plan	The Consultee has reviewed the proposed mitigation following the submission of the DCO application.	The Applicant has set out the proposed mitigation for geology and hydrogeology effects in Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065] .	Agreed
3.9.4	Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065]	Assessment conclusions presented in the ES	The Consultee has reviewed the assessment conclusions following the submission of the DCO application.	The Applicant has submitted the geology and hydrogeology assessment within Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065] .	Agreed

3.10 Agriculture and Soils

Table 3.10 Agriculture and Soils

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	Applicant's Current Position	Status
3.10.1	Application Document 6.2.3.6 (C) Part 3 Kent Chapter 6 Agriculture and Soils submitted at Deadline 7	Assessment methodology presented in the ES	The Consultee defers to the District Councils on these matters.	The Applicant has provided the agriculture and soils assessment methodology, set out in Application Document 6.2.3.6 (C) Part 3 Kent Chapter 6 Agriculture and Soils submitted at Deadline 7. The Agricultural Land Classification (ALC) survey methodology is set out in Application Document 9.31 (C) Agricultural Land Classification Survey Results – Kent submitted at Deadline 7.	No further comments to be given – deferred to District Councils
3.10.2	Application Document 6.2.3.6 (C) Part 3 Kent Chapter 6 Agriculture and Soils submitted at Deadline 7 and Application Document 7.5.10.2 (B) Outline Soil Management Plan – Kent [REP6-068]	Mitigation presented in the ES and Outline Soil Management Plan	The Consultee defers to the District Councils on these matters.	The Applicant has set out the proposed mitigation for agriculture and soils effects in Application Document 6.2.3.6 (C) Part 3 Kent Chapter 6 Agriculture and Soils submitted at Deadline 7 and Application Document 7.5.10.2 (B) Outline Soil Management Plan – Kent [REP6-068] .	No further comments to be given – deferred to District Councils
3.10.3	Application Document 6.2.3.6 (C) Part 3 Kent Chapter 6 Agriculture and Soils submitted at Deadline 7	Assessment conclusions presented in the ES	The Consultee defers to the District Councils on these matters.	The Applicant has provided the agriculture and soils assessment in Application Document 6.2.3.6 (C) Part 3 Kent Chapter 6 Agriculture and Soils submitted at Deadline 7.	No further comments to be given – deferred to District Councils

3.11 Traffic and Transport

Table 3.11 Traffic and Transport

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.11.1	Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]	Assessment Scenarios	The Consultee agrees that the construction phase is the area of focus and that the operation and maintenance phase of the works will have an inconsequential impact on the highway network and does not require any further assessment or comment. It is also acknowledged that if the site is decommissioned, this will have a lesser impact than the construction stage.	Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] includes an assessment of the construction and decommissioning phases. An assessment of the operational and maintenance phase has been scoped out on the basis that vehicle movements associated with the operation of the site and maintenance requirements are anticipated to be infrequent and low.	Agreed
3.11.2	Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]	Assessment Methodology	The Consultee considered the transport evidence submitted to be robust overall, however, there were several remaining queries which the Consultee requested consideration of by National Grid at the pre-application stage.	This is noted and the additional queries are reviewed within this SoCG further below.	Agreed
			The Consultee agrees with the proposed assessment year of 2029, which should be updated if the project schedule changes.	Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] assesses the peak construction phase which now represents 2030 based on the current construction programme and the highest total annual forecast construction traffic movements.	Agreed
			The Consultee confirms that in addition to the network peaks, the shoulder peaks should be considered in the assessment, as well as the site Saturday PM peak.	Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] includes an assessment of the weekday network peaks and development/ shoulder peaks, as well as the Saturday lunchtime peak.	Agreed
			The Consultee confirms that TEMPro v 7.2 is the appropriate (robust) version for deriving future traffic growth and will not request the use of TEMPro v 8 in this instance (which is heavily caveated due to COVID19).	Whilst this is noted, Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] adopts the latest version of TEMPro (Version 8.1), utilising NTEM dataset v8.0 and the NRTP 2022 Core dataset to reflect local factors (Thanet) for the appropriate road types. The highest factors (all roads) have then been applied to the 2024 baseline flows to derive 2030 baseline traffic flows for the respective time periods. This results in higher factors being adopted (circa 7-8% growth) than the original factors within the PEIR (circa 4% growth).	Agreed
3.11.3	Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]	Study Area/Traffic Counts	The Consultee agrees with the proposed traffic survey specification and study area for the collision review (as confirmed by email in June 2023). The PEIR baseline data, collision rates and receptor sensitivity levels (e.g. driver delay) should be updated in the ES.	Noted, the baseline data within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] is based on traffic surveys which were carried out in 2024 (based on the agreed specification) and collision data obtained from KCC Highways (based on the agreed study area). This information has been used to determine receptor sensitivity levels (e.g. Road Safety) where applicable.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.11.4	Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic & Transport [APP-067]	Construction Vehicle Distribution and Assessment	<p>The Consultee confirms that the Heavy Goods Vehicle (HGV) distribution is reasonable following the updates made after the transport scoping meeting in April 2023. The HGV distribution should be revised using up-to-date information on points of origin (e.g. from the FEED team) if necessary.</p> <p>The Consultee confirms that the trip distribution for construction staff is accepted and considered robust to assume all will be travelling by motor vehicle.</p>	<p>The HGV distribution within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] reflects the Consultee’s feedback in April 2023.</p> <p>The distribution of construction staff is based on a simple gravity model which has been developed based on 2021 Census data (representing the latest information currently available) for construction workers living within a 60-minute catchment area of the site. In view of the COVID-19 pandemic, this dataset has only been used to identify the districts where construction workers live rather than to estimate travel patterns. All staff have been assumed to travel by vehicle for robustness.</p>	Agreed
			<p>The Consultee requested that U-turning movements are considered at the Ebbsfleet Roundabout and the Sevenscore Roundabout to reflect the left in/ left out nature of the proposed site access on the A256.</p> <p>The Consultee has now seen the supporting evidence of construction traffic flows with the junction capacity modelling presented in Application Document 6.3.3.7.A (B) ES Appendix 3.7.A Transport Assessment Note [REP5-029].</p>	<p>As requested, the distribution of construction vehicles within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] reflects the left in/left out nature of the proposed site access on the A256 dual carriageway and include u-turning movements at the Sevenscore roundabout for construction vehicles departing to the south and at the Ebbsfleet roundabout for construction vehicles arriving from the north. There are traffic flow diagrams showing proposed construction traffic flows including u-turning movements at these junctions (Application Document 6.3.3.7.G ES Appendix 3.7.G Traffic Flow Diagrams [APP-181]).</p> <p>Junction capacity modelling had previously not been carried out given that construction traffic will largely avoid the network peak hours and that peak (assessed) levels will only be experienced for a short duration, with no significant effects expected with respect to driver delay. Nonetheless, the approach for the junction capacity assessments was discussed and agreed in a meeting with KCC on 15 January 2026, following the Examining Authority’s First Written Questions. Junction capacity modelling was then carried out for the Minster, Sevenscore and Ebbsfleet roundabouts. The results are presented in Application Document 6.3.3.7.A (B) ES Appendix 3.7.A Transport Assessment Note [REP5-029].</p>	Agreed
			<p>The Consultee requests that the potential implications of the new construction compound on Sandwich Road is assessed.</p>	<p>Noted, this has been assessed within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067].</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.11.5	Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]	Construction Staff Assumptions	The Consultee notes that office based/supervisor and management staff are being assessed as single car occupancy rather than the 1.5 per vehicle for other staff. However, there is no indication of what number of staff fall into the aforementioned categories. For completeness, clarity should be provided on this point as this will determine daily trips for staff.	As set out within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] , there is expected to be a daily peak of 241 construction workers associated with the Kent Onshore Scheme in 2030 (which is a maximum daily figure) and 121 construction workers on the busiest day (2026) in terms of total daily construction vehicles (including LGVs and HGVs). All construction workers will travel to/from the Site at the start and end of the working day. An average vehicle occupancy factor of 1.5 construction workers per vehicle has been adopted for the site-based construction staff, which is considered to be reasonable, yet robust, given that all staff have been assumed to travel by vehicle (rather than other modes) and that a formal Car Share Scheme will be implemented to match potential car sharers.	Agreed
3.11.6	Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]	Cumulative Schemes	The Consultee acknowledges that cumulative schemes are subject to change. The allocated sites of Manston Green, Spitfire Green and Westwood Village should be considered. The Consultee notes that this may still be subject to change as planning applications obtain approval.	Other proposed developments that have the potential to overlap temporally with the Proposed Project have been identified and any potential inter-project cumulative effects resulting from the interaction between these other developments and the Proposed Project have been assessed within Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073] . This includes consideration of more than 25 proposed developments on the short-list including Manston Airport, Spitfire Green and Westwood Village.	Agreed
3.11.7	Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-388] Application Document 7.5.9.2 (B) Outline Public Rights of Way Management Plan – Kent [REP6-088]	Deliverables – Outline Construction Traffic Management Plan	The Consultee requests that a CTMP should be prepared to consider working hours, arrival/departure times, vehicle routing, traffic management, site parking, measures to minimise impacts during network peaks, use of banksmen to facilitate safe delivery, wheel washing facilities and PRoW considerations.	Application Document 7.5.1.2 Outline Construction Traffic Management and Travel Plan – Kent [APP-388] was prepared and supplied as part of Statutory Consultation for the Proposed Project. This has since been updated to reflect the feedback received and includes the information requested by the Consultee, including details on wheel washing facilities and road sweepers and the other measures set out by the Consultee. Application Document 7.5.9.2 (B) Outline Public Rights of Way Management Plan – Kent [REP6-088] has also been prepared in consultation with KCC to provide details on PRoW diversions, closures and management during the construction, operation and decommissioning phases. Both management plans are secured by Requirement 6 of Schedule 3 of Application Document 3.1 (J) draft DCO submitted at Deadline 7. .	Agreed
3.11.8	Application Document 6.3.3.7.A (B) ES Appendix 3.7.A Transport Assessment Note [REP5-029].	Deliverables – Transport Assessment Note	The Consultee confirms that the TA can either be incorporated within the PEIR (and therefore ES), on the basis that the assessment methodologies follow TA guidelines, or that a separate standalone Transport Assessment Note (TAN) can be prepared.	Application Document 6.3.3.7.A (B) ES Appendix 3.7.A Transport Assessment Note [REP5-029] forms an appendix to Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] and has been prepared to identify where the information that would typically form part of a standalone Transport Assessment (TA) can be found in other chapters and reports that have been prepared for the Kent	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
				Onshore Scheme. This approach is designed to reduce repetition between documents. The Transport Assessment Note (TAN) also includes further information where necessary, including in response to feedback received from National Highways. The TAN has been informed by consultation with the Consultee as the local highway authority, and National Highways which manages the Strategic Road Network (SRN).	
3.11.9	Application Document 7.5.9.2 (B) Outline Public Rights of Way Management Plan – Kent [REP6-088]	Deliverables – Outline Public Rights of Way Management Plan	<p>The Consultee confirmed previously that the proposed scope of the Outline PRow Management Plan (as presented during the transport scoping meeting in April 2023) is broadly acceptable, although a number of matters remain under consideration (e.g. the assessment of impacted routes and development mitigation) which should be addressed prior to DCO Submission.</p> <p>The Consultee requested that all specific points of PRow management covering pre-construction, construction, operation, and any decommissioning must be agreed with and approved by the County Council prior to the Development Consent Order (DCO) application being submitted.</p> <p>Following review of the information submitted in the DCO, the Consultee has confirmed they are now agreed with the Applicant's position.</p>	<p>Application Document 7.5.9.2 (B) Outline Public Rights of Way Management Plan – Kent [REP6-088] has been prepared in consultation with the Consultee to provide details on PRow diversions, closures and management during the construction, operation and decommissioning phases. The principles of the document have been agreed prior to DCO submission.</p> <p>The proposed management measures within Application Document 7.5.9.2 (B) Outline Public Rights of Way Management Plan – Kent [REP6-088] seek to retain access to PRow during all phases of the Proposed Project, with temporary diversions only being proposed where these are required to bypass any temporary closures during the construction phase where necessary. No PRow are proposed to be permanently stopped up as a result of the Kent Onshore Scheme.</p> <p>Application Document 7.5.9.2 (B) Outline Public Rights of Way Management Plan – Kent [REP6-088] will be developed further into a finalised document (Detailed PRowMP) by the appointed Contractor, ahead of the commencement of any construction activities. The PRowMP is secured by Requirement 6 of Schedule 3 of Application Document 3.1 (J) draft DCO submitted at Deadline 7.</p> <p>The Applicant will maintain a regular dialogue with the PRow officers at KCC throughout the construction period of the Proposed Project in order to ensure the objectives of the Detailed PRowMP are achieved.</p>	Agreed
			<p>The Consultee has previously requested that the Outline PRow MP should address opportunities for enhancements to and development of the PRow network as part of the project (such as a community/ legacy fund for PRow improvements).</p> <p>The Consultee has confirmed they are agreed with the Applicant's position.</p>	<p>The Applicant supports the delivery of community benefits associated with transmission infrastructure (the Applicant already has established programmes which deliver this) and will investigate the potential to provide a contribution towards a community/ legacy fund for PRow improvements. For example, the Applicant operates a community grant programme which is available to nearby charities and not for profit organisations, when projects are in construction. However, community benefit is separate to compensation and mitigation. The former Government consulted on community benefit options associated with transmission infrastructure and proposed the introduction of guidance in this regard. The Applicant supports this and believes it should be flexible, allowing community benefits to respond to local and regional needs. Whilst awaiting clarity on the</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
				government's position, the Applicant is working to understand local and regional aspirations and priorities in relation to community benefits. The Applicant welcomes the suggestions for delivering community benefits and will work with stakeholders and local communities to further inform this as the project progresses.	
			The Consultee advises that KCC PRow is the highway authority for PRow, not KCC Highways.	Noted, consultation has accordingly been undertaken with KCC PRow Officers.	Agreed
3.11.10	<p>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]</p> <p>Application Document 7.5.9.2 (B) Outline Public Rights of Way Management Plan – Kent [REP6-088]</p>	PRow and walking/ cycling network	The Consultee agrees with the PRow scoped in for the assessment of the construction phase. Further information should be provided on where the PRow network intersects or adjoins on and off-site access routes. The King Charles III Coast Path should be referred to as a National Trail rather than a promoted route.	<p>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] identifies the PRow (including Public Footpaths, Bridleways and Restricted Byways) and national/ regional walking and cycling routes (including the King Charles III England Coast Path) which pass through the Order Limits.</p> <p>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic & Transport [APP-067] subsequently includes an assessment of those where potential impacts may arise as a result of the Proposed Project during the construction phase. The King Charles III Coast Path has been referred to as a National Trail (instead of a promoted route) as requested.</p> <p>Application Document 7.5.9.2 (B) Outline Public Rights of Way Management Plan – Kent [REP6-088], as secured by Requirement 6 of Schedule 3 of Application Document 3.1 (J) draft DCO submitted at Deadline 7, has been produced in order to mitigate the impacts of the Proposed Project on Public Rights of Way (PRow) and the King Charles III England Coast Path (categorised as a national trail) in Kent.</p>	Agreed
	Application Document 2.7 (C) Access, Rights of Way and Public Rights of Navigation Plans – Kent [REP6-003]		The Consultee requests that clear and legible figures showing PRow are prepared to inform the DCO submission, as well as route plans showing interactions with level crossings and green routes.	The ES is supported by GIS figures including paragraph 6.4.3.7.4 Walking and Cycling Routes (including PRow) in Application Document 6.4.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] . The DCO submission is also informed by Application Document 2.7 (C) Access, Rights of Way and Public Rights of Navigation Plans – Kent [REP6-003] which identifies these interactions.	Agreed
	<p>Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-064]</p> <p>Application Document 2.7 (C) Access, Rights of Way and Public Rights of Navigation Plans – Kent [REP6-003]</p>		The Consultee requests that the cycle route to west of A256 is considered as part of the proposals.	The existing pedestrian/cycle route which commences at the northern end of Jutes Lane and runs northwards to the west of (and parallel with) the A256 will be temporarily diverted during the construction phase (during cable trenching works only) and then locally diverted (realigned) to cross the permanent access road during the operational phase. Access to the pedestrian/cycle route will retained all times with the proposed diversions in place.	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
	<p>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]</p> <p>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]</p>		<p>The Consultee has previously expressed concern that the construction phase is across a significant timeframe (50 months) and will impact on the PRow network in the area.</p> <p>The Consultee has confirmed they are now agreed with the Applicant’s position.</p>	<p>Works have been planned to make use of the primary accesses as far as possible, minimising use of the secondary accesses to those activities that are strictly necessary. Using the secondary accesses for limited works helps keep overall construction activities down reducing impacts on PRow and the construction programme, it also derisks elements of the work. The secondary accesses chosen are already identified as maintenance accesses for NG infrastructure or 3rd party infrastructure that is being worked upon as part of this project.</p>	Agreed
3.11.11	Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]	PRow Mitigation	<p>The Consultee advises that efforts should be made to minimise path closures and retain popular routes during the project. However, PRow must not be used as construction routes. Therefore, where temporary closures are required, convenient and safe diversion routes should be provided to reduce disruption to path users. Any PRow diversions/closures must be approved by the Consultee’s PRow and Access Service, and these should be applied for at an early stage with details of timescales and project schedule. Robust information boards explaining temporary access restrictions should be considered for paths that will be closed for long periods.</p> <p>The Consultee has previously requested that all routes affected by construction should be reinstated to an improved standard as mitigation.</p> <p>The Consultee has confirmed they are now agreed with the Applicant’s position.</p>	<p>The proposed management measures within Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353], as secured by Requirement 6 of Schedule 3 of Application Document 3.1 (J) draft DCO submitted at Deadline 7, seek to retain access to PRow during all phases of the Proposed Project, with temporary diversions only being proposed where these are required to bypass any temporary closures during the construction phase where necessary. No PRow are proposed to be permanently stopped up as a result of the Kent Onshore Scheme.</p> <p>All locations where a PRow would be impacted by the Proposed Project would have appropriate signage to advise the dates and hours affected. The Applicant would develop, through consultation with KCC PRow officers, a standard form of signage relating to temporary PRow closures and diversions which would be used across the Proposed Project.</p> <p>Prior to re-opening PRow, the Contractor will remove all temporary works and reinstate any directly affected PRow to the same standard as recorded prior to the commencement of construction. Should any PRow be damaged during the construction phase by the Contractor, the Applicant will repair the damage and return it to a comparable (surface) condition. Any remediation will be discussed with landowners and PRow officers before handover.</p>	Agreed
3.11.12	<p>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353]</p> <p>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic & Transport [APP-067]</p>	Assessment of PRow Diversions and Closures	<p>The Consultee requests further details/justification on the overall magnitude of effect of a PRow diversion and/or closure, in terms of the categories and definitions used and what is considered long term and short term. Further clarification is also required as there cannot be a diversion of a route without a closure. In addition, “temporarily stopped up and diverted” should be used instead of just “stopped up” to demonstrate that a diversion route will be provided.</p>	<p>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353], as secured by Requirement 6 of Schedule 3 of Application Document 3.1 (J) draft DCO submitted at Deadline 7. has been prepared in consultation with KCC, which includes further details of PRow diversions, closures and durations. A short-term temporary diversion has been classified as a period of six months or less, whereas a long-term temporary diversion has been classified as a period of between six months and the full construction period. It is acknowledged that there cannot be a PRow diversion without a closure. Temporary diversions will be provided to bypass any</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
	<p>Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects [APP-072]</p> <p>Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-007]</p> <p>Application Document 6.2.3.11 (B) Part 3 Kent Chapter 11 Health & Wellbeing [AS-003]</p>		<p>The Consultee has previously commented that they did not consider the levels of medium/low impact on PRoW across all criteria to be sufficient as this does not consider the potential impact of the project over the operational period. Further detail and clarity regarding any permanent diversions during the operational period of the project (e.g. for TE26 and EE42 regarding the Pylon Options) and the overall intentions including for the management of the PRoW network was requested.</p> <p>The Consultee has confirmed they are now agreed with the Applicant's position.</p>	<p>temporary closures during the construction phase where necessary.</p> <p>The assessment of PRoW Diversions and Closures within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic & Transport [APP-067] has been reviewed based on the feedback received from KCC. The traffic and transport assessment does not identify any significant impacts on PRoW in terms of diversions and closures, with the proposed embedded mitigation and control and management measures in place. No permanent PRoW diversions are proposed during the operational phase of the Proposed Project.</p>	Agreed
			<p>The Consultee has previously commented that they do not consider the assessment to account for all criteria – public health, socio-economic, tourism, access to greenspace. A separate assessment of PRoW should be carried out as its own topic.</p> <p>The Consultee has confirmed they are now agreed with the Applicant's position.</p>	<p>The Applicant acknowledges the concern raised by KCC. However, it is proposed to continue to assess PRoW, following established practice in Environmental Impact Assessment (EIA). It is not conventional for an ES to have its own PRoW topic chapter.</p>	Agreed
			<p>The Consultee requests that the ES should recognise the amenity of PRoW.</p>	<p>This is noted and addressed within Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-007].</p>	Agreed
3.11.13	<p>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic & Transport [APP-067]</p>	<p>Assessment of Non-Motorised User Amenity</p>	<p>The Consultee disagrees with the conclusion that the Proposed Project would result in an overall low impact on Non-Motorised User Amenity, given the evidence, experience, and overall impact of development in the area.</p>	<p>The assessment of Non-Motorised User Amenity within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic & Transport [APP-067] has been reviewed based on the feedback received from KCC. The likely impact of the Proposed Project on Non-Motorised User Amenity for all receptors within the study area is considered to be not significant</p>	Not Agreed
3.11.14	<p>Application Document 7.5.1.1 (F) Outline Construction Traffic Management and Travel Plan – Kent submitted at Deadline 7</p> <p>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic & Transport [APP-067]</p>	<p>Sunday/Bank Holiday Working</p>	<p>The Consultee requested that increased levels of traffic on Sundays/ Bank Holidays need to be considered, ideally in the form of a separate traffic modelling scenario using this peak traffic as a baseline.</p>	<p>Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic & Transport [APP-067] and Application Document 7.5.1.2 (B) Construction Traffic Management and Travel Plan - Kent [REP6-064], as secured by Requirement 6 of Schedule 3 of Application Document 3.1 (J) draft DCO submitted at Deadline 7, set out the parameters for the assessment of extended working hours, and the management measures for the control of trips made during working hours.</p> <p>The Applicant has proposed core construction working hours of 07:00 to 19:00hrs Monday to Friday, and 07:00 to 17:00hrs on Saturdays, Sundays, and Bank Holidays. While this includes weekends and holidays, the application clarifies that construction activity is not expected to occur on every Sunday or Bank</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
	<p>Application Document 3.1 (J) draft DCO submitted at Deadline 7.</p>			<p>Holiday. Importantly, restrictions are in place to limit the type and scale of activity during these periods, including a cap of 30 HGV movements per day on Sundays and Bank Holidays and limitations on percussive piling. These restrictions are further detailed in Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 7.</p> <p>The Traffic and Transport assessments, including those in Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067], have considered these extended hours and associated vehicle movements. The assessments conclude that, with the proposed mitigation, no significant adverse effects are anticipated. Nonetheless, the Applicant has committed to ongoing dialogue with the Local Highway Authority to ensure that any concerns are addressed through detailed construction planning and coordination.</p> <p>In addition to the above, it is also expected that there will be up to 50% fewer LGV and staff vehicle movements on Sundays and Bank Holidays than the number of movements anticipated to be experienced on weekdays and Saturdays. The assessment of the Saturday lunchtime peak (12pm-1pm) is considered to offer a robust assessment of the weekend period when higher levels of construction vehicle movements are expected and so an additional assessment of Sundays/Bank Holidays is not considered to be required on this basis.</p>	
3.11.15	<p>Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-064]</p> <p>Application Document 7.5.9.2 (B) Outline Public Rights of Way Management Plan – Kent [REP6-088]</p> <p>Application Document 3.1 (J) draft DCO submitted at Deadline 7.</p>	Additional Engineering Matters	<p>The Consultee requests that HGVs should avoid secondary access routes where possible, depending on likely vehicle types and volumes. Further details should be provided in respect of construction vehicles using secondary routes such as Marsh Farm Road, Hill Court Road, Cooper Street Drove, Richborough Road and Whitehouse Drove. Whilst it is anticipated that only Light Goods Vehicles (LGVs) will be used, this could still be vehicles of up to 3,500 kg using single track country lanes only wide enough for one vehicle, with very few passing places over considerable lengths. Some temporary passing places may be required dependent on the anticipated number of trips and vehicle types.</p>	<p>The Applicant is aware of the limited capacity of the secondary accesses, notably Jutes Lane, Tothill Street, High Street, Marsh Farm Road, A257, The Causeway (Ash Road) and Richborough Road. The flow of construction vehicles on these accesses have been limited with the number of HGVs to be <10 per day at the peak of the works. LGVs are largely vans and 4x4 vehicles for staff movements and again have been limited to a maximum of 25 per day at the peak. The works required to be undertaken using these accesses has also been limited and is considered necessary to undertake the works. Jutes Lane will only be used to undertake utility connection works which originate from Jutes Lane, Marsh Farm Road will be used to access the existing OHL for temporary diversion works. Condition surveys of all secondary accesses will be undertaken. This has been set out in the DCO in the following documents: Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-064] and Application Document 7.5.9.2 (B) Outline Public Rights of Way Management Plan – Kent [REP6-088].</p> <p>Following further consultation with KCC Highways, a daily cap of ten HGV movements will be imposed on Marsh Farm Road, to minimise potential impacts of construction traffic through access</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
				<p>point K-AP-8 (K-BM04). In addition, construction traffic HGVs through Minster will be controlled such that construction HGVs will not pass two-way (in both directions) at the same time. A daily cap of ten HGV movements will also be imposed on Ebbsfleet Lane North, to minimise potential impacts of construction traffic through access point K-AP-6 (K-BM06). These commitments are included within Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-064].</p>	
		<p>The Consultee requested further details on Abnormal Indivisible Loads (AILs) including consultation on any Temporary Traffic Management (TTM) arrangements and the potential impact of AILs at the Ebbsfleet Roundabout</p>		<p>Details on the likely routes to be used by abnormal loads and the constraints along these routes are contained within Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-064], as secured by Requirement 6 of Schedule 3 of Application Document 3.1 (J) draft DCO submitted at Deadline 7. It is expected that the contractor will review all access constraints in more detail at a later stage and carry out any additional assessments (including structural assessments) where necessary. Alternative routes or temporary works will also be used if necessary.</p>	Agreed
		<p>The Consultee requires a Road Safety Audit to be carried out for each proposed access. The construction of K-BM02 must be Design Manual for Roads and Bridges (DMRB) compliant and will be subject to the County Council’s technical approval and safety audit process.</p>		<p>The A256 junction has been designed to be fully compliant with DMRB. A Stage 1 RSA has been carried out and shared with KCC. A Designer’s Response to the RSA Stage 1 has been produced outlining the changes made in response to the RSA’s comments. The proposed design/ layout of the A256 access has been revised to consider any recommendations where necessary.</p>	Agreed
		<p>The Consultee requests highway and PRoW condition surveys to be undertaken prior to commencement, post-completion and at suitable intervals, along with a commitment to repair any damage to the fabric of the Highway (including verge) or PRoW. Routine monitoring should be carried out for any impacted routes, with regular highway cleaning/ sweeping if necessary.</p>		<p>As set out in Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-064], road condition surveys will be carried out pre-construction, during construction, and post-construction, to identify any defects that arise to highways assets/verges during the construction phase of the Proposed Project for re-instatement. At this stage, it is proposed to carry out road condition surveys in the vicinity of the proposed access points on the A256, Ebbsfleet Lane, Ebbsfleet Lane North and Sandwich Road only. Further discussions will be held with KCC Highways to identify any additional locations where road condition surveys may be required within the Order Limits.</p> <p>As set out in Application Document 7.5.9.2 (B) Outline Public Rights of Way Management Plan – Kent [REP6-088], the Applicant will undertake pre-commencement condition surveys of all directly affected PRoW prior to the commencement of construction. Prior to re-opening PRoW, the Contractor will remove all temporary works and reinstate any directly affected PRoW to the same standard as recorded prior to the commencement of construction. Should any PRoW be damaged</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
				<p>during the construction phase by the Contractor, the Applicant will repair the damage and return it to a comparable (surface) condition. Any remediation will be discussed with landowners and PRow officers before handover.</p> <p>Both management plans are secured by Requirement 6 of Schedule 3 of Application Document 3.1 (J) draft DCO, submitted at Deadline 7.</p>	
			<p>The Consultee has a technical approval process in place for any works by statutory undertakers that affect County Council structures and therefore would welcome engagement with National Grid to ensure proposals do not have any adverse effect on the structures. This includes consultation with the Consultee's Asset Management Team for the A256 and Sustrans for the NCN15 Coastal Path.</p>	<p>The FEED engineering team has conducted additional consultation with KCC and has prepared a Memorandum of Understanding (MoU) as part of this process. The MoU covers additional items relating to the protection of structures/ assets for example.</p> <p>The Applicant will maintain ongoing dialogue with the County Council throughout preparation of the DCO application, including thematic meetings with the Highways team where matters of concern around asset interfaces will be addressed.</p>	Agreed
3.11.16	<p>Application Document 6.3.3.7.G ES Appendix 3.7.G Traffic Flow Diagrams [APP-181]</p> <p>Application Document 6.4.3.7 ES Figures Kent Traffic and Transport [APP-266]</p>	Highways and transportation	<p>Marsh Farm Road and Richborough Road/Whitehouse Drove were previously considered likely not suitable for the construction traffic proposed, and KCC asked for these to be reviewed.</p> <p>KCC previously requested that a revised strategy/route for construction traffic to and from the site, but have since agreed this is not required.</p>	<p>The identified parts of the local highway network will only be used to access localised works and to enable the wider works to subsequently be accessed via the main site access (K-BM02) on the A256 Richborough Road. Therefore, it is not considered that a revised strategy or route for construction traffic is required.</p>	Agreed
3.11.17	N/A	Protective provisions for highway works	<p>KCC are currently seeking legal advice in relation to the protected provisions for highway works, given their view that they are significantly more favourable to the body carrying out the highway works than their standard s278 agreement. For example, it makes provision for KCC's approval to be deemed to have been granted within 14/28 days if KCC has not confirmed approval or refusal beforehand. It also does not provide for commuted sums, or dedication of new highway, which are key elements of their s278 agreements.</p>	<p>It is acknowledged by the Applicant that KCC are still seeking legal advice on this at the time of Deadline 7. The Applicant is of the view that the protective provisions offer KCC as the highways authority with all of the protections which a S278 agreement would give.</p>	<p>Not Agreed</p> <p>(at this stage, subject to KCC's legal advice)</p>
3.11.18	N/A	Mitigating impacts on the Major Road Network	<p>Adaptive management/remediation is, in our view, a feasible proposal when considering mitigating impact on the Major Road Network in the case of temporary peak overlap. In our view, the proposed Delivery Management System (DMS) and Traffic Management and Monitoring System (TMMS) are largely reactive in their nature and act in retrospect on network pressures. Queue monitoring at junctions can be achieved by providing/updating</p>	<p>The Applicant's position is that the mitigation measure TT02 identified within the Application Document 7.5.3 (D) Outline Onshore Construction Environmental Management Plan [REP6-074] provides sufficient constraint on vehicle routing and volumes. This states that the contractor(s) will implement a monitoring and reporting system to check compliance with the measures set out within the Outline CTMTP and that deviations from the authorised routes or changes to traffic levels that are higher than the assumptions set out within this Outline CTMTP</p>	<p>Not Agreed</p> <p>(at this stage, but can be discussed further as part of the final CTMTP)</p>

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
			CCTV systems and integrating their use within the proposed DMS and TMMS measures. This has been discussed with the Applicant and they are investigating.	will require discussion with the relevant highways authorities to determine whether additional measures are needed.	

3.12 Air Quality

Table 3.12 Air Quality

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.12.1	Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]	Assessment methodology presented in the ES	The Consultee has confirmed they are deferring to the District Councils on this matter.	The Applicant has provided the air quality assessment methodology in Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068] .	No comment to be given – Deferring to District Councils
3.12.2	Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068] Application Document 7.5.6.2 (C) Outline Air Quality Management Plan – Kent [REP5-077] .	Mitigation presented in the ES and Outline Air Quality Management Plan	The Consultee has confirmed they are deferring to the District Councils on this matter.	The Applicant has set out the proposed mitigation for air quality effects in Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068] and Application Document 7.5.6.2 (C) Outline Air Quality Management Plan – Kent [REP5-077] ..	No comment to be given – Deferring to District Councils
3.12.3	Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068]	Assessment conclusions presented in the ES	The Consultee has confirmed they are deferring to the District Councils on this matter.	The Applicant has provided the air quality assessment in Application Document 6.2.3.8 Part 3 Kent Chapter 8 Air Quality [APP-068] .	No comment to be given – Deferring to District Councils

3.13 Socioeconomics, Recreation and Tourism

Table 3.13 Socioeconomics, Recreation and Tourism

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.13.1	<p>Application Document 7.5.9.2 (B) Outline Public Rights of Way Management Plan – Kent [REP6-088]</p> <p>Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-007]</p>	Public Rights of Way	<p>The Consultee has previously commented that the Consultee would not accept any permanent closures but expects there is much greater detail to come forward around this (e.g. PRow management plan). The Consultee also highlighted the national trail and – suggested that engagement should be had with the national trail officer at KCC.</p> <p>The Consultee has confirmed they are now agreed with the Applicant’s position.</p>	<p>The assessment of effects on PRow includes recreational routes and routes used for access. An outline PRow Management Plan (Application Document 7.5.9.2 (B) Outline Public Rights of Way Management Plan – Kent [REP6-088]) has been produced for the ES which include closures and diversions to PRow routes.</p> <p>Further details have been included in the assessment in ES Chapter 10 (Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-007]).</p>	Agreed
3.13.2	<p>Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-068]</p> <p>Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-007]</p>	Study Area	<p>The Consultee has noted National Grid’s comments regarding the 500 m PRow study area and are happy that National Grid have taken this on board. The Consultee provided an appendix to the statutory consultation response which set out the impact of the Proposed Project on recreational access and stated that it would be good for this to be taken into consideration. The Consultee notes this is set out within the PRow Management Plan and reviewed this document following submission of the DCO Application.</p>	<p>The assessment of recreational routes and PRow recognises that some PRow will overlap/go beyond the 500 m study area boundary. Where this is the case, the assessment considers whether the Proposed Project impacts on the route beyond 500 m. Additionally, the PRow assessment includes consideration of PRow routes connected via cycling and pedestrian route networks which are impacted by the Proposed Project. The study area has been set out within the ES chapter (Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio-Economics, Recreation, and Tourism [REP1A-007]) and the outline PRow Management Plan (Application Document 7.5.9.2 (B) Outline Public Rights of Way Management Plan – Kent [REP6-088]).</p>	Agreed
3.13.3	<p>Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-064]</p>	Extended Working Hours.	<p>The Consultee has concerns over extended working hours. It is clear that it would lead to a shorter construction programme for the Proposed Project. However, the Consultee anticipates adverse impacts on National Trails and PRow, which the Consultee would not support.</p> <p>The Consultee notes the response from National Grid and is in agreement.</p>	<p>The Applicant has set out the proposed construction core working hours within the CTMTP for Kent (Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-064]). The CTMTP identifies exceptions to the core working hours for certain activities e.g. those necessary in an emergency where there is a risk to persons or property. It also identifies restrictions on percussive piling works and HGV deliveries during weekends and bank holidays.</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
				<p>The Applicant has considered programme implications and risk for the Proposed Project, and has concluded that it can accommodate the exclusion of bank holidays from the core working hours at the substation site in Kent (except by agreement with the local planning authorities), without prejudicing its ability to accelerate the project in accordance with the NESO Clean Power 2030 objectives.</p> <p>Furthermore, and recognising the desirability of this outcome to stakeholders and communities, the Applicant is also able to agree that for the bank holiday Mondays that form part of a 'bank holiday weekend' (meaning Easter Monday, the early May bank holiday, the Spring bank holiday, and the summer bank holiday) the associated (preceding) Saturday and Sunday are also not worked. This is facilitated by the likely implications of the exclusion of the bank holiday Mondays on contractor shift patterns, and also reflects the fact that the Applicant does not anticipate working every weekend in all areas of the project at all times in any case. On this basis, the Applicant is comfortable reducing its flexibility in the manner proposed at the converter station sites, although further limitations would introduce unacceptable risks to the ability to programme and deliver the works in a sufficiently timely manner.</p> <p>This reduction in flexibility is proposed specifically at the substation site in Kent, because it is acknowledged that these are large static construction sites where work will be being undertaken for 4-5 years (as opposed to smaller single site works such as individual substations, or works with shorter construction periods). Notwithstanding this, the reducing in flexibility on bank holidays and the bank holiday weekends set out above is not for the purpose of mitigating effects (the ES identifies no impacts that would require this mitigation) but is proposed following a project-specific review in the context of ongoing discussions with stakeholders.</p> <p>The possibility of working on bank holidays is retained for those works which are likely to be more transient, for example the cable sections, where construction activity will be undertaken at each location for shorter periods of time in any case. The possibility of working on bank holidays is also retained for any railway works, where possessions may be dictated by third parties and where bank holiday work may be a necessity.</p> <p>Wording reflecting the above has been added to Requirement 7 of the draft DCO (Application Document 3.1 (J) draft DCO, submitted at Deadline 7).</p>	

3.14 Health and Wellbeing

Table 3.14 Health and Wellbeing

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.14.1	<p>Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-064]</p> <p>Application Document 6.2.3.11 (B) Part 3 Kent Chapter 11 Health & Wellbeing [AS-003].</p>	Project responses to statutory consultation comments	The Consultee agreed with the approach taken by National Grid to address comments from the statutory consultation and had no comments to make.	The Applicant presented their response to the comments on health and wellbeing from the Consultee at statutory consultation, where the primary concern was the impact on PRowS and the effect on the health and wellbeing of Kent residents. The mitigation on the impacts on construction traffic has been covered in the Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-064] and further details of the health and wellbeing assessment methodology in Application Document 6.2.3.11 (B) Part 3 Kent Chapter 11 Health & Wellbeing [AS-003].	Agreed
3.14.2	<p>Application Document 6.2.3.11 (B) Part 3 Kent Chapter 11 Health & Wellbeing [AS-003]</p>	Study Area	The Consultee agrees to the study area as set out within the PEIR and has no further comments to make.	The Study Area, which covered the extent of the Kent Onshore Scheme and includes wards such as Cliffsend & Pegwell and Little Stour & Ashtone, was set out within the PEIR and is the same for the ES, as indicated in Application Document 6.2.3.11 Part 3 Kent Chapter 11 Health & Wellbeing [AS-003]. This was also shown at the meeting in October 2023.	Agreed

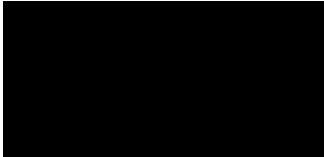
3.15 Cumulative Effects

Table 3.15 Cumulative Effects

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.15.1	N/A	Cumulative Schemes	The Consultee agreed the list of cumulative schemes included in the PEIR.	The list of cumulative schemes included in PEIR Volume 2 Part 1 Appendix 1.5 was agreed. It was agreed the Council will advise the Applicant if additional schemes it believes should be considered in the assessment of cumulative effects come forward.	Agreed
3.15.2	<p>Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List [APP-092]</p> <p>Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List [APP-093]</p>	Cumulative Schemes – short list and long list	The Consultee has reviewed the short list and long list following submission of the DCO application and provided updates for inclusion in the list. The Consultee is in agreement with the Applicant.	<p>The long list and short list are provided within Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List [APP-092] and Application Document 6.3.1.5.C ES Appendix 1.5.C Inter-Project Cumulative Effects Short List [APP-093].</p> <p>Since the submission of the Application, the Applicant has considered any ‘other existing and, or approved development’ that have come forward since the Cumulative Effects Assessment submitted at DCO Submission (including those recommended by the LPAs) was undertaken. This has considered the following:</p> <ul style="list-style-type: none"> • Other existing and, or approved development not previously identified; • Other existing and, or approved development identified previously, but for which there is additional information (e.g. an Environmental Statement or Preliminary Environmental Information Report (PEIR)); and • Other existing and, or approved development included on the original long list that have been withdrawn or are no longer being progressed. <p>The details of this assessment which includes an updated long list and short list are set out in Application Document 9.110 Inter-Project Cumulative Effects Assessment Update - Technical Note [REP6-098].</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	KCC Current Position	The Applicant Current Position	Status
3.15.3	<p>Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects [APP-072]</p> <p>Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073], Application Document 6.2.4.10 Part 4 Marine Chapter 10 Intra-Project Cumulative Effects [APP-083], Application Document 6.2.4.11 (B) Part 4 Marine Chapter 11 Inter-Project Cumulative Effects [REP1A-011]and Application Document 6.2.5.2 Part 5 Combined Chapter 2 Project-wide (Combined) Effects of the Proposed Project [APP-086]</p>	Conclusions of the Cumulative Effects Assessments	The Consultee has reviewed the conclusions of the cumulative effects assessment and is in agreement.	The Applicant has set out the conclusions of the Cumulative Effects assessment in Application Document 6.2.3.12 Part 3 Kent Chapter 12 Kent Onshore Scheme Intra-Project Cumulative Effects [APP-072] and Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073] . Conclusions from the CEA update are set out in Application Document 9.110 Inter-Project Cumulative Effects Assessment Update - Technical Note [REP6-098] .	Agreed

4. Approvals



On Behalf of	National Grid
Name	[Redacted]
Position	Senior Project Manager (Consents)
Date	27.04.2026

Signed

On Behalf of	Kent County Council
Name	
Position	
Date	

5. References

- Ministry of Housing, Communities and Local Government. (2024). *Planning Act 2008: Examination stage for Nationally Significant Infrastructure Projects*. Retrieved from <https://www.gov.uk/guidance/planning-act-2008-examination-stage-for-nationally-significant-infrastructure-projects>
- The Planning Inspectorate. (2015). *Advice Note two: The role of local authorities in the development consent process*. Retrieved from https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/TR010019/TR010019-Advice-00006-2-Advice_note_2_The%20role%20of%20local%20authorities%20in%20the%20development%20consent%20process.pdf#:~:text=The%20Planning%20Act%202008%20.

Appendix A Summary of Engagement

Date	Topic	Discussion points
10 November 2021	Thanet District Council (TDC), Dover District Council (DDC) & Kent County Council (KCC) Meeting	Need case, Sea Link project, consenting strategy, emerging preference, routing and siting update, consultation strategy.
12 May 2022	DDC, KCC and National Grid Briefing meeting	Need case, Sea Link project, consenting strategy, emerging preference, routing and siting update, consultation strategy.
09 June 2022	TDC, DDC, KCC and National Grid Meeting	Project and timeline, feedback on draft non-statutory consultation strategy, emerging preference update.
11 July 2022	TDC, DDC, KCC and National Grid Meeting	Project and timeline, project update, non-statutory consultation strategy.
11 August 2022	TDC, DDC, KCC and National Grid Meeting	Project and timeline, project update, non-statutory consultation, EIA scoping, survey access, ground investigation.
08 September 2022	TDC, DDC, KCC and National Grid Meeting	Project and timeline, project update, non-statutory consultation, ground investigation locations.
13 October 2022	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, non-statutory consultation, survey access, ground investigation locations.
14 December 2022	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, non-statutory consultation, ground investigation.
14 February 2023	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, ground investigation works, approach to coordination (in accordance with Planning Inspectorate (PINS) guidance), non-statutory consultation, site visits.
14 March 2023	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, planning performance agreement (PPA) and host authority engagement plan

Date	Topic	Discussion points
12 April 2023	KCC and National Grid Transport Meeting	Transport meeting to review scope of work, encourage feedback on transport and access and to discuss reports for the PEIR and ES stages.
18 April 2023	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic meetings, PPA and host authority engagement plan.
15 May 2023	KCC and National Grid Cultural Heritage Meeting	Virtual Cultural Heritage Thematic Group Meeting to provide an update relating to heritage issues and outline the proposed works including the geophysical survey.
13 June 2023	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, landscape design, thematic meetings, PPA and host authority engagement plan, statement of community consultation.
19 June 2023	KCC, TDC, DDC and National Grid - Socioeconomics, Recreation and Tourism Meeting	Scheme Overview, Socio-Economics, Recreation and Tourism Methodology, Baseline, Next Steps, Discussion.
11 July 2023	TDC, DDC, KCC and National Grid - Meeting	Project update and timeline, PPA, host authority engagement plan and cost schedule, ground investigation programme, site notices.
12 July 2023	KCC and National Grid - Transport Meeting	Transport meeting to review cumulative schemes to be considered by the PEIR.
08 August 2023	TDC, DDC, KCC and National Grid - Meeting	Project update and timeline, PPA, host authority engagement plan and cost schedule, site notices, SoCC feedback.
10 August 2023	KCC, TDC, DDC and National Grid - Socioeconomics, Recreations and Tourism Meeting	High-level project overview, scope, methodology, baseline sources, sensitive receptors.
12 September 2023	TDC, DDC, KCC and National Grid - Meeting	Project update and timeline, PPA progress, SoCC feedback.

Date	Topic	Discussion points
16 October 2023	TDC, DDC, KCC and National Grid – Health and Wellbeing	Engagement relating to the PEIR – covered a high-level project overview, scope, methodology, baseline sources, sensitive receptors.
15 December 2023	KCC Statutory Consultation Response Letter	This letter detailed KCC’s main comments and concerns over the Proposed Project in response to the 2023 Statutory Consultation response. The main comments and concerns were: concerns over the bellmouths on the A256 and further details on construction traffic, concerns over the PRowWs and further detail on management plan, little information on minerals and waste safeguarding, SuDS, further work required in relation to heritage and ensure mitigation or compensation proposed is acceptable.
15 January 2024	TDC, DDC, KCC and National Grid - Meeting	Project update and timeline, statutory consultation, thematic meetings, PPA progress.
05 February 2024	TDC, DDC, KCC and National Grid - Meeting	Project update and timeline, statutory consultation, terrestrial ecology thematic meeting, PPA progress.
06 February 2024	KCC, DDC, TDC, EA and National Grid Meeting – Water Environment	Project update and timeline, engagement to date, FRA approach, converter station flood risk update.
07 February 2024	TDC, DDC, KCC and National Grid Meeting – Air Quality	Project update and timeline, air quality assessment methodology and statutory consultation feedback responses.
13 February 2024	TDC, DDC, KCC and National Grid - Meeting	Project update and timeline, thematic meetings, PPA progress, statements of common ground (SoCG).
14 February 2024	National Grid, KCC, TDC and DDC – Geology and Hydrogeology Thematic Meeting	Project update and timeline, statutory consultation overview, geology and hydrogeology updates, thematic meetings, AOB and questions.
19 February 2024	TDC, DDC, KCC and National Grid Meeting – Socioeconomics,	Project update and timeline, socio-economic statutory consultation feedback and responses (PRowW, study area), discussion, next steps.

Date	Topic	Discussion points
	<i>Recreation and Tourism</i>	
<i>20 February 2024</i>	<i>KCC, DDC, TDC and National Grid Meeting – Landscape and Visual</i>	<i>Project update and timeline, interface with other disciplines, statutory consultation feedback, predicted significant effects on landscape character and visual amenity, design principles and landscape strategy, outline landscape and ecology management plan and questions / AOB.</i>
<i>27 February 2024</i>	<i>KCC and National Grid Cultural Heritage</i>	<i>Virtual Thematic Group Meeting to discuss ongoing heritage works. Main focus of conversation associated with proposed evaluation trenching. Locations of trenches shared on screen, with follow up emails to finalise locations. Historic England have deferred to the County Archaeologist (CA) on the trial trenching design, which has been discussed with the KCC CA, with agreement to the approach being obtained.</i>
<i>February 2024</i>	<i>KCC and National Grid – Ecology Information Shared</i>	<i>The Kent Vantage Point (VP) Survey and collision risk assessment was shared with KCC for information only by National Grid.</i>
<i>04 March 2024</i>	<i>KCC, DDC, TDC and National Grid Meeting –Health and Wellbeing</i>	<i>Project update and timeline, health and wellbeing update and timeline, statutory consultation feedback (PRoW and construction traffic feedback), discussion, next steps and AOB.</i>
<i>12 March 2024</i>	<i>TDC, DDC, KCC and National Grid Meeting</i>	<i>Project update and timeline, PPA progress, thematic updates, ongoing decision-making, community benefit.</i>
<i>02 April 2024</i>	<i>KCC, DDC, TDC, EA and National Grid Meeting – Water Environment</i>	<i>Review of actions from last thematic meeting, groundwater monitoring and flood risk assessment at Kent converter station site, drainage design updates, construction phase dewatering and permitting requirements.</i>
<i>16 April 2024</i>	<i>TDC, DDC, KCC, SE England Coast Path National Trail Officer and National Grid Meeting – Landscape and Visual</i>	<i>Project update and timeline, discussion relating to aspects of the LVIA, Approach to outline landscape and ecology management plan, Mitigation Design Concepts and questions / AOB.</i>

Date	Topic	Discussion points
16 April 2024	KCC, TDC, DDC and National Grid Transport Meeting	Transport meeting to provide a project update, review statutory consultation (PEIR) feedback and the transport deliverables including the Outline PRow Management Plan.
17 April 2024	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, PPA progress, thematic updates, ongoing decision-making.
April 2024	KCC and National Grid - Ecology Information Shared	The First Season (2022-2023) Breeding and Wintering bird reports for Kent was shared with KCC for information by National Grid.
02 May 2024	KCC, TDC, DDC and National Grid – Transport (PRow) Thematic Meeting	Outline PRow Management Plan Discussion, PRow Feedback/Considerations, AOB.
14 May 2024	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, PPA progress, thematic updates, ongoing decision-making.
24 May 2024	KCC, TDC, DDC, NE and National Grid Terrestrial Ecology Thematic Meeting (Kent proposals)	Summary of terrestrial ecology survey and assessment work since last meeting/Confirmation of use of trenchless techniques, depth of drill and risk of frac out/Noise modelling results regarding disturbance of adjacent Site of Special Scientific Interest (SSSI)/Vantage point surveys and collision risk assessment for new section of overhead line (OHL)/Proposals for offsetting loss of golden plover habitat/Biodiversity net gain opportunities/AOB.
28 May 2024	TDC, DDC, KCC and National Grid Meeting – Hydrology Thematic Meeting	Previous Meeting Actions, Ecological Mitigation Land Areas, additional consents and licences to DCO, drainage updates, works within River Stour Floodplain.
May 2024	KCC and National Grid – Ecology Information Shared	A preliminary noise assessment (contour maps only) for Kent, but not part of the DCO Documentation, were shared with KCC for information only by National Grid.
04 June 2024	KCC and National Grid – Landscape and Visual	The Provisional Growth Rates, Kent Indicative Species Mix, and outline Landscape and Ecology Management Plan (LEMP) Draft Structure were shared with KCC for agreement by National Grid.

Date	Topic	Discussion points
	<i>Information shared (via email)</i>	
<i>11 June 2024</i>	<i>TDC, DDC, KCC and National Grid Meeting</i>	<i>Project update and timeline, PPA progress, thematic updates, ongoing decision-making.</i>
<i>18 June 2024</i>	<i>KCC, DDC, TDC and National Grid Meeting – Landscape and Visual</i>	<i>Project update and timeline, interface with other disciplines, statutory consultation feedback, predicted significant effects on landscape character and visual amenity, design principles and landscape strategy, outline landscape and ecology management plan and questions / AOB.</i>
<i>19 June 2024</i>	<i>TDC, DDC, KCC and National Grid Meeting – Socioeconomics, Recreation and Tourism</i>	<i>Project update and timeline, socio-economic statutory consultation feedback and responses (PRoW, study area), discussion, next steps.</i>
<i>09 June 2024</i>	<i>TDC, DDC, KCC and National Grid Meeting</i>	<i>Project update and timeline, PPA progress, thematic updates, ongoing decision-making.</i>
<i>03 July 2024</i>	<i>TDC, DDC, KCC and National Grid Meeting – Air Quality</i>	<i>Project update and timeline, proposed Air Quality Management Plan, proposed air quality monitoring locations during construction and unclosed statutory consultation topics.</i>
<i>23 July 2024</i>	<i>TDC, DDC, KCC and National Grid Meeting - Transport</i>	<i>Targeted consultation – design changes, additional PEI (Traffic and Transport), Core Working Hours, Public Rights of Way – PEIR Findings (Traffic and Transport), Emerging Design, Statutory Consultation Feedback – AOB.</i>
<i>July 2024</i>	<i>KCC and National Grid – Ecology Information Shared</i>	<i>A note on the creation of wet grassland for golden plover in Kent (now superseded and not a part of the DCO Application) was shared with KCC for information only by National Grid.</i>
<i>02 August 2024</i>	<i>KCC and National Grid – Landscape and Visual Information Shared.</i>	<i>National Grid shared the Photosheet VP01 template and the growth rates with KCC for agreement.</i>
<i>06 August 2024</i>	<i>KCC, TDC, DDC Natural England (NE) and National Grid Terrestrial</i>	<i>Summary of terrestrial ecology survey and assessment work since last meeting / confirmation of use of trenchless techniques, depth of drill and risk of frac out / noise modelling results regarding disturbance of adjacent SSSI</i>

Date	Topic	Discussion points
	<i>Ecology Thematic Meeting (Kent proposals)</i>	<i>and SPA from Horizontal Direct Drilling (HDD) and associated works / temporary loss of woodlark and nightjar foraging habitat outside SPA / proposals for offsetting loss of skylark nesting habitat / proposals for creation/enhancement of acid grassland / AOB. In particular, the differences between Design Freeze 2 and Design Freeze 3 were discussed.</i> <i>A request was made to NE that management prescriptions be provided for Sandwich Bay to Hacklinge Marshes SSSI required for the site to meet favourable condition.</i>
13 August 2024	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, PPA progress, thematic updates, ongoing decision-making.
14 August 2024	TDC, DDC, KCC and National Grid Meeting – Socioeconomics Thematic Meeting	Targeted consultation, the annual Kent Open Championship in golf, discussion and AOB.
28 August 2024	KCC and National Grid – Landscape and Visual Information Shared	National Grid shared the Visual Appendix Structure Example – BTNO1 and 2 to KCC for comment and the Kent Landscape and Visual Value, outline LEMP Draft Structure, Sensitivity Ratings and the Sequential Cumulative Visual Assessment to KCC for agreement.
10 September 2024	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, PPA progress, thematic updates, ongoing decision-making.
17 September 2024	TDC, DDC, KCC and National Grid Meeting – Hydrology Thematic Meeting	Project update and progress on actions from previous meetings, update on Water Framework Directive (WFD) – comments from Environment Agency (EA) received and to be reviewed by National Grid – description of Project activities to occur on the floodplain of the River Stour, temporary crossing of the River Stour – key features of bridge design – discussion of River Fromus crossing and AOB/questions.
18 September 2024	KCC, DDC, TDC, NE and National Grid Terrestrial Ecology Thematic Meeting (Kent proposals)	Summary of entire outline ES Ecology Chapter impact assessment and mitigation proposals. Outcome of riparian mammals assessment. Discussion over the need to ensure recovery of the mudflats in the intertidal zone from the HDD connection works. Need to provide details of the type of culvert to be used to ensure no disruption of connectivity in ditches. Potential arable land enhancement areas for golden plover to offset loss of functionally linked land. Natural England agreed with the field clusters being considered and

Date	Topic	Discussion points
		<i>the broad mitigation strategy. Need to provide details of lighting impacts from the converter station in the ES chapter.</i>
<i>08 October 2024</i>	<i>TDC, DDC, KCC and National Grid Meeting</i>	<i>Project update and timeline, PPA progress, thematic updates, ongoing decision-making.</i>
<i>14 October 2024</i>	<i>KCC and National Grid – Landscape and Visual Information Shared</i>	<i>National Grid shared the Kent Indicative Species with KCC for agreement and shared the Draft Mitigation Design package with KCC for comment.</i>
<i>16 October 2024</i>	<i>KCC and National Grid – Air Quality Information Shared</i>	<i>National Grid shared the air quality assessment methodology with KCC to confirm and the construction monitoring locations to be agreed.</i>
<i>16 October 2024</i>	<i>KCC and National Grid – Landscape and Visual Information Shared</i>	<i>National Grid shared the Kent Table of Agreement with KCC for comment.</i>
<i>12 November 2024</i>	<i>TDC, DDC, KCC and National Grid Meeting</i>	<i>Project update and timeline, PPA progress, thematic updates, ongoing decision-making. Agenda included explanation and discussion of Cumulative Effects Assessment.</i>
<i>12 November 2024</i>	<i>KCC and National Grid – Cumulative Effects Information Shared</i>	<i>The Cumulative Effects Long List and Short List was shared with KCC by National Grid for comment and feedback, with comments requested to be provided within 3 days of the date the long and short lists were shared.</i>
<i>27 November 2024</i>	<i>KCC and National Grid – Socioeconomics, Recreation and Tourism Information Shared.</i>	<i>The PRoW Technical Note on the approach to assessing the PRoW was shared with KCC by National Grid for comment. A response was received by KCC which stated that there were no specific comments to be made on the methodology technical note.</i>
<i>28 November 2024</i>	<i>KCC, Suffolk County Council (SCC), East Suffolk Council</i>	<i>Virtual Thematic Group Meeting with Historic England, Suffolk County Archaeologist, and East Suffolk Council to discuss project updates. Updates included latest on the</i>

Date	Topic	Discussion points
	<i>(ESC), HE and National Grid - Archaeology</i>	<p><i>results of the evaluation trenching in Suffolk as well a brief overview of Kent.</i></p> <p><i>Gorse Hill was discussed, and it was noted that the results suggested the archaeological remains were of local/regional significance, and not national significance. It was also noted that no remains of national significance had been recorded in Suffolk to date, although some of the remains on the Ebbsfleet Peninsula in Kent were considered of national significance.</i></p> <p><i>Historic England asked if they would be able to review the DCO before submission and AECOM confirmed this would not be possible due to the limited time in the programme. Historic England also asked if it would be possible to review the 'DCO wording'. Historic England agreed to the scope of the geo-archaeological works in Kent.</i></p>
<i>November 2024</i>	<i>KCC and National Grid – Ecology Information Shared</i>	<i>The Kent Vantage Point Survey and collision risk assessment and a summary of the impact assessment and proposed mitigation for Kent (not a part of the DCO documentation, but used as the basis for the Kent ES Chapters) was shared with KCC for information only by National Grid.</i>
<i>November 2024</i>	<i>KCC and National Grid – Ecology Information Shared</i>	<i>The draft Habitat Regulations Assessment (HRA) was shared with KCC for comment by National Grid,</i>
<i>09 December 2024</i>	<i>KCC and National Grid – Landscape and Visual Information Shared</i>	<i>National Grid shared the Kent Table of Agreement (2024 12 09) and the Draft Mitigation Design Package (2024 12 09) with KCC for comment.</i>
<i>10 December 2024</i>	<i>KCC, TDC, DDC, NE and National Grid Terrestrial Ecology Thematic Meeting (Kent proposals)</i>	<i>The approach to Biodiversity Net Gain was discussed in this meeting.</i>
<i>7 January 2025</i>	<i>TDC, DDC, KCC and National Grid– Landscape and Visual Thematic Meetings</i>	<i>Project update and timeline, discussion relating to table of agreement of issues, discussion relating to landscape mitigation plans, AOB.</i>

Date	Topic	Discussion points
14 January 2025	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic updates, ongoing decision-making.
21 January 2025	TDC, DDC, KCC and National Grid Meeting – Air Quality	Air quality thematic meeting to provide a project update, to discuss the assessment findings, and to agree the air quality monitoring locations proposed for the construction phase.
21 January 2025	KCC, DDC, TDC, NE and National Grid Terrestrial Ecology Thematic Meeting (Kent proposals)	Discussion of golden plover mitigation parcel, including the fact wintering bird surveys are being undertaken and have confirmed presence of golden plover, and that lighting only affects the eastern boundary. Confirmation that Natural England consider the updated collision risk assessment addresses their main concerns, with only some limited further comments. Confirmation Natural England have no specific comments on the type of deflector chosen for the new section of overhead line. Confirmation there will be a stand-by generator as part of operation of development. Confirmation there will be scrapes created along the River Stour as long-term enhancement within South Richborough Pasture Local Wildlife Site. Use of instant hedges for closing temporary gaps.
11 February 2025	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic updates, ongoing decision-making.
11 March 2025	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic updates, ongoing decision-making.
08 April 2025	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic updates, ongoing decision-making.
19 May 2025	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic updates, ongoing decision-making.
10 June 2025	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic updates, ongoing decision-making.
8 July 2025	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic updates, ongoing decision-making.

Date	Topic	Discussion points
11 July 2025	Cultural Heritage	A meeting with the County Archaeologist to provide an update.
21 July 2025	Landscape Thematic Meeting	A meeting to discuss the landscape related matters raised in KCC, DDC and TDC Relevant Representations.
6 August 2025	Ecology Thematic Meeting	A meeting to discuss the ecology related matters raised in KCC, DDC and TDC Relevant Representations.
12 August 2025	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic updates, ongoing decision-making.
9 September 2025	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic updates, ongoing decision-making.
14 October 2025	Ecology Thematic Meeting	A meeting to discuss the ecology related matters raised in KCC, DDC and TDC Principal Areas of Disagreement Summary Statements.
14 October 2025	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic updates, ongoing decision-making.
18 November 2026	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic updates, ongoing decision-making.
9 December 2026	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic updates, ongoing decision-making.
13 January 2026	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic updates, ongoing decision-making.
15 January 2026	KCC and National Grid – Transport Meeting	Transport meeting to review and agree the approach for junction capacity modelling following the Examining Authority’s First Written Questions.
20 January 2026	KCC and National Grid Meeting	A meeting to review the structure of the Statement of Common Ground as well as the outstanding matters. Potential thematic meetings were also discussed.
16 February 2026	KCC and National Grid Meeting	A meeting to review the outstanding ecology matters in the SoCG.

Date	Topic	Discussion points
17 March 2026	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic updates, ongoing decision-making.
31 March 2026	KCC and National Grid Meeting	Highways meeting with KCC Highways.
14 April 2026	TDC, DDC, KCC and National Grid Meeting	Project update and timeline, thematic updates, ongoing decision-making.

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

Registered in England and Wales
No. 4031152
nationalgrid.com