

The Great Grid Upgrade

Sea Link

Sea Link

Volume 7: Other Documents

Document 7.4.3: ~~Draft~~ Statement of Common Ground Between National Grid Electricity Transmission and Historic England.

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

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Version

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

1. Introduction

1.1 Overview

- 1.1.1 A Statement of Common Ground (SoCG) is a written statement produced as part of the application process for a Development Consent Order (DCO) and is prepared jointly between the applicant and another party. It 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.
- 1.1.2 This SoCG is between National Grid Electricity Transmission Ltd (National Grid) and Historic England (HE) relating to the DCO application for the SEA Link Project (the Proposed Project). 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 Role of Historic England in the DCO Process

- 1.2.1 Historic England (HE) is an executive non-departmental public body and is sponsored by the Department of Culture, Media and Sport. Historic England was originally established under the National Heritage Act 1983 and operated from 1983 to 2015 under the name English Heritage. Due to the changes of the structure of Historic England, the body was renamed Historic England in 2015. HE is the government's statutory advisor and a statutory consultee on all aspects of the historic environment and historic assets.
- 1.2.2 Historic England's role in relation to the DCO process derives from the Planning Act 2008.
- 1.2.3 Historic England is a statutory body as prescribed under Section 42(1)(a) (duty to consult) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (as amended). Advice and consultation responses are typically provided as part of non-statutory consultation and engagement, in response to the Environmental Impact Assessment (EIA) Scoping Report 2, as part of statutory consultation (including on the Preliminary Environmental Information Report (PEIR) and participation in the Examination process.

1.3 Format of Document and Terminology

- 1.3.1 Section 2 of this SoCG summarises the engagement the Parties have had with regard to the Proposed Project.
- 1.3.2 Section 3 of this SoCG summarises the issues that are 'agreed', 'not agreed' or are 'under discussion'. 'Not agreed' indicates a final position where the Parties have agreed to disagree, whilst 'Agreed' indicates where the issue has been resolved.
- 1.3.3 Abbreviations used within the SoCG are provided in Table 1.1 below.

Table 1.1. Abbreviations

Abbreviation/Term	Definition
DCO	Development Consent Order
DF	Design Freeze
dML	Deemed Marine Licence
EIA	Environmental Impact Assessment
ES	Environmental Statement
HE	Historic England
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
LiDAR	Light Detection and Ranging
LVIA	Landscape Visual Impact Assessment
OOWSI	Outline Onshore Overarching Written Scheme of Investigation
OWSI	Outline Offshore Overarching Written Scheme of Investigation
PEIR	Preliminary Environmental Information Report
PROW	Public Right of Way
<u>PWWSI</u>	<u>Project Wide Written Schemes of Investigation</u>
SoCG	Statement of Common Ground
TJB	Transition Joint Bay
WSI	Written Scheme of Investigation

2. Record of Engagement

2.1 Summary of discussions

2.1.1 Table 2.1 summarises the consultation and engagement that has taken place between the Parties.

Table 2.1 Summary of discussions

Date	Topic	Discussion points
5 May 2021	Historic England Introduction Meeting	Virtual introductory meeting to discuss the project. Overview of the project and the background, discussion of National Grid's approach to Developing Proposals and further details of the Sea Link project, including discussion of protected and chartered wrecks and Suffolk Heritage Coastline. Finished with AOB/questions.
31 January 2022	Sea Link Historic England Terrestrial Introduction Meeting	Virtual meeting to discuss project background and need case, introduction to Sea Link project, the approach to developing proposals, indicative timeline, work to date, Sea Link emerging preference and heritage assets, surveys, next steps and AOB/questions.
13 July 2022	Archaeology	Virtual meeting with Historic England to discuss the project. Overview provided by National Grid team, with some discussion regarding surveys Historic England would expect to see (i.e. geophysical survey, evaluation trenching, review of historic mapping, aerial photos, and LiDAR), as well as review of proposed Ground Investigation works.
28 July 2022	Sea Link Update – Historic England	Virtual meeting where details were presented of the converter station site options considered in Suffolk and examples of appearance and layouts for converters.
4 October 2022	Marine Archaeology	Virtual meeting with Historic England to discuss the loss of vibrocores recommended for Stage 2 geoarchaeological analysis and agreement for duplicates of those cores to be obtained and assessed during further geotechnical surveys planned in 2024.
1 December 2022	Archaeology and Marine Archaeology	Scoping Opinion response from Historic England submitted as part of the Planning Inspectorate's Scoping Opinion: Proposed Sea Link document.
20 January 2023	Archaeology and Heritage	Built Site meeting with Historic England and the Kent County Archaeologist to examine the Site/Scheme on the ground. Visit included the landfall, Ebbsfleet Lane, and Richborough Castle, and included discussions on potential physical impacts as well as impacts on setting.
21 - 23 February 2023	Archaeology and Heritage	Built Email correspondence with Historic England, as well as Kent County Council, to agree viewpoint photography for the Kent element of the Scheme.

Date	Topic	Discussion points
4 May 2023	Sea Link Update – Historic England	Project update and timelines, outstanding actions, non-statutory consultation overview, scoping opinion response, design options, Kent site visit and AOB/questions where all discussed.
12 June 2023	Archaeology and Heritage	Built Email correspondence with Historic England to provide information on the work undertaken to date linked to potential setting impacts in advance of virtual meetings.
13 June 2023	Marine Archaeology	Virtual meeting with Historic England to discuss updates relevant to the offshore element of the Project. Summary of the known and potential marine archaeological resource presented. The rationale for the additional marine geophysical and geotechnical surveys was discussed, including confirmation that discarded cores recommended for Stage 2 geoarchaeological analysis will be obtained again as part of this survey.
15 June 2023	HE, Suffolk County Archaeologist and English Heritage Archaeology	Virtual Thematic Group Meeting with, Historic England, English Heritage and the Suffolk County Archaeologist to discuss project updates. Main topic of conversation focused on the proposed geophysical survey, with some discussions around potential setting impacts. Historic England to undertake site visit in Suffolk to examine assets where they feel there may be impacts on setting.
14 August 2023	Archaeology/Built Heritage	Email correspondence with Historic England and English Heritage to agree access to Richborough Castle to undertake site photography for setting assessment.
6 October 2023	Built Heritage	Virtual meeting with Historic England and East Suffolk Council to discuss the Project and the possible impacts on built heritage. This included discussions relating to ongoing agreement of locations of photomontages required for the heritage assessment.
27 November 2023	Built Heritage	Virtual meeting with Historic England and East Suffolk Council to discuss the Project and the possible impacts on built heritage. Main focus around agreement of locations of photomontages required for the heritage assessment. Meeting was followed by email correspondence with a list of proposed viewpoints supplied. These were agreed in January 2024.
8 December 2023	Archaeology	Virtual Thematic Group Meeting with. Historic England, English Heritage and the Suffolk County Archaeologist to discuss project updates. Main topic of conversation focused on results of the geophysical survey and proposals around archaeological evaluation trenching.
19 December 2023	Archaeology and Marine Archaeology	Historic England returned comments relating to the Preliminary Environmental Information Report (PEIR) and associated technical appendices relating to cultural heritage.
January to March 2024	Built Heritage	Email correspondence with Historic England and East Suffolk Council regarding built heritage and finalisation of viewpoint photography. Main discussions with East

Date	Topic	Discussion points
		<i>Suffolk Council, with Historic England agreeing approach and viewpoints by email on 15 March 2024.</i>
<i>13 March 2024</i>	<i>Archaeology</i>	<p><i>Virtual meeting between National Grid and Historic England teams covering both Kent and Suffolk. National Grid team provided an overview of project updates heading towards DF3.</i></p> <p><i>Some high-level discussions relating to ongoing fieldwork and upcoming evaluation trenching.</i></p>
<i>27 March 2024</i>	<i>Marine Archaeology</i>	<i>Virtual Thematic Group Meeting with Historic England to discuss project updates (including fieldwork surveys), timeline and discussion of comments relating to the PEIR deliverables. Initial discussion relating to the Statement of Common Ground – Historic England would prefer to review at the Environmental Statement stage but can provide comment prior to this if necessary. Historic England were also made aware of the Environmental Information Request regarding impact to Goodwin Sands.</i>
<i>28 March 2024</i>	<i>Archaeology</i>	<i>Virtual Thematic Group Meeting with Historic England and Suffolk County Archaeologist to discuss project updates. Discussion focused on works associated with finalising archaeological evaluation trench locations to enable land access team to start agreeing access.</i>
<i>25 April 2024</i>	<i>Archaeology</i>	<p><i>Virtual Thematic Group Meeting with Historic England, Suffolk County Archaeologist, and East Suffolk Council to discuss project updates. Discussion focused on works associated with finalising archaeological evaluation trench locations to enable land access team to start agreeing access, with some discussion regarding problems relating to access.</i></p> <p><i>Stakeholders enquired as to whether the Sea Link Team had been able to engage with other projects such as Lion Link and Nautilus. Sea Link Team confirmed they were reaching out to other schemes.</i></p>
<i>9 May 2024</i>	<i>Sea link update meeting</i>	<i>Project update and timelines, statement of common ground – HE appreciates engagement and development of SoCG and happy to work with National Grid to bring approaches together.</i>
<i>30 May 2024</i>	<i>Archaeology</i>	<p><i>Virtual Thematic Group Meeting with Historic England, Suffolk County Archaeologist, and East Suffolk Council to discuss project updates. Discussion focused on works associated with finalising archaeological evaluation trench locations to enable land access team to start agreeing access, with some discussion regarding issues relating to access.</i></p> <p><i>The Sea Link Team were also asked if they had any update on Wood Farm Listed Building, and its condition.</i></p>
<i>27 June 2024</i>	<i>Archaeology</i>	<i>Virtual Thematic Group Meeting with Historic England, Suffolk County Archaeologist, and East Suffolk Council to discuss project updates. Discussion focused on works associated with finalising archaeological</i>

Date	Topic	Discussion points
		<p>evaluation trench locations to enable land access team to start agreeing access, and confirming the Study Area for Suffolk was sufficient (with Suffolk County Council). It was also noted that the Sea Link team were working with Lion Link to approach trenching of the Converter Station Site in a holistic way.</p>
25 July 2024	Archaeology	<p>Virtual Thematic Group Meeting with Historic England, Suffolk County Archaeologist, and East Suffolk Council to discuss project updates. Updates included noting that evaluation trenching had started in both Suffolk and Kent. It was also noted that access for viewpoint photography had been agreed for Suffolk.</p> <p>Stakeholders also asked if Sea Link were still engaging with other projects such as Lion Link, and Sea Link team confirmed they were.</p>
30 July 2024	Archaeology	<p>Email with Historic England to introduce them to the team undertaking the evaluation trenching and invite them to attend site visits. Historic England confirmed they would like to attend site visits and will agree dates/times as works progress. Email also enquired as to the best person to talk to at Historic England regarding the scope of works to examine geo-archaeological remains in the Minster Marshes area.</p>
5 September 2024	Archaeology	<p>Virtual Thematic Group Meeting with Historic England, Suffolk County Archaeologist, and East Suffolk Council to discuss project updates. Updates included latest on the results of the evaluation trenching in both Suffolk and Kent. It was also noted that viewpoint photography had been undertaken in Suffolk.</p> <p>Stakeholders also asked for confirmation that Sea Link were still engaging with other projects such as Lion Link, and Sea Link team confirmed they were.</p> <p>Historic England provided an update on Woodfarm, a Grade II listed building.</p>
25 September 2024	Archaeology	<p>Virtual Thematic Group Meeting with Historic England, Suffolk County Archaeologist, and East Suffolk Council to discuss project updates. Updates included latest on the results of the evaluation trenching in both Suffolk and Kent. It was also noted that viewpoint photography had been undertaken in Suffolk.</p> <p>Historic England asked if they would be able to review the DCO before submission and AECOM confirmed they would ask if this would be possible due to the limited time in the programme.</p>
31 October 2024	Update	<p>Project update and timeline, Suffolk coordination and master planning, Kent coordination, AOB/questions.</p>
28 November 2024	Archaeology	<p>Virtual Thematic Group Meeting with Historic England, Suffolk County Archaeologist, and East Suffolk Council to discuss project updates. Updates included latest on the results of the evaluation trenching in Suffolk as well a brief overview of Kent.</p>

Date	Topic	Discussion points
		<p>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.</p> <p>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.</p>
2 December 2024	Update (marine)	Project update and timeline, marine survey updates (with confirmation of additional technical report to be submitted post DCO application), update on SoCG progress, AOB/questions.
28 May 2025	SoCG	Discussion on structure and process for developing an SoCG.
19 June 2025	Update	<p>Discussed initial comments received on SoCG.</p> <p>Project provided an update on evaluation trenching in Kent and Suffolk. Agreed that since Wood Farm has been delisted it can be removed from the assessment.</p> <p>Project provided update on marine archaeology.</p>
24 July 2025	Friston <u>— hengeD-Shaped Enclosure</u>	Project update following Phase 2a and Phase 2b trial trenching evaluation in Suffolk and in particular, discussion around the significance and mitigation of the possible neolithic henge near Friston.
23 October 2025	Friston <u>— hengeD-Shaped Enclosure</u>	<p>Project update following additional geophysical survey undertaken in the area of the possible neolithic henge near Friston.</p> <p>Results that demonstrate the feature is a D-shaped enclosure rather than a henge shared with HE and SCC. Both agreed the feature was clearly not a henge and that it was not considered of high value or of schedulable quality. As such, it was agreed that the asset no longer had to be avoid, and mitigation through excavation and recording would be suitable if the Suffolk Onshore Scheme resulted in physical impacts.</p> <p>It was also noted that any physical impacts on the asset would require the excavation of the full asset, and not just the section being impacted.</p>
7 November 2025	SoCG and RR update	Provided a project update and discussed matters raised in HE's Relevant Representations including Suffolk archaeological evaluation and significance of archaeological assets, impacts on Richborough Forst and Ebbsfleet Peninsula, and provided update on OWSI and geoarchaeological works.

Date	Topic	Discussion points
<u>27th January 2025</u>	<u>D-Shaped Enclosure</u>	<u>Interim report on the results of Phase 3 evaluation excavations near the D-Shaped enclosure provided by email.</u>
<u>5th February 2026</u>	<u>RR update</u>	<u>Provided a project update and discussed matters arising from the hearings.</u>
<u>25th February 2025</u>	<u>D-Shaped Enclosure</u>	<u>Final report on the results of Phase 3 evaluation excavations near the D-Shaped enclosure provided by email.</u>
<u>18th March 2026</u>	<u>RR update</u>	<u>Provided a project update and discussed matters arising from the hearings, as well as discussions regarding mitigation around Ebbsfleet Lane.</u>
<u>15th April 2026</u>	<u>Geo-Archaeology</u>	<u>Interim report on the results of geo-archaeological works undertaken as part of the GI works over winter 2025/26 provided by email.</u>
<u>22nd April 2026</u>	<u>Geo-Archaeology</u>	<u>Provided an update on the geo-archaeological works undertaken in winter 2025/26, the timetable for further reporting, and potential need for further works as evaluation or mitigation.</u>
<u>22 April 2026</u>	<u>SoCG</u>	<u>Discussed and agreed remaining outstanding matters.</u>

3. Areas of Discussion Between the Parties

3.1 Assessment Methodologies

Table 3.1 Assessment Methodologies

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
3.1.1	<p>Application Document 6.14 Environmental Scoping Report 2022 [APP-299]</p> <p>Application Document 6.15 Scoping Opinion 2022 [APP-300]</p>	Assessment methodology	<p>HE agreed to the proposed EIA Methodology and the scope of the assessment as set out in Application Document 6.14 Environmental Scoping Report 2022 [APP-299].</p> <p>The Applicant has provided extensive pre-application archaeological investigations, both onshore and offshore. This is to be commended. They have provided a robust assessment of the location, type and significance of designated and undesignated heritage assets. Heritage receptors have therefore been considered in the design of the scheme, and a robust approach to mitigation has been proposed.</p>	The methodology and scope of the EIA has followed that set out in Application Document 6.14 Environmental Scoping Report 2022 [APP-299] , and takes account of HE's comments made in its response to the request for a scoping opinion (see Application Document 6.15 Scoping Opinion 2022 [APP-300]) as well as during pre-application engagement.	Agreed

3.2 Development Consent Order

Table 3.2 Development Consent Order

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
3.2.1	<p>Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343]</p> <p>Application Document 7.5.4.2 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Kent [REP3-050]</p> <p>Application Document 3.1 (G)-Draft</p>	Drafting of the DCO	<p>In the event of the project being consented, HE would want to ensure that there is adequate mitigation, and that this is appropriately secured through the consent order.</p> <p>HE will be providing comments and recommendations on the DCO wording, specifically Archaeology Requirement 14 (2) and the REAC and OWSI documents.</p> <p>HE have accepted the proposed wording, and have no further comment at this time.</p>	<p>This Applicant is updating <u>has updated</u> Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk and Application Document 7.5.4.2 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Kent <u>throughout examination</u> based on comments received from HE, and these will be submitted at Deadline 5.</p> <p>The wording of the DCO and the REAC have both been updated in line with comments received from Historic England</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
	Development Consent Order [REP4-217]				
3.2.2	Application Document 3.1 (G) Draft Development Consent Order [REP4-217]	Drafting of the DCO	<p>Further consideration has been requested with regards to the design parameters for the Kent side Converter Station design, specifically how to ensure that historic environment issues are considered and that there is adequate consultation in the event of the DCO being granted.</p> <p>HE have accepted the proposed wording and have no further comments at this time</p>	<p>The design of the Minster Converter Station is being developed in consultation with stakeholders and in line with design parameters as set out in Application Document 7.12.2 Design Principles – Kent [APP-367REP6-058]. Design Principles CO.2 in Table 3.1 of Application Document 7.12.2 Design Principles – Kent [REP4-225-REP6-058] sets out the need to design the Minster Converter Station in response to Landscape Visual Impact Assessment (LVIA) and Heritage key views to demonstrate at the detailed design stage how the impact of the proposals has been minimised. Compliance with key design principles set out in Table 3.1 of Application Document 7.12.2 Design Principles – Kent [REP4-225-REP6-058] is secured through Schedule 3 Requirements 63 of the DCO.</p> <p>HE have also now been added as a named consultee within Requirement 3 regarding detailed design of the Minster Converter Station (Application Document 3.1 (GH) draft Development Consent Order [REP4-217REP5-005])</p>	Agreed
3.2.3	Application Document 3.1 (G) Draft Development Consent Order [REP4-217]	Drafting of the DCO	<p>HE would like to explore whether further consultation with HE could be made conditional as part of the DCO and REAC documents, and how the design parameters can be secured to ensure the harm to the historic environment is minimised.</p> <p>HE have noted and accept the proposed wording, and this has been confirmed to the ExA in response to ExQ2 (10th March)</p>	<p>The Applicant has updated the DCO wording in line with comments from HE, and HE are now a named consultee in Requirement 3 regarding detailed design of the Minster Converter Station (Application Document 3.1 (GH) draft Development Consent Order [REP4-217][REP5-005])</p>	Agreed
3.2.4	Application Document 3.1 (G) Draft Development Consent Order [REP4-217]	Deemed marine licence (dML)	<p>HE focus in the written representation will be on mitigation and to ensure that measures are appropriately secured through the DCO and dML.</p>	<p>The Applicant has considered -comments received on the specific wording of the DCO and dML and updated documents where relevant.</p>	Agreed
3.2.5	Application Document 3.1 (G) Draft Development Consent Order [REP4-217]	Drafting of the DCO	<p>In their comments on further information/submissions received by Deadline 1 and 1A [REP2-052], HE recommended that an appropriate wording is added to the draft DCO to enable engagement with Historic England on the</p>	<p>The Applicant has updated wording within section '14 Archaeology' of the DCO in line with HE's request, the latest version being Application Document 3.1 (GH) Draft Development Consent Order [REP4-217REP5-005].</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
			<p>heritage issues. This is important to ensure post consent works are appropriate.</p> <p>Paragraph 1.16 of HE's Written Representation [REP1-198] also recommends that wording of the draft DCO requirement is revised before the end of the examination. The revised requirement should include provision for a Historic England's involvement in approval of the mitigation measures and include HE as a named party.</p>		
3.2.6	Application Document 3.1 (G) Draft Development Consent Order [REP4-217]	Drafting of the DCO	In their comments on further information/submissions received by Deadline 1 and 1A [REP2-052], HE noted that the document 'Outline Offshore Overarching Written Scheme of Investigation (PINs Examination Reference: PDA-033) is referenced within Part 1, Article 1(1) of the DCO as a certified document, but it is not included within the list of certified documents in Schedule 19.	The Applicant has included the Outline Offshore OWSI within Schedule 19 of the DCO, the latest version being Application Document 3.1 (GH) Draft Development Consent Order [REP4-217REP5-005] .	Agreed
3.2.7	9.84 (B) Register of Environmental Commitments (REAC) [REP4-235]	Deemed marine licence (dML)	In their comments on further information/submissions received by Deadline 1 and 1A [REP2-052], HE noted that given there is no condition with the draft Development Consent Order (DCO) deemed marine licence (dML) for pre-construction surveys, we would like to understand how these surveys will be secured. We recommend the appropriate mechanism for securing of these surveys should be included in the draft Development Consent Order (DCO) and a revised wording shared with Historic England prior to the end of the examination.	Pre-Construction Surveys are secured within the Offshore CEMP [REP4-223REP6-072] and the Cable Specification and Installation Plan which in themselves are secured within Condition 4 of the DML (Schedule 16 of DCO).	Agreed
3.2.8	Application Document 3.1 (G) Draft Development Consent Order [REP4-217]	Drafting of the DCO	Paragraph 5.5 of HE's Written Representation [REP1-199] asks for HE's formal name to be appropriately referenced within the DCO and dMLs, as follows: Historic Buildings and Monuments Commission for England.	In the DML, "Historic England" is defined as meaning the "Historic Buildings and Monuments Commission for England, or its successor in function". The Applicant will include this definition within the front end of the Order as well.	Agreed

3.3 Offshore and Intertidal Archaeology and Cultural Heritage

Table 3.3 Offshore and Intertidal Archaeology and Cultural Heritage

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
3.3.1	Application Document (D) 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology [REP4-033]	Offshore study area	Discussions are ongoing. The Consultee stated in November 2024 that all matters remain under discussion at this time. <u>Discussion resolved during examination</u>	The study area used within Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology [REP4-033/REP6-034] reflects the Order Limits and is adequate to allow the baseline to be understood and potential impacts to be considered.	Agreed
3.3.2	Application Document (D) 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology [REP4-033]	Baseline characterisations of the marine historic environment and data sources	Additional geotechnical work undertaken in October 2024 was still in progress at the time of submission and was not included within the documents submitted. HE has received the additional geoarchaeological reports [AS-033] and [AS034] and provided comments in a letter dated 1 October 2025. The updated versions (REP1-029 and REP1-031 respectively) have taken on board HE's comments and increased the number of samples proposed. This has addressed our previous comments.	The results of the additional geotechnical work undertaken in 2024 and updated deposit models are now available and are were presented within Application Document 9.2 Supplementary Stage 1 and Stage 2 Marine Geoarchaeological Assessment [AS-033] and Application Document 9.2.1 Supplementary Stage 1 and Stage 2 Marine Geoarchaeological Assessment - Technical Note (dated May 2025) [AS-034] . Both documents were submitted to PINS on 12 June 2025 and provided to Historic England on 5 August 2025. Comments on Application Document 9.2 Supplementary Stage 1 and Stage 2 Marine Geoarchaeological Assessment [AS-033] were received from Historic England on 3 October 2025. An updated version of this document, addressing the comments received from Historic England was submitted -at Deadline 1 (see REP1-029 and REP1-031).	Agreed
3.3.3	Application Document (D) 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology [REP4-033]	Impact assessment	HE has reviewed Application Document 6.2.4.6 Part 4 Marine Chapter 6 Marine Archaeology [APP-079] and notes that the chapter includes changes requested in HE previous comments at the PEIR stage (see HE advice dated 19th December 2023). This represents good progress towards addressing HE previous concerns and we will provide further detail on this in our written representation. We note updated versions of the Marine Archaeology Chapter [REP4-033] and Marine Archaeology Technical Report [REP4-045] were submitted at deadline 4. We are content the changes requested in our Written Representation that have been appropriately made in the marine archaeology chapter technical report submitted at deadline 4.	The Applicant has considered- further comments received on the assessment of marine archaeology and subsequently updated the Marine Archaeology chapter of the ES as required, the latest version being Application Document 6.2.4.6 (DE) Part 4 Marine Chapter 6 Marine Archaeology [REP4-033/REP6-034] . The Applicant will continue to engage with HE to understand and address any outstanding matters regarding the assessment of effects on marine archaeology.	Agreed
3.3.4	Application Document 7.5.5 (C) Outline	Marine archaeology mitigation	HE has reviewed Application Document 7.5.5 Outline Offshore Overarching Written Scheme of Investigation (OWSI) and notes that the document	The Applicant has -considered- further comments received on the Offshore OWSI and has subsequently updated the document as required, the latest version being Application	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
	Offshore Overarching Written Scheme of Investigation (OWSI) [REP4-063]		<p>includes changes requested in HE previous comments at the PEIR stage (see HE advice dated 19th December 2023). This represents good progress towards addressing HE previous concerns and we will provide further detail on this in our written representation.</p> <p>We note the updated version of the Outline OWSI [REP4-063] submitted at deadline 4 and are content <u>with</u> the changes requested in our Written Representation have been made.</p>	<p>Document 7.5.5 (C) Outline Offshore Overarching Written Scheme of Investigation (OWSI) [REP4-063]. The Applicant will continue to engage with HE to understand and address any outstanding matters regarding the proposed mitigation for marine archaeology effects.</p>	

3.4 Onshore Archaeology and Cultural Heritage

Table 3-4 Onshore Archaeology and Cultural Heritage

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
3.4.1	<p>Application Document 6.3.2.3.F ES Appendix 2.3.F Phase 1 Archaeological Trial Trenching Report (Draft) [APP-114]</p> <p>Application Document 6.3.3.3.F Appendix 3.3.F Archaeological Evaluation Trenching Report (Draft) [APP-166]</p>	Scope of archaeological evaluation (Suffolk and Kent)	<p>HE commented that the draft trenching plans look well targeted and have confirmed that they are supportive if the County Archaeologists are. HE will wait for any updates from the trial trenching before any final decisions are made; however, the Consultee has agreed to the scope of the geophysical survey and trial trenching as set out on Application Document 6.3.2.3.F ES Appendix 2.3.F Phase 1 Archaeological Trial Trenching Report (Draft) [APP-114] and Application Document 6.3.3.3.F Appendix 3.3.F Archaeological Evaluation Trenching Report (Draft) [APP-166]</p>	<p>Trial trenching included a mix of trenches targeted on possible archaeological features recorded through non-intrusive surveys (i.e. geophysical survey) as well as testing of blank areas.</p> <p>The scope of the evaluation trenching and geophysical surveys in Kent and Suffolk was agreed with Kent County Council and Suffolk County Council with both organisations agreeing trench locations, the percentage of trenching required, and approving the Written Schemes of Investigation.</p> <p>Evaluation trenching in Kent was undertaken in a single phase with reporting been submitted as part of the DCO Application (Application Document 6.3.3.3.F Appendix 3.3.F Archaeological Evaluation Trenching Report (Draft) [APP-166]).</p> <p>The results of the Phase 1 archaeological evaluation trenching in Suffolk are provided in Application Document 6.3.2.3.F ES Appendix 2.3.F Phase 1 Archaeological Trial Trenching Report (Draft) [APP-114], with the data summarised in Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109], and potential impacts assessed in Section 3.9 of Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050REP6-020].</p> <p>The interim results of the Phase 2a evaluation trenching in Suffolk are also included in Section 3.9 of Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage [APP-050REP6-020].</p> <p>Phase 2b evaluation trenching was undertaken after submission of the application. The final reports for Phase 2a and Phase 2b trial trench evaluation have been shared with HE in July 2025 and submitted to PINS on 16 September 2025 (refer to Application Document 9.3.1 Suffolk Section Phase 2A Archaeological Evaluation Report [AS-135] and Application</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
				<p>Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136]).</p> <p>Additional cultural heritage impact assessment based on the full and final results of the Phase 2a and Phase 2b trial trench evaluation in Suffolk has been undertaken by the Applicant and will be submitted at Deadline 5- [REP5-087]. The results of the Phase 2b trial trenching revealed a potential neolithic hengiform monument along the location of the HVDC cable route and access track. The Applicant has undertaken additional geophysical surveys and evaluation trial trenching of these areas and has been -in discussion with HE and Suffolk County Council Archaeological Advisor with regards to the nature and significance of the assets, and appropriate mitigation. The Applicant- submitted a Change Notification for the Proposed Project which included an amendment of the Order Limits at this location to allow the re-routing of the cable and access track to avoid the location of this heritage asset if required.</p> <p>Further investigation works undertaken have confirmed that the asset is now considered to be a Bronze Age G-Shaped Enclosure, with the full extent visible in additional geophysical survey undertaken in September and October 2025 (Application Document 9.76.5.2 Change Request Appendix B Geophysical Survey Report [CR1-057]).</p> <p>Consultation with HE, as well as SCCAS, has confirmed that the asset is not considered to be national significance, and both stakeholders have agreed that impacts on the asset could be mitigated through full excavation if it could not be avoided (see SCC's Local impact reports (LIR) from any local authorities [REP1-130] and HE's Written Representations (WRs) relating to Change Request 1 [REP3A-021]).</p>	
3.4.2	<p>Application Document 6.4.2.3 ES Figures Suffolk Cultural Heritage Part 2 of 2 [APP-230]</p> <p>Application Document 6.4.3.3 ES Figures Kent Cultural Heritage Part 2 of 2 [APP-262]</p>	Photomontages (Suffolk and Kent)	<p>HE requested viewpoints to be turned into photomontages and undertake a heritage specific approach to views assessment.</p> <p>HE will review the photomontages and comment on these in due course.</p>	<p>Photomontages from agreed heritage viewpoint locations have been provided in Application Document 6.4.2.3 ES Figures Suffolk Cultural Heritage Part 2 of 2 [APP-230] and Application Document 6.4.3.3 ES Figures Kent Cultural Heritage Part 2 of 2 [APP-262].</p> <p>Additional illustrative visualisations were submitted at Deadline 1 and can be found in Application Document 9.14 Suffolk and Kent Illustrative Visualisations [REP1-296].</p>	Agreed
3.4.3	Application Document 6.3.2.3.F Appendix 2.3.F Phase 1 Archaeological	Suffolk Onshore Scheme – Archaeological evaluation	The lack of completed archaeological evaluation has limited a full understanding of the baseline information and the significance of the archaeological assets which may be affected by the proposals.	Available land within the Suffolk Order Limits, where there is the potential for physical impacts, was assessed through evaluation trenching. The results of this are detailed in Application Document 6.3.2.3.F Appendix 2.3.F Phase 1 Archaeological Trial Trenching Report (Draft) [APP-114] for Suffolk.	Agreed

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	Trial Trenching Report (Draft) [APP-114]		However, HE acknowledges that the trial trenching will be on-going and agree to review the supplementary report once available post the submission of the DCO application.	<p>The final reports for Phase 2a and Phase 2b trial trench evaluation have been shared with Historic England in July 2025 and to PINS on 16 September 2025 (refer to Application Document 9.3.1 Suffolk Section Phase 2A Archaeological Evaluation Report [AS-135] and Application Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136]). Additional impact assessment based upon the results of Phase 2a and 2b evaluation trenching in Suffolk will be submitted at Deadline 5- [REP5-087].</p> <p>Additional trial trenching information -as a result of the- Phase 3 trenching in Suffolk associated with the enclosure to the east of Friston, has been shared with HE and is provided within Application Document 9.127 Suffolk Phase 3 Archaeological Evaluation Final Report [REP5-140] submitted at Deadline 5. The heritage assessment has- been updated accordingly.</p> <p>Areas not available for trenching during pre and examination phases will be subject to further intrusive trial trenching as set out in Application Document 7.5.4.1 (BC) Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk to be submitted at Deadline 57 which is secured in the DCO by Schedule 3 Requirement 14-. The OWSI has been was updated in agreement with the Archaeological Advisor to the LPA from SCCAS and will be shared with Historic England. The updated OWSI will be submitted at Deadline 5.</p>	
3.4.4	Application Document 9.3.2 Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136]	Suffolk Onshore Scheme - prehistoric henge	<p>Phase 2b evaluation trenching in Suffolk identified a possible prehistoric henge. HE initially advised the Applicant that avoidance would be the right choice of mitigation as the remains were originally considered to be of schedulable quality.</p> <p>Following additional geophysical survey and confirmation that the asset is actually a D-shaped enclosure rather than a henge, HE has confirmed that the asset is no longer considered to be of schedulable quality.</p>	<p>The results of Phase 2a and 2b evaluation trenching in Suffolk have been shared with Historic England in July 2025 and an updated impact assessment based on the final results will be submitted at Deadline 5- [REP5-087]. The Phase 2b work identified a possible prehistoric henge feature near Friston which was considered by Historic England to be of national significance and of schedulable quality, subject to further investigation. As such, HE initial advise advice was that mitigation through design would be deemed the most appropriate mitigation, with the asset avoided.</p> <p>Additional geophysical survey has since confirmed that the asset is a D-shaped enclosure rather than a henge, and as such it is not considered to be of schedulable quality. Further consultation with SCC Archaeological Advisor and HE noted that the asset no longer had to be avoid avoided, and mitigation through excavation and recording would be suitable if the Suffolk Onshore Scheme resulted in physical impacts. If the Suffolk Onshore Scheme would result in physical impacts to the asset, the complete extent of the asset would need to be subject to archaeological excavation-. Additional evaluation trenching (Phase 3 Suffolk) has been undertaken to inform the most appropriate mitigation strategy for this asset. Results of this Phase 3 trial trenching have been shared with HE and SCC Archaeological Advisor and will be submitted into the examination at Deadline 5- [REP5-140].</p> <p>The Applicant has amended the Order Limits around Friston to allow enough flexibility to accommodate appropriate mitigation measures, following further investigation</p>	Agreed

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3.4.5	<p>Application Document 6.2.2.3 Part 2 Suffolk Chapter 3 Cultural Heritage</p> <p>Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343]</p>	Suffolk Onshore Scheme - Cultural Heritage mitigation	<p>HE notes that a location specific Outline Written Scheme of Investigation (WSI) have been prepared for the Suffolk Onshore Scheme in consultation with the statutory consultees which sets out details of post-consent assessment and mitigation measures.</p> <p>HE welcomes commitment to archaeological mitigation. HE notes however that the document had not been previously shared with them. HE will therefore provide further comments on this in their Written Representation. Amendments and further drafting may therefore be required.</p> <p><u>HE has reviewed the latest OWSI and have confirmed comments addressed (see Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk submitted at Deadline 7). HE is aware that there are ongoing conversations on the PWWSI with SCC Archaeological Advisor.</u></p>	<p>Geophysical surveys and information from evaluation trial trenching hashave been used to inform the design of the Suffolk Onshore Scheme so that the most sensitive areas are avoided, while construction methods have been adapted to avoid impacts in other areas.</p> <p>Mitigation where impacts cannot be avoided is being<u>has been</u> developed with HE and Archaeological Advisor at SCC with details provided in Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) - Suffolk [APP-343] submitted at Deadline 7.</p> <p>The Applicant is in the process of updating<u>has updated</u> Application Document 7.5.4.1 (C) Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk [APP-343] submitted at Deadline 7 in line with comments received during further consultation with SCC Archaeological Advisors and will issue an updated version at Deadline 5.<u>HE and shared draft versions on 24 and 29 April 2026.</u> The Applicant will engage further with HE to consider their feedback in<u>issue</u> the updated <u>OWSI version at Deadline 7.</u></p>	Under discussion Agreed
3.4.6	Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage [APP-093]	Kent Onshore Scheme - Richborough Roman Fort	<p><u>In their Deadline 6 submission REP6-263 HE considerstates the following with regards to Richborough Roman Fort:</u></p> <p><u>“Historic England continues to maintain that there is a higher level of harm to Richborough Roman Fort than has been describedassessed by the Applicant. This is because the setting of the fort contributes more applicant. As we previously highlighted in our Written Representation the applicant has assessed the magnitude of harm to the significance of the fort caused by development within its setting (during operation and towards the understanding of the monument than is set out in maintenance) to be ‘Negligible’ with a resultant ‘Minor Adverse’ significance of effect ([APP-063] Table 3.14, pg. 65.) On the application. The visualisations provided demonstrate assumption that appropriate design mitigation will be implemented, utilising the least intrusive of the design principles put forward (as described in [APP-365] Design Approach Document –</u></p>	<p>The effect of the Proposed Project on the setting of Richborough Roman Fort is assessed in Section 3.9 of Application Document 6.2.3.3 Part 3 Chapter 3 Cultural Heritage [APP-063]. The assessment concluded that the magnitude of impact would be negligible. This was based on the distance between the asset and the proposed Minster Converter Station and Substation, the presence of other modern development that is closer to the asset, and the fact that the Wantsum Channel, which forms a component of the asset’s setting, has altered significantly as a result of silting and land reclamation, changes that have considerably altered the setting of the monument. This is demonstrated in the illustrative visualisations for Kent, and specifically the illustrative visualisation produced from VP 8 – Richborough Fort Viewing Platform, see Application Document 9.14 Supplementary Environmental Information Report – Suffolk and Kent Illustrative Visualisations [REP1-296].</p> <p>Furthermore, the proposed Minster Converter Station and Substation would be located on the northern side of the former Wantsum Channel, and as such would not alter the ability to understand the original setting of Richborough Fort as a shore fort overlooking the channel nor would it sever any intervisibility that may have existed between Richborough Fort and the Ebbsfleet Lane complex on the north side of the Wantsum Channel. A negligible magnitude of impact on an asset of high value would result in a minor adverse effect (considered ‘not significant’ in EIA terms). The level of harm to the designated asset is assessed in Section 7.5 (paragraphs 7.5.35 to 39) of Application Document 7.1 Planning Statement [APP-319],</p>	Under discussion Agreed

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			<p><u><i>Kent, and [APP-367] Design Principles – Kent), Historic England assess the magnitude of harm to be ‘Small’ (as per [APP063] Table 3.10, pg. 31.). According to the methodology used by the applicant (as per [APP-046] plate 5.2, pg. 14), this may then result in a ‘Moderate’ or ‘Minor’ significance of effect. We consider that a ‘Minor’ significance of effect is appropriate and that the harm is therefore ‘Not Significant’.</i></u></p> <p><u><i>Despite our disagreement regarding the specific magnitude of harm, the resultant significance of the effect does therefore broadly align with the applicant’s assessment. This is subject however to ensuring that the detailed design of the converter station will intrude into views from the amphitheatre towards the fort and in and around the fort itself.</i></u></p> <p><u><i>meets the aims set out within the design parameters as currently set out. It should be noted however that if a design is chosen that increases the intrusion of this structure within the landscape, then the harm may be considered ‘Moderate’ which would then be ‘Significant’.</i></u></p>	<p>superseded by [AS-057REP6-054], to amount to less than substantial harm at the lower end of the spectrum.</p> <p><u><i>Regarding-It is considered that the potential impactsdisagreement between the Applicant and HE in relation to the specific magnitude of impact on the setting of Richborough Fort, HE- is a matter of professional opinion and, both parties have also stated that ‘We consideragreed that a ‘Minor’the resultant significance of effect is appropriatewould be minor and that the harm is therefore ‘Not Significant’ in their ‘Comments on any further information/ submissions received by deadline 1 and deadline 1A [REP2-052]’not significant’.</i></u></p>	
			<p>HE acknowledges that some steps have been taken in regard to this application to reduce the potential for harm to the historic environment, for example, siting the converter station in as are of topography which helps to shield it naturally from view, as well as ensuring that the roofline does not break the horizon when viewed from the fort. In order to ensure harm to the significance of Richborough Romam Fort is truly minimised, however, the final design of the converter station complex needs to be better considered within the design parameters set out in the application.</p> <p>HE havehas noted the additional measures in the REAC which is secured via the DCO Schedule 3 Requirement 3.</p>	<p>The design of the Minster Converter Station and Substation is being developed in consultation with stakeholders and in line with design parameters as set out in Application Document (B) 7.12.2 Design Principles – Kent [REP4-225REP6-058]. Design Principles CO.2 within Table 3.1 of REP4-225REP6-058, set out the need to design the Minster Converter Station and Substation in response to LVIA and Heritage key views to demonstrate at the detailed design stage how the impact of the proposals has been minimised. Design Principle CO.3 (Table 3.1) also identifies LVIA VP08 (Richborough Roman Fort) as a strategic view to assess the performance of the design of the converter station in different lighting conditions with a particular focus on how the sheen on cladding materials can affect appearance. Compliance with key design principles set out in Table 3.1 of Application Document (B) 7.12.2 Design Principles – Kent [REP4-225REP6-058] is secured through Schedule 3 Requirements 3 of the DCO. The design of the Minster Substation is further secured within measure GG36 in the REAC [REP4-234] which in turn is secured by DCO Schedule 3 Requirement 3- REP6-134.</p>	Agreed
			<p>Some of the design responses put forward at this stage (see Section 6 Doc 7.11.2 Design Approach Document- Kent) are</p>	<p>The Applicant has considered -further comments on the specific wording of the DCO and made amendments as a result-. The Applicant will consult further with HE to discuss feasible design mitigation options.</p>	Agreed

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
			<p>likely to be more intrusive within the landscape and therefore would have correspondingly higher level of harm. There does not appear to be a secure route by which Historic England can provide comment on the design moving forward, and mitigation against the historic harm needs to be appropriate.</p> <p>HE havehas some concern surrounding the design commitments in the REAC (LV17) and the Draft DCO Schedule 3 Requirement (3 Converter Station Design) as drafted, as they make no explicit provision for stakeholder engagement on this issue beyond the County Council.</p> <p>HE will provide further comment on this process in our written representation and recommend that the ExA seek further reassurances and a commitment from the Applicant to ensure that a design is chosen which reduces as far as possible harm to the significance of these heritage assets. HE would also want to ensure that they are specifically included as consultees in this process and that reducing harm, to heritage assets is a consideration in the design parameters</p>	<p>The design of the Minster Converter Station is being developed in consultation with stakeholders and in line with design parameters as set out in Application Document 7.12.2 (B) Design Principles – Kent [REP4-225REP6-058]. Design Principles CO.2 in Table 3.1 of REP4-225 sets out the need to design the Minster Converter Station in response to LVIA <u>and Heritage key views</u> to demonstrate at the detailed design stage how the impact of the proposals has been minimised. Compliance with key design principles set out in Table 3.1 of Application Document (B) 7.12.2 Design Principles – Kent [REP4-225REP6-058] is secured through Schedule 3 Requirements 3 of the DCO.</p> <p>HE have been added to the list of named consultees within Requirement 3 of the draft DCO (Application Document 3.1 (GH) draft Development Consent Order [REP4-217REP6-004]), and they have also acknowledged that they ‘consider that a ‘Minor’ significance of effect is appropriate and that the harm is therefore ‘Not Significant’ in their <u>deadline 2 submission</u> ‘Comments on any further information/ submissions received by deadline 1 and deadline 1A [REP2-052]’</p>	
3.4.7	Application Document 6.2.3.3 Part 3 Kent Chapter 3 Cultural Heritage	Kent Onshore Scheme - Ebbsfleet Peninsula	<p>HE is pleased that the Applicant has undertaken extensive archaeological evaluations during the pre-application period. The results of this work have been well accounted for in the design and the risk of large impacts on the most sensitive areas of the Ebbsfleet Peninsula Complex has been largely avoided.</p> <p>However, HE agrees with the ES that the development is still likely to result in some harm to the Ebbsfleet Peninsula Complex. This will result in a permanent residual change and a significant effect in EIA terms to an undesignated, but potentially nationally significant, heritage asset.</p> <p>HE disagrees that the ability to mitigate the effect through a programme of archaeological works would reduce the significance of the effect to ‘Minor’ (Table 3.12, pg 60, Doc 6.2.3.3, Environmental</p>	<p>The Applicant acknowledges that mitigation through a programme of archaeological investigation does not reduce the magnitude of impact. The reduction in the significance of effect recognises that professional excavation and recording of archaeological remains is a compensation measure, the successful completion of which would reduce the overall harm to the asset to an acceptable level. The proposed mitigation through a programme of archaeological investigation has been agreed in principle with the Kent County Council Archaeological Officer.</p> <p>The Applicant will consult further with HE and KCC to discuss feasible design mitigation options. Site compounds are an important element of the construction process allowing space for staff welfare facilities and the lay down and storage of plant and materials. The Applicant has looked to relocate compounds away from areas highlighted as of increased value where possible however is unable to remove the compounds completely and still complete the works. A number of separate compounds have been proposed to enable the various elements of the works to be controlled safely and effectively, this involves three principal compounds adjacent to the Converter and Substation site, these are for the Converter Contractor, the Cable Contractor and the OHL Contractor. Segregation of these compounds is best practice from a Construction Design and Management perspective; the location of these main compounds has been chosen to reduce impacts</p>	<u>Under discussion</u> <u>Agreed</u>

Ref	Relevant Application Document	Summary of Description of Matter	HE Current Position	National Grid Current Position	Status
			<p>Statement, Part 3 Kent, Chapter 3 Cultural Heritage) as the harm here is only somewhat offset and not truly lessened by the ability to record remains prior to their removal.</p> <p>This is in line with para 5.9.16 of EN-1 which recognises that the ability to record evidence of the asset should not be a factor in deciding whether such loss should be permitted.</p> <p>HE therefore recommend options are considered by the applicant to further reduce the heritage harm. We consider this could be achieved by removing site compounds and through using no-dig options.</p> <p><u>However, in their deadline 6 submission REP6-263, HE agrees that appropriate steps have been taken to substantially limit the risk of harm to heritage asset. This is through design which is informed by archaeological evaluations to avoid what we think are the most significant areas of archaeology. Areas of the Ebbsfleet complex within the order limits where archaeology needs to be preserved have been identified and will be protected through the works. HE, along with the Kent County Council archaeological advisor are in regular discussions regarding the proposed excavations to establish appropriate protection measures. With the appropriate controls in place, HE agrees that the risk of harm to significant remains associated with this complex is reduced. Therefore, in this case, because steps are being taken to retain rather than remove archaeological remains, HE agrees that the residual effect for construction may be considered 'Minor Adverse' and 'Not Significant' as set out in table 3.13.</u></p> <p><u>HE also agrees with the Kent County Council archaeological advisor that the change to the setting of the Ebbsfleet complex will result in a 'Moderate Adverse' effect, as the magnitude of impact is greater than the 'Negligible' assigned by the applicant. HE thinks that it would be a</u></p>	<p>on the archaeology of the area. The compounds either side of the A256 are necessary to enable the trenchless crossing of the road, with the western compound also acting as an enabling compound for the Converter contractor to allow for the access and main compounds to be constructed. The Applicant will work<u>The Applicant has consulted further with HE and KCC to discuss feasible design mitigation options and has worked</u> with its contractors to look to reduce the footprint of compounds where practicable during the detailed design process. The no-dig option of installing compounds above top-soil without undertaking a top-soil strip has been considered. This option would however impact the quality of the top-soil which would then require remedial works to return it to its original condition. The Applicant considers that the remedial works would be just as impactful as the top-soil strip so would not provide a betterment.</p> <p>Ongoing development of the design, as well as consultation with KCC, has also aimed to avoid areas considered to be of greatest sensitivity. This includes two areas of Bronze Age barrows and enclosures where a 'preservation in situ' strategy is being developed as part of the ongoing mitigation plan. This will be <u>was</u> detailed in the updated Kent OWSI to be submitted at Deadline 5- <u>[REP5-072]</u>.</p> <p><u>As a result, the residual effects on the Ebbsfleet Peninsula Complex and its setting would be not significant.</u></p>	

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			<p><u>'Small' impact using the criteria set out in the ES and it would amount to less than substantial harm.</u></p>		
3.4.8	<p>Application Document 7.5.4.2 (G) Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Kent [REP4-063]</p>	<p>Kent Onshore Scheme - Cultural Heritage mitigation</p>	<p>HE notes that a location specific Outline Written Scheme of Investigation (WSI) have been prepared for the Kent Onshore Scheme in consultation with the statutory consultees which sets out details of post-consent assessment and mitigation measures.</p> <p>HE welcomes commitment to archaeological mitigation. HE notes however that the document had not been previously shared with them. HE will therefore provide further comments on this in their Written Representation. Amendments and further drafting may therefore be required.</p> <p>HE have noted the changes to the OWSI, we will not be providing any further written comment as set out in the text above but will continue through the OWSI engagement post consent as set out in the OWSI and as set out in the DCO requirement</p> <p><u>HE has reviewed the latest OWSI and have confirmed comments addressed (see Application Document 7.5.4.1 (E) Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Kent submitted at Deadline 7)</u></p>	<p>Geophysical surveys pointed to high archaeological potential areas adjacent to Richborough Way (Thanet) on the Ebbsfleet Peninsula, and trenching confirmed the presence of a complex multi-period site. The data was used to design the Kent Onshore Scheme so that some of the most sensitive areas were avoided, while construction methods have been adapted to avoid impacts in other areas.</p> <p>Mitigation where impacts cannot be avoided is being developed with HE and Archaeological Advisor at KCC with details provided in Application Document 7.5.4.2 (DE) Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Kent submitted at Deadline <u>57</u>.</p> <p>The Applicant will continue to engage with HE to consider their feedback.</p>	Agreed

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3.4.9	Application Document 6.3.3.3.G ES Appendix 3.3.G Geo-archaeological Desk Based Assessment [APP-167].	Kent Onshore Scheme - geoarchaeological information	<p>HE notes that a full study is proposed with further coring to supplement evidence from test pits and trial trenches. Preliminary information was obtained through Ground Investigation works but this has not been archaeologically assessed. The Ground Investigation data provides valuable baseline information towards characterisation and understanding of the archaeological potential of an area, and it is a shame these opportunities were not taken to generate the archaeological information that is needed.</p> <p>This will need to be provided, and we recommend the ExA seek and understating from the applicant as to the likely delivery and format of the documents.</p> <p>Also outstanding is an understanding of effects that changes to ground water levels and flows might have on buried archaeological and palaeoecologist assess. A detailed geoarchaeological study will help in that respect.</p> <p>Final agreement is pending the results of the GI monitoring works</p>	<p>The Applicant notes that the GI works undertaken to date utilised techniques that would not have enabled geo-archaeological data to be collected. A geo-archaeological desk-based assessment of the Kent Onshore Scheme was therefore undertaken to inform the assessment; this is presented as Application Document 6.3.3.3.G ES Appendix 3.3.G Geo-archaeological Desk Based Assessment [APP-167]. This was based on a scope agreed with KCC and HE and included a review of the data collected as part of the GI works as well as data from nearby projects, including the Richborough to Canterbury Connection.</p> <p>The Applicant has continued to engage with KCC and HE and has developed a scope of works to enable geo-archaeological works to be accommodated during the GI works which started in November 2025 and due to be completed by March 2026, with an interim report supplied to HE on the 15th April 2026 and submitted at Deadline 7. The full report on the results of this work <u>expected in late May/early June 2026 and</u> will be used to define any further <u>evaluation and</u> mitigation (if required). This will be secured within <u>Any further evaluation or mitigation that might be required for impacts on geo-archaeological remains has been captured through</u> Application Document 7.5.4.2 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Kent, <u>with a more detailed methodology to be provided as part of a Site- Specific WSI.</u></p> <p>Changes to water levels and flows and the potential impacts of these on heritage assets will be addressed as part of <u>further examined once the final geo-archaeological assessment work to be undertaken in conjunction with the next phase of GI works report has been submitted.</u></p>	Under discussion <u>Agreed</u>

4. Approvals

Signed



On Behalf of

National Grid

Name

Sebastian Stevens

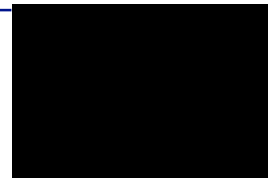
Position

Senior Project Manager (Consents)

Date

23 March 2026

Signed



On Behalf of

Historic England

Name



Position

Team Leader

Date

28th April 2026

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>

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