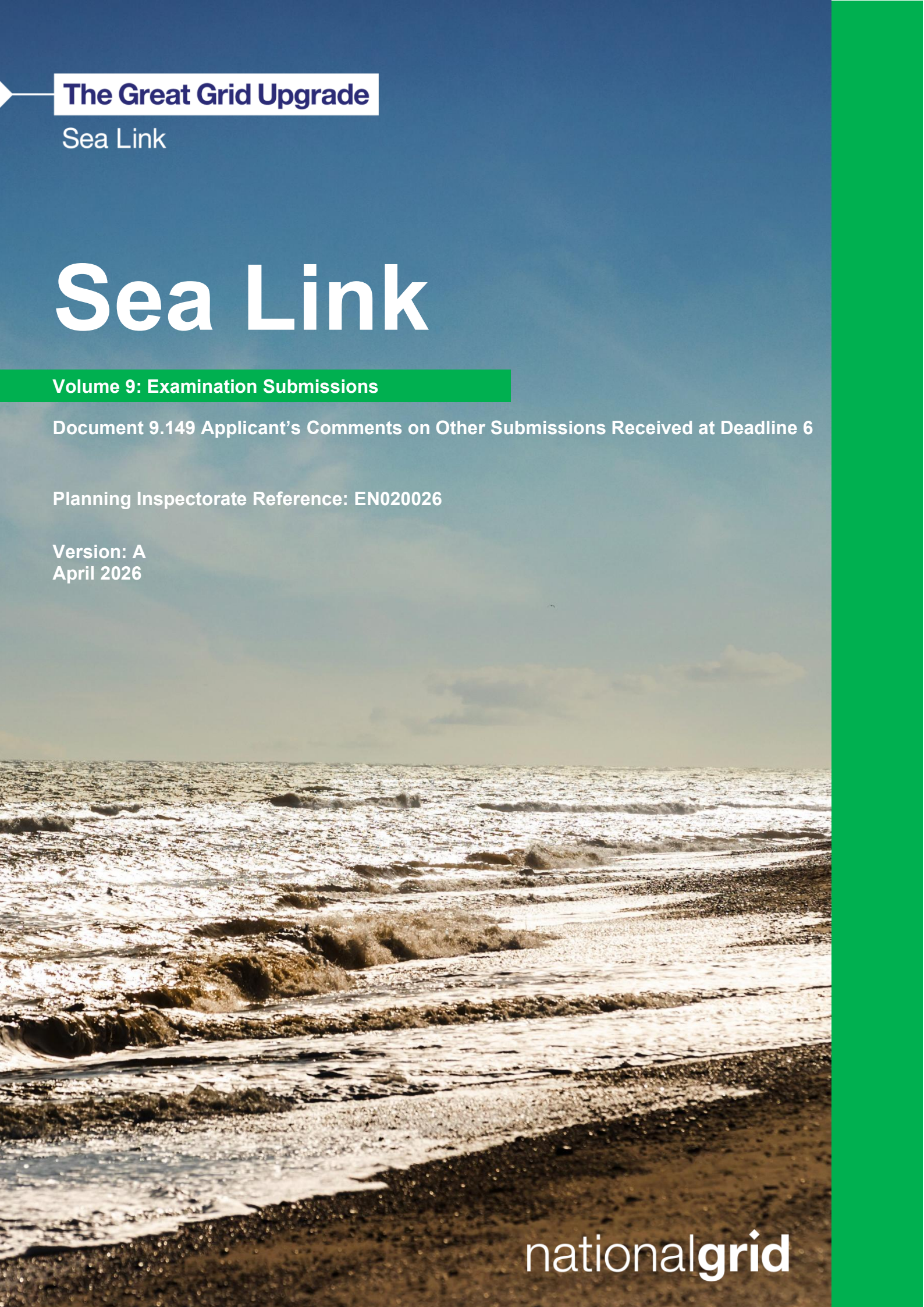




The Great Grid Upgrade

Sea Link

Sea Link

Volume 9: Examination Submissions

Document 9.149 Applicant's Comments on Other Submissions Received at Deadline 6

Planning Inspectorate Reference: EN020026

Version: A
April 2026

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1. About this Document

1.1 Purpose of this Document

- 1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) comments on other submissions made by Interested Parties at Deadline 6, in response to the application for development consent for the Sea Link Project (the Project).
- 1.1.2 Interested Parties responses received at Deadline 6 have been reviewed and considered in full. The purpose of this document is to provide the Applicant's comments on new matters or matters which have been expanded upon within Interested Parties submissions at Deadline 6.

1.2 Applicant's Comments on Responses to Third Written Questions

- 1.2.1 Responses received at Deadline 5 regarding the ExA's Second Written Questions are provided in **Application Document 9.150 Applicant's Comments on Responses to Third Written Questions**. Table 1.1 below lists the representations responded to in that document.

Table 1.1 Representations in Application Document 9.150 Applicant's Comments on Responses to Third Written Questions

Interested Party	Content
Natural England	REP6-249
CPRE Kent	REP6-259
East Suffolk Council	REP6-261
Friston Parish Council	REP6-262
Historic England	REP6-263
Joint Nature Conservation Committee	REP6-264
Kent County Council	REP6-265
Kent Wildlife Trust	REP6-266
London Gateway Port Limited	REP6-267
National Trust	REP6-269

Port of London Authority	REP6-270
Royal Society for the Protection of Birds (RSPB)	REP6-271
Saxmundham Town Council	REP6-272
Substation Action Save East Suffolk (SASES)	REP6-273
Thanet District Council	REP6-274
The Maritime and Coastguard Agency	REP6-275
Suffolk County Council	REP6-276
Caroline Pope	REP6-277

1.3 Structure of the Report

- 1.3.1 Table 1.2 below outlines the structure of this document. The Applicant's comments are provided in response to paragraph numbers used in the original submissions, with paragraphs grouped where appropriate for clarity.

Table 1.2 Structure of the Document

Chapter	Chapter Heading	Content
2	Port of London Authority	REP6-140
3	Suffolk County Council	REP6-141, REP6-181, REP6-182, REP6-183, REP6-184 and REP6-237
4	David Stevens	REP6-142, REP6-200 and REP6-279 (this superseded REP6-199)
5	Five Estuaries Offshore Wind Farm Ltd	REP6-143
6	Jane Hetherington	REP6-144
7	Marianne Fellowes	REP6-145, REP6-218, REP6-219 and REP6-220
8	Paul Bongers de Rath	REP6-146
9	Roger Skinner and Wendy Skinner	REP6-147 and REP6-151

10	Save Minster Marshes	REP6-148, REP6-172 and REP6-173
11	Suffolk Energy Action Solutions Ltd (SEAS)	REP6-149, REP6-150, REP6-175, REP6-255, REP6-256A, REP6-256B, REP6-256C, REP6-256D, REP6-256E, REP6-256F, REP6-256G and REP6-256H
12	Aldeburgh Town Council	REP6-152
13	Benhall and Sternfield Parish Council	REP6-153 and REP6-154
14	East Anglia ONE North Limited, East Anglia TWO Limited and ScottishPower Renewables (UK) Limited	REP6-155
15	East Suffolk Communities Energy Partnership	REP6-156
16	East Suffolk Council (Cllr Katie Graham)	REP6-157
17	East Suffolk Council (Tom Daly)	REP6-158
18	East Suffolk Council	REP6-159, REP6-160 and REP6-161
19	Environment Agency	REP6-162
20	Friston Parish Council and Substation Action Save East Suffolk (SASES)	REP6-163, REP6-164, REP6-165, REP6-178, REP6-179 and REP6-180
21	Historic England	REP6-166
22	Kelsale & Yoxford Ward, East Suffolk Council	REP6-167
23	Kent County Council	REP6-168
24	Kent Wildlife Trust	REP6-169 and REP6-240
25	Northumbrian Water Limited and Ward Hadaway LLP on behalf of Northumbrian Water Limited (NWL)	REP6-170 and REP6-254
26	Ramsgate Town Council	REP6-171
27	Saxmundham Town Council	REP6-174
28	Snape Parish Council	REP6-176 and REP6-177

29	Thanet District Council	REP6-185 and REP6-186
30	Walberswick Parish Council	REP6-187
31	Westleton Parish Council	REP6-188
32	Alan John Almond	REP6-189
33	Andrew McDonald	REP6-190
34	Angela Stevens	REP6-191
35	Caroline Pope	REP6-192 and REP6-193
36	Charlotte Fox	REP6-194
37	Cllr Rebecca Wing	REP6-195
38	Cllr T-J Haworth-Culf	REP6-196
39	Coral Duncan	REP6-197
40	David Rix and Ian Rix	REP6-198 and REP6-210
41	Dr Stephanie Bunn	REP6-201
42	Elizabeth Trudy Duffield and Matthew Garrard	REP6-202 and REP6-280
43	Fiona Cramb	REP6-203
44	Fiona Gilmore	REP6-204
45	George Cooper	REP6-205
46	Glynis Robertson	REP6-206
47	Good Connections Walberswick Ltd	REP6-207
48	Gordon Young	REP6-208 and REP6-278
49	Iain Brown	REP6-209
50	Joan Edlis	REP6-211
51	Julie Townsend	REP6-212
52	Karen McKenzie	REP6-213
53	Karen McKenzie on behalf of Save Minster Marshes	REP6-214

54	Karl Pearsall	REP6-215
55	Louise Chadwick	REP6-216
56	Luigi Beltrandi	REP6-217
57	Mark Chandler	REP6-221
58	Michael Hills	REP6-222
59	Michael Mahony	REP6-223
60	Norman Kenneth Bate	REP6-224
61	Paul Atkinson	REP6-225
62	Philip Smith	REP6-226
63	Piers Sturridge	REP6-227
64	Rhett Griffiths	REP6-228
65	Sarah Courage	REP6-229
66	Stephanie Jane Harrison	REP6-230
67	Stephen Palmer	REP6-231
68	Terry Haworth	REP6-232
69	Theresa Thorne	REP6-233
70	Timothy John Harrison	REP6-234
71	Victoria Caroline Hambley	REP6-235
72	Matthew Denny	REP6-236
73	CPRE Kent	REP6-238
74	Joint Nature Conservation Committee	REP6-239
75	Natural England	REP6-241, REP6-242, REP6-243, REP6-244, REP6-245, REP6-246, REP6-247, REP6-248, REP6-250, REP6-251 and REP6-258
76	Royal Society for the Protection of Birds (RSPB)	REP6-252

77	Aldringham-cum-Thorpe Energy Action	REP6-253
78	Pippa Southorn	REP6-257
79	Dover District Council	REP6-260
80	Marine Management Organisation	REP6-268

2. Applicant’s Comments on the Submission from Port of London Authority

2.1 Introduction

- 2.1.1
- Table 2.1 summarises the Applicant’s comments on Port of London Authority Deadline 6 Response [REP6-140] Port of London Authority’s comments on Submissions Received at Deadline 5
- 2.1.2
- The Applicant has responded to Port of London Authority’s Deadline 6 Response [REP6-270] in **Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions**.

Table 2.1 Applicant’s Comments on the Port of London Authority Deadline 6 Submission [REP6-140]

Reference	Matter	Point Raised	Applicant’s Comments
2 Draft Development Consent Order (“dDCO”) [REP5-006]			
2.1	Draft Development Consent Order (dDCO)	Updates have been made to the dDCO at deadline 5 including the addition of protective provisions for the PLA. Whilst the inclusion of protective provisions for the PLA is welcomed, the PLA are still in discussions with the Applicant and further amendments are expected to be submitted at deadline 6, including the addition of a remediation clause. Any final comments on the PLA’s protective provisions will therefore be provided at deadline 7. Other updates of relevance to the PLA are: - Article 2 – Interpretation. Two new definitions have been included “areas of interest” and “areas of safeguarded depth plan.” The PLA is supportive of both these additions but has several minor points regarding consistency between the definitions in the dDCO and the Areas of Safeguarded Water Depth Plan [REP4-098]. The PLA understands that the Applicant will be making amendments at deadline 6 to resolve the inconsistencies. - Article 2 – Interpretation – the activities that are carved out of the definition of commence have been amended to remove the reference to offshore preparation works and to now include trial trenching. The Schedule of Changes to the dDCO [REP5-107] advise that this is to “better reflect the activities that will take place pre-commencement” but there is no reference to trial trenching in the outline Navigation and Installation Plan (“oNIP”) [REP4-076], the outline Cable Specification and Installation Plan (“oCSIP”) [REP5-118], the Navigational Risk Assessment (“NRA”) [REP5-031] or in other documents such as the outline offshore Construction Environmental Management Plan [REP5-069]. Either further information should be provided about where this trial trenching may take place, what it may involve and how it will be controlled or such activity should not be carved out of the definition. - Article 2 – Interpretation – a definition of the GridLink Interconnector project has been included. This is welcomed. - Schedule 1, Part 1 – The description of Work No. 6 marine electric line cables has been amended so that it now includes at (b) reference to burying cables. The PLA supports this amendment. - Schedule 3, Requirement (17) “Depth Protection” has been added. The PLA is supportive of this addition but would reiterate the comment above about ensuring the drafting is consistent with the Plan. It is understood that there will also be an	The Applicant confirms that the term ‘<i>Areas of Safeguarded Water Depths</i>’ was included at Deadline 6 to replace ‘Areas of Interest’ to ensure consistency between all plans and the dML. Further clarity on Trial Trenching has been included into the Outline Application Document 9.92 Outline Cable Specification and Installation Plan at Deadline 6 and Deadline 7. PLA’s Protective Provisions have also been updated. The Applicant confirms that requested amendments to the Area of Safeguarded Water Depth Plan have been submitted at Deadline 6 and Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		update to the Areas of Safeguarded Water Depth Plan at deadline 6 to include on the Plan areas of shallower water depth where the Sea Link and GridLink cables would not cross. This must be in the dDCO. - Schedule 16 – Deemed Marine Licence (“DML”). Amendments have been made to the DML including the same change to the definition of commence and to the definition of Work No. 6. - At Part 2 Conditions, a new condition (3) has been included which prohibits various activities within the Areas of Interest including wet storage; exclusion zones (but recommended Restricted Zones are permitted) and planned cable joints. Drafting also deals with the crossing of GridLink and existing cabling. Condition (3) is welcomed. - At Part 2 condition (4) the PLA is included as a consultee to plans. This is welcomed. Plans such as the CSIP now must be in substantial accordance with the outline plan. The PLA set out in its deadline 5 response [REP5-177] its concerns about the use of the word substantial as the wording is very weak and could result in final plans being different from the outline plans. The final plans should simply be in accordance with the principles in the outline plans. The update to 4(a) which makes it clear that the CSIP is to be informed by a CBRA is welcomed. Condition 4(1) is also clear that trial trenching can be undertaken before plans such as the NIP are submitted. This is concerning. As set out above, more detail is needed on where the trial trenching may take place and what controls will be in place. - Condition 4(6) is now clear that water depths between KP 33 and KP 38 must not be reduced unless otherwise agreed with MMO in consultation with MCA and Trinity house. The PLA welcomes this amendment. - The PLA has marked up a copy of the DML at Appendix 1 with the outstanding changes that it considers are required to the DML.	
3.1	Environmental Statement Part 4 Marine Chapter 1 Physical Environment [REP5-020]	Whilst updates have been made to Marine Chapter 1 Physical Environment [REP5-020], table 1.19 (page 85) still advises that “At present, no expected boulder removal is anticipated to be required along the route. However, should boulders be identified that are considered an impediment to the construction during the pre-installation survey, these would be removed by either a subsea grab or a displacement plough.” The PLA set out in its deadline 2 response [REP2-060], deadline 4 response [REP4-198] and deadline 5 response [REP5-177] that it was disappointing that the Applicant had not taken the opportunity to commit to no relocation of boulders to or within the Areas of Interest i.e. the Areas of Safeguarded Water Depth. Table 1.19 should be updated to include this commitment.	The Applicant has already committed to the PLAs requests in the Application Document 9.92 Outline Cable Specification and Installation Plan Table 1.19 has been updated.
4	Environmental Statement Part 4 Marine Chapter 7 Shipping and Navigation [REP5-026]	Whilst various changes have been made to the Shipping and Navigation Chapter, to avoid repetition the PLA would direct the Examining Authority to section 5 of its deadline 5 response [REP5-177] where, apart from bullet point 1, the PLA's comments remain outstanding. Deadline 5 changes of relevance to the PLA include: Changes to distances for example, at para 7.7.3 the PLA has been amended from being 9km to the west of the Offshore scheme to now being 8.9km to the west of the Offshore scheme. Whilst the PLA has no objections to these changes, most of which appear to be minor, it is noted that para 7.7.20 amends the distance from the Offshore Scheme and the Tongue pilot station from 80m to 200m. The Applicant provides no reason for this change in distance.	The Applicant notes these comments. This is noted by the Applicant. The updated distances and KPs within the Shipping and Navigation Chapter relate to the results of the final review of the distances and offsets to the final Sea Link Order Limits, relative to the working routeing, rather than the Order Limits per se.

Reference	Matter	Point Raised	Applicant's Comments
		- Changes to KP's for example in relation to the Sunk Pilot Station, the KP reference has been amended from 37 to 37.5. Again, there is no objection to what appear to be minor changes. - At 7.8.3 the text in relation to rolling 500m recommended restricted zones has been updated to remove the reason for the zones and to remove the provision in relation to advanced notice, replacing it with liaison with Interested Parties 'to establish communication protocols regarding the safety zones'. The oNIP [REP4-076] provides more detail on how this could be achieved with the NIP being updated accordingly. - Amendments to section 7.10 (additional mitigation and enhancement measures) See comments below on the REAC in section 7 below.	
5.1	Environmental Statement Appendix 4.7.A Navigational Risk Assessment [REP5-031]	In line with the changes to the Environmental Statement Part 4 Marine Chapter 7 Shipping and Navigation [REP5-026] amendments have been made to the NRA to amend distances, KP's, the text in relation to rolling 500m recommended restricted zones and the text in relation to additional mitigation measures. To avoid repetition, see the PLA's comments on these matters in section 4 above.	Please see response to reference 4 above.
5.2		Additionally, to avoid repetition the PLA would direct the Examining Authority to section 6 of its deadline 5 response [REP5-177] which set out the PLA's extant comments on the NRA.	The Applicant has reviewed these comments provided at Deadline 5 and has provided an updated version of the NRA at Deadline 6.
6.1	Outline Offshore Construction Environmental Management Plan [REP5-067]	Please see section 7 below in relation to commitments GM04, MPE05 and SN12.	Please see the Applicant's responses to comments on these commitments below at reference 7.3 and reference 7.5.
6.2		To avoid repetition, the PLA would also direct the Examining Authority to para's 13.3 to 13.5 of its deadline 5 response [REP5-177] which remain outstanding.	The Applicant confirms that it has addressed these matters in an updated version of the Outline CEMP at Deadline 6.
7.1	Register of Environmental Commitments ("REAC") [REP5-116] Section 1	Section 1 contains actions and commitments that the undertaker will comply with during the construction, operation or decommissioning of the Proposed Project. There is no reference to compliance during maintenance. The addition of a reference to maintenance would be consistent with the terminology used in Requirement 17 of the dDCO which requires Work No. 6 including any associated development or ancillary works, located within the Areas of Interest to be "designed, installed, operated and maintained" at a level.	The Applicant confirms that where each REAC entry is applicable to construction, this has been outlined within the individual REAC commitment.
7.2		It is stated that the measures are secured by Requirement 5 in the DCO and that the REAC "has been developed to provide firm, precise commitments for measures that are not subject to amendment" however Requirement 5(1) of the dDCO allows for the relevant planning authority or other discharging authority to allow the works to be carried out not in compliance with the approved plan. This is concerning, particularly as it is not clear who would approve non-compliance with the offshore elements of the proposed Scheme or whether any consultation would take place before non-compliance was permitted or refused. The commitments provided for in the REAC and the requirement to carry out the works in accordance with the REAC should be absolute and Requirement 5 should be amended accordingly.	The Applicant provides the following response to these comments on commitments: MPE05 – This will be updated and submitted at Deadline 7. SN11 – This commitment is surrounding avoiding simultaneous RAM operations with the North Falls and Five Estuaries developments. The Applicant would like to clarify that concurrent RAM operations between these offshore developments and Sea Link would not occur within the Areas of Safeguarded Depth "Long Sand Head Two-Way Route crossings area" and "North East Spit area", as the Five Estuaries and North Falls cable routes do not route within the "Long Sand Head Two-Way Route crossings area" or the "North East Spit area".
7.3		Commitments relating to the offshore scheme start on page 18. Comments on the commitments are set out in the table below. The PLA would note that many of these points have been made previously:	

Reference	Matter	Point Raised	Applicant's Comments	
		MPE05	In the REAC It is stated that depth of burial monitoring surveys are to be undertaken by the undertaker post installation during the construction phase. Part 4, Chapters 1 and 4 of the Environmental Statement are then referenced. However, the outline offshore Construction Environmental Management Plan ("outline offshore CEMP") [REP5-067] includes at table 1.6 reference to MPE05 and it states there that the oCSIP and outline offshore CEMP are the relevant plans. No timescale is provided on when the survey(s) will take place and therefore this could presumably be undertaken at any point during the construction phase. The outline offshore CEMP also gives the impression of a further survey that is proposed 12 months after commissioning would also be secured through MPE05 along with the targeted surveys of areas where DoL hotspots are detected. However, it is not clear how MPE05 as currently drafted secures these additional surveys.	SN12 – This commitment was updated at Deadline 6 to remove the wording 'where practical' as requested, and now states: <i>The Applicant shall adhere to the approach to Restricted Ability to Manoeuvre operations in visibilities of below 2 nautical miles as outlined in the Outline Navigation and Installation Plan (NIP) secured within the Deemed Marine Licence.</i> SN14 – This will be updated and submitted at Deadline 7. SN19 – The Applicant has provided an updated version of SN19 at Deadline 6 which secured it at all phases, and SN20 has been updated to secure the commitment to no planned cable joints within the Areas of Safeguarded Depth.
		SN11	SN11 must be amended so that the commitment applies to all three Areas of Safeguarded Water Depth rather than just the Sunk.	SN20 - This commitment has been updated at Deadline 6 to secure the commitment to no planned cable joints within the Areas of Safeguarded Depth.
		SN12	SN12 must be amended to remove the wording 'where practical' and so that it applies to all three Areas of Safeguarded Water Depth. The commitment must apply for all project phases.	SN22 - This commitment has been updated at Deadline 6 to provide this.
		SN14	The commitment must apply for all project phases	
		SN19	The measure should be split so that it (1) commits to minimising disruption to the Sunk anchorage and Sunk Pilot boarding area during all phases (2) commits in line with the DML to no planned cable joints in all three Areas of Safeguarded Water Depth.	
		SN20	SN20 requires a re-write to reflect the commitments made by the Applicant in terms of safeguarded water depths and it must apply to all three Areas of Safeguarded Water Depth. The reference to the location of cable joints must also be explicit that there will be no planned cable joints in the Areas of Safeguarded Water Depth.	
		SN22	This commitment needs to carve out the areas where there must be no reduction in water depth, set out the areas where depths must be safeguarded and then apply the MCA's 5% reduction in water depths every where else. There must be no reductions in water depth that exceed 5%	
7.4	Section 2	Section 2 provides a mitigation route map and it states at para 1.1.5 that its production reduces the risk of any commitments being missed at a later date. With that in mind it is surprising that the usual suite of mitigations for cable schemes are not identified such as boulder relocation, archaeological finds etc.	The REAC has been resubmitted at Deadline 7. However, the boulder relocation and archaeological finds are already secured within the CSIP.	
7.5		Commitments relating to the offshore scheme start on page 95. Comments on the commitments are set out in the table below. The PLA would note that many of these points have been made previously:	The Applicant provides the following response to these comments on commitments:	
		GM01	The commitment must apply to all project phases.	GM01 – This has been updated for Deadline 7.
		GM02	The proposed measure only references that the UKHO, the Crown Estate and Kingfisher will be provided as-built locations of the cable and external protection, but others such as the PLA will also be given this detail. It is	GM02 – This has been updated at Deadline 6 to incorporate the Port Authorities.

Reference	Matter	Point Raised	Applicant's Comments
			recommended that a reference to other interested parties is included in the measures proposed and that the protective provisions are referenced in the securing mechanism.
		GM04	The sensitive routeing and siting of infrastructure and temporary works is proposed and Schedule 1 of the DCO is referenced. This is the whole of the authorised development. It is unclear how Schedule 1 results in sensitive routeing or siting. This is also at odds with the outline offshore CEMP which states in Table 1.5 that the oCSIP and outline offshore CEMP are the relevant plans to secure this commitment.
		GM05	Refers to early and continued stakeholder engagement. It is stated that this is secured through the outline offshore CEMP. The outline plan refers to external notifications and it would appear from para 1.6.7 that authorisation is required from National Grid for stakeholder liaison with statutory authorities and other stakeholders. It might be more appropriate to refer to the oNIP.
		MPE02	The commitment should apply to all project phases.
		SN01	SN01 needs so be clear what happens when cable burial is unsuccessful (either to full depth or to minimum DoL) in the Areas of Safeguarded Water Depth and link back to the remediation clause in the PLA's protective provisions. It should also apply to all project phases.
		SN02	The commitment should apply to all project phases.
		SN03	The commitment should apply to all project phases.
		SN04	Any commitment should apply to all project phases. The PLA notes that in the Statement of Common Ground with Trinity House [REP5-059] entry 3.3.9 states that they do not always consider buoys suitable mitigation for exposed cables as they would need to be placed very close to the cable to be effective and could create an additional hazard for surface navigation so discussions on this matter will be required.
		SN08	The commitment should apply to all project phases and to all three Areas of Safeguarded Water Depth. The reference to 'any expected change in under keel clearance or anticipated introduction of seabed hazards' is concerning.
		SN29	The PLA still has outstanding concerns about the NIP which is the securing mechanism for SN29 and has highlighted that the size of the recommended restricted zones may need to be reduced in order for port operations not to be significantly disrupted at certain times, in areas such as the Sunk boarding and landing area (see section 7 of REP5-177).
		SN32	This will need to reflect any clear commitments in relation to no concurrent RAM vessels.
			GM04 - This is embedded mitigation which was incorporated at the routing and siting stage and is applicable to the whole development. All marine mitigation is also secured within the offshore CEMP. GM05 – The Outline CEMP was updated at Deadline 6 to reflect this request to reference other documentation in Condition 4 of the dML. MPE02 – This has been updated for Deadline 7. SN01 – The Applicant has provided an updated version of this commitment at Deadline 6 to address this comment. SN02 – The Applicant will update the REAC at Deadline 7 to apply this commitment to all phases. SN03 - The Applicant will update the REAC at Deadline 7 to apply this commitment to all phases. SN04 – The Applicant notes this comment and has updated this commitment which will be submitted in the REAC at Deadline 7. This commitment now states: SN08 – This has been updated to all Phases at Deadline 6. SN29 – Regarding the potential for reducing the size of the Recommended Restricted Zones at certain times and in certain areas such as near the Sunk Pilot Boarding Station, the Applicant takes the view that this is a safety matter, and that it will adhere to industry best practice to balance port and Sunk VTS requirements for safety, and that it commits to a 500m rolling RRZ, unless otherwise agreed with Sunk VTS. SN32 – This has been updated at Deadline 6.
8.1	Outline Cable Specification and Installation Plan [REP5-118]	The PLA and the Applicant have been discussing the content of the oCSIP and because of this, the PLA has no substantive comments on the deadline 5 oCSIP [REP5-118] other than to emphasise it is not appropriate for final documents such as the CSIP to be in substantial accordance with the outline document. The PLA will review and provide any final comments on the oCSIP at deadline 7. This is noted by the Applicant.	

Reference	Matter	Point Raised	Applicant's Comments
9.1	Water Depth Baseline Study – Shipping and Navigation Technical Note [REP5-121]	Whilst an updated Technical Note has been submitted, the version history of the document advises that it is updating errata. The PLA's suggestion therefore remains that the maximum 5% limit on water depth reduction as proposed by the MCA, is extended to include the NE Spit Area of Safeguarded Depth to approximately KP105. This would be consistent with the approach taken at the other two areas of absolute safeguarded depth to ensure areas currently deeper than the safeguarded depths are also not subject to significant reductions.	The Applicant confirms that the 5% water depth reduction requirement applies to full cable route.
10.1	Applicants Comments on Other Submissions Received at Deadline 4 [REP5-132]	Table 8.1 summarises the Applicant's comments on Port of London Authority Deadline 4 Response [REP4-141]. Table 8.2 summarises the Applicant's comments on Port of London Authority Deadline 4 Response [REP4-198].	The Applicant notes this comment.
10.2		The Applicant advises in relation to RAM operations that the oNIP was updated at deadline 4 to extend its remit to other Areas of Interest, but the PLA comments on the deadline 4 oNIP highlight that concurrent RAM Operations should also not be permitted to occur in the IMO Routeing Measures AOI and the Princes Channel Approaches AOI. The Applicant also has not addressed the PLA's comment regarding RAM operations in visibilities of below 2 nautical miles.	Regarding concurrent RAM operations, please see the Applicant's response to this matter in Table 15.1 at reference 7.6 in Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109]. The Applicant can confirm that additional text regarding RAM operations in visibilities of below 2 Nautical Miles has been added to the oNIP in section 3.4 at Deadline 6 and further updated at Deadline 7.
10.3		The PLA notes the Applicants response to the PLA's concerns regarding the use of the term 'substantial accordance' is to direct the PLA to the deadline 5 version of the DML which has updated the requirement for plans and now requires them to be in substantial accordance with the outline version. No reason is given for this approach or why the concerns of the PLA and others (see for example the MMO) have not been addressed.	The Applicant confirms that it is not in a position to enforce Conditions on the MMO with regards to consultation outside of what is already captured in the dML. The Applicant has reached out the MMO on the PLA's suggested dML wording on the 22 nd April 2026. The MMO's Deadline 5 response [REP5-175] states the following:
10.4		A similar response is provided in respect of the changes to the DML that the PLA has sought. There is no explanation as to why the MMO is able to agree that licensable activities can be carried out not in accordance with the submitted plans etc and no mechanism to ensure that the MMO consults on any proposals for non-compliance before making their decision.	<i>The PLA has proposed that Schedule 16, Part 2 Condition 4 (5) is amended to include "(provided that the MMO has consulted with any party that it was required to consult with in relation to a relevant plan, protocol, statement, or details pursuant to this condition 4)". The MMO does not consider this amendment appropriate and notes Condition 4 has been re-worded during examination to include consultees including the MCA, EA and Cefas. The MMO has no issue with the inclusion of the PLA as part of the list of consultees as the MMO consult with the authority on activities that fall under their jurisdiction as standard practice.</i> The Protective Provisions are the appropriate place to secure this consultation.
11.1	Applicant's Responses to Second Written Questions [REP5-135]	The Applicant's responses regarding the Shipping and Navigation questions are set out in table 20.1 (starting on page 90). The PLA does not comment on every response but would highlight: 2SN2 – Whilst the Applicant correctly identifies that the PLA requested clarification regarding freespan clearance in its Written Representation [REP2-034] the PLA's understanding of freespan clearance is different from that of the Applicant. The PLA considers freespan to be sections of the cable that are not	The Applicant has the following responses: - The Applicant appreciates the clarification on the PLA's use of the term "freespan clearance" and has updated the oNIP accordingly for Deadline 7. 2SN3 - The Applicant confirms that the CBRA is a document authored at a point in time to inform assessments. This document

Reference	Matter	Point Raised	Applicant's Comments
		touching the seabed rather than the Applicant's interpretation that they are sections of cable laid on the seabed uncovered by protection. 2SN3 – The PLA would question why key documents will be updated post consent based on the additional requirements for deeper burial. 2SN4 – The PLA set out in its response to Second Written Questions [REP5-177] the concerns about the suitability of the NIP to effectively cover vessel operation movements and communications. The PLA's response also set out how the PLA's concerns could be overcome. This matter remains outstanding.	will be updated during detailed design as is normal practice for subsea cable projects. 2SN4 – The Applicant notes this and has provided an updated version of the NIP at Deadline 6 to address these matters (Application Document 9.12 (C) Outline Navigation and Installation Plan [REP6-099]).
12.1	Areas of Safeguarded Water Depth - Consideration of Additional Installation Requirements [REP5-139]	The PLA welcomes the production of this Report which advises that further engineering work has been completed to establish the most appropriate method of installation for achieving the required Safeguard Water Depths. This relates to additional pre-sweeping requirements in the Sunk Pilot Boarding Area and the use of additional cable burial techniques within the NE Spit area	This is noted by the Applicant.
12.2		The Report identifies that at the Sunk Pilot Boarding Area pre-sweeping will also be required between KP38.7 and KP44.4 at an average depth of 1.5m with the material being re-distributed within the pre-swept area of the Order Limits This is in addition to the previously assessed application parameters of pre-sweeping KP96.32 to KP113.883 at an average depth of 2m.	
12.3		At the North East Spit the creation of a trench by backhoe is the preferred option between KP102.4 to KP104.4.	
12.4		The Applicant has confirmed to the PLA that this additional pre-sweeping means that the subsequent cable lowering "remains 2.0m-2.5m below 22.5m CD". As a result of this confirmation, the PLA is content that the DoL information in the oCSIP and CBRA are consistent and that application documents do not require an update in respect of DoL.	
13.1	Outline Navigation and Installation Plan [REP4-076]	The PLA has reviewed its comments on the oNIP and sets out below the comments which it considers are outstanding and still need to be satisfactorily addressed by the Applicant: - The temporal scope of this and all documents that relate to shipping and navigation, need to be clear and consistent. For example, the oNIP has references to the oNIP applying to the construction and operational phase (para's 1.1.1 and 1.1.2) but there are also references to the operation and maintenance phases (para 1.1.3) and this implies that the operational phase is therefore different to the maintenance phase. The PLA considers that as Requirement 17 refers to both operation and maintenance that all shipping and navigation documents need to be clear that they relate to operation and maintenance. - It also needs to be clear when each document comes into force and what controls are in place prior to a document coming into force. For example, para 1.2.18 of the oNIP states that the oNIP comes into force once construction begins. That would mean that activities such as trial trenching which is carved out of the definition of construction would not be controlled by the oNIP. This is concerning. - At para 1.2.22 the list of Interested Parties still does not include the Port of Tilbury.	The Applicant had provided an updated version of the oNIP at Deadline 6 [REP6-099] to address the PLA's concerns: - The Port of Tilbury was included as an Interested Party at Deadline 6. - The following text can be found under the section entitled Freespan Clearance, at paragraph 2.4.3: <i>The Proposed Project's primary cable protection strategy is via cable lowering.</i> Regarding the additional and outstanding comments listed by the PLA, the Applicant has provided a further update of the oNIP at Deadline 7 to address these. The Applicant appreciates the clarification on the PLA's use of the term "freespan clearance" and has updated the oNIP accordingly for Deadline 7. Regarding SN11, please see the Applicant's response to this comment above in reference 7.3.

Reference	Matter	Point Raised	Applicant's Comments
		- It needs to be clear in the oNIP and all other relevant Shipping and Navigation Documents (e.g. the oCSIP) when Interested Parties will be consulted and when documents will be updated. Given the complex issues that the NIP is covering it is not appropriate simply for Sea Link to update the document and provide it to Interested Parties at 'regular intervals' (para 1.3.2). Para 2.4.2 refers to possible updates to the NRA, post consent, if routeing has changed significantly prior to construction. There is no reference to further consultation with IPs, which will be required prior to installation activities commencing (See Five Estuaries oNIP para's 3.3.2-3.3.3). - Freespan Clearance – at Para 3.12 the first sentence should make it clear that the primary cable protection strategy is via cable lowering below the seabed. - Para 2.3.3 it is concerning that the oNIP states the cable will be buried where practicable. - It is also concerning that there is single sentence stating what might happen where target depth of lowering cannot be achieved: rock backfill may be installed. This takes no account of section 3.9 and in particular the Areas of Safeguarded Water Depth or the Areas of Reduction in Water Depth and the requirements set out in para 3.9.2. - Whilst para 3.3.6 has been updated to be clear that simultaneous RAM operations are not permitted to occur. This is limited to the Sunk – as set out above in relation to SN11 it needs to apply to all three Areas of Safeguarded Water Depth.	
14.1	Concluding Remarks	The PLA remain in discussion with the Applicant as to how mitigations to a number of technical issues are secured. Other projects such as Five Estuaries and North Falls have already set precedents as to how these standard mitigations are secured. The PLA believes these outstanding issues, based on the detailed feedback presented here, can be resolved by the close of the examination, provided the Applicant does not attempt to progress novel alternatives.	This is noted by the Applicant.
14.2		At deadline 1 the PLA included a table at paragraph 13.5 of its Written Representation [REP1 156] setting out how the PLA's concerns regarding the Sea Link application needed to be addressed. At Deadline 5 [REP5-177] a further update to the table was provided. With one deadline remaining, the PLA has updated the table to show progress in relation to the various activities.	The requested REAC commitments below will be added at Deadline 7. These were already included within the relevant offshore plans at D6 but due to time constraints were not added to the REAC for Deadline 6.

Activity	Summary of PLA's Position	Securing Mechanism	Status
Cable installation, maintenance, operation and decommissioning	Safeguarding of current and future depths: 22m Sunk Pilot Boarding Area 12.5m Long Sand Head 12.5m North East Spit And in all cases making allowance for an over-dredge tolerance of 0.5m	Design Requirement	Agreed
		Protective Provisions for the PLA	In discussion – currently with Applicant
		Certified Plan	Understood Plan to be updated at deadline 6 to include areas of shallower water depth where Sea Link will not cross GridLink. This will need to be secured in the DCO
Cable installation and maintenance	The most effective method of cable laying in terms of speed and ability to achieve the required cable burial depth must be used	oNIP	Updated version provided by applicant
		REAC	Need to secure the most effective method of cable laying outstanding. Necessity for reduced RRZ at times and no RAM operations when visibility less than 2NM remain outstanding
Cable Crossings	Safeguarding of current and future depths: 22m Sunk Pilot Boarding Area 12.5m Long Sand Head 12.5m North East Spit And in all cases making allowance for an over-dredge tolerance of 0.5m Further information and controls required in relation to the Sea Link - GridLink crossing point to ensure that if Sea Link is installed first, Grid Link can still be brought forward and water depths safeguarded	Design Requirement	Agreed
		Protective Provisions for the PLA	In discussion – currently with Applicant
		Certified Plan	Understood Plan to be updated at deadline 6 to include areas of shallower water depth where Sea Link will not cross GridLink. This will need to be secured in the DCO

Activity	Summary of PLA's Position	Securing Mechanism	Status
Use of cable protection	Safeguarding of current and future depths: 22m Sunk Pilot Boarding Area 12.5m Long Sand Head 12.5m North East Spit And in all cases making allowance for an over-dredge tolerance of 0.5m	Design Requirement	Agreed
		Protective Provisions for the PLA	In discussion – currently with Applicant
		Certified Plan	Understood Plan to be updated at deadline 6 to include areas of shallower water depth where Sea Link will not cross GridLink. This will need to be secured in the DCO
Surveys and Monitoring Trial Trenching	Consultation with the PLA prior to any surveys or monitoring taking place	Protective Provisions for the PLA	Survey and monitoring provisions agreed in protective provisions. Trial trenching included in dDCO at deadline 5 – protective provisions need to be updated to reflect this
		DML	Excludes pre-construction surveys, trial trenching and monitoring from the definition of commence. How are these activities controlled.
		oNIP	Deadline 4 oNIP contains no reference to trial trenching. Pre-commencement activities can take place before NIP has been approved.
Boulder relocation	Boulders / Debris cannot be displaced within or to the Areas of Interest and must be removed	oCSIP	Understood update to be made to oCSiP at deadline 6
		REAC	Commitment required in REAC
Archaeology relocation	Archaeological relocation cannot occur within or to the Areas of Interest and must be removed	oCSIP	Understood update to be made to oCSIP at deadline 6
		REAC	Commitment required in REAC
UXO relocation	The PLA must be consulted on any application for marine licensing for	oCSIP	Agreed
			Agreed

Activity	Summary of PLA's Position	Securing Mechanism	Status
	the clearance of UXO within or which may affect the Areas of Interest before such applications are submitted to the MMO. With regard being had to any request made by the PLA for reasonable amendment to the proposed application. The PLA must be notified of the final programme for any clearance of UXO within the Areas of Interest	Protective Provisions for the PLA	
Dredging / Disposal of sediment	Dredging cannot lead to a reduction in navigable depth within the Areas of Interest as a result of dredged material being placed directly into these areas of migrating into these areas from disposal sites	oSDMP Design Requirement Certified Plan	Agreed Agreed Understood Plan to be updated at deadline 6 to include areas of shallower water depth where Sea Link will not cross GridLink. This will need to be secured in the DCO
Wet storage	Wet Storage of materials and/or equipment cannot occur within the Areas of Interest	oCSIP DML REAC	Agreed Agreed Commitment required in REAC
Field joints	Planned field joints should not be located in the Areas of Interest	oCSIP DML REAC	Agreed Agreed Commitment required in REAC
Freespan Clearance	There must be a clear commitment to no freespans over the Areas of Interest	oNIP and/or Design Requirement	Different interpretation of what freespan clearance is. oNIP needs to provide a clear commitment to no freespans over the Areas of Safeguarded Water Depth

Activity	Summary of PLA's Position	Securing Mechanism	Status
		REAC	Commitment required in REAC
Remediation	It needs to be clear what will happen if cable burial depths are not achieved during installation or maintenance.	Protective Provisions for the PLA DML	Remediation paragraph being discussed with a view to it being included within the PLA's protective provisions.

3. Applicant’s Comments on the Submission from Suffolk County Council

3.1 Introduction

- 3.1.1 Table 3.1 summarises the Applicant’s comments on SCC Deadline 6 Response [REP6-141] Comments on Submission Received at D5
- 3.1.2 Table 3.2 summarises the Applicant’s comments on SCC Deadline 6 Response [REP6-181] Post-Hearing Submission for Compulsory Acquisition Hearing 2.
- 3.1.3 Table 3.3 summarises the Applicant’s comments on SCC Deadline 6 Response [REP6-182] Post-Hearing Submission for Issue Specific Hearing 3.
- 3.1.4 Table 3.4 summarises the Applicant’s comments on SCC Deadline 6 Response [REP6-183] Post-Hearing Submission for Open Floor Hearing 3.
- 3.1.5 Table 3.5 summarises the Applicant’s comments on SCC Deadline 6 Response [REP6-184] ISH3 Action Points.
- 3.1.6 Table 3.6 summarises the Applicant’s comments on SCC Deadline 6 Response [REP6-237] Appendix A.
- 3.1.7 The Applicant’s has responded to SCC Deadline 6 Response [REP6-276] in **Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions.**

Table 3.1 Applicant’s Comments on the Suffolk County Council Deadline 6 Submission [REP6-141]

Reference	Matter	Point Raised	Applicant’s Comments
Comments on further information / submissions received by Deadline 5			
	Purpose of this submission	The document has been prepared by Suffolk County Council to provide a written response to submissions received by the Examining Authority (ExA) at Deadline 5. Examination library references are used throughout this document to assist readers. SCC has not sought to repeat previous representations and has instead taken an approach of providing further information where appropriate. Unless indicated otherwise, SCC considers its positions as set out in previous submissions unchanged.	Noted
Table 1 – Document 3.1(H) draft Development Consent Order			
1	Work No. 17 – Principal Public Right of Way Diversions	This is to be omitted from the draft DCO.	The draft DCO has been updated at Deadline 7 and that document sets out the Applicant’s position in this matter.
	2), d) works to alter the course of, or otherwise interfere with a watercourse, drainage works, attenuation ponds, and temporary culverts;		
2	Schedule 3 Requirement 14	SCCAS are generally satisfied with the wording Requirement 14 (Archaeology). SCCAS are however concerned that part 4 does not make clear that archaeological mitigation works must take place prior to any pre-	The draft DCO has been updated at Deadline 7 and that document sets out the Applicant’s position in this matter.

Reference	Matter	Point Raised	Applicant's Comments
	Update to archaeology requirement 14	commencement works as well as construction works, given the high potential for these activities (based upon the list of activities defined within the DCO as pre-commencement works) to cause below ground impacts which may damage or destroy archaeological remains before they are appropriately mitigated. Therefore, additional clarity is still needed in the wording of the requirement to appropriately safeguard archaeology and secure this work at an appropriate time in relation to other works. As such, SCCAS would continue to advise that Requirement 14 (4) should be worded as follows: 'All archaeological works must be carried out in accordance with the approved site-specific written scheme of investigation for that stage, prior to the commencement of any pre-commencement or construction works in that stage'.	

Table 2 – Document 7.5.3 (C) Outline Onshore Construction Environmental Management Plan

1	Drainage Management Plan (DMP)	The LLFA would like the applicant to agree a minimum level of detail for the DMP that will be provided. The DMP needs to include as a minimum: - construction surface water drainage system design - construction management, maintenance and remediation schedules required consents, e.g. Land Drainage Act, Environmental Permit - flood risk controls - Flood & weather alerts - pollution, water quality and emergency control measures - phasing plan (if required) - construction site plan that includes compounds, material storage areas and temporary site parking The DMP should look to use a SuDs solution, and all SuDs are to be established prior to use.	The Applicant agrees with the LLFA and has included details into paragraph 8.1.9 of the Application Document 9.17.1 Suffolk Drainage Strategy.
2	Cultural heritage provisions	8.1 There WILL be direct and indirect impacts upon buried archaeological remains as a result of numerous elements of the planned pre-commencement and construction works. SCCAS would advise that greater clarity and detail regarding the pre-commencement and construction activities which have the potential to impact upon buried archaeological remains is needed within this document. The CEMP should also set out that prior to the commencement of any pre-commencement or construction works within an area, that the need for any archaeological mitigation work to be undertaken should be assessed and the location of any archaeological preservation in situ areas must be identified. Where there are archaeological constraints identified, these should be mitigated prior to works commencing, in line with the OWSI and site specific WSIs and archaeological PIS management plan. Archaeological constraints should be identified on plans and project constraints mapping to ensure that all archaeological mitigation work is completed prior to commencement of any other works and that defined archaeological PIS are suitably protected.	Archaeological mitigation is outlined in the updated the OWSI which has been submitted at Deadline 7 (Application Document 7.5.4.1 Suffolk Overarching Written Scheme of Investigation (C)). This will be followed by a Project Wide Written Scheme of Investigation (PWWSI) which will be developed in line with the Project Stages, as well as the Site Specific Written Schemes of Investigation (SSWSI) for each mitigation area. The OWSI includes the requirement for the CEMP to detail all archaeological works required, including areas of Preservation in Situ, as well as the need to mitigate areas where there are potential impacts resulting from decompaction works.

Reference	Matter	Point Raised	Applicant's Comments
		The CEMP should also set out the provision for an HDD archaeology management plan to be produced in relation to potential impacts of bentonite breakouts upon defined archaeological PIS areas. It is also worth flagging that any decompaction works following the removal of track matting (as set out in H01) has the potential to impact upon archaeological remains and therefore will need consideration as part of any decompaction methodologies. Any reinstatement works (as set out in H02) will also need to take any identified archaeological PIS areas into account and ensure impacts are avoided within these areas.	
3	Archaeological Clerk of Works	Table 3.1 of the CEMP should also include the Archaeological Clerk of Works (ACoW) and list their role and responsibilities.	
Table 3 – Document 7.5.6.1 (D) Outline Onshore Overarching Written Scheme of Investigation (OWSI)			
1	Document approval status	This document is NOT yet agreed with SCCAS. Whilst many of the comments set out within the SCC LIR with regards to the first draft of this document have now been addressed, a number of amendments are still required in line with the comments set out below to facilitate this and to ensure that archaeological mitigation provisions are suitable and robust.	The Applicant has updated the OWSI in line with comments from SCC as well as HE, and have submitted an updated OWSI at Deadline 7 (Application Document 7.5.4.1 Suffolk Overarching Written Scheme of Investigation (C)). All comments have now been addressed and agreed, with the exception being the requirements relating to the Project Wide Written Scheme of Investigation (PWWSI) for which discussions are ongoing.
2	Guidance documents	2026 versions of all SCCAS standard fieldwork guidance documents are to be issued in April 2026, so please can all references be updated to the latest versions.	
3	Timing of archaeological works and safeguards	This document should explicitly set out that archaeological evaluation and mitigation work will need to be completed prior to the start of any pre-commencement or construction works within an area. It should also set out that prior to the commencement of any pre-commencement or construction works within an area, that the need for any archaeological mitigation work to be undertaken should be assessed and the location of any archaeological preservation in situ areas must be identified. Where there are archaeological constraints identified, these should be mitigated prior to works commencing, in line with the site specific WSIs and archaeological PIS management plan. Archaeological constraints should be identified on plans and project constraints mapping to ensure that all archaeological mitigation work is completed prior to commencement of works and that defined archaeological PIS are suitably protected.	
4	Mitigation areas/scope	1.3.4 SCCAS have provided detailed comments regarding mitigation areas and the scope of the ongoing evaluation and mitigation work which is required for the project to the Applicant's archaeological consultant. As such, Appendix A is not currently approved as not all mitigation areas are yet agreed and as an up to date and clearer plan showing the evaluation status for different areas of the scheme is needed. However, SCCAS would advise that as the final scope of evaluation and mitigation work will be agreed within the site specific WSIs, that	

Reference	Matter	Point Raised	Applicant's Comments
		plans showing provisional mitigation areas should be omitted from the OWSI as it is a working document and likely to change. SCCAS would advise that what is required in the OWSI is an up to date plan showing the status of evaluation works for the entire onshore area of scheme in Suffolk and clearly identifying which land parcels have had evaluation works completed and those where evaluation/assessment is still pending, based upon the latest order limits and works plans.	
5	Geophysical survey guidance	3.3.3 The SCCAS 2026 Standard Requirements for Geophysical Survey document should also be referenced here.	
6	Trenching levels	3.4.2 The expectation would be for a 5% trenching sample of any parts of the scheme where geophysical survey has been unable to be undertaken.	
7	Preservation in situ	4.2.19 In line with the updated requirement wording, provision needs to be made for a scheme wide HEMP which identifies the archaeological sites within the order limits which are to be preserved in situ rather than subject to alternative mitigation and sets out the safeguards which will be implemented to secure this during pre-commencement and construction works and also throughout operation.	
8	Preservation in situ	4.2.20 This will only be acceptable if it is demonstrated that there will be a sufficient buffer between formation levels and any archaeological remains, otherwise alternative mitigation will be required. Any decompaction works following the removal off temporary haul roads or compounds has the potential to impact upon archaeological remains and therefore will need consideration as part of any decompaction methodologies.	
9	Human remains	4.3.18 The statement relating to burial deposits should also include reference to the need for the SCCAS 2023 MPO guidance to be followed where a potential for this is identified.	
10	Scientific dating	4.3.43 and OSL dating	
11	Reporting	Section 6 needs updating to reflect the required reporting strategy for the project and to offer greater clarity regarding the reporting process. Reports will be required for any further phases of archaeological assessment work which are undertaken. All mitigation sites will require a PXA to be prepared, whether they warrant publication or not. Provision needs to be made for a PXA for each mitigation site (or group of mitigation areas should they be located in the same area/contain related remains). Following the submission and approval of all PXAs, a project wide UPD will need to be prepared which sets out the ongoing strategy for assessment, reporting and publication for the project as a whole.	

Reference	Matter	Point Raised	Applicant's Comments
		Provision should be made for full grey literature research archive reports for ALL sites, independent of publication given not every element of sites will necessarily be published. The approach to publication will be agreed in the UPD. It is likely that multiple publications will be necessary depending upon the agreed strategy e.g. thematic/period based/specific sites or finds of significance etc. All reports will need review and approval by SCCAS.	
12	Site specific WSIs	SCCAS preference, based upon what has worked successfully on other similar projects, is that following approval of the Outline Onshore Overarching WSI, a project wide site specific WSI which sets out the detailed strategy for further evaluation and mitigation for the entire onshore scheme in Suffolk should be submitted, to be supplemented by site specific method statements by the appointed archaeological contractor for individual areas of archaeological assessment/mitigation. These documents will need approval by SCCAS. This is so that the ongoing archaeological requirements for the project as a whole can be clearly understood, instead of a more piecemeal approach. This document can then also be provided to all project contractors, with the defined scheme wide locations of outstanding archaeological evaluation and mitigation added to project constraint mapping. This will ensure that all parties are clear as to the archaeological constraints in each part of the scheme and so that all archaeological mitigation work is completed prior to commencement of any other works in each area and that defined archaeological PIS are suitably protected.	The Applicant is currently continuing to engage with Stakeholders regarding the proposed approach to the development of a Project Wide Site Specific WSI (PWWSI). The provision for a PWWSI has been added to the updated version of Application Document 7.5.4.1 Outline Onshore Overarching Written Scheme of Investigation (OWSI) – Suffolk. Discussions are ongoing relating to how this will be produced to align with the Project Stages/development of the Detailed Design, allowing evaluation and mitigation to be undertaken as agreed on a stage by stage basis. The Applicant has made a small change to ensure that any pre-commencement works that pose no risk to archaeology can commence prior to the PWWSI being approved. As such the document states “This will ensure that all parties are clear as to the archaeological constraints in each part of the Suffolk Onshore Scheme and so that all archaeological mitigation work is completed prior to commencement of any other works in each area <i>that involve intrusive groundworks or vegetation removal</i>, and that defined archaeological PIS are suitably protected”.

Table 4 – Document 7.5.6.1 (D) Outline Air Quality Management Plan – Suffolk [REP5-074]

1	Outline Air Quality Management Plan	Public Health are content with the monitoring and mitigation proposed. Minor queries relating to specific sections are highlighted below.	Noted.
	Updates to the document as per tracked changes		
2	Page 3 1.2.3 - ESC <i>‘The element of the Proposed Project covered by this oAQMP is the Suffolk Onshore Scheme, which lies within the administrative area of ESC, which is a unitary authority within SCC.’</i>	East Suffolk Council isn’t a Unitary Authority.	Noted. This has been corrected in the latest version of the Air Quality Management Plan (7.5.6.1 (F) Outline Air Quality Management Plan – Suffolk), submitted at Deadline 7.
3	Page 12 AQ04 - Speed limit	Why have the speed limits been taken out, it leaves it open to interpretation	The Air Quality Management Plan (AQMP) was updated at Deadline 5 (7.5.6.1 (D) Outline Air Quality Management Plan - Suffolk [REP5-074])

Reference	Matter	Point Raised	Applicant's Comments
			to align with the mitigation framework set out in the Register of Environmental Actions and Commitments (REAC). The removal of a fixed numeric speed value was intended to allow the application of speed limits that are appropriate to prevailing site conditions. Defining a single speed limit at DCO stage does not always reflect the range of conditions that may be present across the construction programme, including variations in ground conditions, weather, traffic levels and construction activities. To provide additional clarity and address concerns regarding interpretation, the Applicant has amended the measure to state: "...Impose and signpost <i>an appropriate</i> maximum speed limit on unsurfaced haul roads and work areas...". The inclusion of the word appropriate confirms that a defined speed limit will be set and enforced, while allowing sufficient flexibility to ensure the measure remains effective for dust control under prevailing site conditions.
4	Page 14 5.3.1 - AQ04 <i>'Hold regular liaison meetings with other high risk construction sites within 500 m of the site boundary, to ensure plans are co-ordinated to minimise dust and particulate matter emissions and to understand the interactions of the off-site transport/deliveries which might be using the same strategic road network routes'.</i>	Please can the frequency of these meetings be specified	The Applicant does not propose to specify a fixed frequency for liaison meetings, as the appropriate level of engagement will vary depending on the nature, scale and stage of nearby construction activities. Meetings will be held as required to ensure that plans are effectively co-ordinated to minimise dust and particulate matter emissions and to understand potential interactions associated with off-site transport and deliveries. In practice, this may involve more frequent meetings (for example, weekly or monthly) where there is active overlap with other high-risk construction sites, and less frequent meetings (for example, bi-monthly or quarterly) where projects are at different stages or where activities are limited. This approach ensures that liaison is proportionate, responsive and targeted, while maintaining effective coordination with other construction sites as circumstances evolve throughout the construction programme.

Table 5 – Document 9.107 Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125]

1	Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station	The Council considers much of the detail been provided in this response is additional to what had previously been submitted. As such, it does not agree that its previous submission that inadequate detail and consideration of its proposed alternative access route was incorrect. SCC notes the reference to paras 4.3.22 and 4.3.23 of EN-1. SCC does not consider that the Applicant's response demonstrates that the proposed alternative route could not meet the objectives of the proposed development in the same timescale for the following reasons: • The alternative route does not affect any part of the energy infrastructure included within the authorised development, meaning the same infrastructure capacity would be delivered. • Accurate, up-to-date information regarding indicative timescales for the project's delivery have not been provided. The timescales provided, such as in [REP1A-004] do not account for the delay in the examination taking place. Although not mentioned in its needs case	The Applicant has clearly set out its position on the alternative access route proposed by SCC in its Deadline 5 Submission REP5-125 .

Reference	Matter	Point Raised	Applicant's Comments
		[APP-320], the Applicant has indicated elsewhere that the objective of the project is for energisation to occur by 2030. However, no information has been provided demonstrating the feasibility of this objective. • Information on expected timescales for AIL deliveries are not provided. It may be the case that AIL deliveries which must use this route are not needed until later in the delivery programme which would provide time to construct the haul road, undertake any enabling works, such as at the level crossing, and, potentially, for the Sizewell Link Road to be constructed prior to AIL deliveries. SCC notes the potential disadvantages of its proposed alternative access route which were recognised in SCC's original submission. However, SCC does not consider that these potential disadvantages outweigh the benefits of its route when compared to the Applicant's as set out in its original submission. To add, the risk from Sizewell C's works to the level crossing do not pose the level of risk portrayed by the Applicant. The works themselves are not expected to be lengthy and are planned to be completed by Q4 2026. If the works had not started by the time Sea Link needs to do its works, it should be possible for Sea Link to commence those works which would likely remove the need for Sizewell to do any works themselves as Sea Link would improve the crossing such that it can accommodate SMO AILs which is beyond Sizewell's needs at that crossing. The Applicant could coordinate to ensure the safety upgrades are such that Sizewell would not need to undertake any additional works which could cause delay to Sea Link. SCC notes that the Applicant presents great detail on the potential disadvantages of SCC's route but does not undertake a balancing exercise between the positives and negatives of each route to demonstrate that the Applicant's route is preferable and justified in policy terms. SCC maintains that the potential issues posed by its proposed route have practical, deliverable solutions which is not the case for the Applicant's route given the uncertainties over the Benhall Bridge and the unsuitability of alternative options presented for AIL deliveries. Moreover, the potential for the mini-bridge option for the Benhall Bridge hardly represents a resilient long-term solution to access a new major energy hub when considering the likely future projects that will need access to connect to Sea Link's infrastructure, including Lion Link and other projects on the TEC register.	

Table 6 – Document 9.124 Landscape and Nighttime Assessment [REP5-137]

1	The document sets out the required operational external lighting systems at Saxmundham Converter Station and Minster Converter Station and Substation, along with the relevant secured mitigation measures.	SCC notes the additional information provided by the Applicant. However, SCC disagrees with the nighttime receptor value judgements and considers them fundamentally flawed. It is not evident, for example, how relative tranquillity and remoteness would be reduced at nighttime (see LCAL1). The document refers to Nano Watts of light in various areas of the scheme based on the CPRE mapping (paragraph	The Applicant disagrees that the nighttime receptor value judgements are flawed and the reasoning for such judgements is detailed within Application Document 9.124 Landscape and Visual Nighttime Assessment [REP5-137] . The CPRE mapping is available online and the baseline is described within REP5-137 to inform the assessment. As stated in REP5-137 , nighttime photomontage visualisations have not been prepared as insufficient lighting design information is currently available.

Reference	Matter	Point Raised	Applicant's Comments
		1.5.3). However, it does not interpret these values but focuses instead on the influence of the 'brighter pockets' on the darker areas. The CPRE England's Light Pollution and Dark Skies Map shows that large parts of the project area between Saxmundham and the Landfall site are within dark areas (below 0.5 Nano Watts/sqcm/sr), some of which would be considered 'pristine' (below 0.25 Nano Watts/sqcm/sr). It would have been useful to see the DCO boundary superimposed on the CPRE map. The nighttime baseline photography underlines how dark the project area is. No visualisations of the operational phase were provided. SCC considers that this document underlines the need for a requirement within the DCO for a full external lighting design scheme to be submitted to and approved by the relevant discharging authority at detailed design stage (post DCO consent). This would need to be based on a design principle to minimise light pollution, by keeping lux levels and Kelvin values as low as possible and avoiding sky glow, glare and light intrusion through use of appropriate luminaires, mounting heights, hoods and louvres.	See Application Document 9.147 Outline Operational Lighting Management Plan [REP6-122] submitted at Deadline 6. The plan has also been secured in Requirement 3, with a further requirement to submit a final Operational Lighting Management Plan to local planning authorities for approval prior to installation of operational lighting. The outline plan has also been added to the list of certified documents in the draft DCO.

Table 7 – Document 9.17.1 (B) Suffolk Drainage Strategy [REP5-083]

1	Basin sides slopes - 6.6.5 Basin side slopes are proposed to be 1:3.	LLFA requirement for basins is no greater than 1:4 (LLFA SuDS Guidance Appendix A) If applicant wishes to use 1:3 side slopes, then a Designers risk assessment is to be supplied for each basin.	The Applicant agrees with SCC on this point. CIRIA SuDS Manual 2015 (CIRIA C753) states the following: “<i>Side slopes to the pond between the aquatic and safety bench should not usually exceed 1 in 3 for public safety reasons, and wherever mowing is required, slopes should preferably be no steeper than 1 in 4.</i>” (page 490) “<i>...even with smaller mowing machines, grass banks can only be cut by ride-on or wide hand operated mowers up to 1 in 4 slopes; the maximum slope for any form of hand-operated equipment is generally taken as 1 in 3, but this should be subject to risk assessment, which considers the capability of the particular cutting machine.</i>” (page 651). The typical basin cross sections represented within the Appendix to the Application Document 9.17.1 (B) Suffolk Drainage Strategy [REP5-083] show maximum 1 in 3 slopes, however these are subject to detailed design and the associated maintenance risk assessment which will be dictated by the vegetation proposed on the slopes and the maintenance strategy and could be 1 in 4 or shallower. All ponds proposed by the Applicant will be under the control of the Applicant for the purposes of maintenance and those activities will be fully risk assessed as identified within CIRIA C753. Should the public have potential access to the ponds the safety guidance within CIRIA C753 is being met by the typical details shown.
2	Terminology - Use of the word ‘pond’.	Review document and replace pond with basins, unless there is to be a permanent body of water.	Application Document 9.17.1 (B) Suffolk Drainage Strategy [REP5-083] paragraph 6.6.8 states ‘<i>The permanent attenuation ponds will be designed to be organic in shape and to be of value for riparian mammals by retaining an earth ledge and sloping bank above a shallow (e.g. minimum 10 cm) permanent water level. The ledge will be planted with emergent riparian vegetation.</i>’

Reference	Matter	Point Raised	Applicant's Comments
			The Applicant notes that pond has however been used in some areas of the strategy to describe the temporary basins, this will be amended within the strategy document.
3	Basin landscaping - 9. Amenity, landscaping of the basins/swales is not referenced.	LLFA require basins & swales to be Fescues or Bent grasses (80% plus) and Wildflower Seed (20% or less) – Wet or dry. Basins are to be vegetated prior to being used for water storage & treatment. (Suffolk SuDs Palette (SSP) -Guidance).	The Applicant has provided details of the typical attenuation basin within Application Document 9.17.1 (B) Suffolk Drainage Strategy [REP5-083], including the need for vegetation. The Applicant notes the LLFA mix requirement and although has no concerns with the proposal, would look to agree the mix within the detailed Drainage Management Plan – Suffolk, committed to within Schedule 3 Requirement 6 of Application Document 3.1 (I) draft Development Consent Order [REP6-004], so that all environmental mitigation commitments can be met with an agreed vegetation mix that is acceptable to the LLFA. The Applicant has made the following commitment on vegetation planting within Application Document 9.84 (D) Register of Environmental Actions and Commitments [REP6-134]. ‘LV13 -To provide an integrated drainage solution with attenuation ponds planted with marginal wetland species set within a wider context of native scrub planting to improve the biodiversity value across the site.’
4	Outfalls and Headwalls Outfalls and headwalls are depicted as concrete with galvanised steel handrails	LLFA would request that the projects look at alternatives structures that will blend into the landscape of the basin, whilst being maintainable.	The Applicant will review options including those available from Suffolk Highways and consider them for use subject to the Applicants design assurance and risk assessment processes.
5	6.2 Design Guidance and Policy List the design guidance and policy that has been reviewed.	National Standard for SuDS shall be reviewed, and it shall be demonstrated through the document where the guidance cannot be met.	The National Standards for SuDs are referenced throughout the Application Document 9.17.1 (B) Suffolk Drainage Strategy [REP5-083] . Clarification will be provided by referencing them within section 6.2 of the document identifies the design guidance and policies used in the development of the Drainage Strategy. The Strategy is compliant with the national guidance and local guidance where this is more stringent.
6	Appendix A: Drainage Design Summary Proposed infiltration basin location	Where infiltration basin is proposed, applicant need to demonstrate that infiltration is possible. If the infiltration rate is less than 10mm/hr, then an alternative strategy is to be demonstrated.	Infiltration testing was undertaken at the location of the permanent drainage assets to inform the outline drainage design and Drainage Strategy. Geological mapping and geotechnical investigation along the length of the project in Suffolk was used to identify the ground conditions, this informed the outline drainage design in line with the sustainable drainage hierarchy. Additional infiltration testing for the temporary infiltration basins will be undertaken as part of the detailed ground investigation to inform the detailed design.
7	Appendix B Drainage Layouts – Cross sections of basins	LLFA notes that there is cross section of attenuation/detention basins, but no infiltration basin is shown.	The cross section of the attenuation/detention basin shown reflects the cross section of the infiltration basin with the exception that there is no outfall or permanently wet section.
8	Water Reuse – Alluded to water reuse 3 rd party	Applicant needs to clearly demonstrate if water reuse by 3 rd parties is achievable and what level of water reuse can be achieved in accordance with the National Standards for SuDS.	The Applicant does not currently have any signed agreements with 3 rd parties for water reuse. However, given the demand for water in the region such reuse, feeding into adjacent irrigation supplies, is considered viable. The Applicant will continue to pursue these opportunities.
9	Cultural Heritage - Archaeological assessment and mitigation	All ponds, pipelines and associated drainage works should be scoped in for archaeological assessment (where located outside of areas within which evaluation has already been completed) and mitigation	The Applicant has updated the OWSI in line with comments from SCC as well as HE, and have submitted an updated OWSI at Deadline 7 (Application Document 7.5.4.1 Suffolk Overarching Written Scheme of

Reference	Matter	Point Raised	Applicant's Comments
		(as appropriate). Appropriate provisions for this must be set out within the OSWI and all relevant documentation.	Investigation (C)) . This includes the ability to undertake evaluation works including, but not limited to, evaluation trenching in areas not previously evaluated.

Table 8 – Document 9.27 Updated Archaeological Assessment – Suffolk [REP5-087]

1	Response to document – SCCAS comments on additional archaeological assessment	SCCAS would generally agree with the conclusions made within this assessment regarding the archaeological remains identified within the additional areas of archaeological evaluation. Whilst a number of remains of archaeological significance have been defined, SCCAS are satisfied that scheme impacts upon these heritage assets can be appropriately mitigated through an agreed programme of archaeological mitigation or through Preservation in Situ, to be secured through the OWSI and DCO Requirements (final versions of both still pending agreement). As previously set out by SCCAS, the D-shaped enclosure which has been defined at Friston is considered to be of regional significance and has the potential to contain settlement evidence and other remains. SCCAS would therefore advise that partial excavation of just a section of this feature would not be appropriate or in line with best practice and would not adequately mitigate the effects of the development upon this monument, resulting in a significant adverse effect. Therefore, this monument needs to be subject to a programme of enhanced mitigation to enable it to be mitigated in full if not going to be completely avoided by the route On the basis of the changes proposed to the order limits in this area and the results of the latest archaeological evaluation work, there is a suitable alternative route which would avoid the enclosure entirely and provide an opportunity to preserve this monument in situ, which SCCAS would strongly support as the preferred and optimum mitigation approach.	The Applicant acknowledges the comment.

Table 9 – Document 9.84 (C) Register of Environmental Actions and Commitments (REAC) [REP5-115]

1	Cultural Heritage – Heritage mitigation commitments	Any decompaction works following the removal of track matting (as set out in H01) has the potential to impact upon archaeological remains and therefore will need consideration as part of any decompaction methodologies. Any reinstatement works (as set out in H02) will also need to take any identified archaeological PIS areas into account and ensure impacts are avoided within these areas.	The Applicant has updated the OWSI in line with comments from SCC as well as HE, and have submitted an updated OWSI at Deadline 7 (Application Document 7.5.4.1 Suffolk Overarching Written Scheme of Investigation (C)). This includes the requirement to mitigate any potential impacts resulting from works such as decompaction operations, as well as the ongoing protection of preservation in situ areas.
2	REAC B27 - A seasonal restriction on compound set-up and demobilisation for the trenchless bore such that it occurs outside the nesting season (February to August). The most potentially disturbing elements of trenchless installation (set up of trenchless compound S10) will take place between	Should this seasonal restriction be between September and November for the Suffolk landfall compound to negate the risk of possible disturbance of overwintering birds at the RSPB North Warren reserve?	The Applicant has previously responded to this point raised by Suffolk County Council. There is already a seasonal restriction on compound set up during the breeding season and a similar restriction during the wintering season would render the project undeliverable. It is also unnecessary as modelling has confirmed that noise and lighting will not significantly affect the SSSI during winter.

Reference	Matter	Point Raised	Applicant's Comments
	September and January, to minimise disturbance of breeding nightjar and woodlark in the adjacent Sandlings SPA		
3	REAC B48 - A 20 m buffer will be implemented during construction around any Cetti's warbler nests that do establish within the construction area in each nesting season. A specific decision will then be undertaken in discussion with the ecological clerk of works over the construction activities that can take place in that area while the nest is active. In addition, there will be continued monitoring for Cetti warbler throughout the nesting season (March to August) by experienced ecologists. If singing males are present the site manager will be notified and steps taken to introduce construction works in the area prior to a nest being established.	How does the applicant propose to locate Cetti's Warbler nests given the skulking nature of this species which makes them difficult to accurately locate?	This refers to Kent rather than Suffolk but the Applicant will detect them in the same manner in which they were detected during breeding bird surveys for the project, through update surveys every spring and summer recording a consistent pattern of Cetti warbler calls, sightings and nesting behaviour (e.g. birds repeatedly visiting a specific location with nest-building material).
4	REAC B59 - The Undertaker shall prepare a HDD landfall Method Statement and Drilling Fluid Management Plan in consultation with Natural England (NE), Kent Wildlife Trust (KWT) and Royal Society for the Protection of Birds (RSPB), National Trust, and Thanet District Council, and submit the same for approval by the Marine National Grid March 2026 Sea Link 36REAC Ref Commitment Management Organisation (MMO) in accordance with the Cable Specification and Installation Plan prior to the commencement of any HDD activities.	SCC Ecology/SCC would like to be included in the consultation for this method statement.	REAC B59 has been updated for D7 to include East Suffolk Council in the list of consultees to ensure local concerns are considered.
5	REAC B66 to REAC B69 - Measures with regard to features present at the Kent landfall site	These references are for the Kent landfall site – SCC Ecology therefore have no comments to make on these points.	Noted.

Reference	Matter	Point Raised	Applicant's Comments
6	REAC AQ15 – Impacts on air quality sensitive receptors	“Where substantial maintenance activities are required during the operational phase and have the potential to generate dust or emissions, proportionate dust and emissions management measures consistent with those committed to for the construction phase shall be implemented, as appropriate, to minimise any effects on air quality. These measures include AQ02, AQ03, AQ04, AQ05, AQ06, AQ07, AQ08, AQ09, AQ10, AQ11 and AQ12 as set out in this document.” What would constitute ‘substantial’? If any maintenance activity has the potential to generate dust and emissions, substantial or otherwise, then we would expect proportionate dust and emissions management measures to be put in place in order to protect health.	The Applicant notes the concern regarding the term ‘substantial’. To avoid ambiguity, this wording has now been removed from the REAC measure (AQ15). Maintenance activities are generally limited in scale and include routine inspections, minor repairs and occasional refurbishment works. While such activities are not expected to generate significant dust, the Applicant agrees that any maintenance activity with the potential to generate dust or emissions will be subject to proportionate management measures to protect human health, such as those set out in measures AQ02, AQ03, AQ04, AQ05, AQ06, AQ07, AQ08, AQ09, AQ10, AQ11 and AQ12 of the REAC.
7	REAC A02 – Dangerous Trees A pre-construction check will be undertaken of trees within the Order Limits and remedial works actioned where appropriate (e.g. where they pose an unacceptable risk to people or property). Trees will be monitored during the construction period, and during operation where they pose a risk to infrastructure constructed as part of the Proposed Project. All staff operating on the Site are to be made aware of the need to look out for obvious signs of tree defects and to report them to the Site Manager who will seek further advice as necessary. Where remedial works are required in respect of those trees which are subject of commitment A05, then details of such works will be agreed in advance with the relevant local planning authority, save where already addressed in the Arboricultural Method Statement as required by Requirement 8, Schedule 3 and save in the case of emergency.	SCC considers that there needs to be a post completion safety audit for all trees that may have been adversely affected by the development and could therefore be or become a danger to life and property. This goes beyond the being a danger to the newly built infrastructure and needs to include third party property and health and safety of all users. The audit also needs to include all potentially affected trees, not just those that could pose a risk to the new infrastructure.	Where trees are located within the ownership boundary of the Applicant, they will be periodically inspected to assess their structural condition and safety and this is detailed within Application Document 6.10 Arboricultural Impact Assessment Part 1 of 2 [APP-294]. In accordance with Requirement 8, Schedule 3 within Application Document 3.1 (G) draft Development Consent Order [REP6-004] an Arboricultural Method Statement will be submitted to and approved by the relevant planning authority. This document will include the final level of arboricultural impacts and will detail an auditable system of compliance (which is generally achieved through arboricultural monitoring). Where trees are to be retained but impacted by the Proposed Project the Arboricultural Method Statement will detail how construction works will be achieved, which could include the use of ground protection or other specialist mitigation measures. Any impacts to trees that may require ongoing monitoring will be detailed within the Arboricultural Method Statement. The auditable system of compliance will ensure that the trees and their condition are monitored throughout the construction phase.
8	REAC A03 – Physical damage to trees A banksman will be used where the movement of plant or long reach machinery occurs within 5m of any part of a retained tree to	SCC queries whether this only refers to fly-over incursions. If this includes machinery entering the RPAs, then SCC would expect to see a cross-reference here to special construction methods, including the use of mats to prevent soil compaction.	In accordance with Application Document 6.10 Arboricultural Impact Assessment Part 1 and Part 2 [APP-294] and [APP-295] the area of constraint associated with retained trees will be protected with robust fencing where it is in proximity to construction works. The final extent of tree protection measures will be detailed within the Arboricultural Method Statement, which is secured via Requirement 8, Schedule 3 within Application Document 3.1 (G) draft Development Consent Order [REP6-

Reference	Matter	Point Raised	Applicant's Comments
	ensure no damage is sustained. Works within 5m of any part of a retained tree should only occur if they cannot be avoided.		004] . All incursions within the area of constraint associated with retained trees will be detailed within the Arboricultural Method Statement which will detail appropriate mitigation measures and this commitment is referring to those trees.
9	REAC A06 - Additional tree work Will require approval from relevant local authority	This is acceptable provided that AMS and TPP are also agreed with the relevant local authorities.	In accordance with Requirement 8, Schedule 3 within Application Document 3.1 (G) draft Development Consent Order [REP6-004] an Arboricultural Method Statement will be submitted to and approved by the relevant planning authority.
10	REAC A21 – Loss of trees Replacement planting at ratio of 3:1	The commitment by the Applicant to replace each lost mature tree with three new trees is welcomed by SCC. However, SCC does not recommend the planting of standard trees, unless there is bespoke aftercare (in particular, watering) provided also. SCC would recommend choosing smaller sizes, such as feathered trees, as they would be easier to establish/replace, should they fail.	
11	Trees and Hedgerows – pre-commencement works	SCC is concerned about paragraph 3 of Requirement 5 of the draft DCO, which specifies that all pre-commencement operations must be carried 'in accordance with the plans listed in paragraph (2) above, the outline management plans...'. The concern is that this may lead to unnecessary vegetation loss, given that at DCO consent stage the Rochdale Envelope is applied, allowing for a reasonable worst- case scenario, including for vegetation loss. SCC therefore expects that vegetation removal will be finetuned and further reduced during the detailed design stage. The wording of paragraph 3 does not incentivise the Applicant to provide updated plans detailing and further reducing the removal of vegetation (including mature, veteran, ancient trees and important hedgerows) based on the detailed design and micro-siting prior to precommencement operations, which currently include site clearance and temporary accesses, both likely to incur vegetation losses. SCC would welcome a commitment in the REAC that will ensure that vegetation removal is only carried out as far as necessary, based on the latest design and not in accordance with potentially obsolete plans.	The Applicant is updating to REAC and CEMP as necessary to respond to this comment.
12	REAC GG02 – Control documents No provision of Overarching Documents in addition to Outline Control Documents	SCC considers that post consent there will be the need of a detailed overall LEMP prior to the Stage LEMPs. SCC (Landscape) considers that it needs to be made clearer that the contactor will need to comply with the agreed Stages Plans rather than with the Outline Plans approved at DCO consent, as the latter are produced to a Rochdale envelope and require refining (reducing impacts further where possible).	The project has been deliberately structured to enable the staged detailed design of the project and staged discharge of requirements. The programme depends on this being undertaken as planned, with very significant programme delays possible if an approach is required that introduces the need to complete detailed design, including of landscaping, across the whole project before starting on part. It is also entirely unnecessary; there is no reason why the landscaping at Saxmundham must be determined prior to works starting at Friston for example. The outline LEMP provides the overarching strategy and there is no need to introduce an additional stage of discharge between the outline LEMP and the detailed LEMPs
13	REAC GG06 – Reinstatement A full photographic/aerial footage and descriptive record of condition (pre-condition survey) will be	SCC would welcome, if it could be agreed that this record is made available to SCC or the relevant discharging authority. Please clarify the alternatives for aerial vs photographic footage. SCC considers that aerial photos of hedgerow will not provide sufficient information.	The photographic record will be either from air or from the ground as appropriate to make a usable record. For hedgerows therefore the photographic record would be from the ground.

Reference	Matter	Point Raised	Applicant's Comments
	carried out of the working areas that may be affected by the construction activities prior to these works commencing.		
14	REAC GG07 – Temporary change in land use, habitat loss and vegetation clearance Hedgerows, fences and walls (including associated earthworks and boundary features) will be reinstated to a similar style/specification and quality to those that were removed where possible, with landowner consultation.	SCC considers any deviation from accurate reinstatement would need to be agreed with the relevant discharging authority.	The Applicant does not propose any changes to the wording of GG07 in response to this comment.
15	REAC GG21 – Construction lighting Lighting of lowest level	SCC (Landscape) recommends the use of warmer light (below 3000K), which can produce the same illumination levels.	The Applicant will work with their contractors and supply chain to identify suitable lighting solutions including the potential for 3000K lighting towers to be used in sensitive areas.
16	REAC GG26 – Types of fencing	SCC welcomes that the fencing would not block any surface water flow, but queries the potential restriction on movement of wildlife, such as small mammals.	This is controlled by REAC measure B15 which states that <i>‘While the haul road will be fenced, this fence will generally not go entirely to ground level so mammals such as badger will be able to pass. Where fencing is required to go to ground level passing places will be provided for mammals.’</i>
17	REAC GG27 - Impacts on human receptors from noise during construction works Communication and complaints handling in relation to noise.	SCC queries, whether the commitment goes far enough and whether there should be consideration to provide an offer of temporary hotel accommodation to residents affected by noise/vibration beyond a defined threshold.	Guidance on construction noise levels where temporary rehousing may be considered is provided in Annex E.4 of BS 5228-1:2009+A1:2014 ‘Code of practice for noise and vibration control on construction an open site – Part 1: Noise’. The noise levels at which temporary rehousing may be considered are not expected to exceeded (by a comfortable margin) during the works.
18	REAC LV01 – Impacts on vegetation Shrub, planting, where trees cannot be replaced.	This is insufficient. Any trees that need to be removed to enable the scheme will need to be replace at a ratio of 3:1. If replacement is not possible at the same location, due to planting restrictions over the cables, replacement will need to be included elsewhere within the DCO or outside as compensatory planting.	The Applicant responded to the replanting ratio request in document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241] and subsequently updated the REAC with commitment A21 which commits to the replacement of all mature trees to be removed with three newly planted trees.
19	REAC LV03 – five-year aftercare	SCC considers that a five-year aftercare commitment may be sufficient for habitats that are more easily reinstated but considers it too short for tree and woodland planting and ecological habitats of higher distinctiveness. SCC considers that adaptive aftercare needs to include the temporal element, meaning that if there is a significant failure rate (such as 30%) the replacement planting in such areas will reset the clock for the aftercare period. This is yet to be anchored in the OLEMP [REP4-064] and LV03.	

Reference	Matter	Point Raised	Applicant's Comments
20	REAC LV14 The River Fromus bridge design shall be developed as described in Requirement 3(3).	SCC considers that the detailed design, including the bridge's layout and scale, design elements, materials, colours and finishes, need to be submitted to and approved by the relevant local authority and that Requirement 3 in the draft DCO needs to be strengthened in this regard (current wording only requires confirmation that the bridge design is within the parameters listed).	The draft DCO has been updated at Deadline 7 which sets out the Applicant's position in this matter.

Table 3.2 Applicant’s Comments on the Suffolk County Council Deadline 6 Submission [REP6-181]

Reference	Matter	Point Raised	Applicant's Comments
Written Summary of Representations made at Compulsory Acquisition Hearing 2 (CAH2)			
4	Sections 127 and 138 of the PA2008 and Schedule 15 of the dDCO – Protective Provisions	4.1 At this stage, SCC has a number of matters under discussion with the applicant in relation to protective provisions for highways authorities. SCC will relay its comments in writing to the applicant. At this stage, SCC cannot commit to the approval of that PP but is hopeful that we can reach a resolution in the not too distant future	The response is noted and an updated Section 127 and 138 Statement are submitted at Deadline 7.

Table 3.3 Applicant’s Comments on the Suffolk County Council Deadline 6 Submission [REP6-182]

Reference	Matter	Point Raised	Applicant's Comments
Post-Hearing Submission for Issue Specific Hearing 3 – Written Summary of Representations made.			
	Purpose of this Submissions	The document has been prepared by Suffolk County Council to provide a written summary of the representations made by the Council at Issue Specific Hearing 3 (ISH3) held 25-27 March 2026. SCC has also included additional comments relevant to the agenda items. Examination Library references are used throughout to assist readers. Tables are numbered in line with the ISH3 agenda, items which were not relevant to Suffolk County Council have not been included in this submission.	Noted.
2.1	Matters arising from the supplementary agenda	No comments to make on this matter.	Noted.
3.1	Flood Risk	The applicant has submitted a draft technical statement ([REP5-134] - Document 9.122: Surface Water Flood Risk and Climate Change - Technical Note Planning Inspectorate Reference: EN020026 Rev A) regarding the surface water flood risk maps with climate change applied. The LLFA has replied to the applicant with some minor amendments including making the maps clearer in regard to the future predicted surface water risk around the proposed developed areas. Regarding the surface water drainage strategy (construction and operational), the parties are working together to resolve the outstanding matters ([REP5-083] - Document 9.17.1: Suffolk Drainage Strategy Planning Inspectorate Reference: EN020026 Rev B).	The Applicant confirms that the maps on pages 4 to 8 of Document 9.122 [REP5-134] are intended to provide detail at a high spatial resolution, for key areas of the operational Suffolk and Kent Onshore Schemes. The images are excerpts from the appended plates (A.1 and A.2), which present the future predicted surface water risk data for the full extents of the proposed development areas in Suffolk and Kent respectively. No changes to the submission are therefore proposed. The Applicant will submit a final update to Application Document 9.17.1: Suffolk Drainage Strategy Planning at Deadline 7, to include key amendments, as discussed with SCC. Details of these changes are provided within the Applicants responses below within Table 3.4 of this

Reference	Matter	Point Raised	Applicant's Comments
		SCC requested a note including climate change allowance maps for flood risk. This has been resolved upon receipt of the applicant's surface water flood risk and climate change technical note [REP5-134]. It is also noted that a revised drainage strategy has been drafted, and ongoing constructive discussions between SCC and the applicant. Generally, the direction of travel is positive, and SCC anticipates that all of our outstanding concerns in relation to surface water risk at the Friston and Saxmundham sites can be resolved in due course.	document which is the Applicant's Comments on the SCC Deadline 6 Submission [REP6-141], and specifically the Applicants responses to SCC's Table 7 comments.
3.2	The applicant's approach to the sequential and exceptions tests	As contained in response to AP 86 in [REP4-150]: For temporary works, however, it is not clear to SCC that the sequential test has been passed. This applies to the Applicant's comments on temporary storage of construction materials and temporary accesses. For the former, the Applicant states that it will 'seek to avoid storage of construction materials within Flood Zone 3 and areas of high and medium risk of flooding from surface water' (para 3.2.13 of the FRA) as detailed in W06 of the CoCP. This fails to meet the sequential test as it has not been demonstrated that the location of these materials cannot be placed in areas of low surface water flood risk. The Applicant must commit to placing such materials in areas of low surface water flood risk in the absence of any demonstration that this is not feasible. Regarding temporary accesses, the Applicant says that "temporary access routes within Flood Zone 3 and areas of high and medium risk of flooding from surface water will be suitably designed for flood resilience in accordance with any conditions of a Flood Risk Activity Permit and removed at the end of the construction phase, with the land reinstated." However, a Flood Risk Activity Permit is not a mechanism whereby risk of surface water flooding is controlled. Therefore, committing to this permit does not allow for the sequential test to be passed in relation to surface water flooding were flood resilience through suitable design for temporary access routes considered necessary to pass, as appears to be implied by the Applicant. For the exception test, whilst it is recognised that the "wider sustainability benefits" referenced in part a of para 5.8.11 of EN-1 include those fulfilled in the need case of the development, consideration should also be given to the benefits given to the local community who may experience increased flood risk. At present, SCC considers more could be done to fulfil this in line with its representations on the need for further mitigation and offsetting/compensatory measures. There is also potential to look at expanded community benefits provision beyond the minimum set out in government guidance should the decision maker consider it appropriate. SCC reiterates its concern regarding the temporary storage basin that it is a basin not a pond, whereas a pond retains permanent water, whereas a basin is a temporary measure, so that is a technical point which needs addressing. If the temporary storage basin is situated within Flood Zone 3 (A or B) and there is a significant flood event from the river which inundates the basin, then it cannot be used if there is a	The Applicant has revised commitment W06 in 7.5.3 (D) Outline Onshore Construction Environmental Management Plan [REP6-075] to secure that during construction of the Suffolk Onshore Scheme, construction materials would be stored within Flood Zone 1 and areas at low risk of flooding from surface water. Regarding temporary accesses, the majority forming part of the Suffolk Onshore Scheme are in Flood Zone 1 and in areas at low risk of flooding. Commitment W06 has also been updated, removing reference to Flood Risk Activity Permits, to clarify that, where (very locally) construction access routes cross Flood Zone 3 and areas at high risk of surface water flooding no land raising would be required and there would therefore be no flood risk impacts. With regard to the temporary drainage basin, the Applicant has also updated 6.8 (B) Flood Risk Assessment [REP6-052] and will submit an updated Drainage Strategy at Deadline 7 which reflect a design change, whereby the basin is removed and replaced by a linear drainage feature, which avoids works in Flood Zone 3. This design change, coupled with a wide range of control and mitigation measures, detailed in 7.5.3 (D) Outline Onshore Construction Environmental Management Plan [REP6-075] would ensure that the exception test part b is satisfied. There would be no potential for increases in flood risk during construction of the Suffolk Onshore Scheme. It is therefore the Applicants position that as there would be no increase in flood risk, a requirement to secure community benefits to outweigh flood risk impacts is not required.

Reference	Matter	Point Raised	Applicant's Comments
		significant rainfall event from another catchment and as a result fills up the drainage system. SCC would suggest that the temporary storage basin should ideally be located in Flood Zone 1, or in a worse case Flood Zone 2. Alternatively, the Applicant could provide a different measure to store surface water rainfall during the construction period. Regarding exception testing, SCC would suggest that considering the local concern around flooding, mitigation measures in respect of this issue would form part of the consideration for the purposes of the exception test.	
3.3	Matters relating to the objection of the Water Framework Directive	SCC has no comments on make on this item and defers to relevant authorities such as the EA.	Noted.
4.1	Junction Capacity Modelling – responses and updates	No data received at Deadline 5. SCC requested a wider selection of junctions to be modelled and provided a list of junctions it considered relevant for analysis in Appendix A of [REP3-101] response to the EXA's first set of questions. SCC's position remains that the cumulative impact of traffic on the A12 and other corridors has not been satisfactory assessed noting that both SZC and SPR undertook sensitivity testing to do so. Baseline data. As this was captured by the applicant in 2024 this will need to be reviewed against real time data collected by SZC surveys, noting that care needs to be taken to avoid double counting SPR and SZC traffic. The concern is that even small increases to traffic can trigger overcapacity or if that has already been reached increase delays disproportionately. SCC has asked the applicant on a number of occasions for a wider selection of junctions to be modelled, and this position has not changed since SCC issued its Local Impact Report. SCC set out the junctions of particular concern in [REP3-101] in a table in Appendix A. This has been communicated to the applicant in a number of discussions outside of the representations process. SCC does recognise that the junctions that have been chosen are the three set out at page 49 of [REP5-135]. SCC would still like to see junction modelling for a wider range of junctions but will comment on the modelling once this has been received from the applicant. SCC is in a unique position currently and it is the cumulative impacts of several projects in the area, which is causing concern, not just Sea Link. So, in proportion Sea Link is similar to the SPR projects with regards to HGV and worker traffic. But in addition, there is Sizewell C. Sizewell C and SPR have both undertaken sensitivity tests on the A12, in particularly to look at the impacts of cumulative traffic on the network. SCC is concerned that if Sea Link continue to only consider the impacts of their own project, the greater cumulative impacts will be missed. SCC did provide some information to show that the impact is not just peak on peak, but if you actually aggregate construction traffic from a	<u>Junction Modelling</u> The Applicant has previously provided responses to these matters within their response to SCC Point 13.3 within Table 18.2 of Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109]. Furthermore, details of the junction modelling results are provided within Application Document 6.3.2.7.A (B) Environmental Statement Appendix 2.7.A Transport Assessment Note [REP6-039]. This includes further justification on the scope of the junction modelling that has been carried out. A Sensitivity Test has also been carried out as part of the junction modelling to account for "seasonal peak traffic" - a potentially higher Baseline at other times of the year. The Applicant acknowledges that SCC will provide comments on the junction modelling in due course. <u>Cumulative Assessment</u> The Applicant has previously responded to SCC's comments on the scope of the cumulative traffic and transport assessment, including within Table 2.9 of Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014], Table 26.1 of Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064] and Table 18.2 of Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109]. <u>HGV Caps</u> The Applicant agrees that localised HGV caps, where the Applicant has already incorporated limited movements through sensitive locations, can provide reassurance to the communities affected. Several daily localised HGV caps are therefore included within Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan – Suffolk [REP6-062] where these caps are secured. Otherwise, the Applicant considers that periodic monitoring and adaptive management, working collaboratively with SCC and other developers in the region, is the best approach to dealing with traffic issues that may arise during the delivery of the project. Traffic management and monitoring is covered within the Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan – Suffolk [REP6-062] paragraphs 7.4.9 to 7.4.13 and coordination will be undertaken by the Transport Co-ordinator as outlined in paragraph 7.6.5. The Applicant

Reference	Matter	Point Raised	Applicant's Comments
		number of projects, then there are actually peaks outside of that peak on peaks. SCC notes there has been reference to Bramford to Twinstead when considering impacts, but in terms of caps which is a completely different scenario as the routes involved were not affected by other projects. As it stands there is Sizewell C, two SPR projects, and SCC with one our own projects in the vicinity of the A12 coming along in 2027-28. The new A1094/A12 Friday Street roundabout junction was opened to traffic on Monday March 23rd, although further works will be ongoing into July. Sizewell C will see numerous works projects, with the exception of the Two Village Bypass, southern roundabout and the SLR west roundabout joining onto the A12. These works will be completed by this summer, with a number of Deed of Obligation environmental mitigation schemes being delivered through 2026 into possibly early 2027 and may affect the A12 and the Two Village Bypass roundabout. The southern end is mainly offline. SCC has not received a programme for works as yet but expect them to take place in the next two years, with an opening in Q4 2027 to Q1 2028, and the same for the SLR roundabout south of Yoxford. There is also other works on the B1122, A1094 and the B1069, but these are expected to be complete within the next 12 months. The final scheme is the A12 MRN scheme, which is in Woodbridge, south of the A14. This is in the planning process, which is currently on hold due to the May county elections, so the decision has not been made, however, the original intention was to commence in 2027, but this is likely to be deferred by around six months.	disagrees that overall HGV caps assist in this as they potentially limit the flexibility of the contractors to adapt to changing circumstances and can have unforeseen impacts on the wider network. <u>Network Improvements</u> These network improvements are acknowledged by the Applicant and follows on from the discussions which were held with SCC Highways on 30 March 2026.
4.2	Driver delay and mitigation	SCC considers there are the following issues • Cumulative journey time across the network due to additional NSIP traffic on the network on and across the A12 and other construction traffic routes. • Impacts on journey times caused by displaced local traffic (e.g. A1094/B1069) • Increase in risk by drivers joining main routes becoming frustrated and taking chances (e.g. Bell Lane Marlesford). First two are largely economic and environmental and the latter safety related but this can vary on a case-by-case basis. Potential mitigation: Remove / minimise traffic – not an option as project needs to be delivered Traffic Calming. Signs and road markings. May have some effect by highlighting hazards. Can also have environmental benefits. Typically tailored to each site. Environmental: Embedded driver behaviour, timing, numbers, emission control. Site specific for particular users / receptors such as improvements to pedestrian crossings and / or footways. Speed Limits – reduce severity of collisions but may cause bunching and less space for joining traffic. Must be compliant with national and	<u>Issues</u> The Applicant acknowledges these points and has previously responded to the issues raised by SCC including within Table 2.9 of Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014], Table 26.1 of Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064] and Table 18.2 of Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109]. <u>Potential Mitigation</u> The Applicant welcomes SCC's suggestions for potential mitigation and these will be reviewed for consideration as part of the Detailed CTMTP secured under Requirement 6 of the DCO. <u>A1094/ B1122 Junction</u> In terms of the A1094/ B1122 junction, the Applicant acknowledges these constraints and has responded to this as part of the response to ISH3 Action Point 8 within Application Document 9.135 Applicants Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110]. <u>Cumulative Assessment (and SPR Data)</u>

Reference	Matter	Point Raised	Applicant’s Comments
		local guidance to avoid inappropriate limits with poor compliance. Other traffic restrictions e.g. weight limits. Should not be necessary to control project traffic as CTMP / CEMP does that. May be necessary for displaced or ‘ancillary’ traffic. Example HGVs servicing concrete batching plants / quarries. Difficult to enforce. Enforcement: One extreme are average speed cameras. Effective but costly to install and to maintain (admin resources). May also displace traffic onto other routes. SCC notes that the SZC commitment was to provide a funding and a mechanism to mitigate unforeseen impact during the construction phase of the project. SCC noted a junction which caused concern (A1094 into B1122) due to it being a tight corner which is not suitable for turning HGVs. SCC has concerns that if HGVs or long vehicles need to get in via this route, such as cable drums, then the vehicle would need to go up to the site compound via the B1069 Snape Road, turn around and come back down again. Or if the vehicle used the B1122 through Leiston, which SCC understands is a potential AIL route. SCC has taken the applicant’s data and also data from SPR projects from their CMP discharge of requirements, where they have updated their traffic figures and superimposed the data on a quarterly basis. The cumulative peak is not the SPR peak, nor is it at its ceiling, however both are at two thirds or their peak which results in actually going over the total peak as it would equal one and one third. SCC would expect the applicant to have modelled a realistic worst case, because this would be the cumulative impact, or at least a sensitivity test, again it will be covered by the cap so the cap would be at its peak. It would be useful to understand that cumulative impact and the sensitivity around the A1094 and the B1069 because the data SCC has been collating suggests there is more traffic than expected from previous forecasts and modelling.	The Applicant acknowledges these comments and those raised previously by SCC within their Deadline 5 Submission [REP5-178]. The Applicant has provided a more thorough response below. The Applicant acknowledges SCC’s comparison of Sea Link and SPR traffic (not SZC as stated) including that individual peaks are not expected to coincide, and that cumulative peaks could therefore occur at different times to individual peaks. This is acknowledged by the Applicant and matches the graph (Appendix F of Application Document 9.90 (A) Applicant’s Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]) which identifies various construction peaks, based on the current understanding of when cumulative schemes are expected to occur. Therefore, these cumulative peaks would be lower than the levels assessed within the Traffic and Transport cumulative assessment work which has been based on peaks overlapping. The Traffic and Transport cumulative assessment work within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060] therefore remains to be robust. In addition, SCC has identified various dates for SPR and SZC in terms of when peak construction levels are anticipated to occur, stating that SZC is likely to be delayed so that their peak of 2028 is more likely to be delayed by 2-3 years (pushing this to 2030-2031). Should this be the case, then the delayed SZC peak would no longer overlap with the peak construction phase of Sea Link in Suffolk (2028). The Traffic and Transport cumulative assessment within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060] has nonetheless been based on worst-case scenario of peaks overlapping and remains to be robust. With respect to LionLink, the Applicant has reviewed the LionLink PEI Report and agrees with SCC, that there is minimal information available including on construction vehicle numbers, routing and phasing. Therefore, the Applicant maintains that the previous assumptions adopted for LionLink remain valid and robust in the absence of this information. The cumulative assessment for LionLink and Sea Link considered the whole study area, including the A12, B1121 (for access S-BM09) and other routes. The Applicant has submitted an additional set of Tables in the form of those submitted within [REP4-099] highlighting only those links and junctions which would have their peak levels of cumulative traffic (with and without the proposed development) in years other than 2028 (in response to ExQ 3TT1.). As previously mentioned, the cumulative peak is expected to be largely driven by Sizewell C and is therefore forecast to be 2028 or 2029 for the majority of the highway network within the study area with or without Sea Link. It is acknowledged that the cumulative peak could be earlier (2027) or later (2030) depending on which cumulative schemes are coming forward at the time. The Applicant has therefore reviewed the first set of Tables within Application Document 9.105 (A) Supplement to the Preliminary Cumulative Highway Impact Assessment in Suffolk [REP4-099] which exclude Sea Link traffic, to identify which cumulative schemes the cumulative traffic flows for each part of the highway network are predominantly associated with and the associated peak year. The Applicant has also reviewed the second set of Tables within Application Document

Reference	Matter	Point Raised	Applicant’s Comments
			9.105 (A) Supplement to the Preliminary Cumulative Highway Impact Assessment in Suffolk [REP4-099] which include Sea Link traffic, to identify the likely cumulative peak year following the inclusion of Sea Link construction traffic, although this will not affect the cumulative peak year when this is driven by the other cumulative schemes. This information was re-submitted at Deadline 6 as a Post-Hearing Action. To recap expected peak years for other cumulative schemes are: • EA2 – 2026 (works started in July 2025) • EA1N – 2026 (Month 14)/2028 (Month 34) • Sizewell C – 2028/2029 (albeit maybe later as suggested by SCC), works started in January 2024 • LionLink – 2029/2030 (two years after Sea Link) Note Application Document 9.105 (A) Supplement to the Preliminary Cumulative Highway Impact Assessment in Suffolk [REP4-099] was updated at Deadline 6 (Application Document 9.105 (B) Supplement to the Preliminary Cumulative Highway Impact Assessment in Suffolk [REP6-096]) to address ExA Third Written Question 3TT1. In view of the above, the Applicant has carried out a worst-case cumulative Traffic and Transport assessment within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060] which includes the highway network within the study area including the A1094 and B1069. The junction modelling within Application Document 6.3.2.7.A (B) Environmental Statement Appendix 2.7.A Transport Assessment Note [REP6-039] also includes the A12/ A1094 junction and the A1094/ B1069 junction including scenarios with and without cumulative development traffic.
4.3	Effects of current planned highway works (such as the A12) on the proposed development construction traffic	SZC improvements included as numbered works (e.g. relief roads / roundabouts) were designed to accommodate growth plus SZC / SPR traffic. Table 9.5 of the Consolidated Transport Assessment refers to this modelling. Those schemes within Deed of Obligation are largely environmental mitigation schemes and will not have been designed in terms of capacity. In general, the relief roads (TVB, SLR), Yoxford Roundabout) will deliver benefits in reduction in journey times and road safety albeit the park and ride sites and Deed of Obligation schemes (e.g. pedestrian crossings, speed limits) may have a direct negative impact on A12 journey times but are beneficial in terms of safety and indirectly by reducing worker traffic between the park and ride sites and the main site. In terms of delivery with the exception of the TVB and SLR the majority of the numbered highway works will be delivered by July 2026 (excepting landscaping). TVB are about to commence with most work being offline and opening in Q4 2027 or Q1 2028. These only affect both the A12 and B1122 and hence Sealink construction traffic when the new roads are tied into the existing. The Deed of Obligation schemes are in the process of delivery with the majority of those on the A12, B1122, A1094 delivered by the end of 2026.	These network improvements are acknowledged by the Applicant and follows on from the discussions which were held with SCC Highways on 30 March 2026. Capacity upgrades on the A12 corridor will provide benefits to existing road users and the delivery of Sea Link and other NSIPs.

Reference	Matter	Point Raised	Applicant's Comments
		The SCC A12 MRN Scheme is awaiting a planning decision This is unlikely to be before Q2 2026 due to local elections. If so, the anticipated commencement early in 2027 is likely to be delayed. Progress on the development south of Saxmundham is outside SCCs control (need to check with ESC regarding progress of planning application) but is understood to include construction of a roundabout and a pedestrian crossing with speed limit reductions.	
4.4	Benhall Railway Bridge update and abnormal load routes	SCC responded to Sealink AIP on the 19th March 2026 with technical comments. Hoping to resolve these in the next few weeks to allow investigations to proceed subject to road space being available. No request for further information has been requested but think this may be for the most recent inspection undertaken in Jan 2025. SCC cannot understand how the temporary bridge cannot be moved without closing the B1121 from the access to the River Fromus Bridge access referred to by Saxmundham Town Council diversion through the town is difficult. Key issues would be the low bridge on the B1119, narrow carriageway and lack of footways on the High Street, the steep junction and level crossing on Chantry Road and the safety concerns of using the A12/B1119 junction. No further information has been received from the applicant to consider the structures on wider routes such as the A12, B1122, B1069 or A1094. Update on structures at Little Glemham and Kelsale on A12 (south). Relaxation of STGO restrictions on these structures will be reviewed on the 13th April 2026. These restrictions were relaxed on a temporary basis subject to loads moving across structures at low speed without oncoming traffic. SCC preference would be a commitment to the applicant's option one if it is viable, which would either repair or strengthen the Benhall Railway Bridge. SCC has set out in a number of representations that there is a difference between repair, which would have wider community benefits and a more clearly defined single period of disruption, as opposed to the mini bridge which carries more long-term uncertainty. SCC is concerned that if only a 'preference' is secured then potentially nothing is actually secured and that concerns over cost might be used later to resort back to the mini bridge option, which SCC does not feel is appropriate as it would cause considerably greater cumulative effects. SCC would have the preference that the bridge works are completed before construction traffic for Sea Link starts but acknowledges that this might be challenging due to the discussions with third parties including SCC and Network Rail.	The Applicant welcomes the receipt of comments on the AIP from SCC and receipt of the January 2000 structural assessment report. The Applicant has issued responses to the comments raised by SCC on 15th April 2026 and received a response to these on 16th April 2026. The AIP is now under revision and will be issued shortly for approval. The temporary bridge is not a prefabricated unit; it is a series of girders and plates that will be installed and dismantled at the Benhall Rail Bridge location. The individual elements will either be stored on the verge between uses, removed to the compound by the Fromus Bridge or removed to the supplier's own storage area off site. Delivery and removal from site will be using low loader articulated vehicles or similar which will not require road closures. No HGV traffic will be routed through Saxmundham with the exception of the capped vehicles routed north along the B1121 Main Road and turning east onto the B1119 during the construction of the Fromus Bridge. These works would not coincide with any closure of the B1121 Main Road for the works to Benhall Rail Bridge. The Applicant has confirmed that the structural assessment of structures along the proposed AIL routes is a post consent issue, as is the case for other DCOs within the region including SZC and EA1N and EA2. The Applicant will continue to liaise with SCC on the condition of their structures and notes that this is a continuously evolving situation. Supporting the post consent approach that the Applicant is taking to this issue. The Applicant has provided a statement within Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan that confirms the Applicants preference is for option 1 and a remedial works solution. However, the works must be proportionate and a commitment to undertake remedial works whilst the scope of those works is unknown would not be proportionate. The majority of construction traffic can utilise the Benhall Rail Bridge with no limitation due to the weight restriction. Therefore, preventing construction from commencing until such time as the Benhall Rail Bridge works are undertaken would not be appropriate or necessary. The Applicant agrees with SCC that negotiations on any works need to be held between the Applicant, SCC and Network Rail and that these may impact the timing of any works.

Reference	Matter	Point Raised	Applicant's Comments
		If the bridge works would need to be undertaken during the Sea Link construction works, then it would be essential for there to be a restriction on Sea Link's HGV traffic whilst the bridge was closed to prevent the Sea Link HGVs adding to the diversion routes. SCC also has concerns regarding the capacity of the B1119/A12 junction in Saxmundham as adding HGVs here would cause issues. SCC remains concerned regarding the southern access route to the Saxmundham site due to the likelihood that much of the detail regarding the feasibility and delivery of either the repair of the Benhall Railway Bridge or the mini bridge option will still be outstanding at the close of the examination. There are also potential outstanding issues around the access to the White House Residential Park. SCC understands that the engineering elements involved in the southern are not insurmountable, however, it is normally the costs, delays and environmental issues which may make works unfeasible. The three main issues are: - • Benhall Railway Bridge – If the bridge can be upgraded to be capable of carrying abnormal loads, then it is the logical route into the converter site directly from the A12, so it does have merits in transport terms. It also provides a long-term legacy in that it provides a link from the A12 into the site, and possible the wider site as well. • B1122/B1069 to access the site – SCC has raised concerns regarding the structures on this route not having been assessed, so there are restrictions on abnormal loads (not CNU 44 tonnes or less). • SZC Assessment of structures south of Yoxford to the A14 – These have been assessed on the basis of STGO3 moves. Bearing in mind structures change over time, they are, with two exceptions cleared for STGO3 use to Yoxford. The exceptions are two structures at Little Glenham and Kelsale which are both culverts. Little Glenham has a STGO1 restriction on it and Kelsale has a STGO, which basically means these will accept loads up to that loading in terms of weight. There has been a temporary relaxation of that to allow moves up to STGO3, which are permitted based on vehicles travelling at very low speed with no vehicles coming in the opposite direction. SCC have had difficulties in finding out whether this is being complied with. As a	The Applicant has confirmed with Application Document 7.5.1.1 Outline Construction Traffic Management and Travel Plan that no construction traffic HGVs will utilise diversions through Saxmundham during any works to Benhall Rail Bridge by the Applicant. The majority of the construction traffic required to access the Saxmundham converter station site can access the site without any works being required to Benhall Rail Bridge. As the closest access route to the primary road network and the route that requires the least amount of new infrastructure, this is the optimum access route. The Applicant is aware that a limited number of AIL vehicles are required to undertake the works and has outlined the options for these vehicles to access site within Application Document 9.112 (A) Benhall Railway Bridge - Crossing Feasibility Study, including a route that does not require the use of Benhall Rail Bridge. The Applicant has confirmed that vehicle access to and from the White House Residential Park from the A12 shall be maintained throughout any planned works to Benhall Rail Bridge. The Applicant welcomes SCCs confirmation that the B1121 Main Road access is the logical route. The Applicant notes that this route is part of the proposed AIL route for the project and that structures along the length of the AIL route will need to be assessed at the detailed design stage. It is noted that this is no different to the consented SZC and EA1N and EA2 projects for with assessments are still ongoing and that this constraint would apply for all proposed accesses including the alternative access proposed by SCC. The Applicant notes that this route is part of the proposed AIL route for the project and that structures along the length of the AIL route will need to be assessed at the detailed design stage. It is noted that this is no different to the consented SZC and EA1N and EA2 projects for with assessments are still ongoing and that this constraint would apply for all proposed accesses including the alternative access proposed by SCC.

Reference	Matter	Point Raised	Applicant's Comments
		result, this arrangement will be undergoing a risk assessment in mid-April, this means it is problematic to get abnormal loads up the A12. What has not been assessed is special order movements, such as transformers. These have not been assessed by SZC and they have also not finished the assessments from Lowestoft to the south of Yoxford. As it stands, and it would depend on individual assessments, it may be highly likely there would be restrictions on any special-order movement on the A12 to even get to the proposed River Fromus bridge.	
4.5	Potential capping of heavy good vehicles using the local road networks	SCC would welcome caps in a similar manner to SPR EA1(N), EA2 and SZC. These can be daily caps, peak hour and shoulder caps or a combination. If the ExA are minded accepting weekend working and HGV movements (for the stated restricted purposes) then caps should also apply to Saturday / Sunday. SCC notes the Applicant's response to 2TT7 which refers to the Bramford to Twinstead decision in 2024 not to enforce HGV caps on the local road network. However, as recognised by the Applicant, different projects are different. There are substantial differences in the context of cumulative development between the two projects.	The Applicant's position within the response to 2TT7 as outlined in Application Document 9.123 Applicant's Responses to Second Written Question [REP5-135] is still considered to be accurate and valid. Further additional information on this issue was supplied within Application Document 9.131 Applicants Comments on Responses to Second Written Questions [REP6-106] in the Applicant's comment on SCC's response to 2TT7, including specific focused caps in the sensitive areas of Saxmundham, Friston and Aldeburgh. In summary, the Applicant agrees that localised HGV caps, where the Applicant has already incorporated limited movements through sensitive locations, can provide reassurance to the communities affected. Several daily localised HGV caps are therefore included within Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan – Suffolk [REP6-062] where these caps are secured. Otherwise, the Applicant considers that periodic monitoring and adaptive management, working collaboratively with SCC and other developers in the region, is the best approach to dealing with traffic issues that may arise during the delivery of the project. Traffic management and monitoring is covered within the Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan – Suffolk [REP6-062] paragraphs 7.4.9 to 7.4.13 and coordination will be undertaken by the Transport Co-ordinator as outlined in paragraph 7.6.5. The Applicant disagrees that overall HGV caps assist in this as they potentially limit the flexibility of the contractors to adapt to changing circumstances and can have unforeseen impacts on the wider network.
5.1	Accommodation for workers of the proposed development	We need to give clear consideration as to how this will be managed. Do the applicants have a clear idea of where workforce will be accommodated during the construction phase? We need to ensure that this is effectively managed to ensure that the workforce is effectively accommodated in a manner which does not adversely affect the visitor economy or rental sector. The applicant should work with representatives from both sectors to ensure that they are apprised of realistic numbers and timescales, as well as ensuring that appropriate TTW times and routes can be considered. If there is an effect beyond East Suffolk, this can be factored in and managed accordingly. It is inevitable that there will be crossover with Sizewell, as detailed below. SCC has concerns over the cumulative impact of multiple projects and the intersection between construction traffic, pressures on	The Applicant's proposed framework of monitoring and mitigation secured through Application Document 9.84 Register of Environmental Actions and Commitments (REAC) allows for adaptive management during the construction period. This includes the ability to monitor workforce accommodation demand, engage with relevant stakeholders, and implement appropriate measures where necessary. The Applicant has provided detailed response regarding tourism impact monitoring and mitigation within Document 9.136: Applicant's Responses to Third Written Questions [REP6-111] (see 3SERT2).

Reference	Matter	Point Raised	Applicant's Comments
		accommodation sectors and a wider economic impact of multiple projects happening in quick succession. There is likely to be impacts from SZC alongside others which could result in the road networked being potentially overwhelmed by levels of traffic, so there needs to provisions made to ensure emergency access will be in place. Whilst there maybe economic benefits, SCC does not want there to a disbenefit. SCC wants to see a thriving tourism and visitor economy at the end of the project.	
5.2	Tourism impact monitoring and mitigation	There is already considerable pressure on the accommodation sector (self-catering and private rental) as a result of Sizewell C. At the time of writing, 2,000 workers are already onsite for Sizewell alone. Whilst there are some short-term benefits to be made for the accommodation sector and wider visitor economy, we need to ensure that we have a viable tourism economy once all NSIPs are complete. The sector has expressed concerns and the need to ensure that Suffolk still has a tourism economy which is attractive and accessible to visitors. Given the number of projects taking place over a relatively short period of time, it is inevitable that there will be some crossover, and it is important that the effects of all of them are taken into consideration. It would therefore be very difficult to consider them in isolation. One NSIP alone is likely to have some impact, to a greater to lesser degree. Multiple projects will likely have a significant impact We need to consider the practical aspects of how the construction phase would impact the visitor experience in a number of areas. Perception Is Suffolk likely to be viewed as a viable place for a short break or holiday? Word of mouth, particularly in an age of TripAdvisor and/or social media, can quickly lead to negative experiences and perceptions becoming widespread. Excess traffic and diversions create bad first impressions on arrival. Add to this excess noise, road closures, visual blight during construction phase and afterwards) etc and Suffolk could acquire an image which would be problematic. This in turn has the potential to lead to people holidaying elsewhere or at the very least not returning in the short to medium term. Practical effect on tourism businesses- Roadworks, delays, road closures etc all pose issues for businesses. The visitor economy relies on shift workers as well as prompt deliveries of fresh food and other supplies. If these need to be accommodated, then they need to be planned for, and mitigation measures need to be put in place to ensure that these can be overcome. Timescale Whilst Suffolk welcomes visitors all- year round and is a popular out of season weekend and short break location, there is clearly a traditional "high season" of July- early September where visitor numbers are at their peak. Whilst we strive to have good public transport links, we need to acknowledge that the bulk of visitors will travel by car and so traffic will be heavier during the peak period. There needs to be a	The Applicant has undertaken a comprehensive and robust EIA and maintains its position that the Project will not give rise to significant effects on socio-economics, leisure and tourism following the application of appropriate mitigation. Overall, the Applicant considers that the combination of the EIA and supporting technical documents provide a robust, proportionate, and policy-compliant framework for assessing and managing socio-economic effects.

Reference	Matter	Point Raised	Applicant's Comments
		balance struck between accommodating visitors, while acknowledging the practical benefits of a construction project taking place when the weather is good. Marketing and publicity If NSIPs are likely to happen, then there needs to be adequate notice given and the operators need to work with the sector to ensure that the messages convey the fact that Suffolk is still open for business and welcoming visitors. Sizewell C has a tourism mitigation fund, which is working with the sector to convey such messages. As part of this work, it is carrying out perception studies and collating baseline data on visitor numbers, spend etc across the district, in order to measure the effects on individual businesses, towns and the county as a whole. Organisations such as the Suffolk Coast Destination Management Organisation (DMO) and the Suffolk and Norfolk Local Visitor Economy Partnership (LVEP) will be useful sources of support and information.	
6.1	Core Working Hours	Public Health The proposed construction core working hours as set out in [AS-127] are Monday – Friday 07:00 to 19:00; and Saturday, Sundays, and Bank Holidays: 07:00 to 17:00 plus start up and close down activities up to one hour either side of the core working hours. SCC recognise the Applicants comments detailed in [REP3-069] reference 1GEN49 regarding programme certainty, contractor logistics, national energy objectives, and potential constraint costs. The strategic need case and delivery pressures are noted. However, from a public health perspective, infrastructure delivery must be balanced against the protection of community health and wellbeing and should not come at a disproportionate cost to community mental health and quality of life, particularly where impacts are experienced over extended durations. Lengthy core working hours, including routine Sunday and Bank Holiday working, have the potential to materially reduce predictable periods of respite for affected communities over a prolonged construction programme. Sustained noise, vibration, and activity outside conventional weekday hours can contribute to sleep disturbance, stress, reduced respite, and wider mental wellbeing effects, even where technical thresholds for “significance” are not exceeded. Continuous exposure to stressors, especially when compounded by overlapping NSIPs in the region, is likely to have a substantial impact on mental health and wellbeing. Vulnerable groups, including older people, disabled residents, and those without access to private vehicles, may be disproportionately affected, as they have fewer options for respite. The lack of quiet periods and predictability in daily life can exacerbate stress, anxiety, and feelings of powerlessness, and may contribute to health inequalities within the affected communities. Whilst SCC recognises the need for a degree of programming flexibility, the Applicant has not demonstrated that routine weekend and Bank Holiday working across the onshore elements represents the least harmful approach, nor that alternative phasing or geographically targeted restrictions have been fully explored. Public Health therefore	The core working hours proposed (secured via requirement 7 of Document 3.2 Draft Development Consent Order) are required to facilitate the delivery of the Proposed Project, a critical nationally important electricity transmission infrastructure, by 2030. This reflects the need presented in the UK Government's Clean Power 2030 Action Plan, responding to NESO's Clean Power 2030 report. The delivery of the Proposed Project in accordance with the programme set out in the Applicant's Transmission Licence, in accordance with the NESO clean power objectives, and in a way that reduces constraints costs being passed to consumers, is fundamental to the need case for the Proposed Project. The Proposed Project requires the ability to programme its work as necessary across a seven-day week. While it is not anticipated that Sunday and bank holiday working would be undertaken across the entire onshore elements of the project every weekend, the ability to utilise weekend days as required is critical to allow an effective delivery programme to be developed. Within the core working hours themselves, there are restrictions on noisy works (namely percussive piling) and on HGV movements on weekends, with neither percussive piling nor HGV deliveries occurring on Sundays or bank holidays with the exception of activities covered under requirement 7 paragraph (4). Furthermore, bank holiday weekends are excluded from the core working hours at the Suffolk converter station site and the Kent converter station and substation site, with further restrictions at Friston (Kiln Lane) substation (recognising that this is already consented via another project DCO). There are robust controls in a suite of management plans secured via requirements 5 and 6 of the dDCO that mitigate the effects of construction activity, noting for example Document 7.5.3 Outline Onshore Construction Environmental Management Plan [REP6-074], Application Document 9.84 Register of Environmental Actions and

Reference	Matter	Point Raised	Applicant's Comments
		maintains that working hours are restricted to Monday–Friday: 08:00–18:00 and Saturday: 08:00–13:00, with no works permitted on Sundays or Bank Holidays, except in exceptional circumstances agreed in advance with SCC with start-up and close-down periods strictly limited to no more than one hour either side of the core hours and must exclude any activity likely to cause disturbance to nearby residents or businesses. SCC notes that its proposed Core Working Hours submitted in its Schedule of Changes to the DCO retains 07:00 – 19:00 working which is due to consideration of the working hours of other DCOs, such as EA1N and EA2. It should be noted that, from a Public Health perspective, SCC would still recommend 08:00 – 18:00 from a Public Health perspective. Regarding piling works, Public Health welcomes the clarification that piling work is precluded on Sundays (unless otherwise approved by the relevant planning authority). We note the Applicant intends to allow for Saturday piling work both early morning (07:00-08:00) and afternoon piling (13:00- 17:00) when local residents might reasonably expect respite from such intrusive activities in those parts of their weekends. As proposed, this would leave only one day per week (Sunday) during which residents could expect a piling free environment, whether to benefit from an uninterrupted morning rest or to enjoy time in their homes, gardens, or other amenity spaces in a piling free environment. This represents a significant and, in our view, unreasonable curtailment of residential amenity and overall quality of life. SCC therefore recommends that piling activity during these Saturday periods should be precluded, except where expressly approved by the relevant planning authority. This approach would retain necessary flexibility in circumstances where a clear and justified need for such activity can be demonstrated. SCC has given detailed representations on the adverse effects of extended working hours, the mitigation provided by their restriction and, by consequence, their necessity, in several previous representations including its LIR [REP1-130], responses to the Applicant at each deadline. SCC supports that there has been some movement on the core working hours with respect to piling works not taking place on Sundays, although, in addition, SCC would also like this to be extended to Saturdays. Comparing the Sea Link draft DCO to the SPR DCOs, there is a substantially greater number of exceptions in the Sea Link DCO which is an area of concern. This issue has been raised in SCC's Local Impact Report and it is also important to note that Sea Link's core working hours include an added hour before and after the time period for setting up and standing down activities, which is not included in the SPR working hours, which elongates Sea Link's core working hours. SCC's preference would be for these shoulder working hours to be removed or at least there was more clarity regarding or restrictions around what the shoulder hour activities would involve. <u>Further comments</u> The Applicant has previously used the status of its project as CNP, in addition to the Clean Power 2030 report, to justify the need for extended working hours. As pointed out by the ExA at the beginning of	Commitments (REAC) [REP6-134], and Application Document 9.83 Outline Code of Construction Practice [REP4-232]. The Applicant's position reflects that set out in its responses to ExQ 1GEN49 in Document 9.73 Applicant's Responses to First Written Question [REP3-069] and its responses to AP106 Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2)ISH2 Action Point 106 [REP4-086].

Reference	Matter	Point Raised	Applicant's Comments
		ISH 3, national policy does not allow the need case of CNP to be considered where their application presents unacceptable risks to human health. SCC submits that, in line with its previous representations, shortcomings in the Applicant's assessment mean that the likely effects on human health have not been accurately portrayed. At least, SCC does not consider that there can be confidence that there will not be significant effects on human health / that there will not be substantial effects which would require mitigation. SCC's concerns relate both to the assessment of the project's effects in isolation [APP-058] and cumulatively [APP-060]. In addition to the shortcomings of the Applicant's assessment, SCC considers that there is a large degree of uncertainty around what the effects of the project will be on account of the context of intense cumulative development. There is limited evidence to base predictions of cumulative effects on human health in this context. SCC made these points on page 53 of [REP4-150]. SCC also considers that it is currently uncertain as to whether the Applicant will be in a position to deliver the project by 2030 in any event, having regard to the evidence given to the House of Commons Energy Security and Net Zero Committee by the DESNZ Head of Mission for Clean Power 2030 in January 2026 that there were two grid reinforcement projects that "at present are not on the right timetable", one of which was this project, and that it was "presently on a 2031 timetable" (Q427 and Q428 of the evidence to the Committee on 14 January 2026, as recorded in Hansard). The Applicant stated that EN-1 identifies an urgent national need for electricity infrastructure of the nature of the Scheme, which is required in the national interest to be delivered as soon as possible, as quickly as possible, and at speed and scale. What is "possible" in the case of an individual project necessarily involves a consideration of whether and how the project as currently formulated complies with the guidance in EN-1 and EN-5 and with the decision-making tests in the Planning Act 2008. There is no imperative in either policy or in legislation to deliver a project with unacceptable impacts simply to meet a stated desire to progress as quickly as possible. SCC do not accept that recognition of the urgent need for electricity infrastructure in national policy statements EN-1 and EN-5 is as simplistic as alluded to by the Applicant. If the Secretary of State had opted to do so, it would have been easy to state in EN-1 or EN-5 that there is an urgent need for grid reinforcement which must be met by 2030, however, it is not explicitly stated. The policy is couched in terms of seeking to progress "as soon as possible" (para 3.3.83 of EN-1). This then raises the question of what is possible and that has to be seen within the context, first of all, of the statutory framework. Section 104(7) of the Planning Act 2008, as also reflected in EN-1 paragraph 4.1.5, outlines that the Secretary of State must be satisfied with the balance between adverse effects and the benefits of the Proposed Development. In drawing that balance it is relevant to have regard to whether the same (or similar) benefits could be achieved without imposing the same (or similar) adverse impacts, and that entails an adequate consideration of alternatives that could deliver the same grid	

Reference	Matter	Point Raised	Applicant’s Comments																																																								
		reinforcement outcomes. In terms of consideration of strategic alternatives, SCC consider that there is a lack of clarity in the way the Applicant has presented material, particularly on costs and particularly the calculation of cost constraints. Therefore, SCC considers that there are clear factors that would place the positions in a different light if a proper review of the available alternatives was carried out. The Applicant’s case is that the Proposed Development must be delivered by 2030/2031 due to the significant costs incurred by constraint payments (where a Contract for Difference agreement is in place for a project and that the existing electricity transmission infrastructure cannot facilitate the additional supply). The Applicant utilises the contents of Table 3.2 (Planned Generation for East Anglia) of its Strategic Options Backcheck and Review [APP-320]. Upon sight, this table contains outdated information. For instance, LionLink has a listed completion date of 2024, however, Suffolk County Council is aware that this NSIP only recently conducted its Statutory Consultation (which will end on 10 March 2026) and this states an expected completion date of 2032 (as paragraph 2.4.1 of the LionLink Preliminary Environmental Information Report). SCC has therefore conducted a desktop review of [APP-320] and found the following information. The following projects are listed, however, do not have Contract for Difference agreement and therefore are unlikely to be progressed or built, either by the stated completion dates or potentially at all, which alters the outcomes of calculations related to constraint payments:																																																									
		<table><tr><th>Completion Year</th><th>Generation Name</th><th>Substation</th><th>Plant Type</th><th>Total Installed Capacity (MW)</th><th>Availability Factor</th><th>Scaled Generation Capacity (MW)</th></tr><tr><td>2022</td><td>Brook Farm</td><td>Bramford 400kV</td><td>Energy Storage</td><td>49.9</td><td>0.83</td><td>41.4</td></tr><tr><td>2024</td><td>Yare Power</td><td>Norwich 400kV</td><td>Energy Storage</td><td>49.5</td><td>0.83</td><td>41.1</td></tr><tr><td>2028</td><td>East Anglia One North</td><td>Leiston [sic] 400kV</td><td>Wind</td><td>860.0</td><td>0.7</td><td>602.0</td></tr><tr><td>2029</td><td>Lapwing Fen II</td><td>Walpole 400kV</td><td>Energy Storage</td><td>249.6</td><td>0.83</td><td>207.2</td></tr><tr><td>2029</td><td>Bramford BESS</td><td>Bramford 400kV</td><td>Energy Storage</td><td>400.0</td><td>0.83</td><td>322.0</td></tr><tr><td>2030</td><td>Scira-Dudgeon Extension Stg1</td><td>Norwich 400kV</td><td>Wind</td><td>719.0</td><td>0.7</td><td>503.3</td></tr><tr><td>2030</td><td>Alchemy Bramford</td><td>Bramford 400kV</td><td>Energy Storage</td><td>500.0</td><td>0.83</td><td>415.0</td></tr></table>	Completion Year	Generation Name	Substation	Plant Type	Total Installed Capacity (MW)	Availability Factor	Scaled Generation Capacity (MW)	2022	Brook Farm	Bramford 400kV	Energy Storage	49.9	0.83	41.4	2024	Yare Power	Norwich 400kV	Energy Storage	49.5	0.83	41.1	2028	East Anglia One North	Leiston [sic] 400kV	Wind	860.0	0.7	602.0	2029	Lapwing Fen II	Walpole 400kV	Energy Storage	249.6	0.83	207.2	2029	Bramford BESS	Bramford 400kV	Energy Storage	400.0	0.83	322.0	2030	Scira-Dudgeon Extension Stg1	Norwich 400kV	Wind	719.0	0.7	503.3	2030	Alchemy Bramford	Bramford 400kV	Energy Storage	500.0	0.83	415.0	
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	Battery					
2031	High Grove Solar	Necton 400kV	Energy Storage/PV Array	720.0	0.83	597.6
2031	Evolution Power Norfolk	Walpole 400kV	Energy Storage/PV Array	860.0	0.83	713.8
2031	Scira-Dudgeon Extension stg2	Norwich 400kV	Wind	231.0	0.7	161.7
2031	Norwich Green Energy Centre	Norwich 400kV	Energy Storage	400.0	0.83	332.0
2031	Norwich 100MW BESS	Norwich 400kV	Energy Storage	100.0	0.83	83.0
2032	GF Norwich BESS	Norwich 400kV	Energy Storage	400.0	0.83	332.0
2032	Bramford 2 GEC (Ethos Green)	Bramford 400kV	Demand/Energy Storage/PV	57.0	0.83	47.3
2032	Norwich	North	Energy Storage	249.9	0.83	207.4
	Main BESS - Long Stratton Stg1	Anglia 400kV				
2032	Necton Greener Grid Park	Necton 400kV	Energy Storage/Reactive Comp	78.0	0.83	64.7 MW
2033	Bramford GEC (Ethos Green)	Bramford 400kV	Demand/Energy Storage/PV	650.0	0.83	539.5
2033	ER BRF 2 Energy	Bramford 400kV	Energy Storage/PV Array	249.0	0.83	206.7
2033	Bradenham-Thetford (Necton) GEC (Ethos Green)	Necton 400kV	Demand/Energy Storage/PV	850.0	0.83	705.5
2033	Norwich 2 EDF	Norwich 400kV	PV Array/Wind	28.0	0.7	19.6
2033	Intwood Farm BESS	Norwich 400kV	Energy Storage	240.0	0.83	199.2
2034	Norwich Main BESS -	North Anglia	Energy Storage	700.0	0.83	581.0

Reference	Matter	Point Raised						Applicant's Comments
			Long Stratton Stg2	400kV				
		2034	Scira-Dudgeon Extension stg3	Norwich 400kV	Wind	400.0	0.7	280.0
		2034	Wymondham Road Farm	Norwich 400kV	Energy Storage	228.0	0.83	189.2
		2034	Necton High Impact Energy Hub	Necton 400kV	Energy Storage/PV Array/Onshore	1,000.0	0.7	700.0
		2034	Zenobe Necton BESS	Necton 400kV	Energy Storage	300.0	0.83	249.0
		2035	Sizewell C Stage 1	Sizewell 400kV	Nuclear	1,670.0	0.85	1,419.5
		2036	Sizewell C Stage 2	Sizewell 400kV	Nuclear	1,670.0	0.85	1,419.5

The Applicant is therefore requested to provide up-to-date information on its needs case so as to demonstrate how much capacity is actually needed by both 2030 and 2035 in terms of projects which are likely to be in place and generating electricity by those dates. In addition, the Applicant is requested to provide its detailed calculations for the claimed constraint costs which are said to arise if the project is delayed due to restricted working hours, both in terms of sources of the input data, including the calculations made using the input data and their methodology, and in terms of the per capita (per consumer) cost of those constraint costs.”

6.2	Mental Health Impacts	The consenting, construction, and operation of major infrastructure projects such as the Proposed Scheme have the potential to give rise to significant and enduring effects on the mental health and wellbeing of local residents and communities. During the pre-construction and construction phases, changes to the local environment including alterations to landscape character, increased noise and air pollution, vibration, activity levels, and traffic disruption, alongside the introduction of large-scale infrastructure, can erode residents’ sense of place, belonging, and control. These effects can be compounded by uncertainty regarding the scale, duration, and nature of works, as well as concerns about access to essential services, community facilities, social infrastructure, and green and blue spaces. Such conditions can contribute to heightened stress, anxiety, and reduced quality of life, particularly among more vulnerable groups, including older people, disabled residents, and those without access to private transport. These effects may persist and evolve during the operational phase. The ongoing presence of large-scale infrastructure, together with visual intrusion, maintenance traffic, lighting, and changes in environmental conditions (including air quality, noise, and vibration), may continue to influence perceptions of comfort, safety, and security. This can alter local character and identity, contributing to feelings of loss, disconnection, and reduced satisfaction with the living environment. Concerns regarding perceived risks to health and safety, and the distribution of benefits and burdens associated with the	The Applicant maintains the view that the Project will not have a significant effect on health and wellbeing, in isolation or cumulatively, and that its assessment presented in APP-058 is robust. A detailed response regarding the proportionate measures and commitments to demonstrate recognition of the LPA and community’s concerns regarding health and wellbeing is set out in Application Document 9.136 Applicant’s Responses to Third Written Questions in response to 3HW3. Measures to address disruption and potential effects on mental health and wellbeing arising from construction activities are secured within Application Document 9.84 Register of Environmental Actions and Commitments (REAC) which was submitted at Deadline 6. In response to SCC’s comments regarding vulnerable populations and new SEND school in Saxmundham, the Applicant refers to its detailed response provided in Application Document 9.153 Applicant's Response to the ExA's Rule 17 Letter (please refer to Ref 10.3). The Applicant has provided further information regarding the significance of potential intra-project cumulative effects in Application Document 9.141 Intra Project Cumulative Effect Significance - Technical Note [REP6-117]. It is

Reference	Matter	Point Raised	Applicant's Comments
		Scheme may further contribute to sustained anxiety and mistrust within affected communities. A key consideration across all phases is the potential for cumulative effects, both intra and inter. The layering of impacts such as noise, vibration, traffic, lighting, and landscape change can intensify disruption and perceptions of inequity, erode community cohesion, and give rise to longer term psychosocial effects, including fatigue, frustration, and a diminished sense of control. These effects extend beyond physical disturbance and are central to understanding the full scope of health and wellbeing impacts associated with the Proposed Scheme. The Applicant's intra-project cumulative effects assessment [APP-059] concludes that most effects are "<i>minor adverse (not significant)</i>" and are not expected to combine in a way that would result in significant cumulative impacts on health and wellbeing. However, the assessment acknowledges that, for some residential receptors, particularly under the scenario where the Friston Substation is constructed as part of the Proposed Project, there is potential for significant cumulative effects during construction, operation, and decommissioning, due to the combination of moderate visual amenity effects with additional noise, traffic, and health and wellbeing impacts. Notably, no specific mitigation is confirmed for these cumulative effects. Similarly, the inter-project cumulative effects assessment [APP-060] identifies potential impacts on health and wellbeing arising from landscape and visual effects, noise and vibration, traffic and transport, and social cohesion. Despite recognising that cumulative construction activity could extend and intensify the duration and magnitude of disruption, particularly for communities exposed to multiple projects in succession or in close proximity, the Applicant concludes that because individual effects from each project are generally assessed as "minor adverse (not significant)" and because peak construction phases are unlikely to fully overlap, the overall cumulative effect on health and wellbeing, including mental health, is "<i>not significant</i>." SCC considers this conclusion to be insufficiently precautionary. There remains uncertainty regarding programme alignment across projects, and a reasonable worst-case scenario should account for overlapping peak construction periods, particularly in relation to Sizewell C and the removal of the EA1N/EA2 haul road. Regarding [APP-058], SCC Public Health challenges the assessment conclusion of 11.9.59 that likely effect on health and wellbeing arising from social cohesion and community identity impacts during the construction phase will be "<i>temporary minor adverse (not significant)</i>". 11.9.53 notes "<i>Roads bordering the Suffolk Onshore Scheme may be used by construction traffic which could increase traffic and community severance between neighbourhoods.</i>" 11.9.54 suggests a lower sense of community in the area and 11.9.56 relating to [APP-048] landscape and visual which acknowledges "<i>the assessment concludes that a number of significant effects would remain</i>". Paragraphs 11.9.85-11.9.86 concludes that the magnitude of impacts on health and wellbeing from social cohesion and community identity during the operational and maintenance phase would be small and therefore	noted that three of the four councils asked to identify additional mitigation or offsetting effects for intra-project cumulative effects have concluded that no such measures are available. The Applicant has explained its position regarding those measures proposed by SCC in response to point 16 in Application Document 9.153 Applicant's Response to the ExA's Rule 17 Letter.

Reference	Matter	Point Raised	Applicant's Comments
		<i>“minor adverse (not significant)”</i>. These conclusions appear to underestimate the likely extent and persistence of community level stressors. It is not clear that the assessment has fully captured the psychological and social effects of long-term environmental change, including the perception of industrialisation of rural areas. Similarly, [APP-058], paragraphs 11.9.2 – 11.9.19 acknowledges that construction activities may temporarily restrict access to hospitals, GP practices, and other social infrastructure, and that increased traffic could contribute to community severance and inhibit access to healthcare facilities. The assessment concludes that the magnitude of effect would be <i>‘negligible’</i> and <i>‘not significant’</i> due to the limited duration of works, baseline capacity within local GP services, and the assumption that existing emergency services can absorb any additional demand. SCC considers this conclusion to understate the potential real-world effects. Even temporary disruptions can have meaningful consequences in rural areas where alternative access options are limited, particularly for vulnerable populations and those without access to private transport. The assessment does not adequately account for cumulative pressures arising from other NSIPs, nor the stress and uncertainty associated with disrupted access to healthcare. More broadly, SCC considers that the approach to cumulative assessment within [APP-058], [APP-059], and [APP-060] does not sufficiently reflect the lived experience of affected communities. Nor does it adequately account for the psychological and social impacts of prolonged uncertainty, repeated disruption, and the progressive industrialisation of the local environment. The cumulative sense of disruption, uncertainty, and loss of amenity, especially where multiple NSIPs are present or anticipated, can intensify adverse mental health outcomes beyond what is reflected in the Applicant’s “minor adverse” classification. This is particularly relevant for vulnerable groups, including older people, disabled residents, and those without access to private transport, who may have fewer options for respite or alternative access to services and green spaces. SCC does not agree with the conclusion of [APP-058] 11.11.2 that there are no likely significant residual effects in relation to health and wellbeing receptors during construction, operation and maintenance and decommissioning of the Suffolk Onshore Scheme. Nor does SCC agree with the conclusion in [APP-060] 13.4.14 that health and wellbeing CEA anticipates no significant adverse effects on mental health. The Council considers that the assessments do not fully recognise or address the mental health impacts associated with the scheme, including those arising cumulatively from the concentration of multiple NSIPs in Suffolk. SCC has set out how mental health is likely to be affected as a result of the proposed development in paragraphs 14.56 and 14.57 of its LIR [REP1-130]. The Applicant’s assessments on mental health do not appear to take these considerations into account, undermining their reliability as a true representation of the likely effects on mental health in a worst-case scenario. The conclusions presented in paragraphs 11.11.2 and 13.4.14 of [APP-058] are considered unreasonably optimistic and do not reflect the	

Reference	Matter	Point Raised	Applicant's Comments
		lived reality of communities experiencing sequential and overlapping infrastructure development and the substantial pressures that are placed on wellbeing. SCC further notes that the Applicant's assessment does not give specific consideration to neurodiverse individuals or those with sensory sensitivities, which is a notable omission within [APP-058]. Individuals within these groups, including those with autism spectrum conditions or sensory processing differences, may experience noise, vibration, visual disturbance, and increased traffic activity in a more acute or materially different way to neurotypical people. Effects may result in disproportionate and more severe impacts on mental health and wellbeing in this group. Furthermore, SCC considers that the assessment lacks sufficient detail in several key areas. While [APP-058] acknowledges potential increased demand on GP services, there is limited consideration of impacts on mental health services, including service capacity. The reliance on a 1:1800 GP-to-patient ratio (based on 2009 guidance) does not adequately reflect current demographic pressures or the specific characteristics of the Suffolk population, including its above-average age profile and the presence of other vulnerable groups. Paragraph 11.7.21 [APP-058] refers to Mental Health within Local Health Profiles, but does not set out a profile. The Council acknowledges the Applicant's position but does not agree that it can replace a profile which is founded on evidence and data. A data driven profile would also allow SCC to evaluate whether the profile is an accurate reflection of mental health in the area and how robustly evidenced it is. Public Health therefore request that this data is provided and assessed. This exercise is essential to ensure that the Applicant's assessment is based on an accurate baseline of mental health such that the adverse impacts are not underestimated. SCC therefore cannot presently agree that the Applicant's assessment has been undertaken against a robust benchmark. Paragraph 11.7.42 could be improved by setting out broader demographic assessments. This should include unemployment rates, protected characteristics, gypsy/ travellers non-English speakers, people involved in the criminal justice system, refugees and/or asylum seekers, single parent families and people with low literacy/numeracy. The assessment should note if these groups are more likely to be adversely affected by the proposal, which should be reflected in their sensitivity classifications, and key learnings should be used to inform mitigations. Given the inherent uncertainty associated with predicting mental health and wellbeing impacts, particularly those arising cumulatively and over time, Public Health consider it essential that effects are actively monitored in a structured and proportionate manner. It is recommended the Applicant develop and implement a robust Mental Health and Wellbeing Monitoring Plan covering the construction phase and early years of operation, with clear reporting routes, defined review points, and mechanisms to trigger responsive mitigation where required. Another aspect which bolsters the necessity of a monitoring plan is potential adverse cumulative effects on vulnerable groups. The Applicant's consideration of vulnerable groups in the ES is minimal	

Reference	Matter	Point Raised	Applicant's Comments
		which SCC has previously criticised in Chapter 14 of [REP1-130]. In addition to those critiques, other vulnerable groups such as neurodiverse and SEND individuals do not appear to have received any consideration in the relevant parts of the ES such as [APP-060] and [APP-058]. SCC is aware that a new SEND school will open in close proximity to the B1121 and the Applicant's permanent access road¹. Consideration of how this vulnerable group, as well as this specific receptor, will be affected is therefore essential. For instance, members of certain vulnerable groups may be more susceptible to noise and vibration effects and the effects of high levels of HGVs due to the different ways sensory inputs affect them. It is therefore vital that effects on all vulnerable groups are considered and robustly monitored in addition to potential mitigation measures being identified. <i>Monitoring</i> Reliance solely on publicly available GP or Primary Care data would be insufficient, as this captures only those individuals who actively present and self-report. This approach risks underrepresenting wider community impacts, particularly among individuals who experience stress, anxiety or wellbeing deterioration but do not engage with formal health services. Whilst community surveys may provide more direct insight into lived experience, these too have methodological limitations, including potential response bias where views are influenced by opposition to the Project rather than demonstrable mental health effects. Nevertheless, survey and qualitative approaches can provide valuable triangulation when designed appropriately and interpreted alongside service data. Learning from monitoring arrangements associated with other NSIPs, including Sizewell C, suggests that a multi-layered approach is more robust. This may include: • Population health management (PHM) data and trends in Primary Care activity • Monitoring of referrals to social prescribing and community mental health services • Engagement with Primary Care leads within the project catchment to identify emerging trends • Regular liaison with Community Mental Health Teams • Clear community routes for raising concerns (with mechanisms to ensure issues are captured, categorised and escalated appropriately) • Periodic reporting to relevant local authority and health partnership forums to enable two-way dialogue Consideration of independent or academic evaluation to provide objective assessment of early and cumulative impacts including work undertaken by Suffolk MIND as detailed: https://www.suffolkmind.org.uk/reports-and-accounts/ and University of Suffolk as detailed: • University publishes independent study on early impacts of Sizewell C University of Suffolk	

Reference	Matter	Point Raised	Applicant's Comments
		• Following SCC's guidance on community engagement <u>community-engagement-and-wellbeing-policy</u> Public Health does not seek to prescribe the precise methodology; however, the Applicant should set out a transparent, evidence-based framework that combines quantitative service data with qualitative community insight, establishes a baseline, defines indicators and thresholds, and explains how findings would trigger mitigation or adaptation of measures. Without such a structured monitoring plan, there is a risk that mental health and wellbeing impacts are either under-detected or interpreted in isolation, limiting the ability to respond proportionately and effectively.	
7.1	Archaeology update and assessed impacts	<u>Summary of positions</u> SCCAS are satisfied with the scope and extent of archaeological evaluation work which has been undertaken so far and that sufficient provisions are being made with regards to completing evaluation work within the remaining small areas of the scheme where this has not been possible, due to various constraints, post-consent. SCCAS are also satisfied with the assessment of impacts with regards to archaeological heritage assets within areas where archaeological evaluation has already been completed and that provisions are being made to undertake appropriate archaeological mitigation work post-consent in order to offset the harm to below ground archaeological remains which will be caused by the development. SCCAS are currently in discussion with the Applicant's archaeological consultant to agree the detailed location and scope of ongoing archaeological assessment and mitigation work, taking into account the results of previous evaluation work and assessments of significance and impact. <u>Suffolk OWSI</u> SCCAS advise that although generally happy with the approach to ongoing archaeological evaluation and mitigation which is set out within the Suffolk OWSI, that a number of amendments are still required (further to the amendments already made in response to comments by SCC in the LIR) in order to achieve SCCAS agreement with this key document and to ensure that a robust and appropriate scheme of archaeological mitigation is secured and delivered. Aside from a few technical details requiring correction, clarity is needed within the document regarding the necessary timing of archaeological works in relation to other elements of the scheme (prior to any pre- commencement as well as construction works) and the safeguards which will be put in place to ensure archaeological requirements are recognised by all parties who will be undertaking pre-commencement and construction works as part of the development. More robust provisions need to be set out for sites which are to be mitigated through Preservation in Situ and greater clarity is required regarding areas of the scheme where archaeological assessment work remains outstanding in line with the most up to date order limits and works plans. The mitigation areas presented within this document are also not yet agreed. The approach to post-excavation reporting also needs amending in line with the approach which has been tried and	The Applicant notes the comments and summary regarding the OWSI, Requirement 14, and how concerns should be secured. An updated OWSI has been submitted at Deadline 7 (Application Document 7.5.4.1 Suffolk Overarching Written Scheme of Investigation (C)). This includes revisions in relation to comments from SCC, and has been reviewed and approved by SCC and HE. The OWSI now makes it clear that mitigation must be agreed in all areas prior to pre-commencement works involving intrusive works with the potential to result in impacts on cultural heritage. These changes have also been added to the Requirement 14 wording. The only outstanding point is in relation to the requirements relating to the Project Wide Written Scheme of Investigation (PWWSI) for which discussions are ongoing. The Applicant acknowledges the comment regarding the D-Shaped enclosure. Mitigation, either preservation in situ or full excavation, will be captured in a PWWSI and subsequent SSWSI as noted in the OWSI. Regarding the point relating to the setting of heritage. The Applicant acknowledges that SCCAS defer to ESC and HE on this point. As such, they refer to the SoCG that has been agreed with ESC Application Document 9.15 and HE in Application Document 7.4.3 (D) Statement of Common Ground Historic England.

Reference	Matter	Point Raised	Applicant's Comments
		tested for other major infrastructure projects in the county. Detailed comments will be provided at Deadline 6 and have also been shared with the Applicant's archaeological consultant. <u>Requirement 14 and pre-commencement works</u> Whilst the wording of DCO Requirement 14 is generally satisfactory, SCCAS are however concerned that part 4 does not make clear that archaeological mitigation works must take place prior to any precommencement works as well as construction works, given the high potential for these activities (based upon the list of activities defined within the DCO as pre-commencement works) to cause below ground impacts which may damage or destroy archaeological remains before they are appropriately mitigated. There is a need to ensure that archaeological work is undertaken before any other activity involving below ground disturbance occurs within an area, in order to avoid other works potentially occurring within sites of defined archaeological significance prior to the completion or implementation of agreed archaeological work, as this would undermine the ability to appropriately mitigate the impacts of the development upon below ground heritage assets. Therefore, additional clarity is still needed in the wording of the requirement to appropriately safeguard archaeology and secure this work at an appropriate time in relation to other works. <u>How our concern should be secured</u> As well as the necessary timing of archaeological work being more clearly set out within the OWSI, SCCAS would continue to advise that Requirement 14 (4) should be worded as follows: 'All archaeological works must be carried out in accordance with the approved site-specific written scheme of investigation for that stage, prior to the commencement of any pre-commencement or construction works in that stage'. SCCAS would also advise that within the CEMP, greater clarity and detail regarding the pre-commencement and construction activities which have the potential to impact upon buried archaeological remains is needed. The CEMP should also set out that prior to the commencement of any pre-commencement or construction works within an area, that the need for any archaeological mitigation work to be undertaken should be assessed and the location of any archaeological preservation in situ areas must be identified. Where there are archaeological constraints identified, these should be mitigated prior to works commencing, in line with the OWSI and site specific WSIs and archaeological PIS management plan. Archaeological constraints should be identified on plans and project constraints mapping to ensure that all archaeological mitigation work is completed prior to commencement of any other works and that defined archaeological PIS are suitably protected. The CEMP should also set out the provision for an HDD archaeology management plan to be produced in relation to potential impacts of bentonite breakouts upon defined archaeological PIS areas. The need for archaeological works to precede other scheme works should also be clearly set out within all relevant project documentation e.g. the Suffolk Drainage strategy. <u>Regarding the Friston D-Shaped enclosure and change request:</u>	

Reference	Matter	Point Raised	Applicant's Comments
		During the hearing, the Applicant indicated that the intended approach to mitigation of the regionally significant D-shaped enclosure would be to preserve it in situ. SCCAS would strongly support this as the preferred and optimum mitigation approach, although would not object to excavation of this site should plans change. SCCAS would however advise that partial excavation of just a section of this feature would not be appropriate or in line with best practice and would not adequately mitigate the effects of the development upon this monument, resulting in a significant adverse effect. Therefore, should preservation in situ become no longer possible, this monument would need to be subject to a programme of enhanced mitigation to enable it to be mitigated in full if not going to be completely avoided by the route, through the excavation of this monument in its entirety. Setting of heritage assets, including cumulative impacts SCC considers the effects on the Fromus Valley and the setting of its heritage assets, resulting from the proposed access road and bridge, unacceptable and has provided detailed comments on this in the LIR [REP1-130]. SCC considers that there may be intra-cumulative effects resulting from the proposed access and the converter station on Hurts Hall and The Layers but defers to Historic England and East Suffolk Council for detailed comments. SCCAS defer to Historic England and East Suffolk Council on this matter.	
8.1	Intra-project cumulative effects including the estimation of significance and need for mitigation (including how that is secured)	SCC maintains that a precautionary approach to the inter and intra project related mental health impacts is appropriate due to what both residential and non-residential receptors will be experiencing with the Sea Link project. This is set out in SCC's previous response to ExQ1 [REP3-101] and ExQ2 [REP5-204]. The project sits within the context of a really intense period of NSIP development locally and Sea Link cannot be divorced from this fact. In terms of specific mitigation measures that SCC believes to be necessary, these have been set out in [REP5-204], particularly regarding public rights of way (PRoW) in pages 49-51 of this document, which SCC continues to endorse. SCC has also proposed some revised wording for REAC, which SCC also still supports. Regarding the proposed mental health mitigation and monitoring plan, there is unlikely to be agreement between the applicant and SCC, but SCC believes that a targeted mitigation in the form of contributions to a plan here would be appropriate given the potential effects on mental health from a whole range of sources, such as traffic disruption, potential sleep disruption and potential noise impacts from extended working hours outside of core hours on certain occasions. These impacts can be assessed in isolation but can be difficult to assess cumulatively. SCC notes that the applicant does not consider monitoring to be necessary and therefore it seems likely to be an item that will be a decision for the panel.	Health and Wellbeing The Applicant maintains the view that the Project will not have a significant effect on health and wellbeing, in isolation or cumulatively, and that its assessment presented in APP-058 is robust. A detailed response regarding the proportionate measures and commitments to demonstrate recognition of the LPA and community's concerns regarding health and wellbeing is set out in Application Document 9.136 Applicant's Responses to Third Written Questions in response to 3HW3. Measures to address disruption and potential effects on mental health and wellbeing arising from construction activities are secured within Application Document 9.84 Register of Environmental Actions and Commitments (REAC) which was submitted at Deadline 6. Economic Impacts The Applicant notes SCC's comments regarding economic benefit for the Suffolk economy. The Applicant has submitted Application Document 9.120 Detailed Skills, Supply Change and Employment Plan at Deadline 6 to accompany the Application for a Development Consent Order (DCO) for the Sea Link project. The Applicant has explained its position regarding those measures proposed by SCC in response to point 16 in Application Document 9.153 Applicant's Response to the ExA's Rule 17 Letter.

Reference	Matter	Point Raised	Applicant's Comments
		Regarding the mitigation on the PRow, there are certain measures about construction hours here, but there was also a proposal that SCC has made for a new PRow to run east to west along the B1119 to link other parks of the PRow network. The applicant has pushed back on this proposal, considering the new PRow to be an enhancement rather than mitigation. As the only assessed significant effect on the PRow network is bridleway 4910, SCC position is that there is cumulative potential degradation of the PRow network as a result of the Sea Link project, which, whilst the impact on an individual PRow might not rise to the threshold of significance, the experience for someone using that PRow network might be quite seriously degraded by individual non-significant effects. This is why SCC considers the new PRow along the B1119 would be appropriate as mitigation rather than enhancement. Socioeconomics: On a wider economic point, we also need to consider where the workforce and materials will be drawn from for this and other NSIP initiatives. Again, coming back to the point about the cumulative effect, we need to be mindful of how LionLink will work alongside the other projects. While we would obviously want to see the economic benefits for the Suffolk economy (and an appropriate sourcing tool might be something like the <u>Suffolk Supply Chain</u>) we need to ensure that we are able to provide the labour and materials when required. If done effectively, then it will be a welcome boost for Suffolk businesses and employment figures. If materials and workforce are to be transported into Suffolk, then we need to return to the point about additional traffic on the county's roads and pressure on bedspaces. Whilst we welcome the economic and practical benefits of the SeaLink scheme, we need to ensure that any potential disbenefits are considered and effectively mitigated against.	
8.2	Matters relating to the application of the mitigation hierarchy	SCC Planning There is nothing in EN-1 or EN-5 which restricts the application of the mitigation hierarchy in relation to cumulative effects. Nor does the NPS exclude CNP infrastructure from following the mitigation hierarchy. Therefore, likely significant adverse effects must be mitigated or, where possible, offset. SCC does not consider relevant policy to necessarily restrict the mitigation hierarchy to significant effects, however, as explained in relation to effects on PRow in response to the Applicant's answer to 1TT16 of ExQ1 [REP4-203]: SCC considers that, for certain technical areas, there is great difficulty in determining how to apply the mitigation hierarchy. This is on account of the shortcomings of the Applicant's assessments which form the Environmental Statement. SCC has relayed severe concerns with various aspects of assessments, including methodology, evidence bases and reasonings behind professional judgements, in relation to several ES assessment chapters such as Health and Wellbeing, Traffic and Transport (including PRow) and Socioeconomics and Tourism. Whilst these issues have consequences for the application of the mitigation hierarchy when considering the project in isolation, there are	The Applicant has provided a thorough response to questions around the application of the mitigation hierarchy in its response to Question 3GEN1 in 9.136 Applicants Responses to Third Written Questions [REP6-112] and 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-113]. Socio-economics The Applicant has undertaken a comprehensive and robust EIA and maintains its position that the Project will not give rise to residual significant effects on socio-economics, leisure and tourism in isolation or cumulatively. The Applicant has provided detailed analysis on cumulative worker accommodation demand and capacity within both Application Document 9.117 Applicant's Response to AP104 from Issue Specific Hearing 2, and Application Document 9.123 Applicant's Responses to Second Written Questions (please refer to 2SERT3). This includes consideration of reasonable worst-case scenarios and the interaction with other projects.

Reference	Matter	Point Raised	Applicant’s Comments
		also consequences when considering cumulative effect, both inter and intra project. This is because SCC’s concerns undermine the robustness of the conclusions of the assessments of the project in isolation and it is these conclusions which form the basis of the cumulative effects assessments. This creates uncertainty as to what the magnitude of the likely worst-case scenario adverse cumulative effects will actually be. It should be noted that there is limited evidence from which worst case scenario effects can be predicted, particularly for aspects of Socioeconomics and Tourism and Health and Wellbeing. Further uncertainty is added through the cumulative context of this project in Suffolk. For one thing, there remains varying degrees of uncertainty over how the effects of existing and future cumulative NSIPs will actualise. For existing projects, the Applicant has relied upon the Environmental statements of those projects which are several years old despite the presence of more recent data. In particular, Sizewell C, the status of which as a mega-project exacerbates this uncertainty, submitted its Environmental Statement in May 2020. Socio-economics SCC’s published socio-economic guidance requires NSIP promoters to undertake detailed workforce modelling, including phase-specific labour profiles, skills requirements, home-based and non-home-based labour geographies, and scenario-based assessments using worst-case assumptions. These requirements exist to allow meaningful assessment of displacement, labour shortage risks, strain on local services, and cumulative interactions with other NSIPs. None of this information has been provided by the Applicant. Instead, they rely on a generalised drive-time-based labour catchment, alongside an assumed 70% workforce leakage, without any analysis of cumulative pressures or whether the remaining 30% could realistically be sourced locally. The Applicant does not address the cumulative skills demand and workforce competition created by Sea Link when combined with other major NSIPs taking place in Suffolk and the wider region. Overlapping projects will draw on the same specialised construction and engineering skills across similar time periods. This is a foreseeable cause of skilled-labour shortages, displacement, wage inflation, and supply-chain competition. The Applicant does not acknowledge these cumulative interactions, nor does it propose measures to coordinate skills pipelines, synchronise workforce demand or support local labour markets. No assessment has been provided regarding the availability of, or pressure on, training and education providers. SCC’s guidance clearly states that developers must collaborate through the Regional Skills Coordination Function (RSCF) to assess local capacity, align training pathways with project phasing, and develop targeted interventions for skills shortages. The Applicant also omits any assessment of non-home-based labour or temporary accommodation requirements, despite the expectation that this information must be provided. Without quantification of	Regarding labour market and skills requirements, the Applicant has submitted Application Document 9.120 Detailed Skills, Supply Change and Employment Plan at Deadline 6 to accompany the Application for a Development Consent Order (DCO) for the Sea Link project. The Applicant does not agree that further detailed workforce modelling, as suggested by SCC, is necessary or proportionate to support the assessment of likely significant effects. The approach adopted, based on established methodologies including labour catchment analysis and reasonable assumptions regarding workforce sourcing, provides an appropriate basis for assessing socio-economic effects within the EIA framework. Further response is provided within Application Document 9.136 Applicant’s Responses to Third Written Questions (please refer to 3SERT1). Landscape The Applicant has already been working closely with other projects, including the alignment of landscaping proposals with SPR for the Friston (Kiln Lane) substation. The Applicant will continue to liaise with other developers, including NGV for LionLink, to secure opportunities for further mitigation through coordination as they arise.

Reference	Matter	Point Raised	Applicant's Comments
		non-home-based workforce numbers, it is not possible to assess impacts known to be sensitive under cumulative NSIP pressures. Supply-chain impacts are similarly underdeveloped. There is no scenario-based assessment of supply-chain capacity, no definition of hyper-local, local, or regional supply-chain geographies, and no analysis of cumulative competition between large infrastructure schemes for contractors and specialist SMEs. The Applicant does not provide a structured, measurable, and enforceable approach to supply-chain development or displacement mitigation. The Applicant's skills and employment plan must include cumulative workforce modelling, a local education and training strategy co-developed with the RSCF, supply-chain scenario analysis, measures to mitigate labour-market displacement and cumulative demand, and a governance, monitoring, and adaptive-management framework. These measures are necessary to address foreseeable cumulative socio-economic effects, relevant to the project's impacts, enforceable through the DCO, and proportionate to the cumulative NSIP environment in Suffolk. Without these measures, Sea Link risks exacerbating labour-market pressures, reducing opportunities for local residents, straining the local training system, undermining local businesses, and intensifying cumulative socio-economic impacts associated with multiple overlapping NSIPs. Landscape In terms of cumulative landscape and visual impacts and effects, SCC considers that the mitigation hierarchy needs to be applied in full. This calls on promoters to work as closely together as possible to avoid and minimise cumulative adverse impacts and effects and respect, support, and build on other project's mitigation measures, through co-ordination, cooperation, and collaboration.)	
10.1	Operational noise emissions from converter stations and substations including, but not limited to, low frequency noise emissions and evidence to demonstrate that 5dB below background level is unachievable	SCC defer to East Suffolk Council on this matter.	Noted
11.1	Traffic emissions assessment	SCC defer to East Suffolk Council on this matter	Noted
11.2	Operational back-up generator assessment including, but not limited to, potential for eutrophication impacts and cumulative effects with SPR proposals.	SCC defer to East Suffolk Council on this matter	Noted

Reference	Matter	Point Raised	Applicant's Comments
11.3	Air quality mitigation measures including enforceability and water for dust suppression in Suffolk	SCC defer to East Suffolk Council on this matter	Noted
12.1	Update on red-throated diver displacement assessment – 1.5.3	SCC Ecology are in agreement with the measures stated in the Red-Throated Diver Protocol report. The stated measures (restrictions on cable burying operations from 1 st November – 31 st March in the Outer Thames SPA are, in the opinion of SCC Ecology, sufficient to minimise the risk of disturbing any overwintering Red-Throated Divers and any other seabirds that are prone to disturbance from vessel movements.	Noted
12.2	Seasonal restriction for all activities including pre-lay grapnel run – 1.5.3	The seasonal restrictions listed in the Red-Throated Diver Protocol report (full restrictions on cable laying operations in the Outer Thames SPA between November 1 st & March 31 st and limited restrictions on landfall cable installation between January 1 st & March 31 st are appropriate and will minimise the risk of vessel movements and other operations disturbing sensitive species that overwinter in the Outer Thames SPA boundary (Red-Throated Diver, Lesser Black-Backed Gull, Cormorant, Brent Goose).	Noted
12.3	Application of a 2km buffer for vessel displacement	No comment Provided	Noted
12.4	Potential degradation and compensation in respect of emergency repairs.	No comment provided	Noted
13.1	Whether the potential disturbance effects of terrestrial unexploded ordnance have been sufficiently addressed in the applicant's ecological assessments	The overarching onshore CEMP includes an appendix titled Unexploded Ordnance Risk Assessment. Provided the measures stated in this document are implemented and strictly adhered to during operations onsite, SCC Ecology are satisfied the potential disturbance effects of terrestrial UXO have been addressed sufficiently.	Noted. The Suffolk Ecology and Biodiversity Chapter has also been updated for D6 to include further discussion of this matter.
13.2	Mitigation for riparian mammal activity	There are measures to ensure the potential disturbance of Water Vole resulting from operations through an ecological watching brief and restricting vegetation clearance works to between 15 th February & 15 th April or 15 th September & 31 st October. SCC Ecology consider this appropriate with regard to mitigating potential harm to Water Vole. SCC Ecology would like to know why there have been no mitigation measures for Otter included in the Ecology & Biodiversity report, particularly when evidence of Otter (spraint, possible holt/slides) were found close to the extent of the order limits.	No otter holts or resting places were identified in the location of the bridge crossing of the River Fromus, or the culvert to be installed in the ditch west of the river. Therefore, no specific mitigation measures are required other than to ensure the abutments of the bridge allow for passage of riparian mammals which has been incorporated into bridge design. However, the Suffolk oLEMP includes proposals for update surveys for riparian mammals throughout the construction period and any changes in otter evidence would trigger specific mitigation measures if required.
13.3	Bats including, but not limited to, update on Natural England licensing team barbastelle bat discussions, use of hedgerow gaps vs HDD (including evidence of programme constraints) and mitigation for Daubenton's bats in Pegwell Bay	The matter regarding Daubenton's Bats in Pegwell Bay concerns the landfall site in Kent, therefore SCC Ecology have no comments to make on this particular matter. Where the cable route crosses hedgerows, SCC Ecology would prefer to see HDD employed to ensure and maintain habitat connectivity, thus minimising gaps in the hedgerows. Where HDD is not possible or considered appropriate, dead hedging must be used to maintain habitat connectivity throughout the order limits.	Noted on the hoverport. With regard to HDD under hedgerows, see the Applicant's submission on this in the Applicant's response to East Suffolk Council's Local Impact Report (Application Document 9.35.2 Applicant's Comments on Local Impact Report from East Suffolk Council), and in verbal submissions at ISH2 and ISH3 (Application Document 9.133 (A) Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 3).

Reference	Matter	Point Raised	Applicant's Comments
13.4	Pegwell Bay and former hoverport access and disturbance	This item concerns potential impacts on the landfall site in Kent. SCC Ecology have no comments to make on this matter.	Noted.
13.5	Control of activities under requirements 5 and 6, including consideration of whether the outline landscape and ecological management plan should contain more specific survey methodologies (or provision to secure this detail)	SCC Ecology feel the survey methodologies are sufficiently covered in other documents and do not think it is necessary to repeat them in the oLEMP. Reference to the documents containing the respective survey methodologies could be made in the oLEMP where appropriate. SCC Ecology would like to see surveys for Skylark & Woodlark on the Skylark Enhancement Areas following their establishment.	Noted
13.6	Biodiversity net gain including, but not limited to, an applicant update on progress with legal agreements and details of proposals.	The works along the Suffolk landfall corridor will result in an approximate 26% loss in area habitats. As this loss cannot be rectified through the delivery of onsite BNG, SCC Ecology are keen to hear how the applicant proposes to deliver this BNG. Details of how this will be delivered (presumably through offsite credits?) and where these credits will be located are what SCC Ecology would like to know with regard to the delivery of BNG. Ideally, these BNG credits will be located in Suffolk and as close to the order limits as possible but appreciate this might not be achievable.	The Applicant is currently exploring opportunities for the purchase of BNG Units, not statutory credits, from habitat banks or established and experienced conservation organisations which champion public access and engagement with the aims of delivering the required units in such a way to deliver a more meaningful and targeted provision of BNG (i.e. to benefit protected and notable species within local biodiversity action plans) that may work towards any targets within the incoming Local Nature Recovery Strategy (LNRS). The Applicant will continue to explore a range of options to deliver BNG for the Proposed Project which provide the best choices and outcomes for nature and wider environmental and societal benefits and provide value for money for consumers. The Applicant will use reasonable endeavours to complete the Biodiversity Offsetting Scheme prior to the electrification of the Proposed Project.

Table 3.4 Applicant’s Comments on the Suffolk County Council Deadline 6 Submission [REP6-183]

Reference	Matter	Point Raised	Applicant's Comments
Written Summary of Representations made at Open Floor Hearing 3			
4	Representations by interested parties and others	My name is Councillor Richard Rout and I am Cabinet Member for Devolution, Local Government Reform and Nationally Significant Infrastructure Projects at Suffolk County Council. I'd like to thank you for providing this opportunity for me to address you in person about the SEA link proposed change requests for the project. The applicant has proposed modifications in relation to the red line at the Benhall Road over rail bridge. As requested by the Examining Authority, the County Council has provided further details regarding its alternative approach to the project’s access route found in REP4 -149 and REP-5-179. These submissions set out the Council's rationale for this proposal and its benefits relative to the considerable adverse impacts and risks associated with the applicant’s proposal for access to the site. The only real change to the application caused by the inclusion of the Benhall Bridge in the red line boundary is that the process of acquiring the necessary consents to use the bridge becomes simpler for the applicant. Indeed, the proposed modifications put forward do little more	The Applicant provided a comprehensive response to Suffolk County Council’s proposed northern access route at Deadline 5 (see Application Document 9.107 Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125]). The Applicant is confident that it has undertaken a reasonable and proportionate assessment of alternative access routes, and reached a decision based on a suitable evidence base that considered reasonable alternatives, as set out in the Alternatives chapter of the ES [APP-044]. The Applicant has previously confirmed that any works to Benhall Rial Bridge would be short in duration, occurring for a small number of weekends for the overbridge solution or a maximum of 28 days for a permanent repair. Access to the Whitearch community would be retained throughout any works at the bridge. The Applicant’s position in relation to design and alignment with SPR is set out in the draft DCO submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		than serve to underline the inherent weaknesses and flaws of the proposed development. The impacts of the scheme on heritage and landscape remain and as the examination has progressed, the impacts of the access proposals on the local community have become even more apparent. The Council is particularly concerned regarding the well-being and safety of the residents White Arch Park in Benhall. The Council is pleased that the Applicant has now recognised the importance of access for the White Arch residents, as shown by commitments to taxis for residents who do not have access to a vehicle in the latest version of the Register of Environmental Actions and Commitments REP5-116. However, the Council is concerned with the lack of detail regarding how these commitments will work in practice. Detail has not been provided demonstrating that access for White Arch residents can be maintained whilst a mini-bridge is installed over the Benhall Bridge. The Council considers greater detail regarding the logistics of the taxi service should be provided in a control document, to be agreed post consent, with the Council. It is noted that the applicant has provided a response to the preliminary alternative access proposal set out by the Council REP5-125. Suffolk County Council will respond to this at the next deadline. However, in the interim, I will just say, the County Council recognises that its alternative access proposal is not without issues, but considers that on balance, the harms of this alternative access scheme and the risks associated with its delivery, outweigh those issues, and that the scheme offers in the long-term strategic benefits. Therefore, notwithstanding the longer journey time, the alternative scheme of access is substantially more robust than that being proposed by the applicant. In the Council's consultation response and relevant representation on the Change Request [REP3A031], strongly recommended that further expansion of the Order Limits is needed at the Converter Station site to increase the provision of mitigation planting and allow for a Public Right of Way. However, this has not happened. Rather, the small changes only serve to demonstrate the contrast with the Lion Link project, which set out a comprehensive preliminary approach to the design of the site in their recent consultation, an approach that had been developed in response to detailed feedback from the community. Finally, turning to the modifications to the scheme at the Friston Substation site, whilst these are welcome improvement in terms of alignment between projects, the Council has submitted to the examination in REP5-181 a table setting out how the DCO wording needs further amendment to ensure that the benefits safeguards secured by the existing Scottish Power Renewables consent are fully transposed into the SEA Link DCO. The Council has worked with Friston Parish Council on this problem, and I would like to take this opportunity to take this opportunity to thank	

Reference	Matter	Point Raised	Applicant's Comments
		the Parish Council and Mr Michael Mahoney in particular for working constructively with the Council on this issue.	

Table 3.5 Applicant’s Comments on the Suffolk County Council Deadline 6 Submission [REP6-184]

Reference	Action Point	SCC Response	Applicant's Comments
Response to ExA Actions Points from Issue Specific Hearing 3 (ISH3)			
1	Submit any suggested drafting (whether relating to matters raised in ExQ3 or not) which you consider should be included in the draft Development Consent Order (dDCO), with reasons why you consider it is necessary.	SCC has submitted its response to this Action Point as Appendix A to this document which sits as a separate submission. That document sets out proposed changes and additions to the draft DCO not otherwise included in SCC’s Deadline 6 submissions.	This is noted.
3	Suffolk County Council (SCC), EA and applicant to pull together a position statement regarding the need, or otherwise, to locate the temporary drainage pond out of fluvial flood zone 3 in Suffolk.	The SCC, LLFA is still concerned regarding the applicants’ proposals to include temporary surface water drainage storage within fluvial flood zone 3a. The applicant needs to clearly demonstrate that during a storm event, the temporary surface water drainage storage solution can: a) operate as designed to the 1:100 storm event. b) not be affected by fluvial flood water. c) not increase flood risk elsewhere. d) mitigate any loss of fluvial flood storage.	As detailed in 6.8 (B) Flood Risk Assessment [REP6-052] an alternative design solution comprising approximately 250 m of linear drainage infrastructure (swale, trench or similar) would be feasible in this location, replacing basin TC-40-ATPN and thereby avoiding works in Flood Zone 3a. Document 9.17.1 (B) Suffolk Drainage Strategy is being updated by the Applicant to reflect this change and will be submitted at Deadline 7.
4	Confirm if any wider sustainability benefits to the community are deemed necessary to outweigh flood risk as per NPS EN1, section 5.8.11. In answering, provide full reasoning for your position and, if necessary, drafting for the DCO and/or Register of Environmental Actions and Commitments (REAC) suitable to secure.	If the changes requested by SCC to the Drainage Strategy are fully adopted, SCC does not see that there will be a substantial increase in Flood Risk. However, doubt remains over the level of increase in Flood Risk from the temporary storage of materials which may be in areas of medium or high risk of surface water flooding and in relation to temporary accesses in those areas. SCC considers that if it is the case that certain people will experience increased flood risk as a result of the proposed project from these sources, those people should experience benefits of some kind as part of meeting the criteria of “wider sustainability benefits” as considering how social benefits and burdens are distributed should be a consideration of sustainability. This could be in the form of general compensatory activities, or a targeted commitment to those who fall in this category. For instance, a commitment to community benefit beyond that which is already committed to by the Applicant under its license with Ofgem, targeted at residents in proximity to the sites of the onshore infrastructure could satisfy 5.8.11 of EN-1. SCC has not been able to produce drafting to secure this but will consider doing so at Deadline 7.	The Applicant confirms that in 7.5.3 (D) Outline Onshore Construction Environmental Management Plan [REP6-075] commitment W06 has been updated to secure that during construction of the Suffolk Onshore Scheme, construction materials would be stored within Flood Zone 1 and areas at low risk of flooding from surface water flooding. Given this commitment, alongside the alternative design proposal for the one temporary drainage basin that was proposed in Flood Zone 3a, the Applicant concludes that there would be no increased flood risk experienced by local communities.
6	Provide a written summary of the A12 works, setting out what is	From south to north	This is acknowledged by the Applicant and follows on from the discussions which were held with SCC Highways on 30 March 2026.

Reference	Action Point	SCC Response	Applicant's Comments
	currently happening and what more is planned over the next few years. SCC to also set out if these works could benefit the proposed development, particularly the construction phase.	A12/B1078 Wickham Market. Construction of the access to the southern park and ride will be complete by the end of Q2 2026. It is not operational as a P&R and as such there will be additional traffic using the site resulting in delays to other road users. It is not regarded as a significant factor for Sealink as little construction traffic is expected to use this road. A12 N end of Wickham Market Bypass. Surfacing work will commence in April for 3 to 4 weeks. The speed limit will be reduced to 50mph (subject to successful TRO). The impact on Sealink traffic is considered to be neutral as the slight delays due to the speed limit are likely to be offset by greater consistency due to improved safety and impact of other works. A12 Marlesford: Footway improvements and associated traffic management will create some delays in Q2 2026. If implemented a reduction in speed limit from 40mph to 30mph will result in a small increase in journey time at this location. A12 Little Glemham: Implementation of a pedestrian crossing will have a short-term delay in Q3 or Q4 2026 during construction but little afterwards. Of greater potential impact will be strengthening of the culvert under the A12 but the scope of repairs and timing has yet to be determined. Two Village Bypass. A program for construction and tying in of the southern roundabout has yet to be provided. Whilst the roundabout is being built offline it will need to connect to the A12 which may cause some delays but will be complete by Q4 2027. The TVB will replace a section of the A12 that is restricted to 30mph so will reduce journey times. The A12/A1094 Friday Street Roundabout was open on the 30th March 2026 with final completion forecast on 20th July 2026. During this time there will be temporary speed restrictions which may cause some delays but once complete should improve journey times by smoothing flows, partially for traffic turning in and out of the A1094. SLR (West Roundabout) A program for construction and tying in of this roundabout has yet to be provided. Whilst the roundabout is being built offline it will need to connect to the A12 which may cause some delays but will be complete by Q1 2028. A12/B1122 Yoxford Roundabout was opened on the 31st March 2026 and due to complete at the beginning of July 2026. Until then some traffic management restrictions such as narrow lanes will remain but once fully open should smooth traffic flows albeit with a neutral impact on journey times. Northern Park and Ride, Darsham: The roundabout is open, but some work is still required to tie into the existing A12. Once open there may be a slight additional delay due to a reduction of speed from derestricted to 40mph. All the above may require road closures but these are either overnight or weekends. The latter may impact the Sealink project due to working full days on Saturdays and Sundays. Further SZC specific information is available at https://one.network/ And for all roadworks at https://one.network/	

Reference	Action Point	SCC Response	Applicant's Comments
7	SCC and the applicant to meet to discuss whether journey time analysis, particularly for the A12 in the area of the proposed development in Suffolk, could be produced, maybe with the use of the junction modelling. Provide an update at DL6.	Wait for minutes from Sealink but note concerns from SCC that scope does not include A12. In SCC's view insufficient time is left to do a forward-looking assessment particularly as the construction traffic and phasing of the various NSIPs will need reviewed to identify the realistic worse case cumulative impact (which may be transient across time and space) before undertaking an assessment. A real-time, backward-looking assessment to see changes in journey time and delays would be easier to achieve but an issue would remain to disassociate individual scheme impact albeit this may be possible by reviewing monitoring data.	The Applicant held a further meeting with SCC on 30 March 2026 and the meeting notes were shared with SCC on 7 April 2026 (this also included meeting minutes from the previous meeting on 24 February 2026). The Applicant's position with respect to further journey time analysis remains unchanged from the response to the Examining Authority's Second Written Question 2TT3 within Application Document 9.123 Applicant's Responses to Second Written Question [REP5-135] and subsequently the Applicant's response to ISH3 Action Point 7 within Application Document 9.135 Applicants Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110]. It will not be possible to utilise a Strategic Transport Model within the remaining timescales of Examination due to reliance on third parties nor is this considered necessary given the Driver Delay outputs generated by the junction modelling. It is also not a standard approach to undertake this type of exercise for a time-limited construction phase assessment.
9	Respond to the submitted document 9.107 Applicant's Response to SCC's DL4 Submission on Alternate Access to Saxmundham Converter Station.	SCC has provided this response in its Comments on Deadline 5 submissions submitted at Deadline 6.	The Applicant has provided a response to SCC's previous submission within Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109] .
11	The ExA requires the applicant to work with the County Councils (as Highway Authorities) to consider how any caps to HGV movements could be secured with wording also submitted, should the Secretary of State deem that capping is necessary. Please confirm whether this should be a requirement or part of a control document for securing the caps. This should also include which road links and junctions capping should be set and how the numbers of HGVs would be derived at to set the cap.	If the SoS considers that EN-1 5.14.15 '<i>The Secretary of State may attach requirements to a consent where there is likely to be substantial HGV traffic that:</i> • <i>Control numbers of HGV movements to and from the site in a specified period during its construction and possibly on the routing of such movements;</i> Is applicable to HGV movements for this project. SCC's view is that caps are necessary to ensure that the impacts are no greater than that assessed in the ES and TA by limiting HGV movements to those assessed in those documents. Otherwise, there are no clear measures to prevent the undertaker exceeding the traffic volumes and causing impacts of a scale that have not been assessed. The applicant has full control of what traffic volumes are considered in the assessments and have reassured the authority that these are realistic worse case and will not be exceeded and hence caps should not hinder delivery of the work to programme. To do otherwise would devalue the process of assessment in the view of the authority and most likely the local community. A methodology of applying caps would be to relate these to specific routes, as for SPR EA1(N), EAS2 and SZC and will also allow the cumulative impacts to be kept within the boundaries of what has been accessed (notwithstanding SCC comments regarding the cumulative impact of traffic). 1.1 A12 north (Lowestoft to A1094 Friday Street): maximum of 173 daily movements (50% of 346 movements) ^{1,2} 1.2 A12 south (Seven Hills to A1094 Friday Street): maximum of 294 daily movements (85% of 346 movements) ^{1,2} 1.3 A1094/B1069 (from the A12 to the site entrance south of	The Applicant agrees that localised HGV caps, where the Applicant has already incorporated limited movements through sensitive locations, can provide reassurance to the communities affected. The following daily HGV caps are included within Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan – Suffolk [REP6-062] where these caps are secured: • A daily cap of ten HGV movements at the B1121 Main Road/ B1119 Church Street signalised junction within Saxmundham, to minimise potential impacts of construction traffic at this location (associated with works at access S-BM12). • A daily cap of ten HGV movements at the A1094/ B1122 roundabout junction within Aldeburgh, to minimise potential impacts of construction traffic at this location (associated with works at accesses S-BM01 and S-BM02). • Further to the above, the route along the B1121 Aldeburgh Road and B1121 Saxmundham Road through Friston (associated with access S-BM11) will be limited to access to existing overhead line towers and pylon works. This route will otherwise not be used by HGVs associated with the Proposed Project. • No HGVs will arrive or depart site on Sundays or public holidays, other than for specified exception activities when required (as listed within Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan – Suffolk [REP6-062]), when they will be limited to a maximum of 30 HGVs permitted per day on Sundays and public holidays.

Reference	Action Point	SCC Response	Applicant's Comments
		Knodishall): maximum of 176 HGV daily movements ¹ 1.4 B1121 (from the A12 to the River Fromus compound): maximum of 164 HGV daily movements¹ 1.5 B1119 from Saxmundham east, a maximum of 10 daily HGV movements³ 1.6 B1122 from Aldeburgh north, a maximum of 10 daily HGV movements³ Note 1: calculated from 5.4.4 of the OCT&TP REP5-064 with 2: proportional splits in 5.4.8. 3: understood to be applicants' commitments in Issue Specific Hearing 3. B1121 / B1119 from the River Fromus compound access through Saxmundham: Due to the capacity issues at the B1121/B1119 signal controlled junction at Saxmundham and the limited mitigation possible at the location that no construction traffic uses this route. However, if PINs / SoS consider that due to the importance of this project that use by construction traffic is unavoidable SCC would accept a cap of 10 HGV movements (5 deliveries) a day subject to both this and light movements being outside network peak hours (ie 0700-0900 and 1600-1800). This should, together with the necessary monitoring and enforcement, should be included within the CTM&TP. This was the approach for other NSIPs and has been successful to date. Suitable wording can be based on that for the SPR EA2 OCTMP https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010078-005087-8.9%20EA2%20Outline%20Construction%20Traffic%20Management%20Plan.pdf	The number of vehicles using junctions that are subject to caps in the oCTMTP will be recorded and monitored to ensure these caps are not exceeded. Otherwise, the Applicant considers that periodic monitoring and adaptive management, working collaboratively with SCC and other developers in the region, is the best approach to dealing with traffic issues that may arise during the delivery of the project. Traffic management and monitoring is covered within the Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan – Suffolk [REP6-062] paragraphs 7.4.9 to 7.4.13 and coordination will be undertaken by the Transport Co-ordinator as outlined in paragraph 7.6.5. The Applicant disagrees that overall HGV caps assist in this as they potentially limit the flexibility of the contractors to adapt to changing circumstances and can have unforeseen impacts on the wider network.
12	Respond on the 10 HGV cap proposed by the applicant for the signalised junction in Saxmundham.	See response to AP 11.	The Applicant's comments on SCC's response to ISH3 Action Point 11 is provided above. To confirm, Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan – Suffolk [REP6-062] includes a daily cap of ten HGV movements at the B1121 Main Road/ B1119 Church Street signalised junction within Saxmundham, to minimise potential impacts of construction traffic at this location (associated with works at access S-BM12).
13	The Construction Traffic Management Plan says the applicant has a preference for Option 1 (repairing or strengthening the existing bridge). Is this a strong enough form of wording? Should it be that if Option 1 is fully No Action Point SCC Response	SCC considers its previously made points on the reduced adverse effects, added resilience and benefits from Option 1 justifies a stronger commitment than mere preference for Option 1 to be undertaken. Drafting of such a commitment which could be included in the CTMTP and/or REAC is given below. The commitment is designed to allow for the flexibility in terms of allowing a different option to be implemented (such as the mini-bridge option) prior to repair of the bridge provided that Option 1 is sought when timescales allow it. The wording also sets out the conditions which mean the Applicant is not expected to do	The Applicant has provided a statement within Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan [REP6-062] that confirms the Applicants preference is for a remedial option listed as Option 1, ' <i>Option 1 will be delivered if following the inspection and assessment of the bridge, the scope and programme of remedial works are proportionate and achievable within the programme of the Proposed Project.</i> ' However, the works must be proportionate and a commitment to undertake remedial works whilst the scope of those works is unknown would not be proportionate, given the limited numbers of movements required for

Reference	Action Point	SCC Response	Applicant's Comments
	available then the applicant commits to taking this option ahead of the other options?	Option 1, in which case the Applicant will seek agreement from the LHA to replace the bridge following the construction period to ensure, at least, that the aforementioned long-term benefits are secured even if Option 1 is not feasible. <i>The Applicant must implement Option 1 (repairing or strengthening the existing bridge) only, unless –</i> <i>1. doing so would disproportionately delay the construction programme, in which case the Applicant may implement another Option until such time that, acting reasonably, the Applicant can implement Option 1 without such delay; or</i> <i>2. information comes to light demonstrating that Option 1 is technically unfeasible, the agreement of the required parties cannot be obtained, or otherwise can only be implemented at a disproportionate and unreasonable cost and the Applicant has satisfied the local highway authority this is the case.</i> <i>If, for the reasons set out in paragraph (2), the Applicant has not implemented Option 1, following the end of the construction period, the Applicant will replace the existing bridge, subject to the agreement of the local highway authority and obtaining all necessary consents.</i>	construction and ongoing maintenance of the site. The Applicant does not consider replacement of the bridge as proportionate and will not be looking to replace the bridge. It is considered that replacement of the bridge would result in greater impacts than the alternatives the Applicant has outlined within Application Document 9.112 (A) Benhall Railway Bridge - Crossing Feasibility Study [REP4-101].
14	Applicant and SCC to consider whether there should be a restriction on any HGV movements (other than in relation to the bridge works) if and when Benhall Railway Bridge is closed to public traffic. If so, explain how this should be secured and provide wording.	Prohibition of construction traffic using S-BM-09 River Fromus Compound during closure for the temporary overbridging or bridge repairs would prevent adverse impacts in Saxmundham and could be secured in the OCTM&TP. SCC Highways 7.2.17 SCC Highways has previously raised the following concerns with respect to the usage of Benhall Railway Bridge by AILs associated with the Proposed Project: 1.7 Structural capacity of existing bridge specifically the weight restriction. 1.8 Feasibility of overbridging due to geometry of bridge and the physical space available to install an overbridge. 1.9 The impact on traffic queuing at the A12 junction during the installation and the use of an overbridge. 1.10 Interaction with Network Rail for the installation and the	The Applicant has stated the following in Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan [REP6-062] paragraph 7.2.38, ‘...during any road closures of the B1121 for the project, no HGV construction traffic associated with the Proposed Project would use diversion routes through Saxmundham. In addition, LGV usage associated with the converter station during the Benhall Rail Bridge closure would be minimal (up to 60 LGVs per day). Diversions and any temporary mitigation required as part of the traffic management for the closure of the B1121 will be agreed under SCC's permitting scheme, and National Grid's Transport Co-ordinator would also liaise with SCC, other developers and Suffolk Constabulary on the timing of any closure to minimise impacts as far as practicable.’ 1.7 - The Applicant has provided details on the options being considered associated with the weight restriction on Benhall Rail Bridge and is working with SCC on the development of an approval in principle to undertake the structural investigation works to inform detailed design. 1.8 - The Applicant has provided indicative working layouts that show the overbridging layout including the impact of the geometry of the bridge (vertically and horizontally). Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112]. 1.9 - The Applicant has stated the following in Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan [REP6-062] paragraph 7.2.34, ‘As set out above, the proposed works associated with each Option at Benhall Bridge would require the temporary road closure(s) of the B1121 Main Road between the junctions with the A12

Reference	Action Point	SCC Response	Applicant's Comments
		use of an overbridge. 1.11 Highway / surrounding land at Benhall Bridge is not included in the Order Limits therefore there are concerns around carrying out works outside of the DCO. 1.12 Diversion routes and impacts when the B1121 is closed and traffic diverted through Saxmundham 7.2.38 In addition, during any road closures of the B1121 for the project, no HGV construction traffic associated with the Proposed Project* would use diversion routes through Saxmundham. *In this case 'project' taken to be any closure of the B1121 associated with any works, including pre-commencement, that form part of the approved works The diversion route S/RO/D/02 as shown on plan DCO/S/AC/PS/0601 AS-011 is not an acceptable one to SCC and approval of an acceptable route will need to be given by the LHA.	<i>to the west and the B1121 Church Hill to the east (except for local access which will be retained). The potential impacts of the temporary road closure(s) including in terms of redistributed baseline traffic in combination with peak construction traffic have been assessed as part of Application Document 9.76.5 Change Request Addendum to Volume 6 Environmental Statement submitted at Deadline 1A. It should be noted that the A12/ B1121 Main Road junction would also be closed as part of the works (except for access, strictly limited to works vehicles and those associated with Whitearch Park Residential Park Homes only), to avoid temporary traffic signals on the B1121 Main Road and the potential for vehicles to queue back to the A12'.</i> 1.10 - The Applicant has a draft SOCG Application Document 9.56 Draft Statement of Common Ground Network Rail [REP1-092] which will be updated at Deadline 7 and liaison with Network Rail will continue with respect to the structural investigation works and any potential future remedial works. To date Network Rail has no objection to the proposed survey, remedial works or overbridging works subject to the agreement of method statements and the alignment of the period of works to minimise impacts to their customers. 1.11 - The Applicant has provided indicative working layouts that show the remedial works and overbridging layouts, Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112]. 1.12 - see response at the start of this section. The Applicant has confirmed within Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan [REP6-062] paragraph 7.2.38, that diversions would be agreed with SCC under their permitting scheme.
18	If there are traffic delays due to proposed development construction traffic, either alone or in combination with other developments, is it likely that alternative routes would be taken by the public in their vehicles, potentially having an impact on more minor highways? If so, has this been assessed and is there actions needed to avoid this?	This has not been assessed as no changes were made to baseline traffic to reflect any change in route selection or timing of journeys by local traffic. Traffic data taken over the past 2 years shows that traffic has changed on certain routes when compared to that forecast, some increasing, some decreasing.	The Applicant maintains its position as set out in response to ISH3 Action Point 18 within Application Document 9.135 Applicants Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110]. To re-iterate, in order to identify the potential for existing (Baseline) traffic to utilise alternative routes, an area-wide Strategic Transport Model would need to be used. This was not required as part of the Traffic and Transport assessment work, the scope of which was originally reviewed and agreed with the Local Highway Authorities at an early stage prior to DCO submission (during scoping meetings held in 2023). It is also not a standard approach to undertake this type of exercise for a time-limited construction phase assessment. As there has not been a requirement to utilise an area-wide strategic model based on the construction traffic forecasts of the Proposed Project, it has not been possible to assess the potential for existing road users to utilise alternative routes.
19	If there is anything else the Council's consider is necessary to include within the DCO with	SCC is reviewing the contents of the protective provisions first published in REP5-005 before making final comment.	The Applicant awaits SCC comments on the protective provisions.

Reference	Action Point	SCC Response	Applicant's Comments
	regards to traffic and transport matters, include this in your DL6 submission.	Unresolved Matters (OCTM&TP) Core working hours: To exclude Sat pm, Sundays and Bank Holidays. Agreement of the Traffic Management and Monitoring System with the LHA to ensure robust monitoring, reporting and enforcement of HGV and worker movements to comply with those forecast in the OCTM&TP, TA and ES.	The Applicant has updated Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan – Suffolk [REP6-062] several times throughout Examination to include additional measures following further consultation with SCC Highways. Should there be any remaining unresolved matters, then these will be addressed within the Detailed CTMTP secured under Requirement 6 of the DCO. Details relating to the Traffic Management and Monitoring System are contained within Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan – Suffolk [REP6-062] . Further details relating to the monitoring, reporting and enforcement of HGV and worker movements will be included within the Detailed CTMTP secured under Requirement 6 of the DCO.
20	Provide a joint submission from the applicant and SCC on the junction modelling, with a conclusion of how this influences the overall cumulative traffic assessment for Suffolk and whether this indicates the need for mitigation.	DL7 as this information only received recently and SCC officer absence.	The Applicant notes that a response will be provided by SCC at Deadline 7. Unfortunately, this will not provide the Applicant with sufficient time to respond prior to the end of Examination on 5 May 2026.
21	The ExA requires that the applicant and the highway authorities at SCC and KCC meet to discuss remaining matters of disagreement and try to find a way to progress on these matters as soon as possible. Provide an update at deadline 6.	SCC met with the Applicant to discuss highways matters following ISH 3. A further meeting will be organised to finalise positions and resolve disagreement as far as possible.	The Applicant confirms that a further meeting was held with SCC Highways to review the Statement of Common Ground (including with respect to Traffic and Transport matters) on 22 April 2026, following the previous meeting with SCC and ESC on 30 March 2026.
22	With the submission of the junction modelling and the other information submitted by the applicant through this examination, do the Councils now consider that there is a sufficiently robust assessment of traffic and highways issues, both for the proposed development alone and also when considered cumulatively? If not, explain why.	SCC's position regarding the scope of assessment is unchanged considering that as a minimum a sensitivity test is required to assess the cumulative impact of all NSIP related construction vehicles on the A12 and elsewhere. SCC is still struggling to reconcile the data presented in REP4-099. With that in the SZC Consolidated Transport Assessment. For example, both table 7.1 (early years) and table 7.4 peak years indicate greater volumes of HGVs in the peak hour for SZC alone compared to those presented by the Applicant in Appendix A. For example, a figure of 20 HGV movements in link S_RL1 AS south of A1094 is significantly less than the Early Years of 67 (Main Site) or 108 (Main site and associated sites), Peak Years 70 (typical day) and 102 (busiest day) shown in the SZC TCA.	The Applicant has previously responded to SCC's comments on the scope of the cumulative traffic and transport assessment, including within Table 2.9 of Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014] , Table 26.1 of Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064] and Table 18.2 of Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109] . In terms of the SZC traffic data, the Applicant held a meeting with SCC Highways on 22 April 2026 to review this point and subsequently shared a spreadsheet containing the sources and assumptions for deriving the Sizewell C (SZC) peak construction traffic forecasts to clearly identify how these had been derived, as reported within Application Document 9.105 (A) Supplement to the Preliminary Cumulative Highway Impact Assessment in Suffolk [REP4-099] . The spreadsheet was shared with SCC on 24 April 2026, prior to Deadline 7. To avoid potential confusion, the latest version of the aforementioned document is currently Application Document 9.105 (B) Supplement to the Preliminary Cumulative Highway Impact Assessment in Suffolk

Table 7.10: Sizewell C early years summary trips - HGV

Modelled Hour	Main Development Site				Associated Development Sites											
	SBA		SSE		Southern Park and Ride		Northern Park and Ride		A12 / B1122		Two Village Bypass		Sizewell Link Road		Freight Management Facility	
	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out	In	Out
06:00-07:00	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
07:00-08:00	21	3	22	13	3	0	3	0	1	1	8	1	13	2	3	0
08:00-09:00	21	8	22	16	3	1	3	1	1	1	8	3	13	5	3	1
15:00-16:00	20	13	21	18	3	2	3	2	1	0	7	5	12	8	3	2
16:00-17:00	12	14	17	18	1	2	1	2	1	1	4	5	7	8	1	2
17:00-18:00	7	13	15	18	1	2	1	2	0	0	2	5	4	8	1	2
18:00-19:00	2	11	13	17	0	1	0	1	0	1	1	4	1	7	0	1
Total (modelled hours)	83	61	110	100	11	8	11	8	5	3	30	22	50	37	11	8

Table 7.4: Sizewell C peak construction summary trips – HGV

Modelled hour	Main Development Site			
	Typical Day		Busiest Day	
	In	Out	In	Out
06:00-07:00				
07:00-08:00	48	11	71	14
08:00-09:00	48	22	71	31
15:00-16:00	45	31	66	44
16:00-17:00	29	33	41	47
17:00-18:00	19	32	26	45
18:00-19:00	9	28	11	40
Total (mod. hrs)	199	156	286	221
Total (24 hrs)	395	395	570	570

[REP6-096] which was updated at Deadline 6 to provide further information, in response to the Examining Authority’s Third Written Question 3TT1.

To provide further clarification, the HGV numbers quoted by SCC represent total peak daily construction traffic forecasts for SZC across all access points combined, rather than localised traffic forecasts for different parts of the highway network which are lower, and have informed **Application Document 9.105 (A) Supplement to the Preliminary Cumulative Highway Impact Assessment in Suffolk [REP4-099]**. The peak construction traffic forecasts for SZC have been taken from Tables 8.7 and 8.8 of the SZC Consolidated Transport Assessment for 2028 peak construction. These only include details of total vehicles, and HGVs have therefore been estimated based on the anticipated proportion of HGVs compared to total construction-vehicle related trips during the AM peak (8am-9am) PM peak (5pm-6pm) and 24-hour daily. To confirm this has been calculated as follows based on the SZC Consolidated Transport Assessment:

- AM peak (8am-9am): 102 HGV movements (Table 7.4) out of 470 total construction vehicle movements (Tables 7.2 to 7.6 combined) = 22% HGVs.
- PM peak (5pm-6pm): 71 HGV movements (Table 7.4) out of 848 total construction vehicle movements (Tables 7.2 to 7.6 combined) = 8% HGVs.
- 24-hour daily: 1,140 HGV movements (Table 7.4) out of 12,522 total construction vehicle movements (Tables 7.2 to 7.6 combined) = 9% HGVs.

The above HGV proportions have then been applied to total construction vehicles (across all receptors and time periods) to estimate HGVs across the highway network during the peak construction phase of SZC. For the quoted example (S_RL1), the figure of 20 HGV movements during the AM peak (08:00-09:00) has been calculated by applying 22% to 90 total vehicle movements, which has in turn been taken from Location AB in Table 8.8 (1,630 total vehicle movements in the reference case compared to 1,720 total vehicle movements during the busiest day). This approach has been adopted for all other receptors based on Tables 8.7 and 8.8 of the SZC Consolidated Transport Assessment for 2028 peak construction.

Notwithstanding the above, the cumulative traffic and transport assessment within **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]** is informed by both total construction vehicle and HGV numbers. Therefore, whilst HGV numbers for SZC have been estimated (in the absence of this information being directly available for different receptors across the highway network within the SZC Consolidated Transport Assessment), the total construction vehicle forecasts reflect those presented within Tables 8.7 and 8.8 of the SZC Consolidated Transport Assessment for 2028 peak construction. Therefore, **Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]** remains robust, reflecting the peak construction phases of all NSIPs combined.

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At this point in the examination, do the Council’s consider that there

SCC remains concerns that the scope of the assessment excluded considering impacts on the A12, specifically the cumulative impacts.

The Applicant has previously responded to SCC’s comments on the scope of the cumulative traffic and transport assessment, including within Table

Reference	Action Point	SCC Response	Applicant's Comments
	would be any impacts to traffic and transport, particularly driver delay, which would be assessed as significant in your view? If considered that significant adverse impacts would remain after mitigation, is there further mitigation which should be secured? If so, how would this be secured and with what wording? Would a requirement for the applicant to monitor and if necessary, provide adaptive management/remediation mitigation be sufficient to overcome any concerns that the traffic and transport impacts would be significant? If so, please provide wording and explain how this could be secured.	Once traffic volumes are close to link and junction capacities even small increases can have a disproportionate impact on journey times and delays. See also Q7. Mitigation for residual and / or unforeseen transport impacts can be managed and secured in a similar way as Sizewell through a Contingent Effects Fund. See Schedule 16 of the Deed of Obligation.	2.9 of Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014], Table 26.1 of Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064] and Table 18.2 of Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109]. The Applicant has also provided a response to ISH3 Action Point 7 within Application Document 9.135 Applicants Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110]. The Applicant has also provided a response to SCC's comment on ISH3 Action Point 7 above. The Applicant will not be committing any funds to a Contingent Effects Fund as it does not believe the impacts will have significant effects.
24	Given the winter months the applicant undertook baseline traffic surveys, does there need to be a seasonal adjustment with the junction modelling to take into account busier summer months with tourism traffic? If so, please include with the junction modelling.	Industry practice is to undertake surveys and model neutral months. In terms of the Environmental Assessment SCC would consider that assessing impacts based on the higher summer traffic flows would be misleading reducing the proportional impact of the project. In terms of junction and link capacity assessments this again should be undertaking using neutral month day. However, a sensitivity test using summer baseline data would be informative to identify junctions or links that are close to or overcapacity in the holidays and hence if any restrictions on construction traffic are justified at these times. For example, data from April 2025 and August 2025 shows an 17% increase in the summer month. to that in April.	The Applicant agrees with SCC's response that the Environmental Assessment would have been misleading had it been based on higher summer traffic flows due to reduced proportional impacts of the Proposed Project. This matter was also discussed with SCC Highways on 30 March 2026 when it was agreed that the Baseline traffic surveys were appropriate for use, given that the methodology and period of data collection was agreed with SCC in advance of the surveys. SCC also confirmed this position during a meeting held on 22 April 2026, that the Environmental Assessment has been carried out in accordance with the appropriate national standards, including that set out within the latest Institute of Environmental Management and Assessment (IEMA) guidance. In terms of the junction modelling within Suffolk, a Sensitivity Test has been carried out as part of the junction modelling to account for a potentially higher Baseline at other times of the year. A robust seasonality factor (representing a 21% uplift to the Baseline survey data) was applied to the Baseline traffic survey results to reflect busier network conditions. The junction modelling methodology and results are reported within Application Document 6.3.2.7.A (B) Environmental Statement Appendix 2.7.A Transport Assessment Note [REP6-039]. These results were also shared with SCC and ESC on 1 April 2026 for their review prior to Deadline 6.
25	The ExA require that the Councils work together and provide wording for a requirement within the DCO, if the Councils considered it necessary, for the monitoring and possible adaptive management in regard to tourism impacts	SCC has provided wording for a requirement for monitoring of tourism impacts in Appendix A of this document which has been submitted as a separate submission. SCC was unable to seek agreement from the other Councils in time for Deadline 6 but this will be sought for Deadline 7 and any amended wording submitted accordingly.	The Applicant has provided detailed response within Application Document 9.153 Applicant's Response to the ExA's Rule 17 Letter (please refer to Ref 9.3).

Reference	Action Point	SCC Response	Applicant's Comments
27	If there was to be a Skills and Employment Plan submitted by the applicant which would be considered acceptable by the Councils, would this be sufficient to overcome any remaining concerns relating to economic impacts?	SCC considers that a Skills and Employment Plan (SEP) could be sufficient to address the Councils' remaining concerns relating to skills, education, employment, labour-market and supply-chain effects, provided that the SEP meets clearly defined requirements and is secured through the Development Consent Order (DCO). For clarity, the SEP would need to be a revised, policy-compliant, mitigation-focused and enforceable. An acceptable SEP must operate explicitly as mitigation for the identified cumulative socio-economic impacts arising from Sea Link in combination with other Nationally Significant Infrastructure Projects (NSIPs) in Suffolk and the wider region, rather than functioning as a benefits-based or corporate social-value document. The Skills, Supply Chain and Employment Plan currently shared by the Applicant does not meet this threshold. The existing document is not mitigation-focused, does not address cumulative impacts, lacks robust workforce and supply-chain modelling, provides no enforceable commitments or local governance arrangements, and relies predominantly on high-level signposting to existing corporate programmes. As such, it is insufficient to address SCC's concerns and cannot, in its current form, be relied upon to mitigate the identified economic impacts. In order to be acceptable, the SEP would need to be grounded in robust evidence, including cumulative workforce modelling and scenario-based assessment, using low, medium and high scenarios for labour availability and displacement, clearly identifying workforce requirements by phase, skill and geography. It would need to demonstrate how cumulative economic impacts would be addressed, including skilled-labour shortages, workforce displacement and churn, competition for supply-chain capacity, pressures on education and training provision, and demand for non-home-based accommodation generated by overlapping NSIPs. The SEP would also need to include a locally co-designed education and training strategy, developed through SCC's Regional Skills Coordination Function (RSCF), setting out clearly how further and higher education institutions and training providers would be engaged to meet project demand and cumulative NSIP workforce requirements. In addition, the SEP would need to incorporate a supply-chain development and mitigation approach that identifies hyper-local, local and regional opportunities, assesses capacity constraints, and mitigates cumulative displacement effects within the local and regional economy. Clear governance arrangements would be essential, including the establishment of formal working groups involving SCC and the RSCF, to enable coordinated delivery, oversight and adaptive management throughout the construction period as project timelines and cumulative conditions evolve. The SEP would also need to contain measurable commitments, alongside monitoring, reporting and review mechanisms, to ensure transparency, accountability and ongoing effectiveness. Crucially, the SEP would need to be secured through a	The Applicant has provided detailed response to SCC's comments within Application Document 9.153 Applicant's Response to the ExA's Rule 17 Letter (please refer to Ref 9.4).

Reference	Action Point	SCC Response	Applicant's Comments
		DCO Requirement, so that delivery is enforceable and does not rely on discretionary or voluntary action by the Applicant. Subject to these conditions being met, SCC consider that a compliant and deliverable SEP would represent a proportionate and effective mechanism to mitigate the remaining socio-economic impacts associated with the Proposed Development. SCC has consistently maintained that these impacts are capable of mitigation rather than being inherently unacceptable, and that a robust SEP is the appropriate and proportionate mechanism through which that mitigation should be achieved. Conversely, without such a revised and DCO-secured SEP, SCC would maintain their concerns that the Applicant has not adequately mitigated the cumulative economic impacts of the project. The existing Skills, Supply Chain and Employment Plan, as submitted, does not meet these requirements and is therefore insufficient to address the Councils' concerns.	
30	Respond to the proposed permissive paths and whether they should be proposed as public rights of way?	SCC has responded to this in response to 3SERT3 of ExQ3	Noted.
32	With regard to the proposed exceptions included in requirement 7, are there any that the Council considers as should be omitted or amended?	SCC understands that the Applicant will submit information regarding the intended activities to be covered in the exceptions of Requirement 7 and why they are necessary. Therefore, SCC does not yet have definitive positions on whether any should be omitted at this time. However, SCC has proposed amendments to certain exceptions to better manage potential impacts from the exceptions. In what follows, SCC provides preliminary comments on each of the proposed exceptions: 7.4(a) – Public Health recommend that this provision is limited to trenchless crossing operations that require continuous construction. 7.4(b) –Unless the installation/removal of conductors, pilot wires and protective netting across sensitive receptors is demonstrated to be dependent upon being undertaken outside of core working hours, the provision should be removed or amended to require case by case approval to evidence need for out of hours working. 7.4(c) – Unless the jointing of underground cables is demonstrated to be dependent upon being undertaken outside of core working hours, the provision should be removed or amended to require case by case approval to evidence need for out of hours working. 7.4(d) – Public Health accepts that there is a need to safely conclude certain activities that cannot be abruptly halted. However, it is important that this provision is not relied upon as a matter of routine due to poor sequencing of works. Construction planning should ensure that activities which cannot be safely paused are not commenced where there is insufficient time remaining within core working hours for their completion or safe cessation. It is therefore recommended that this provision be amended to clarify that it applies only where continuation is genuinely unavoidable, i.e. not as a result of works	An updated draft DCO is submitted at Deadline 7.

Reference	Action Point	SCC Response	Applicant's Comments
		being commenced with foreknowledge that activity would require continual working that would extend beyond core hours. 7.4(e) – No comments/objection 7.4(f) – Testing and commissioning of electrical plant is not inherently unsuitable for core working hours. It is recommended that this provision be amended to allow exceptions to core working hours only where safety implications exist. 7.4(g) – The current drafting relating to exceptions from core working hours for works delayed or held up by severe weather conditions is considered overly broad and may enable routine or repeated extensions to working hours. Whilst Public Health recognises that severe weather can disrupt construction activities, recovery of programme should in the first instance be managed through effective forward planning, sequencing and resource allocation, rather than by extending working hours which may adversely affect community health and wellbeing. 7.4(h) – No comments/objection 7.4(i) – No comments/objection 7.4(j) – No comments/objection 7.4(k) – Public Health considers that intrusive and non-intrusive surveys are not inherently dependent on being undertaken outside of core working hours and may give rise to disturbance. It is recommended that this provision be removed or amended to require case-by-case approval with clear justification. 7.4(l) – Public Health considers mechanical and electrical installation works within buildings once erected and enclosed are not inherently dependent on being undertaken outside of core working hours. Works within enclosed buildings may reduce external impacts, however, such works can still generate noise, vibration and traffic movements. It is recommended that this provision be amended to limit activities to those that do not exceed background noise levels at the nearest sensitive receptors, are not expected to give rise to perceptible vibration outside the enclosure and set limits to additional traffic movements including deliveries and workforce travel. 7.4(m) – No comments/objection 7.4(n) – No comments/objection 7.8(a) – No comments/objection 7.8(b) – Public Health considers that internal fitting out works associated with the substation are not inherently dependent on being undertaken outside of core working hours. With effective planning, these activities should be capable of being undertaken within core hours. It is therefore recommended that this provision be removed or amended to require stricter controls relating to noise, vibration and traffic implications with supporting justification. 7.8(c) – Public Health accepts that there is a need to safely conclude certain activities that cannot be abruptly halted. However, it is important that this provision is not relied upon as a matter of routine due to poor sequencing of works. Construction planning should ensure that activities which	

Reference	Action Point	SCC Response	Applicant's Comments
		cannot be safely paused are not commenced where there is insufficient time remaining within core working hours for their completion or safe cessation. It is therefore recommended that this provision be amended to clarify that it applies only where continuation is genuinely unavoidable, i.e. not as a result of works being commenced with foreknowledge that activity would require continual working that would extend beyond core hours. 7.8(d) – Testing and commissioning of electrical plant is not inherently unsuitable for core working hours. It is recommended that this provision be amended to allow exceptions to core working hours only where safety implications exist. 7.8(e) – No comments/objection	
34	All councils to work together to submit alternative wording with respect to core working hours including any restrictions and exceptions required, if the councils consider this necessary.	SCC has provided wording for Requirement 7 in Appendix A of this document which has been submitted as a separate submission. SCC circulated proposed wording to the other Councils. However, alterations have since been made, which means the submission from other Councils may not be identical to SCC's.	This is noted.
35	It is understood that SCC and the applicant are to meet on 7 April regarding access to healthcare and the implementation, monitoring and coordination of mitigation measures to minimise disruption to healthcare access. Provide an update following this meeting	Officers from ESC, SCC, and the Applicant met on 7 April 2026 to discuss health and wellbeing matters. This included implementation, monitoring and mitigation of healthcare access, the development of a health and wellbeing monitoring plan, and core working hours. Whilst no agreements were reached, to progress discussions the Applicant committed to provide further clarity and rationale on the proposed working hours exemptions in Requirement 7 [REP5-005], and SCC will provide high-level recommendations on facilitating monitoring of both access to healthcare, and health and wellbeing. In respect of mitigation, Public Health suggest proactive measures are required alongside robust monitoring. A dedicated plan should be developed setting out how access to GP practices, hospitals, pharmacies, mental health services and other care settings will be maintained throughout construction. This should include: • Ongoing liaison with local NHS bodies, GP surgeries, and ambulance services to identify sensitive locations, groups and relevant time periods. • Coordination with ambulance service and install signed priority routes for ambulances and patient transport. • Temporary transport support (e.g. community shuttle, patient transport coordination) where access is disrupted, particularly in rural areas. • Engagement with key public transport providers to build contingency plans • Monitoring of impacts on journey times to healthcare facilities during construction. • Triggers for intervention if access issues exceed agreed thresholds.	The Applicant maintains its position that the Project will not give rise to significant effects on health and wellbeing, either in isolation or cumulatively, and that the assessment presented in APP-058 is robust and proportionate. A detailed response regarding the proportionate measures and commitments to demonstrate recognition of the LPA and community's concerns regarding health and wellbeing is set out in Application Document 9.136 Applicant's Responses to Third Written Questions in response to 3HW3. This response sets out the relevant measures secured through Application Document 9.84 Register of Environmental Actions and Commitments (REAC) which address the management of potential impacts on health and wellbeing.

Reference	Action Point	SCC Response	Applicant's Comments
		• Coordination with other nearby NSIPs and major projects to minimise overlapping disruptions and compounded access issues.	
39	Does there need to be any changes to the draft DCO or the support documents submitted by the applicant in relation to cultural heritage? If so, please set this out with alternative or additional wording.	Suffolk OWSI SCCAS advise that although generally happy with the approach to ongoing archaeological evaluation and mitigation which is set out within the Suffolk OWSI, that a number of amendments are still required (further to those already made in response to SCC comments in the LIR) in order to achieve SCCAS agreement with this key document and to ensure that a robust and appropriate scheme of archaeological mitigation is secured and delivered. Aside from a few technical details requiring correction, clarity is needed within the document regarding the necessary timing of archaeological works in relation to other elements of the scheme (prior to any pre-commencement as well as construction works) and the safeguards which will be put in place to ensure archaeological requirements are recognised by all parties who will be undertaking pre-commencement and construction works as part of the development. More robust provisions need to be set out for sites which are to be mitigated through Preservation in Situ and greater clarity is required regarding areas of the scheme where archaeological assessment work remains outstanding in line with the most up to date order limits and works plans. The mitigation areas presented within this document are also not yet agreed. The approach to post-excavation reporting also needs amending in line with the approach which has been tried and tested for other major infrastructure projects in the county. Detailed comments will be provided at Deadline 6 and have also been shared with the Applicant's archaeological consultant. DCO Requirement 14 Whilst the wording of Requirement 14 is generally satisfactory, SCCAS are however concerned that part 4 does not make clear that archaeological mitigation works must take place prior to any pre-commencement works as well as construction works, given the high potential for these activities (based upon the list of activities defined within the DCO as pre-commencement works) to cause below ground impacts which may damage or destroy archaeological remains before they are appropriately mitigated. There is a need to ensure that archaeological work is undertaken before any other activity involving below ground disturbance occurs within an area, in order to avoid other works potentially occurring within sites of defined archaeological significance prior to the completion or implementation of agreed archaeological work, as this would undermine the ability to appropriately mitigate the impacts of the development upon below ground heritage assets. Therefore, additional clarity is still needed in the wording of the requirement to appropriately safeguard archaeology and secure this work at an appropriate time in relation to other works. Alternative wording recommended As such, SCCAS would continue to advise that Requirement 14 (4) should be worded as follows: 'All archaeological works must be carried out in accordance with the approved site-specific written scheme of	The Applicant has updated the OWSI in line with comments from SCC as well as HE, and have submitted an updated OWSI at Deadline 7 (Application Document 7.5.4.1 Suffolk Overarching Written Scheme of Investigation (C)). This includes clarity on pre-commencement works which has also resulted in revisions to the DCO wording, as well as updates to include the requirement for a Project Wide Written Scheme of Investigation (PWWSI).

Reference	Action Point	SCC Response	Applicant's Comments
		investigation for that stage, prior to the commencement of any pre-commencement or construction works in that stage'.	
44	The applicant and the Councils to work together and provide a document which provides the reasonings of the parties and DCO (and/or if appropriate REAC) wording to secure the measures identified in responding to 2WQ 2CEIntra3 should the Secretary of State deem this to be necessary.	In response to 2CEIntra3, SCC proposed mitigation for Public Rights of Way and Public Health. In response to AP45 below, SCC has set out its reasonings for PRow and Health and Wellbeing mitigation. For PRow, SCC has taken the view, in lieu of additional onsite mitigation/offsetting being proposed by the Applicant, that offsite measures would be the appropriate approach to secure the required offsetting and that this could be secured via a s106 with SCC. For Health and Wellbeing, SCC provides requirement wording for a Mental Health and Wellbeing Monitoring Plan in Appendix A to this document which has been submitted separately. Such a plan is considered essential to ensure that potential impacts are appropriately identified, understood, and managed over the lifetime of the Project. In this context, Public Health considers that reliance solely on pre-defined embedded and management measures is insufficient to ensure that impacts are appropriately identified and mitigated. A more responsive approach is required, one that enables the ongoing identification of emerging issues and supports timely, proportionate intervention. Monitoring is therefore a fundamental component of mitigation, providing the evidence base necessary to inform adaptive management throughout the Project lifecycle. Accordingly, the Applicant should develop and implement a proportionate yet robust Mental Health and Wellbeing Monitoring Plan for the duration of the Project (construction and early operation), supported by clear reporting routes, defined review points, and mechanisms for escalation where required. Reliance solely on publicly available GP or Primary Care data would be insufficient, as this captures only those individuals who actively present and self-report. This approach risks underrepresenting wider community impacts, particularly among individuals who may experience stress, anxiety, or deterioration in wellbeing but do not engage with formal health services. Whilst community surveys may provide more direct insight into lived experience, these too have methodological limitations, including potential response bias where views may be influenced by opposition to the Project rather than demonstrable mental health effects. Nevertheless, when carefully designed and interpreted, survey and qualitative approaches can provide valuable triangulation alongside service based data. Learning from monitoring arrangements associated with other NSIPs, including Sizewell C, suggests that a multi-layered approach is more robust. This may include: • Population health management (PHM) data and trends in Primary Care activity • Monitoring of referrals to social prescribing and community mental health services	The Applicant has explained its position regarding those measures proposed by SCC in response to point 16 in Application Document 9.153 Applicant's Response to the ExA's Rule 17 Letter .

Reference	Action Point	SCC Response	Applicant's Comments
		• Engagement with Primary Care leads within the project catchment to identify emerging trends • Regular liaison with Community Mental Health Teams • Clear community routes for raising concerns (with mechanisms to ensure issues are captured, categorised and escalated appropriately) • Periodic reporting to relevant local authority and health partnership forums to enable two-way dialogue • Consideration of independent or academic evaluation to provide objective assessment of early and cumulative impacts including work undertaken by Suffolk MIND as detailed: https://www.suffolkmind.org.uk/reports-and-accounts/ and University of Suffolk as detailed: University publishes independent study on early impacts of Sizewell C University of Suffolk • Following SCC's guidance on community engagement community-engagement-and-wellbeing-policy • The Applicant should also actively seek to coordinate with other NSIP developers within Suffolk to ensure a coherent and joined up approach to monitoring across both geographical areas and project timescales. This should include alignment of methodologies, data sharing where appropriate, and consistent reporting mechanisms to enable a comprehensive understanding of cumulative impacts. Furthermore, the Applicant should establish an appropriate and secured legal mechanism, including a dedicated fund with clearly defined governance arrangements agreed in consultation with SCC and other relevant stakeholders. This mechanism should enable timely, proportionate, and targeted mitigation to be implemented in response to issues identified through monitoring, ensuring that access to healthcare impacts are addressed effectively and transparently. Public Health does not seek to prescribe the precise methodology, however, the Applicant should set out a transparent, evidence-based framework that combines quantitative service data with qualitative community insight, establishes a baseline, defines indicators and thresholds, and explains how findings would trigger mitigation or adaptation of measures. Without such a structured monitoring plan, there is a risk that mental health and wellbeing impacts are either under-detected or interpreted in isolation, limiting the ability to respond proportionately and effectively.	
45	Comment on whether you believe that the Secretary of State can consider that all stages of the mitigation hierarchy have been fully met based upon the mitigation offered by the applicant at DL5.	Due to the volume of information requested for Deadline 6 and officer availability, SCC has been unable to answer this Action Point in full. SCC will supplement this answer, such as from a highways perspective, in its Deadline 7 submissions. <i>Public Rights of Way</i> For all stages of the mitigation hierarchy to have been fully met, the full range of extent of effects must be considered. SCC does not consider that this has been fully achieved with regards to Public Rights of Way,	The Applicant has provided a thorough response to questions around the application of the mitigation hierarchy in its response to Question 3GEN1 in 9.136 Applicants Responses to Third Written Questions [REP6-112] and 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-113]. Regarding the proposed additional mitigation measures, the applicant has addressed each of these in its response to the Rule 17 letter in document 9.153 Applicant's Response to the ExA's Rule 17 Letter

Reference	Action Point	SCC Response	Applicant's Comments
		particularly when considering both intra-project and inter-project cumulative effects. SCC has previously set this out, such as in [REP1-130] and [REP4-201]. The main issues with the Applicant's assessment are the lack of consideration of the Public Rights of Way users across the wider network and in the wider context of continued disruption from cumulative developments. The first issue can be viewed as one relating to intra-project cumulative effects. The Applicant's assessment [APP-059] considers non-PRoW effects arising on individual PRoW receptors. However, it does not consider the synergistic effect of the various disruptions on the wider PRoW network arising from the project across the construction period. PRoWs do not exist in silos; rather, each one forms part of a network which users travel along. Accordingly, PRoW users will interact with various parts of the network during journeys which varies depending on the nature of each journey. Whilst each individual closure and diversion may not be considered significant, it remains an open question as to whether the combination on these closures and diversions over the construction period may be significant for PRoW users who utilise the wider PRoW network. SCC has detailed the adverse effects which are likely to arise when considering this such as the chilling effect of repeated disruption over a long period discouraging general PRoW use in addition to the experience of a combination of adverse effects across the construction period. The combined effects of disruption to multiple PRoWs over the construction period has not been considered in [APP-054] or [APP-059]. Related to this issue is the effect of the repeated disruption to the PRoW network in combination with the disruption from cumulative developments over a prolonged period of time. SCC has detailed these concerns in previous submissions such as in paragraph 11.207 of [REP1-130]. Again, the Applicant has assessed individual PRoWs cumulatively [APP-060] but has not considered the combination of these effects on individual PRoWs in relation to the wider context of each PRoW's role in the PRoW network which reflects the reality of the use of PRoWs. The aforementioned concern of repeated disruption to the PRoW network causing a chilling effect is likely to be greatly exacerbated when considering the added disruption and extended duration of impact from Sea Link combined with cumulative developments. The potential effects of recurring disruption from this project in conjunction with cumulative developments over a prolonged period of time on the local PRoW network and associated PRoW users may be considered as secondary or indirect effects. However, this does not affect their relevance for the purposes of assessing the likely significant effects of the project and by consequence, the application of the mitigation hierarchy. This is reflected in Schedule 4, paragraph 5 of The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 which states "<i>The description of the likely significant effects on the factors specified in regulation 5(2) should cover the direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary,</i>	

Reference	Action Point	SCC Response	Applicant's Comments
		<i>positive and negative effects of the development.</i>" In lieu of evidence demonstrating otherwise, SCC considers that a precautionary approach should be taken to ensure there are no residual effects which are not offset. Another concern with inter-project cumulative effects is the assessment's [APP-060] recognition that there is potential for effects to be significant when considering PRoWs in isolation. This includes the cumulative effects of this project and Lion Link on receptors S-P14, S-P15 and S-P17 which are assessed to be Minor/Moderate, following which it is stated "<i>However, given that the effect of each individual development is minor, and the peak construction phases are unlikely to overlap, it is considered likely that the overall cumulative effect on receptors S-P14, S-P15 and S-P17 would be not significant.</i>" For the purposes of closures and diversions, what matters is not peak construction phases but the duration of disruption. Even if there is a temporal gap between the disruption from the two projects, the total disruption is still increased by each one along with the second-order effects from recurring disruption to PRoW users. Therefore, SCC does not see how it can be considered that significant cumulative effects are unlikely for these receptors. This point also applies to the assessment of cumulative effects on receptors S-P9 and S-P10 in relation to EA1N and EA2. In addition, the Applicant states "<i>In terms of PRoW, to reduce the potential for significant overall cumulative effects, PRoW closures/ diversions will be co-ordinated with East Anglia ONE North Offshore Windfarm (ID5) and East Anglia TWO Offshore Windfarm (ID6).</i>" SCC has previously criticised the Applicant's reliance on coordination to avoid potential significant effects such as in Table B3 of [REP2-062] and in response to the Applicant's answer to 1TT17 of ExQ1 [REP4-201]. Regarding the question of whether the Applicant has met the requirements of the mitigation hierarchy in relation to PRoWs, SCC understands that further detail of mitigation will be provided by the Applicant at deadline 6 by way of a revised outline PRoWMP taking into account SCC's proposed revisions submitted at Deadline 2 [REP2-062]. SCC also understands that this revision will include details securing the proposed ermissive routes from the B1121 access and within the converter station site. SCC awaits the submission of this information before it can determine whether the mitigation hierarchy has been applied in full. However, SCC can provide the following preliminary thoughts. It is unlikely that the revised plan will account for the additional potentially significant effects set out here (and previously) by SCC, particularly in terms of total effects on users of the local PRoW network. Whilst the proposed permissive routes are a necessary and welcomed measure, they do not serve to fully mitigate and offset the effects set out by SCC when considering the disruption to the wider PRoW network. The Applicant has indicated that additional offsetting measures proposed by SCC in terms of some kind of right of way along the B1119 is not feasible. Therefore, it is most likely that some commitment to offsite offsetting will be necessary to satisfy the mitigation hierarchy when taking a	

Reference	Action Point	SCC Response	Applicant's Comments
		precautionary approach. This would consist of measures to improve the local PRoW network in lieu of measures being available within the Order Limits. This could be secured through some kind of legal agreement such as a s106 to be agreed with the local authorities. The measures secured in this agreement could be in the form of a financial contribution to SCC to provide offsetting through enhancement of the affected local PRoW network as this is something SCC has extensive experience in undertaking as the relevant local authority for PRoWs. Due to the lack of consideration of the collective effects on the local PRoW network on PRoW users arising from this project and cumulative developments across a prolonged period, SCC considers that a precautionary approach should be taken to ensure there are no residual effects which are not offset. <i>Landscape and Visual</i> SCC welcomes the commitments made by the Applicant with regards to impact avoidance, through avoiding features of landscape and ecological value, with the result that no ancient or veteran trees will be lost because of the scheme. However, SCC considers that the Applicant has not fully met all stages of the mitigation hierarchy based on the mitigation at DL5, as significant and non-significant adverse effects remain as residual effects. SCC considers that, for these, proportionate compensation should be offered as part of the mitigation hierarchy. SCC does not share the Applicant's definition of compensation as remedying or undoing an effect (ISH3), as SCC would consider this mitigation. Compensation by its nature provides something beneficial to offset/make up for an impact or effect that cannot be remedied/mitigated. SCC considers that it would be difficult to achieve offsetting by means of landscape enhancement given the practicalities of the immediate landscape context. However, SCC does not see why policy around the application of the mitigation hierarchy would restrict offsetting SCC considers that the Applicant has failed to avoid impacts on the Fromus Valley by pursuing the access from the B1121 and not fully exploring and assessing other access options that were suggested by SCC. <i>Health and Wellbeing</i> Public Health does not consider that all stages of the mitigation hierarchy have been fully met in relation to health and wellbeing. Within [APP-058], the Applicant has relied primarily on embedded design measures and generic control and management measures, with no additional mitigation proposed specifically to address health and wellbeing impacts. Paragraph 11.8.1 states that <i>"The Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce health and wellbeing impacts..."</i> and paragraph 11.10.1 concludes that <i>"After considering embedded and control and management measures no likely significant adverse effects have been identified. Additional mitigation measures are therefore not required to further reduce, mitigate or offset likely significant adverse</i>	

Reference	Action Point	SCC Response	Applicant's Comments
		<i>environmental effects on health and wellbeing receptors". This position is then carried through into the residual effects conclusions, with paragraph 11.11.2 stating that "there are no likely significant residual effects in relation to health and wellbeing receptors during construction, operation and maintenance and decommissioning of the Suffolk Onshore Scheme".</i> Public Health has consistently challenged these conclusions. The assessment underestimates the nature, extent and persistence of health and wellbeing effects, particularly those arising from cumulative exposure to disturbance, including landscape and visual change, traffic and transport, diversions to Public Rights of Way, noise and vibration, restrictions in access to healthcare, diminished sense of place, belonging and control, uncertainty, and the concentration of multiple NSIPs in Suffolk. In particular, mental health is not meaningfully assessed as a distinct or substantive outcome. The assessment makes only a limited and largely implicit reference to mental health within the context of social cohesion and community identity at paragraph 11.9.53. This level of assessment is insufficient for such an important domain, especially given the scale, duration and cumulative context of the Project. Specifically, [APP-058] does not evaluate key mental health pathways that are reasonably foreseeable in the context of the Project. These include the mental health effects of prolonged uncertainty over a multiyear construction period, sustained exposure to multiple, overlapping disturbances, loss of predictable respite and recovery opportunities, and the cumulative psychological burden experienced by communities hosting successive NSIPs. As a result, the assessment risks underrepresenting mental health impacts; these impacts may not translate into immediate service demand but nonetheless affect population wellbeing. The same criticism is true in the assessment of vulnerable groups. The Applicant's consideration of vulnerable groups in the ES is minimal which SCC has previously criticised in Chapter 14 of [REP1-130]. In addition to those critiques, other vulnerable groups such as neurodiverse and SEND individuals do not appear to have received any consideration in the relevant parts of the ES such as [APP-060] and [APP-058]. These deficiencies are not resolved by the mitigations currently proposed, nor addressed further at DL5. A key consideration across all phases is the potential for cumulative effects, both intra and inter. The Applicant's intra-project cumulative effects assessment [APP-059] concludes that most effects are "minor adverse (not significant)" and are not expected to combine in a way that would result in significant cumulative impacts on health and wellbeing. However, the assessment acknowledges that, for some residential receptors, particularly under the scenario where the Friston Substation is constructed as part of the Proposed Project, there is potential for significant cumulative effects during construction, operation, and decommissioning, due to the combination of moderate visual amenity effects with additional noise, traffic, and health and wellbeing impacts. Notably, no specific health and wellbeing mitigation is confirmed for these cumulative effects.	

Reference	Action Point	SCC Response	Applicant's Comments
		Similarly, the inter-project cumulative effects assessment [APP-060] identifies potential impacts on health and wellbeing arising from landscape and visual effects, noise and vibration, traffic and transport, and social cohesion. Despite recognising that cumulative construction activity could extend and intensify the duration and magnitude of disruption, particularly for communities exposed to multiple projects in succession or in close proximity, the Applicant concludes that because individual effects from each project are generally assessed as “<i>minor adverse (not significant)</i>” and because peak construction phases are unlikely to fully overlap, the overall cumulative effect on health and wellbeing, including mental health, is “<i>not significant</i>”, with no health and wellbeing mitigations proposed. SCC considers in respect of cumulative impacts, the approach taken within [APP-058], [APP-059] and [APP-060] does not adequately reflect the lived experience of affected communities, nor the combined psychological and social consequences of prolonged disturbance, uncertainty and repeated exposure to development activity. The assessments consider individual environmental effects in isolation, rather than capturing how multiple “minor adverse (not significant)” effects may interact spatially and temporally to produce materially harmful outcomes for mental health and wellbeing. This risks systematically underestimating the severity and persistence of cumulative health impacts, particularly in communities experiencing multiple NSIPs in succession or in close proximity. These limitations are compounded by the proposed construction programme that sets out lengthy core working hours. Sustained activity outside conventional weekday periods has the potential to materially reduce predictable opportunities for respite over a prolonged construction period. Even where technical thresholds for individual effects are not exceeded, continuous exposure to noise, vibration, visual change and access disruption can feasibly contribute to stress, sleep disturbance, anxiety and reduced quality of life, particularly when combined with wider uncertainty and loss of control. These effects are likely to be disproportionate for vulnerable groups, including older residents, disabled people and those without access to private transport, who may have fewer opportunities to avoid exposure or access alternative environments for respite. Whilst Public Health recognise the need for a degree of programming flexibility, the Applicant has not demonstrated that routine weekend and Bank Holiday working represents the least harmful option as part of the mitigation hierarchy. In the absence of such consideration, the potential for cumulative mental health and wellbeing effects arising from extended and overlapping construction activity remains insufficiently mitigated. Public Health therefore considers that additional mitigation is required to address cumulative impacts on community mental health and wellbeing arising from the prolonged and combined interaction of construction activities. This should include restrictions to core construction hours as proposed by the Council in its rewording of Requirement 7. Any exceptions should be agreed in advance with the LPA, with startup and closedown periods limited to	

Reference	Action Point	SCC Response	Applicant's Comments
		no more than one hour either side of core hours and excluding activities likely to cause disturbance to nearby residents or businesses. A further limitation is the absence of targeted mitigation for vulnerable groups. Whilst [APP-058] refers in general terms to considering vulnerable groups, Public Health raised in ISH3 post hearing submission that specific groups, including neurodiverse individuals, people with sensory sensitivities, older residents and those without access to private transport, are not meaningfully addressed either in the assessment or in mitigation design. Taking these matters together, Public Health maintain the view that monitoring of mental health and wellbeing is fundamental to mitigating impacts, as it enables the identification of emerging issues in real time and provides an evidence base to inform proportionate and responsive mitigation. Given the uncertainty associated with predicting mental health and wellbeing effects, especially those that may arise cumulatively and over extended timeframes, reliance solely on predefined embedded and management measures is not considered sufficient. Instead, a framework for robust adaptive mitigation is required, capable of responding dynamically to issues identified through ongoing monitoring and engagement. A Mental Health and Wellbeing Monitoring Plan is therefore recommended for the duration of the Project (construction and early operation), with clear reporting routes and defined review points. The Applicant should also actively seek to coordinate with other NSIP developers within Suffolk to ensure a coherent and joined up approach to monitoring across both geographical areas and project timescales. This should include alignment of methodologies, data sharing where appropriate, and consistent reporting mechanisms to enable a comprehensive understanding of cumulative impacts. Furthermore, the Applicant should establish an appropriate and secured legal mechanism, including a dedicated fund with clearly defined governance arrangements agreed in consultation with SCC and other relevant stakeholders. This mechanism should enable timely, proportionate, and targeted mitigation to be implemented in response to issues identified through monitoring, ensuring that emerging health and wellbeing impacts are addressed effectively and transparently. Another factor reinforcing the need for a comprehensive monitoring plan is the potential for adverse cumulative effects on vulnerable groups, as well as the likelihood of unforeseen changes within the planning and community context over the lifetime of the Project. For example, SCC is aware that a new SEND school is due to open in close proximity to the B1121 and the Applicant's permanent access road. This receptor does not appear to have been considered within the Applicant's assessments, potentially reflecting the timing of the application relative to the evolving local baseline. This illustrates a key limitation of the assessment processes, be it assessments are unable to account for material changes that may arise post-submission, including the introduction of new sensitive receptors or changes in population vulnerability. Public Health considers that whilst effort has been made to avoid and reduce impacts through scheme design and standard control	

Reference	Action Point	SCC Response	Applicant's Comments
		measures, insufficient attention has been given to the latter stages of the mitigation hierarchy, namely monitoring, adaptive management, and responsive intervention. As such, Public Health does not consider that the mitigation hierarchy has been fully or effectively applied in relation to health and wellbeing. <i>Socio-economics and Tourism</i> A similar line of reasoning as the one set out above for Health and Wellbeing applies to SCC's view on the application of the mitigation hierarchy for Socio-economics and Tourism. As detailed previously in the examination such as [REP1-130], SCC does not consider that the Applicant's assessment conclusions have been adequately justified and that there is potential for significant effects to arise when considering the context of cumulative developments. Therefore, SCC has proposed mitigation in the form of requirements relating to Tourism Monitoring, Accommodation monitoring and a Skills, Supply Chain and Employment Plan which would serve to ensure that the mitigation hierarchy is followed in respect of Socio-economics and Tourism.	
48	Applicant and local authorities to develop a joint position statement with regard to the unmitigated significant residual landscape and visual effects to see if there are further mitigation measures that can be included or compensation measures to offset any residual significant effects, if the Secretary of State considers that to be necessary.	It has not been possible to produce the joint position statement requested. However, SCC offers its position in response to this Action Point, which includes a Figure appended to this document displaying where further mitigation planting could be delivered. <i>Fromus crossing</i> The landscape mitigation proposals in the OLEMP [REP4-065] in relation to the Fromus bridge are welcome but cannot mitigate for the west-east crossing of a historic landscape with a northsouth orientation. This access route remains detrimental to the historic landscape of the Fromus Valley. SCC therefore considers that compensation needs to be offered. The proposals to strengthen areas of existing planting to provide greater biodiversity and screening function around the River Fromus Bridge and to establish native woodland planting within the areas previously planted with willow plantation to integrate and partially screen views of the River Fromus Bridge within the valley landscape are welcome in this context and SCC would welcome if the riparian landscape in this area was to be enhanced. The commitment to provide a permissive access (for the lifetime of the asset) along the proposed access route, would, while a rights of way issue, also be beneficial in landscape terms, as it would provide better access to the landscape and improved connectivity to the host communities in the area. <i>Converter Station Site</i> Given the landform of the landscape and openness of the site, as well as the nature and scale of the proposed project, SCC considers that a multi-layered approach to mitigation planting is required to achieve minimisation of visual effects from as many locations surrounding the site as possible (not just from the worst affected representative viewpoints). Through reinstatement of boundary hedgerows in the	The comment is acknowledged. The Applicant has considered landscape planting in the vicinity of the Saxmundham Converter Station and Fromus crossing throughout the iterative design process in consultation with stakeholders including Suffolk County Council. The Applicant considers that the proposed landscape mitigation meets the mitigation hierarchy and the Applicant's position remains unchanged from the response to 3LVIA4 contained within Application Document 9.136 Applicants Responses to Third Written Questions [REP6-111].

Reference	Action Point	SCC Response	Applicant's Comments
		wider landscape and the use of strategically placed woodland blocks/tree groups, as well as scattered trees, in varying distances from the visual receptors, would make mitigative planting more effective in screening the development (viewing angle) and/or provide a different focus in the middle ground. SCC considers that in the pursuit of minimising the land take for the scheme, the Applicant has not retained sufficient land to provide mitigation planting commensurate with the scale of the project and magnitude of change to views and landscape character east of Saxmundham. This has also been pointed out by the Design Review Panel. The current proposals are not expected to be able to fully screen the converter station, even long-term, given the height of the proposed buildings and the location of the proposed mitigation planting, close to the proposed structures. SCC considers that there is scope within the order limits for additional landscape planting. SCC has commented previously on the proposed tree belts around the converter station site in response to ExQ1 [REP3-101]. The cross-sections in relation to the proposed planting along the B1119 provided by the Applicant in their revised OLEMP [REP4-065] now show a planting corridor of 8.5m width with three rows of trees, presumably planted at 3m centres. While an improvement, this still falls short of the planting strip of at least 10m width, which SCC considers should be provided along the B1119 to provide a meaningful landscape feature (for example from views from the north as from VP16 [APP-211]. SCC is concerned that the relatively narrow width will result in unsympathetic maintenance and management to keep access routes both north and south of the tree belt accessible. In addition to this the following further mitigation measures should be considered: <i>Predominantly within the DCO limits:</i> SCC maintains that there could be planting along the PRow leading south from the B1119, which would not need to completely block views to the wider landscape, such as a line of trees or intermittent shrub planting. While such planting may not be able to fully screen the development in the distance, it would provide interest and variety in the foreground, while still allowing views into the wider landscape (in directions other than towards the converter station). Strategic block planting could be used to the north of the converter station (for example, to the north-east of where the three PRow meet in their proposed location). Such intermittent planting would improve screening/filtering of views from VP1 [APP-208] (and other parts of the PRow). <i>Predominantly outside DCO limits:</i> Further hedgerow and tree planting should be considered along Public Bridleway Sternfield 491, route 10 (relating to VP4 and VP5, both [APP-209]), and the PRow leading north-east from the B1119 (Sternfield 8) (relating to VP21 [APP-213]). South of the proposed Converter Station site (largely outside the DCO limits) further mitigation layers would be desirable.	

Reference	Action Point	SCC Response	Applicant's Comments
		These suggestions are indicated as a snippet based on Figure1 Saxmundham Converter Station Outline Landscape Mitigation within the oLEMP [REP4-065], submitted as Appendix B to this document at Deadline 6 and SCC asks that they are considered in a Landscape Masterplan (see SCC Design Engagement Strategy document, also provided at Deadline 6). In terms of Design, SCC has produced a Design Engagement Strategy document which is intended to be incorporated as an Appendix to the Design Principles – Suffolk document.	
49	Continue discussions with the councils to seek to identify appropriate mitigation, including measures to compensate and offset significant effects. Provide a position statement at DL6, which includes reasoning as to why the parties consider these measures to be necessary, or not, and wording that can secure such measures should the Secretary of State deem them necessary. All parties to clearly identify any deemed conflicts they consider remain with the applicant's ability to meet the requirements of the Critical National Priority test.	SCC had a meeting with the Applicant on 8th April. However, the Applicant stated that it did not consider it necessary to discuss further mitigation or offsetting measures as it considered that it had met the requirements of the mitigation hierarchy.	The Applicant has provided a thorough response to questions around the application of the mitigation hierarchy in its response to Question 3GEN1 in 9.136 Applicants Responses to Third Written Questions [REP6-112] and 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-113].
59	Respond to the applicant's comments on noise thresholds for the shoulder hours.	SCC will respond at Deadline 7 due to capacity constraints	Noted
81	Respond to the applicant's comments regarding hedgerow gaps.	SCC will respond at Deadline 7 due to capacity constraints	Noted
Appendix B to Suffolk County Council's Response to ISH 3 Action Points: Design Engagement Strategy			
		A document that has been prepared by Suffolk County Council to provide a mechanism for independent design review to be incorporated into Requirement 3 of the draft DCO as requested by 3GEN8 of ExQ3. The document also sets out how engagement will be sought in relation to the designs of the converter station and Fromus bridge and includes narrative on how the documents for submission pursuant to Requirement 3 will be prepared and what they will consist of. SCC considers that a similar document could be incorporated into the Design Principles – Kent application document.	The Applicant held a meeting with SCC to discuss the proposed Design Engagement Strategy and set out that the Design Engagement Strategy is not appropriate or proportionate for the Proposed Project, noting that community consultation on details of requirements is not standard practice given the detailed, technical nature of submissions and the limited areas of influence. The Applicant has subsequently reinforced the Key Design Principles (KDPs).

Reference	Action Point	SCC Response	Applicant's Comments

Table 3.6 Applicant’s Comments on the Suffolk County Council Deadline 6 Submission [REP6-237]

Reference	Matter	Point Raised	Applicant's Comments
1	Article 18 (construction, alteration and maintenance of streets)	Mitigation (including how it is secured) 18.—(1) Subject to paragraph (3), any street (other than any private streets) to be constructed under this Order must be completed to the reasonable satisfaction of the street authority and must, unless otherwise agreed with the street authority, be maintained (including any culverts or other structures laid under that part of the highway) by and at the expense of the undertaker for a period of 12 months from its completion and at the expiry of that period by and at the expense of the street authority . (2) Subject to paragraph (3), where a street is altered or diverted under this Order, the altered or diverted part of the street must be completed to the reasonable satisfaction of the street authority and must, unless otherwise agreed with the street authority, be maintained to the same condition (including any culverts or other structures laid under that part of the highway) by and at the expense of the undertaker for a period of 12 months from its completion and at the expiry of that period by and at the expense of the street authority . (3) For temporary works, the period of 12 months mentioned in paragraphs (1) and (2) commences when the street is reinstated. Justification To avoid the local highway authority incurring the cost for temporary works that solely benefit the undertaker, and which should be met by the undertaker.	The Applicant has provided its comments in respect of this article within Document 9.153 Applicant’s Response to Rule 17 Letter submitted at Deadline 7.
2	Article 11 (street works)	Mitigation (including how it is secured) Street works 11.—(1) <u>With the consent of the street authority</u>, tThe undertaker may, for the purposes of the authorised project, or for purposes ancillary to it, enter upon so much of any of the streets specified in column (2) of Schedule 5 (streets subject to street works) as is within the Order limits and may without the consent of the street authority— (a) break up or open the street, or any sewer, drain or tunnel within or under it; (b) tunnel or bore under the street, or carry out any works to strengthen or repair the carriageway; <u>and</u>	The Applicant has provided its comments in respect of this article within Document 9.153 Applicant’s Response to Rule 17 Letter submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		~~(c) remove or use all earth and materials in or under the street;~~ ~~(d) place and keep structures and apparatus in the street (including signage);~~ ~~(e) maintain, renew or alter apparatus in or on the street or change its position;~~ ~~(f) execute any works to provide or improve sight lines required by the highway authority;~~ ~~(g) execute and maintain any works to provide hard and soft landscaping;~~ (h) carry out re-lining and placement of new temporary markings.; ~~(i) execute any works required for or incidental to any works referred to in sub-paragraphs (a) to (h).~~ (2) Without limiting the scope of the powers conferred by paragraph (1) but subject to the consent of the street authority, ~~which consent shall not be unreasonably withheld or delayed~~, the undertaker may, for the purposes of the authorised project, or for purposes ancillary to it, enter on so much of any other street whether or not within the Order limits, for the purposes set out at paragraph (1)(a) to (i) and paragraph (3) of article 8 (application of the 1990 Act) shall apply. (3) If a street authority that receives an application for consent under paragraph (2) fails to notify the undertaker of its decision within 35 days (or such other period agreed by the street authority and the undertaker) beginning with the date on which the application was received, that authority will be deemed to have granted consent. (4) Any application for consent under paragraph (2) must include a statement that the provisions of paragraph (3) apply to that application. (5) If an application for consent under paragraph (2) does not include the statement required under paragraph (4) then the provisions of paragraph (3) will not apply to that application. (6) The authority given by paragraph (1) or (2) is a statutory right for the purposes of sections 48(3) (streets, street works and undertakers) and 51(1) (prohibition of unauthorised street works) of the 1991 Act. (7) The powers conferred in paragraphs (1) and (2) are without limitation of the powers of the undertaker under the Electricity Act 1989(a). (8) In this article “apparatus” has the meaning given in Part 3 of the 1991 Act. Justification	

Reference	Matter	Point Raised	Applicant's Comments
		Paragraphs 15.10 to 15.19 of SCC's LIR [REP1-130] set out SCC's concerns in respect of article 11 (street works). The following point concerning article 11 is in addition to those included in the LIR. SCC consider certain of the powers listed in article 11(1) are, absent robust justification, in excess of those required to deliver the project and could compromise the street authority's ability to safely manage its network at reasonable expense. Specifically, the matters listed in sub-paragraphs (c), (d), (e), (f), (g) and (i) could result in permanent works being incorporated into the highway maintainable at public expense without any involvement from the street authority. This is a matter of concern for SCC who are bound by the Highways Act 1980 (s41) to maintain such works or remove or modify them at public expense. Absent a suitable highways side agreement or protective provisions to protect SCC's highways interests, SCC considers art.11(1) should be subject to the street authority's consent. SCC considers its concerns in respect of article 11 can be addressed if a satisfactory highway agreement is entered into by the applicant and highway authorities.	
3	Article 13 (Application of the 1991 Act)	Mitigation (including how it is secured) The following provisions should be omitted from article 13(3) - (a) section 56 (power to give directions as to timing of street works); (b) section 56A (power to give directions as to placing of apparatus); (e) section 73A (power to require undertaker to re-surface street); (g) section 73C (materials, workmanship and standard of re-surfacing); Justification SCC considers these elements of the 1991 Act should not be excluded for the following reasons. (a) the omission would preclude the LHA from directing the undertaker to undertake works in co-ordination with others. This would have prevent the LHA from being able to reduce the impact on highway users (b) the omission would compromise the LHA's ability to prevent apparatus being placed in a location that adversely impacts road safety e.g. by compromising visibility	The Applicant has provided its comments in respect of this article within Document 9.153 Applicant's Response to Rule 17 Letter submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		(e) this provision must be retained to ensure that areas of streets adjacent to the authorised works are surfaced to avoid future defects, the cost of which would have to then be covered by the LHA. (For example, areas between multiple trenches or alongside longitudinal trenches). (g) this provision must be retained to ensure that the LHA does not incur future costs resulting from poor material or workmanship	
4	Article 51 (felling or lopping)	Mitigation (including how it is secured) 51.—(1) The undertaker may fell, lop, prune, cut, trim, coppice, pollard, or reduce in height or width, any tree, shrub, shrubbery, hedgerow, or important hedgerow under or within or overhanging or near any part of the authorised project, or cut back its roots, if it reasonably believes it to be necessary to do so to prevent the tree, shrub, shrubbery, hedgerow or important hedgerow— (a) from obstructing or interfering with the construction, maintenance or operation of the authorised project or any apparatus used in connection with the authorised project; or (b) from constituting a danger to persons constructing, maintaining, or operating or decommissioning the authorised project. (2) In carrying out any activity authorised by paragraph (1), the undertaker must not cause any unnecessary damage to any tree, shrubbery or hedgerow, or important hedgerow and must pay compensation to any person for any loss or damage arising from such activity. <u>(3) Except in the cases of emergency, no activity authorised by paragraph (1) may be carried out in relation to any tree or important hedgerow not described or shown on the Trees and Hedgerows to be Removed or Managed Plans until – ÷</u> <u>(a) no less than 28 days prior to the date on which those activities are first carried out, the undertaker has submitted written details notifying the relevant planning authority of the tree or important hedgerow to be felled, lopped, pruned, cut, trimmed, coppiced, pollard, or reduced in height or width, including details of which activity authorised by paragraph (1) will be undertaken in relation to that tree or important hedgerow, no less than 28 days prior to the date on which those activities are first carried out; and</u> <u>(b) Prior to the date on which those activities are first carried out, the relevant planning authority has confirmed, in writing, that the undertaker has demonstrated, to the satisfaction of the relevant planning authority, that the activity is necessary pursuant to the purposes in sub-paragraphs 1(a) and 1(b) and no unnecessary damage to any tree, shrubbery or hedgerow, or important hedgerow will be incurred occur as a result of the activity.</u>	The Applicant has provided its comments in respect of this article within Document 9.153 Applicant's Response to Rule 17 Letter submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		(34) Any dispute as to a person's entitlement to compensation under paragraph (2), or as to the amount of compensation, must be determined under Part 1 of the 1961 Act. (54) Subject at all times to paragraph (8), the undertaker must not pursuant to paragraph (1) fell, lop, prune, cut, trim, coppice, pollard, or reduce in height or width a tree within or overhanging the extent of the public highway without the consent of the relevant highway authority. (65) If the relevant highway authority fails to notify the undertaker of its decision within 35 days (or such other period as agreed by the relevant highways authority and the undertaker) of receiving an application for consent under paragraph (4) the relevant highway authority is deemed to have granted consent. (76) Any application for consent under paragraph (4) must include a statement that the provisions of paragraph (5) apply to that application. (87) If an application for consent under paragraph (4) does not include the statement required under paragraph (6), then the provisions of paragraph (5) will not apply to that application. (98) The consent of the relevant highway authority is not required under paragraph (4) where— (a) the tree to be felled, lopped, pruned, cut, trimmed, coppiced, pollarded, or reduced in height or width is described or shown on the Trees and Hedgerows to be Removed or Managed Plans; and (b) the undertaker has given 5 days notice to the relevant highway authority of its intention to carry out any of the operations described in sub-paragraph (a). (109) The power conferred by paragraph (1) removes any obligation upon the undertaker to secure any consent to remove hedgerows under the Hedgerows Regulations 1997(a). (110) In this article "hedgerow" and "important hedgerow" have the same meaning as in the Hedgerow Regulations 1997. Justification SCC considers the insertion of new paragraph (3) to be necessary as there are several valuable tree and important hedgerows in proximity to the proposed works which the Applicant has assessed to be retained and protected but are subject to the powers in (1). Requirement 8 does not secure (3) as vegetation removal can be done as a pre-commencement operation and so prior to the discharge of Requirement 8 for the respective stage of the authorised development. New paragraph (3) serves to ensure that any vegetation removal of valuable arboricultural receptors outside the envelope of the Applicant's assessment requires confirmation from the relevant planning authority that such removal is necessary which acts as a safeguard to ensure that such removal is in fact necessary for the purposes of (1)(a) or (1)(b). Vegetation,	

Reference	Matter	Point Raised	Applicant's Comments
		especially in respect of mature, ancient and veteran trees, is such that removal cannot be undone and compensation referenced in (2), or any replacement planting, hardly serves to remedy unnecessary damage or removal. Any replacement planting will take a decade or longer to establish and in the case of ancient and veteran trees, no like-for-like replacement will be possible. The proposed wording is reasonable as it does not preclude vegetation removal in cases of emergency, such as where there is an imminent threat to human life, or place any disproportionate burden on the undertaker. SCC's proposed wording for pre-commencement operations would enforce a 28-day notification period which aligns with the notification period set out in new paragraph (3). New paragraph (3) only adds that such a pre-commencement operation notification must include detail demonstrating the necessity of the vegetation removal of any tree or important hedgerow outside of the envelope which is consented with the DCO.	
5	Article 52 (trees subject to tree preservation orders)	Mitigation (including how it is secured) 52.—(1) The undertaker may fell, lop, prune, cut, trim, coppice, pollard or reduce in height or width any tree described in Schedule 14 (trees subject to Tree Preservation Orders) and identified on the Trees and Hedgerows to be Removed or Managed Plans, or cut back its roots, if it reasonably believes it to be necessary in order to do so to prevent the tree— (a) from obstructing or interfering with the construction, maintenance or operation of the authorised project or any apparatus used in connection with the authorised project; or (b) from constituting a danger to persons constructing, maintaining, or operating or decommissioning the authorised project. (2) The undertaker ~~may~~ <u>must not pursuant to paragraph (1)</u> fell, lop, prune, cut, trim, coppice, pollard, or reduce in height or width, any tree within or overhanging land within the Order limits subject to a tree preservation order which was made after 19 September 2024, or cut back its roots, <u>without the consent of the relevant planning authority</u>. ~~if it reasonably believes it to be necessary to do so in order to prevent the tree—~~ ~~(a) from obstructing or interfering with the construction, maintenance or operation of the authorised project or any apparatus used in connection with the authorised project; or~~ ~~(b) from constituting a danger to persons constructing, maintaining, or operating the authorised project.~~ (3) In carrying out any activity authorised by paragraph (1)— (a) the undertaker must do no unnecessary damage to any tree and must pay compensation to any person for any damage arising from	The Applicant has provided its comments in respect of this article within Document 9.153 Applicant's Response to Rule 17 Letter submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		such activity; and (b) the duty in section 206(1) of the 1990 Act (replacement of trees) does not apply. (4) The authority given by paragraph (1) or (2) constitutes a deemed consent under the relevant tree preservation order. (5) Any dispute as to a person's entitlement to compensation under paragraph (3), or as to the amount of compensation, must be determined under Part 1 of the 1961 Act. Justification A desk-based assessment of statutory and non-statutory designations relating to trees was undertaken by the Application on 19 September 2024 and the findings are detailed in section 5.2 of the Arboricultural Impact Assessment (see paragraph 5.2.1 of the Arboricultural Impact Assessment [APP-294]. The amendment to paragraph (2) is necessary to protect any tree which has been made subject to a TPO since that assessment was undertaken.	
6	Requirement 3 - Design	Mitigation (including how it is secured) (1) No stage of development of the above ground elements of the authorised development comprised in Work No. 3B (Suffolk Converter Station) may commence until details of the layout, scale and external appearance of that work have been submitted to and approved by the relevant planning authority in consultation with Suffolk County Council. The submitted details must be in accordance with the ~~design details~~ and the Converter Station Design Principles <u>and the Design Engagement Strategy</u> found in Document 7.12.1 Design Principles – Suffolk. Approval of the submitted details may not be withheld where doing so would contravene a Critical Design Constraint. Work No. 3B must be carried out in accordance with the approved details. ~~(2) No stage of Work No. 3A (Access road to the Suffolk Converter Station) may commence until details of the layout, scale and external appearance of the River Fromus Bridge have been submitted to and approved by the relevant planning authority in consultation with Suffolk County Council. The submitted details must be in accordance with the design details and the River Fromus Bridge Design Principles found in Document 7.12.1 Design Principles – Suffolk. Approval of the submitted details may not be withheld where doing so would contravene a Critical Design Constraint. Work No. 3A must be carried out in accordance with the approved details.~~ (2) Bridge over the River Fromus (a) Development of the bridge crossing of the River Fromus (part of Work No. 3a) must not commence until details of the <u>design</u>, layout and scale of the bridge have been submitted to <u>and</u>	The Applicant has provided its comments in respect of this article within Document 9.153 Applicant's Response to Rule 17 Letter submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		<u>approved by the relevant planning authority, following consultation with Suffolk County Council, in accordance with the Design Engagement Strategy,</u> and the relevant local planning authority has confirmed, following consultation with the Environment Agency, that the parameters set out in (4)(b) have been met. (b) The bridge over the River Fromus should be designed in accordance with the following parameters: (i) the bridge shall not have a soffit height lower than 10.49 m Above Ordnance Datum (approximately 4m above the Q95 flow level); (ii) abutments for the bridge shall be set back no less than 8m from the top of the bank; and (iii) the bridge shall not have a deck width greater than 6m. (c) The details of <u>the design</u>, layout and scale submitted under (a) must be accompanied by a technical statement demonstrating how, recognising the minimum size parameters in (b)(i) and (ii), the Applicant has sought to reduce the scale of the bridge <u>and achieve good design in accordance with national policy</u>, having regard to the relationship with the landscape mitigation proposals, the articulation of the spanning structure, the design of the abutment walls, <u>external colour, surface finish, materials, separation of pedestrian and vehicular traffic</u> and the design of the parapet railings. The technical statement will include a plan, elevation and section drawings, and 3D renders of the bridge design in key view VP02 and CH02. ~~(d) No part of the finished external treatment of the bridge crossing of the River Fromus comprised in Work No. 3A(a) (part of the authorised development comprising the access road to the Suffolk Converter Station) must be implemented until details of the external colour and surface finish (in line with the process established in Design Principle ID.3) have been submitted to and approved by the relevant planning authority.~~ (ed) Should the bridge design comprise a soffit height of less 12.49 m Above Ordnance Datum (approximately 6m above the Q95 flow level), then development of the bridge must not commence until a macro invertebrate monitoring and contingency plan has been submitted to and approved by East Suffolk Council, following consultation with the Environment Agency. The invertebrate monitoring and contingency plan must include: (i) The requirement to carry out Water Framework Directive compliant surveys twice yearly (spring and autumn), upstream and downstream of the Fromus crossing for a period of five years following completion of the construction of the Fromus crossing.	

Reference	Matter	Point Raised	Applicant's Comments
		(ii) Principles of the contingency monetary fund set out in <u>sub-paragraph (e)</u> and criteria for when provision of the fund would be triggered. ~~(f) and criteria for when provision of the fund would be triggered.~~ ~~(fe)~~ Following receipt and review of the monitoring results under <u>sub-paragraph (de)(i)</u>, should the criteria in <u>subparagraph (ed)(ii)</u> be exceeded, then a contingency fund ~~would~~<u>must</u> be provided to fund measures to encourage the passage of macro invertebrates around the Fromus crossing and/or enhancement of Water Framework Directive invertebrate habitat upstream of the Fromus crossing. This ~~would~~<u>must</u> be secured via an appropriate legal agreement. ~~(3) No stage of development of the above ground elements of the authorised development comprised in Work No. 1B (new Substation at Grove Wood, Friston) may commence until details of the layout, scale and external appearance of that work have been submitted to and approved by the relevant planning authority in consultation with Suffolk County Council. The submitted details must be in accordance with the design details and the Substation Design Principles found in Document 7.12.1 Design Principles – Suffolk. Approval of the submitted details may not be withheld where doing so would contravene a Critical Design Constraint. Work No. 1B must be carried out in accordance with the approved details.~~ (3) Suffolk Substation (Friston) (a) Unless otherwise approved by the relevant planning authority, the Suffolk Substation (Work No 1B) ~~will~~<u>must</u> be constructed in accordance with the following details ~~(which accord with~~ <u>within</u> the documents submitted for the discharge of Requirement 12 of part 3 of schedule 1 to SI 2022/433 <u>the East Anglia ONE North Offshore Wind Farm Order 2022 (“SI 2022/433”) insofar as those details relate to the design, scale and layout of Work No. 1B):</u> ~~(i) Substation buildings will be clad in metal cladding using either cool sky tones, light/midrange ground colours, and darker hedgerow/woodland elements. These colours would include RAL DESIGN 240 80 05, RAL DESIGN 110 60 20 or RAL DESIGN 120 50 05 or similar.~~ ~~(ii) The roof cladding should match the colour of the uppermost wall cladding on the buildings.~~ ~~(iii) The door colour should match the colour of the cladding around it. (iv) Perimeter security fences would be coloured green (RAL DESIGN 110 60 20 or similar).~~ (b) Insofar as the details approved pursuant to Requirement 12 of SI 2022/433 are amended or if the East Anglia TWO or East Anglia ONE North projects do not progress as currently planned, then the relevant planning authority ~~shall~~ <u>must</u> have regard to such	

Reference	Matter	Point Raised	Applicant's Comments
		circumstances when considering whether to approve otherwise pursuant to paragraph (a). (46) No stage of development of the above ground elements of the authorised development comprised in Work No. 9B (Kent Converter Station) may commence until details of the layout, scale and external appearance of that work have been submitted to and approved by the relevant planning authority in consultation with Kent County Council and Historic England. The submitted details must be in accordance with ~~the design details~~ and the Converter Station Design Principles and the <u>Design Engagement Strategy</u> found in Document 7.12.2 Design Principles – Kent. Approval of the submitted details may not be withheld where doing so would contravene a Critical Design Constraint. Work No. 9B must be carried out in accordance with the approved details. (57) No stage of development of the above ground elements of the authorised development comprised in Work No. 11 (new Kent Substation) may commence until details of the layout, scale and external appearance of that work have been submitted to and approved by the relevant planning authority in consultation with Kent County Council and Historic England. The submitted details must be in accordance with ~~the design details and the~~ Substation Design Principles and the <u>Design Engagement Strategy</u> found in Document 7.12.2 Design Principles – Kent. Approval of the submitted details may not be withheld where doing so would contravene a Critical Design Constraint. Work No. 11 must be carried out in accordance with the approved details. <u>(6) The details of layout, scale and external appearance of Work Nos. 3AB, 3BA, 9B, and 11 submitted under sub-paragraphs (1), (2), (4), and (5) above must be accompanied by a technical statement demonstrating how these details have been informed by feedback received during the implementation of the relevant Design Engagement Strategy. from relevant stakeholders and from an independent review of the detailed design</u> ~~(8) In this requirement, “the design details” means the Critical Design Constraints, Overarching Design Principles, and the Project Level Design Principles”.~~ Justification In its deadline 4 response <i>Written post hearing submissions including written summaries of oral cases made at hearings the w/c 26 January 2026 – Issue Specific Hearing 2 (ISH2)</i> [REP4-150] SCC explained (in row 131) it had liaised with the other host local authorities (Kent County Council, Thanet District Council and East Suffolk Council) to produce alternative wording for Requirement 3, based on the discussions which had been held. SCC previously justified an “operational artificial light emissions management plan” based on R25(3) and (4) of the SPR DCO.	

Reference	Matter	Point Raised	Applicant's Comments
		However, SCC understands that ESC is proposing a separate requirement to cover this matter, so it is not included in the proposed wording of Requirement 3. Proposed wording for Requirement 3 has been progressed based on developments in the Examination. SCC has collaborated with ESC on the proposed wording; unfortunately, it has not been possible to collaborate with the Applicant and other Councils by this point. The Design Engagement Strategy has been produced by SCC based on that which was included in the EA1N and EA2 design principles statement and adapted for the purposes of Sea Link. This will secure adequate design review from an independent design body and give local stakeholders, who will be experiencing the adverse effects and change in place as a result of the project, the opportunity to feed into the design of the converter station and Fromus bridge. For paragraphs (2) and (3), tracked changes are based on the DCO wording submitted by the Applicant at Deadline 5. For the Suffolk Substation, wording has been changed to cover all matters from the relevant discharge documents of EA2 related to the design of the substation under this consent to ensure consistency between the two consents. Further comments: <u>Suffolk Substation (Friston)</u> It would be helpful if, for paragraph (2)(b) (Suffolk substation (Friston)), the applicant could explain what they mean by “as currently planned”. <u>Paragraph (6)</u> The Design Engagement Strategy includes a mechanism for the independent review of the detailed design of Work Nos. 3A, 3B, 9B and 11. If the Design Engagement Strategy does not become a control document, paragraph (6) will need to be amended to include that mechanism.	
7	Requirement 7 (construction hours)	Mitigation (including how it is secured) ~~7. —(1) Subject to sub-paragraphs 7(2), 7(3), and 7(4) and 7(7) onshore construction work may only take place between 0700 and 1900 Monday to Friday and between 0700 and 1700-1300 on Saturdays, Sundays and Bank Holidays (the core working hours), unless otherwise approved by the relevant planning authority. There will be no working on Bank Holidays in respect of Work No. 3B, Work No. 9B, and Work No. 11, except for the operations described in paragraph (4) below or with the prior agreement of the local planning authority. In respect of those works, for Bank Holiday Mondays (meaning Easter Monday, the early May bank holiday, the Spring bank holiday, and the summer bank holiday) there will also be no working on the preceding Saturday or Sunday in each case.~~ ~~(2) No Percussive percussive piling works may take place outside the core working are limited to 0700 to 1900 Monday to Friday and 0700~~	The Applicant has provided its comments in respect of this issue within Document 9.153 Applicant's Response to Rule 17 Letter submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		to 1700 on Saturdays and may not occur on Sundays or Bank Holidays, unless otherwise approved by the relevant planning authority. (3) ~~Subject to sub-paragraph (4), No~~ HGV deliveries <u>may be made outside the core working hours</u>~~are limited to 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays and may not occur on Sundays or Bank Holidays~~, unless otherwise approved by the relevant highway authority. (4) The following operations may take place outside the core working hours referred to in sub- paragraph (1)— (a) trenchless crossing operations including at landfalls and beneath highways, railway lines, woodlands, nature reserves, Sites of Special Scientific Interest or watercourses; (b) the installation and removal of conductors, pilot wires and associated protective netting across highways, railway lines or watercourses; (c) the jointing of underground cables; (d) the continuation of any work activity commenced during the core working hours to a point where they can securely and or safely be paused; (e) delivery to the transmission works of abnormal loads and any highway works <u>provided that they have been</u> requested by the highway authority to be undertaken outside the core working hours; (f) the testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities; (g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities <u>where not doing so would lead to a disproportionate delay to the construction programme or a disproportionate increase in adverse effects</u>;—In such cases, the undertaker must, as soon as practicable, <u>inform the relevant planning authority in writing of the disruption or interruption and explain why that work could not be completed within the core working hours referred to in sub-paragraph (1)</u>; (h) activity necessary in the instance of an emergency where there is a risk to persons or property; (i) marine works (all works below the mean high water springs line); (j) security monitoring; (k) intrusive and non-intrusive surveys; (l) mechanical and electrical installation works within buildings once erected and enclosed; (m) any highway works requested by the highway authority to be undertaken outside the core working hours; and	

Reference	Matter	Point Raised	Applicant's Comments
		(n) any railway works to be undertaken as part of the project on a Saturday, Sunday, Bank Holiday or outside the core working hours. (5) The core working hours referred to in sub-paragraph (1) exclude start-up and close down activities up to 1 hour either side of the core working hours. <u>Start up and close down activities will be inaudible at the nearest noise sensitive receptor during these times. Where this cannot be reasonably met, justification must be provided to the relevant local planning authority, and as a fall back in accordance with the relevant BS5228-1 Category Threshold (Table E.1), a 50dBA noise limit (where Category B) and a 45dBA noise limit (where Category A) will apply at the nearest noise-sensitive receptors for start-up and close down activities up to one hour either side of the core working hours.</u> (6) The severe weather conditions referred to in sub-paragraph (4)(g) means any weather which as the case may be, the hours referred to in sub-paragraph (3) by reason of physical incapacity (whether for reasons of visibility, ground conditions, power availability, site access, wind or otherwise) or being contrary to safe working practices. (7) <u>In respect of Work No.1A and Work No. 1B, and all other elements of the authorised development, including associated development, located within the area defined in Sheets 2 and 3 of the Works Plans – Suffolk, construction work may only take place between 0700 hours and 1900 hours Monday to Friday and 0700 hours and 1300 hours on Saturdays, with no activity on Sundays or bank holidays, except as specified in sub-paragraph (8).</u> (8) Outside the hours specified in sub-paragraph (7), construction work may be undertaken for essential activities including but not limited to— (a) continuous periods of operation that are required as assessed in the environmental statement, such as concrete pouring and the installation and removal of conductors, pilot wires and associated protective netting across highways or public footpaths; (b) internal fitting out works associated with the substation; (c) the completion of construction activities commenced during the approved working hours which cannot safely be stopped; (d) the testing or commissioning of any electrical plant installed as part of the authorised development; and (e) activity necessary in the instance of an emergency where there is a risk to persons or property. (9) With the exception of activities undertaken in accordance with sub-paragraph (8)(e), the timing and duration of construction work undertaken in accordance with sub-paragraph (8) and, where works do not fall within sub-paragraphs (8)(a) to (8)(e), whether such works are essential, must be approved by the relevant planning	

Reference	Matter	Point Raised	Applicant's Comments
		authority in writing in advance, and must be carried out within the approved time. Justification <u>Core hours</u> Previous SCC submissions have explained that SCC's public health team recommend that, owing to the fact the core working hours should be changed to 0800 and 1800 Monday to Friday and between 0800 and 1200 on Saturdays. Owing to the weight of precedent (including the construction hours included in East Anglia ONE North Offshore Wind Farm Order 2022 (S.I.2022/432), SCC consider the construction hours proposed are reasonable, provided SCC's proposed amendments are incorporated into requirement 7. The wording proposed here is consistent with the wording requested in SCC's LIR [REP1-130] and subsequent submissions justifying the necessity of restricted working hours. As stated in response to AP 37, SCC understands that the Applicant will submit information regarding the intended activities to be covered in the exceptions of Requirement 7 and why they are necessary. Therefore, SCC does not yet have definitive positions on whether any should be omitted at this time. However, SCC has proposed amendments to certain exceptions to better manage potential impacts from the exceptions. SCC will update its proposed wording at Deadline 7 should any further amendments to paragraph 7(4) or 7(8) be needed.	
8	Requirement 8	Mitigation (including how it is secured) Retention and protection of existing trees and hedgerows 8.—(1) No stage of the authorised development may commence until, for that stage, an Arboricultural Method Statement identifying the trees, groups of trees and hedgerows to be retained during that stage has been submitted to and approved by the relevant planning authority. (2) The Statement referred to in sub-paragraph (1) must include— (a) a schedule of all proposed tree and hedgerow removal and management; <u>(b) details of the location, species and condition of the trees, groups of trees, woodlands and hedgerows to be removed and retained during that stage of the authorised development</u> <u>(c) specification for and tree protection plans clearly showing temporary physical protection including clearly defined root</u>	The Applicant has provided its comments in respect of this issue within Document 9.153 Applicant's Response to Rule 17 Letter submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		protection areas to prevent damage / compaction of roots by machinery; and (de) details of an auditable system of compliance. (3) The relevant works in proximity to the protected tree or hedgerow must not commence until the approved protection measures referred to in sub-paragraph (2) are in place, and they must thereafter be maintained during the construction of the relevant stage of the authorised development. (4) The authorised development must proceed in accordance with the Statement referred to in subparagraph 8(1) unless otherwise approved by the relevant planning authority. Justification The amendment to paragraph (2)(b) is needed to allow the relevant planning authority to understand which trees are to be removed and which are to be retained. The amendment to paragraph (c) is necessary to show how trees are proposed to be protected.	
9	New requirement 9 and 9A (Reinstatement Planting Plan)	Mitigation (including how it is secured) Reinstatement planting plan 9.—(1) Unless otherwise agreed with the relevant planning authority, no stage of the authorised development may be brought into operational use until, for that stage, a reinstatement planting plan for trees, groups of trees, woodlands and hedgerows to be reinstated during that stage has been submitted to and approved by the relevant planning authority. (2) The reinstatement planting plan submitted under sub-paragraph (1) must include a schedule of trees, hedgerows or other plants or seedlings to be planted, noting numbers, species, sizes and planting density of any proposed planting or seedlings. (3) The reinstatement planting plan submitted under sub-paragraph (1) must be in general accordance with the outline landscape and ecological management plan (or the final landscape and ecological management plan if approved pursuant to requirement 6). Reinstatement planting plan—implementation, compliance and replacement planting 9A.—(1) Unless otherwise agreed with the relevant planning authority, all reinstatement planting works referred to in requirement 9 must be implemented at the earliest opportunity and no later than by the first available planting season after that	The Applicant has included a requirement dealing with a reinstatement planting plan within the draft DCO to be submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		part of the authorised development to which the reinstatement planting works apply is first brought into operational use. (2) All reinstatement planting works referred to in requirement 9 must be carried out in accordance with the relevant reinstatement planting plan for that stage of the authorised development, unless otherwise approved by the relevant planning authority. (3) All reinstatement planting works referred to in requirement 9 must be implemented, monitored and maintained in accordance with the 'Establishment Maintenance' prescriptions of the landscape and ecological management plan approved pursuant to requirement 6. (4) Any trees or hedgerows planted as part of an approved reinstatement planting plan that, at any time within a period of five years after planting (or such other period as is specified in the landscape and ecological management plan approved pursuant to requirement 6), are removed, die or become in the opinion of the relevant planning authority seriously damaged or diseased, must be replaced in the first available planting season with a specimen of the same species and size as that originally planted, unless otherwise approved by the relevant planning authority. To complement these new requirements, two definitions will need to be included in paragraph 1(1) of Schedule 3 (requirements), namely - “reinstatement planting” includes, unless otherwise agreed with the relevant planning authority, embedded planting, reinstatement hedgerow or other planting and mitigation planting as each are described in the Landscape and Ecological Management Plan approved pursuant to requirement 6; “reinstatement planting plan” means the plan referenced at 9 and 9A and which provides detail on reinstatement planting to be prepared for each stage of the authorised development; Justification SCC considers existing requirement 9 should be replaced with this provision and supplemented by new requirement 9A (which can be renumbered when the final version of the draft DCO is submitted by the applicant in due course). SCC considers the inclusion of these new requirements is reasonable, proportionate and justified, as they will provide adequate control for the discharging authority to ensure that the replacement planting and its establishment is acceptable and secure. These requirements are based on requirements 9 and 10 of the National Grid (Bramford to Twinstead Reinforcement) Order 2024 (SI 2024/958), and so there is a recent Suffolk precedent to further justify their inclusion.	

Reference	Matter	Point Raised	Applicant's Comments
10	New Requirement - Accommodation Strategy and Monitoring Plan - Suffolk	Mitigation (including how it is secured) Accommodation Strategy and Monitoring Plan - Suffolk (1) No part of the authorised development may commence until a Workforce Accommodation Strategy has been submitted to and approved in writing by the relevant planning authority. (2) The Workforce Accommodation Strategy must include: (a) a coordinated accommodation plan demonstrating how the undertaker will work with the undertakers of other nationally significant infrastructure projects and major development proposals in the locality, as approved by the relevant planning authority, to manage cumulative workforce accommodation demand; (b) an assessment of cumulative accommodation demand and supply, taking into account all known and committed projects within the relevant travel-to-work and accommodation catchment; (c) identification of accommodation types to be used (including serviced and non-serviced accommodation), and the proportion of workforce expected to occupy each; (d) details of secured accommodation provision, including evidence of availability and arrangements to prevent displacement of visitor accommodation; (e) measures to avoid the use of tourist accommodation, including enforceable controls on contractors and subcontractors; (f) mechanisms to prevent block booking of visitor accommodation, particularly within identified tourism-sensitive areas; (g) a monitoring and reporting framework, including provision of sufficient data to enable independent verification by the relevant planning authority; (h) a mitigation and intervention strategy, including clear and enforceable action to be taken in advance of, and not after, any identified impact on visitor accommodation. (i) a procedure to report the results of the implementation of the Workforce Accommodation Strategy to East Suffolk Council, Suffolk County Council, the Local Visitor Economy Partnership, and the Destination Management Organisation on a regular basis, including a mechanism for adapting the Strategy based on the reported results. (3) The approved Workforce Accommodation Strategy must be implemented as approved for the duration of the construction period. (4) No variation to the approved strategy shall be made without the prior written approval of the relevant planning authority	The Applicant refers to its detailed response within Document 9.136: Applicant's Responses to Third Written Questions [REP6-111] (see 3SERT2). This response sets out the Applicant's proposed approach to both ongoing monitoring and the implementation of measures to address potential effects on the local tourism and accommodation sector. This incorporates updates made by the Applicant following the meeting held with LPAs on 1 April 2026.

Reference	Matter	Point Raised	Applicant's Comments
		Justification A requirement for an Accommodation Strategy and Monitoring Plan was requested by the ExA in 3SERT2 of ExQ3. SCC collaborated with ESC to form the proposed wording, a similar version of which could be adopted for Kent. SCC considers the requirement to meet many of the criteria requested by various IPs during ISH 3 and previously in terms of an adequate strategy to monitor and adapt to accommodation uses from workers of the proposed project. Moreover, the implementation of the Strategy is accountable to the local authorities and relevant tourism organisations in Suffolk as set out in (2)(i) which can give the decision maker confidence that the benefit of local expertise will inform the Applicant's approach to accommodation and minimising adverse effects on the provision of tourist accommodation.	
11	Requirement 4 (stages of the authorised development)	Mitigation (including how it is secured) 4. —(1) Unless otherwise agreed with the relevant planning authority, written notice setting out the anticipated programme for the carrying out of pre-commencement operations must be given to <u>the host authorities</u> ~~the relevant planning local authority~~ no less than ~~28~~<u>seven</u> days prior to the date on which those pre- commencement operations are first carried out. (2) The authorised development may not commence until a written scheme setting out all stages of the authorised development has been submitted to the relevant planning authority. (3) Any revisions to the written scheme referred to in sub-paragraph 4(2) above must be submitted to the relevant planning authority in advance of the commencement of the stage of the authorised development to which the revisions relate. (4) Written notice of the completion of construction for each stage of the authorised development, and the operational use of that part of the authorised development, must be given to the relevant planning authority within 28 days of the relevant event being completed. (5) The authorised development must be carried out in accordance with the written scheme submitted further to sub-paragraphs (2) or (3). <u>(6) In this requirement, “host authorities” means -</u> <u>(a) in Suffolk, East Suffolk District Council and Suffolk County Council; and</u> <u>(b) in Kent, Dover District Council, Thanet District Council, and Kent County Council.</u> Justification	The Applicant notes that Requirement 4(1) requires a written notice to be provided no less than seven days prior to the date of the first pre-commencement operations. The Applicant considers that the obligation is to provide a notification only and there therefore is no requirement for the relevant authority to take any further action within those seven days. The Applicant is bound by the terms of the DCO (noting the effect of section 161(1)(b) (breach of terms of order granting development consent) of the Planning Act 2008 in respect of pre-commencement operations. Elongating the timescales or requiring confirmation from the relevant planning authority that the pre- commencement operations accord with the DCO is unnecessary and will cause undue delays in beginning pre-commencement operations. The Applicant does not consider that introducing a new definition of host authorities will add any additional clarity but refers to the response to the ExA's Rule 17 Letter in respect of discharging authorities.

Reference	Matter	Point Raised	Applicant's Comments
		The rationale of this proposed change can be found in [REP5-181]: <i>SCC notes that pre-commencement operations must be carried out in accordance with the outline management plans. However, if the works did not satisfy this requirement, there is potential for substantial adverse effects to arise beyond what was assessed in the Environmental Statement. As such, it is vital that notifications for pre- commencement operations are required to demonstrate compliance with the relevant plans in Requirement 5 and outline plans in Requirement 6. In addition, the relevant planning authority should get more than merely 7 days' notice for pre-commencement works as this provides little opportunity to verify that the activities are valid and comply with the relevant controls. As has been stated by SCC and other local authorities during the examination, the presence of multiple NSIPs means the resources of local authorities are</i> <i>becoming increasingly stretched. 7 days, which is 5 working days or less, hardly provides for any opportunity for a technical review of the notification in comparison to all the relevant controls.</i> <i>A more proportionate and reasonable approach would require confirmation from the relevant planning authority that the pre-commencement operations accord with the DCO which must be</i> <i>given within a more reasonable time period such as 28 days. The County Council should also receive the notification as certain pre-commencement activities will fall within its remit such as highways, water environment and archaeology.</i> <i>In short, whilst SCC is not opposed to the principle of deviating from the SPR consents on this matter, SCC is deeply concerned with the disproportionately short notification period and lack of any process of confirmation from a local authority.</i>	
12	Requirement 6(2), (3) and (4) (management plans to be approved)	Mitigation (including how it is secured) (2) The works for each stage of the <u>construction, operation or decommissioning of the</u> authorised development and mitigation works must be carried out in accordance with the relevant stage of the approved plans, schemes and strategies referred to in sub-paragraph (1) or with any amended plans, schemes or strategies that may subsequently be approved by the relevant planning authority or other discharging authority as may be appropriate to the relevant plan, scheme or strategy concerned unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate. (3) All landscaping works must be carried out and maintained in accordance with the Landscape and Ecological Management Plans approved under sub-paragraph (1), and in accordance with the relevant recommendations of appropriate British Standards.	The Applicant does not consider it necessary for the management plans set out in Requirement 6 to be applied to the operation and decommissioning stages of the development. For the operational stage this could place unnecessary limitations on minor maintenance works that would not be necessary to avoid significant effects. Any effects would be likely to be much more limited than those that occur at the construction stage, meaning the full management plans would be overly onerous. For decommissioning this is not considered necessary because requirement 13 already requires a written scheme of decommissioning to be agreed with the relevant planning authority; this written scheme of decommissioning would provide the most appropriate way to agree the measures specifically required at the decommissioning stage. It is not considered necessary to change the reference from five years to ten years. The Applicant has updated the oLEMPs to include more information about the adaptive management proposals during the establishment period.

Reference	Matter	Point Raised	Applicant's Comments
		(4) Unless otherwise approved by the relevant planning authority, Any tree or shrub planted as part of an approved Landscape and Ecological Management Plans that, within a period of ~~ten~~five years after planting, is removed, dies or becomes, in the opinion of the relevant planning authority, seriously damaged or diseased, must be replaced in the first available planting season with ~~the~~specimen of the same species and size as that originally planted unless alternative timing or a different specimen is otherwise approved by the relevant planning authority. Justification The change to paragraph (2) is proposed for reasons of precision to ensure that the management plans in (1) serve as controls for each phase of the authorised development. The proposed changes to (4) is designed to better secure the efficacy of planting which serves as mitigation to the adverse effects of the project, both in terms of screening and reinstatement, and so is material to the decision. Moreover, the Applicant's visualisations which inform its assessments assume successful planting, meaning it is absolutely necessary to ensure the planting will succeed as far as possible. Concerns around the difficulty of establishing planting in Suffolk are well known and have been raised by several IPs due to Suffolk's relative lack of rainfall compared to the national average and the risk of a particular season incurring harsh weather which increases the likelihood of planting failing. Securing a period of 10, rather than 5, years to replace failed planting will lessen the risk of reinstatement and mitigation planting failing and so also lessen the risk of materially new or different effects arising as a result.	
13	Requirement 5 (management plans and commitments)	Mitigation (including how it is secured) 5.—(1) All works forming part of the <u>construction, operation or decommissioning of the</u> authorised development must be carried out in accordance with the management plans, schemes and strategies listed in sub-paragraph (2) below, unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan, scheme or strategy concerned. (2) The plans, schemes and strategies referred to in paragraph (1) above comprise the following— (a) Greenhouse Gas Reduction Strategy; (b) Red Throated Diver Protocol; and	The Applicant position on this matter is contained in the updated draft DCO that is submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		(c) Register of Environmental Actions and Commitments Section 1 (contained within Chapter 2 of Register of Environmental Actions and Commitments). (3) ~~For the avoidance of doubt, a~~All pre-commencement operations must be carried out in accordance with the plans listed in paragraph (2) above, the outline management plans and drainage strategies listed in paragraph 6(1) below, and the outline overarching written schemes of investigation listed in paragraph 14(1) below unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned. Justification The change to paragraph (1) is proposed for reasons of precision to ensure that the management plans in (1) serve as controls for each phase of the authorised development.	
14	Requirement 15 (restriction on carrying out works when consented in another order)	Mitigation (including how it is secured) SCC considers Requirement 15 should prevent Work No. 1B from being constructed under the Sea Link DCO if it has been commenced under another consent. Existing Requirement 15 should therefore be amended as follows – “Where any part of Work No.1B has been ~~completed~~ commenced pursuant to another development consent order, ~~those works that Work~~ must not be constructed under this Order, save where ~~alterations amendments to those works that Work~~ are required for the purposes of the Authorised Project”. Justification SCC was asked to provide wording to revise this requirement in 3GEN27 of ExQ3. SCC engaged with the Applicant on the matter and received indication that the Applicant did not consider a revision to the requirement to be needed and expressed concern over its ability to complete the substation works if the requirement is reworded as suggested by SCC should the SPR projects not progress as envisaged in such a way which prevented Sea Link from building the substation under that consent. However, SCC considers that the inclusion of “save where alterations to that Work are required for the purposes of the Authorised Project” is sufficient to safeguard against this concern. Should, for whatever reason, the Applicant be unable to construct 1B under the SPR consents after that work has commenced, it follows that alterations to that work would be needed, and so the Applicant would no longer be required to use the SPR consents only to construct the substation.	The Applicant has provided its comments in respect of this article within Document 9.153 Applicant’s Response to Rule 17 Letter submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
15	Schedule 3, New Requirement – Skills, Supply Chain and Employment Plan - Suffolk	Mitigation (including how it is secured) <u>[X].—(1)</u> No part of the authorised development may commence until a <u>Skills, Supply Chain</u> and Employment Plan (“SSCEP”) has been submitted to and approved in writing by the relevant local authority, following consultation with Suffolk County Council in its role operating the Regional Skills Coordination Function (RSCF). The SSCEP must demonstrate how it will mitigate cumulative effects on skilled labour availability, workforce displacement, training capacity, supply-chain resilience and accommodation pressures arising from the authorised development in combination with other nationally significant infrastructure projects. The SSCEP must include: (a) a detailed workforce assessment for each phase of the authorised development <u>to be shared with the RSCF</u>, including workforce numbers, skill sets, role durations and the anticipated split between home-based and non-home-based labour, in order to mitigate cumulative skilled-labour shortages and workforce displacement; (b) a Local Education and Training Strategy prepared jointly with the RSCF, demonstrating how training pathways and provider capacity will be aligned with project needs to <u>mitigate cumulative pressure on Suffolk’s FE, HE, Further Education, Higher Education</u> and private training providers and to support inclusive access for local residents; (c) scenario-based cumulative workforce modelling, including a worst-case assessment consistent with Suffolk County Council’s socio-economic guidance, <u>to inform and identify appropriate measures to</u> mitigate cumulative impacts on accommodation, transport, local services and availability of home-based labour; (d) a supply-chain development strategy identifying hyper-local, local and regional opportunities, with measures to support capacity-building and mitigate cumulative supply-chain displacement linked to overlapping NSIP procurement demands; (e) arrangements for ongoing information-sharing with the RSCF to enable adaptive management of cumulative labour-market, training and supply-chain impacts throughout the construction phase. <u>The undertaker must participate in governance arrangements led by the RSCF to support coordinated labour market management, information-sharing and monitoring across nationally significant infrastructure projects in Suffolk;</u> and (f) monitoring and reporting arrangements, including performance indicators for local employment, apprenticeships, training delivery, supply-chain participation and socio-economic outcomes, to ensure enforceability and ongoing assessment of cumulative effects.	The Applicant position on this matter is contained in the updated draft DCO that is submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		(g2)The authorised development must be carried out in accordance with the approved SSCEP unless otherwise approved in writing agreed bywith the relevant local authority following consultation with Suffolk County Council. The undertaker must ensure that all contractors and sub-contractors involved in the authorised development comply with the approved SSCEP, including local employment, training and supply-chain obligations. The undertaker must participate in governance arrangements led by the RSCF to support coordinated labour market management, information-sharing and monitoring across nationally significant infrastructure projects in Suffolk. (3) In this requirement RSCF means the Regional Skills Coordination Function. Justification The justification for this requirement was given in response to 2CEInter1 of ExQ2 [REP5-204] and is not repeated here. The tracked changes indicate minor changes in wording to the requirement that was proposed by SCC there for reasons of improved requirement construction.	
16	Schedule 3, New Requirement - Tourism monitoring - Suffolk	Mitigation (including how it is secured) [X].— (1) No stage of the authorised development may commence until a Tourism Monitoring Plan has been submitted to and approved by the relevant planning authority following consultation with the relevant county council. The Plan must include – (a) detail of the implementation of monitoring across socio-economic, environmental and transport indicators that may be relevant to the potential adverse effects of the authorised project on tourism in East Suffolk; (b) how any monitoring or mitigation activities are carried out with consideration of, and in complement to, existing and ongoing tourism strategies in East Suffolk; (c) how any monitoring or mitigation activities will not duplicate or obviate, but complement, existing and ongoing mitigation and monitoring in relation to tourism in East Suffolk carried out by the undertaker(s) of other nationally significant infrastructure projects in East Suffolk; (d) the establishment of a working group to – i. facilitate local stakeholder engagement and enable a structured approach to appropriate tourism related monitoring requirements, mitigation and adaptive management activities associated with the authorised development; ii. develop and agree terms of reference for the sub-group, ensuring that the purpose and scope of the working group is clear,	The Applicant position on this matter is contained in the updated draft DCO that is submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		and to meet regularly, at a mutually agreed frequency, throughout the calendar year; and iii. agree and establish appropriate mechanisms for collecting, analysing, and acting on data that is appropriate and supportive of the tourism sector. (e) a mechanism for securing a contingency fund to be agreed with East Suffolk Council and Suffolk County Council. (f) a procedure to report the results of the implementation of the Tourism Monitoring Plan to the working group established under paragraph (d)(i) on a regular basis, including a mechanism for adapting the Plan based on the reported results. (2) The mechanism for securing a contingency fund under paragraph 2(e) must include provision for – (a) calculating the quantity of the fund; (b) how and when funds would be released and to whom; and (c) the involvement of the sub-group in any decision made in respect of the fund. Justification SCC was asked to provide wording for such a requirement in 3SERT2. Due to time constraints, SCC has not been able to collaborate with the other authorities to present jointly agreed wording. SCC will seek to undertake this prior to Deadline 7 and will inform the examination of any changes to the wording set out here.	
17	Cable ducts – new Requirement	Mitigation (including how it is secured) X.—(1) If the cables comprised within the Sea Link cable works are installed prior to the cables comprised within the LionLink cable works, the authorised project may not be brought into operational use unless the cable ducts forming part of the LionLink cable works have been installed concurrently with the installation of the cables comprised within the Sea Link cable works where the routes of the cable works for Sea Link and Lion Link overlap. (2) The requirement in paragraph (1) is considered discharged if no Order for the Lion Link cable works is made by the date on which the Sea Link cable works commences (3) For the purposes of this requirement— (a) “the Sea Link cable works” mean Work Nos.2 and 5 of this Order; and (b) “the LionLink cable works” mean the cable works which form part of the proposed electricity interconnector that will link the United Kingdom and the Netherlands via an offshore connection”.	The Applicant opposes the inclusion of such a requirement. The Applicant has engaged with SCC on this issue and explained that it is not possible for the Applicant to install ducts for the The LionLink Application because the works for the LionLink cable are not part of the Sea Link works. The location of Lionlink cables are not fixed yet as the application for a DCO for Lionlink has not been finalised or submitted and is being promoted by a separate organisation. Such a requirement would impose an impossible duty on the Applicant that cannot be achieved. See the responses provided to date in Document 9.136 Applicant's Responses to Third Written Questions and Document 9.134 Applicant's Comments on other submissions received at deadline 4 and deadline 5.

Reference	Matter	Point Raised	Applicant's Comments
		Justification This drafting was requested by the ExA in 3GEN31 of ExQ3 following SCC's request for such a requirement to be added in [REP5-181]. The requirement has been worded such that it only applies if the Lion Link Order has been made at the point upon which the Sea Link cable works commence as SCC recognises that there won't otherwise be certainty that the cable ducts will be used. Moreover, the requirement only applies where the cable routes of the two projects overlap. SCC considers that the requirement places a very small burden on the Applicant but brings benefits in terms of avoiding unnecessary open cut trenching and is supported by national policy requirements of coordination to minimise adverse effects.	
18	Permitted Development – new requirement	Mitigation (including how it is secured) SCC and ESC have collaborated to form the following wording which is based on Requirement 44 of EA1N and EA2: Control of development during operational phase X-(1) During the operation of and within operational land related to Work Nos. 1B, 2, and 3B in the District of East Suffolk and Work Nos. 9A, 9B,10 and 11 in the District of Thanet and Dover, any development in addition to that authorised in this Order that is permitted under Schedule 2 Part 15 Class B (d), (e), or (f) of the General Permitted Development Order 2015 ("electricity undertakings permitted development) or any equivalent successor provision is subject to the following conditions (2) In respect of operational drainage – (a) No electricity undertakings permitted development may commence until an amendment to the Drainage Management Plan approved pursuant to requirement 6 (o) in relation to Suffolk and requirement 6 (p) in relation to Kent that includes provision for the replacement of any existing drainage measures to be removed and maintenance of any new drainage measures to be provided as part of the permitted development, has been submitted to and approved by the relevant lead local flood authority, in consultation with the relevant planning authority and the Environment Agency; (b) The measures in the amendment to the operational drainage management plan in respect of the permitted development must be implemented as approved. (3) In respect of the provision, implementation and maintenance of landscaping – a) No electricity undertakings permitted development may commence until an amendment to the written Landscape and Ecological Management Plan and associated work programme approved pursuant to requirement 6 (f) in relation to Suffolk and	The Applicant set out a detailed response to this suggested requirement in Document 9.136 Applicant's Responses to Third Written Questions and Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109] The Applicant remains of the view that there is no justification for a requirement based on Requirement 44 of EA1N and EA2 to be included in the Sea Link DCO that would interfere with National Grid's permitted development rights.

Reference	Matter	Point Raised	Applicant's Comments
		requirement 6 (g) in relation to Kent that includes provision for the replacement of any existing landscape measures to be removed and maintenance of any landscape measures to be provided as part of the permitted development, has been submitted to and approved by the relevant planning authority; and (b) The measures in the amendment to the written landscape management plan and associated work programme plan in respect of the permitted development must be implemented as approved. Justification Justification is set out in [REP5-181]: <i>SCC strongly objects to the Applicant's position and considers the SPR requirement to be necessary not only for the substation but all parts of the permanent onshore infrastructure which requires mitigation necessary to be acceptable in planning terms which could be undermined by Permitted Development rights. In paragraph 30.5.32 of the ExA's recommendation to the Secretary of State for EA2 1 , the ExA details that it considers the mitigation measures which could be undermined by the extensive Permitted Development rights enjoyed by NGET to 'be necessary to make the proposed onshore substations development acceptable in policy terms'. Clearly, the significant residual effects of the converter station, substation, Fromus bridge and permanent access road despite proposed mitigation measures strongly supports the position that most, if not all, mitigation measures in relation to these works are necessary should the application be consented. Unless there is some restriction on these permitted development rights, there is, as identified in the decision on EA1N and EA2, a real risk that the mitigations secured in the DCO necessary to make the development acceptable in planning terms are reduced in effectiveness in a way not envisaged by the decision maker. Therefore, a requirement akin to Requirement 44 of EA1N/EA2 is necessary for the Sea Link DCO. s</i>	
19	New Requirement – Mental Health and Wellbeing Monitoring plan	Mitigation (including how it is secured) X.—(1) No stage of the authorised development may commence until a Mental Health and Wellbeing Monitoring plan has been submitted to and approved by the relevant planning authority following consultation with the relevant county council. The Plan must include: (a) population health management (PHM) data and trends in Primary Care activity; (b) the monitoring of referrals to social prescribing and community mental health services; (c) provision for engagement with Primary Care leads within the project catchment to identify emerging trends;	The Applicant position on this matter is contained in the updated draft DCO that is submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		(d) provision for regular liaison with Community Mental Health Teams; (e) clear community routes for raising concerns (with mechanisms to ensure issues are captured, categorised and escalated appropriately); (f) periodic reporting to relevant local authority and health partnership forums to enable two-way dialogue; (g) Consideration of independent or academic evaluation to provide objective assessment of early and cumulative impacts including work undertaken by Suffolk MIND¹ and University of Suffolk²; and (h) Provision for following SCC's guidance on community engagement³ (2) The undertaker must coordinate with other NSIP developers within Suffolk to ensure a coherent and joined up approach to monitoring across both geographical areas and project timescales. This should include alignment of methodologies, data sharing where appropriate, and consistent reporting mechanisms to enable a comprehensive understanding of cumulative impacts. (3) The Plan must detail how the Applicant will establish an appropriate and secured legal mechanism, including a dedicated fund with clearly defined governance arrangements agreed in consultation with SCC and other relevant stakeholders. This mechanism should enable timely, proportionate, and targeted mitigation to be implemented in response to issues identified through monitoring, ensuring that access to healthcare impacts are addressed effectively and transparently. Justification Wording for this mitigation measure proposed by SCC was requested in Action Point 44 of ISH 3 action points. SCC has detailed its justification for this requirement in various submissions including in response to Action Points 44 and 45 submitted at Deadline 6..	
20	New requirement – Friston substation	Mitigation (including how it is secured) “Requirement [x] (new substation at Grove Wood, Friston, Suffolk) (1) Unless otherwise approved by the relevant planning authority, the Suffolk Substation (Work No. 1B) must be constructed, <u>operated and decommissioned</u> in compliance with each Requirement applicable to Work No.41 of the East Anglia TWO Offshore Wind Farm Order 2022 (“SI 2022/433”), as if Work No.1B were constructed under SI 2022/433. (2) In so far as any Requirement of SI 2022/433 (“the 2022/433 Requirement”) entails the making of an application by the	The Applicant reiterates the position set out within Document 9.136 Applicant's Responses to Third Written Questions . The requirement proposed is highly problematic and would prevent the delivery of Sea Link because it would require the Applicant to adhere to plans and proposals that the Applicant cannot deliver.

Reference	Matter	Point Raised	Applicant's Comments
		undertaker for the purposes of Work No. 41 or the approval of an application by the discharging authority for the purposes of that work, and at the date when the undertaker intends to carry out works comprised in Work No. 1B no application has been made and no approval of an applications has been given, the 2022/433 Requirements are deemed to be Requirements of this Schedule for all purposes concerned with their discharge and the undertaker is deemed to be a person entitled to apply for their discharge and the relevant planning authority is deemed to be the discharging authority. (3) The discharge of a 2022/433 Requirement by the relevant planning authority in accordance with paragraph (2) is conclusive evidence that that Requirement has been discharged for the purposes of this Schedule. Justification The rationale for and original wording of this requirement can be found in [REP5-181]. The tracked change is proposed to ensure the requirement covers the operational and decommissioning phases of the substation.	
21	New requirement – emergency planning	Mitigation (including how it is secured) For the DCO: Emergency Planning (1) No part of the relevant works may commence until the Suffolk Resilience Forum Radiation Emergency Plan has been reviewed to account for the relevant works or part thereof and reissued in accordance with the relevant Radiation Emergency Preparedness Regulations. The reissued Plan must include measures to – (a) protect all members of the workforce engaged in any activity, work, or operation pursuant to any part of the authorised project, during a radiation emergency; (b) minimise any interference, delay or hinderance arising from activities undertaken pursuant to the authorised project to the implementation of the Suffolk Resilience Forum Radiation Emergency Plan during a radiation emergency; and (c) engage in bi-annual review of the Suffolk Resilience Radiation Emergency Plan with the Duty Holder following the reissuing of the Plan pursuant to sub-paragraph (1). (2) Emergency planning arrangements specified within the Suffolk Resilience Forum Radiation Emergency Plan in respect of the relevant works must be implemented in relation to the relevant part of the relevant works, unless otherwise agreed with Suffolk County Council after consultation with the Sizewell Emergency	The Applicant has included a new requirement to the DCO to be submitted at Deadline 7 covering emergency planning as suggested by SCC.

Reference	Matter	Point Raised	Applicant's Comments
		Planning Consultative Committee and Suffolk Resilience Forum and, as appropriate, the Office for Nuclear Regulation. (3) For the purposes of this requirement— (a) “the relevant works” means — (i) the onshore preparation works; (ii) the Suffolk onshore works; and (iii) to the extent that they are within the Sizewell B Outline Emergency Planning Zone, the offshore works; and (b) “the relevant Radiation Emergency Preparedness Regulations” means the Radiation (Emergency Preparedness and Public Information) Regulations 2019; (c) “the relevant Sizewell B Outline Emergency Planning Zone” means the Sizewell Outline Emergency Planning Zone detailed within the Suffolk Resilience Forum Radiation Emergency Plan; and (d) "the Duty Holder" means "the Duty Holder" as defined within the Radiation (Emergency Preparedness and Public Information) Regulations 2019(a) as amended from time to time. For the REAC: Pre-commencement: (1) Any notification of the anticipated programme for pre-commencement operations must be submitted to the Duty Holder at least 28 days in advance of those operations taking place. Any such notification must detail how the undertaker, in carrying out the specified pre-commencement operation(s), will: 1. Protect all members of the workforce involved in any activity pursuant to the specified operation(s) during a radiation emergency 2. Implement emergency and evacuation procedures if notified of a radiation emergency 3. Maintain open line(s) of communication with the Duty Holder such that any communication from the Duty Holder regarding a radiation emergency event will be received without delay and the undertaker's emergency procedures for a radiation emergency are implemented without delay (2) The details submitted pursuant to sub-paragraph (1) must demonstrate, to the satisfaction of the Duty Holder, that the activities undertaken in relation to the specified pre-commencement operation(s) will not prevent, hinder or otherwise interfere with the Duty Holder's ability to implement the Suffolk Resilience Forum Radiation Emergency Plan in the event of a radiation emergency. (3) For the purposes of this commitment, "the Duty Holder" means "the Duty Holder" as defined within the Radiation (Emergency	

Reference	Matter	Point Raised	Applicant's Comments
		Preparedness and Public Information) Regulations 2019(a) as amended from time to time. Justification SCC stated in Chapter 15 of its LIR [REP1-130] that an emergency planning requirement of a similar kind to the SPR requirement 33 would be necessary for Sea Link given the project's proximity to the Outline Emergency Planning Zone of Sizewell B. The rationale for the proposed wording here is unchanged, although the required detail to be submitted under this requirement has been further specified for precision and to ensure that SCC as the Duty Holder can fulfil its obligations under the Radiation (Emergency Preparedness and Public Information) Regulations 2019; The Applicant should consider incorporating the commitments included in the proposed wording into their overall health and safety / emergency planning arrangements under Construction (Design and Management) (CDM) 2015 regulations. However, it is recognised that it would not be appropriate to include this in the Order itself. SCC has also proposed wording for the REAC regarding pre-commencement operations. This is considered necessary to ensure that the Duty Holder under REPIR is aware of the workforce and traffic associated with the operations to ensure it can meet its duties under those regulations in the event of a nuclear event at Sizewell B. Since the proposed DCO requirement would not need to be discharged prior to the carrying out of pre-commencement works, this REAC commitment is considered necessary.	
22	Schedule 4 (1) Applications made under Requirements	Mitigation (including how it is secured) 1.—(1) Where an application has been made to a relevant authority for any consent, agreement or approval required by a Requirement (including consent, agreement or approval in respect of part of a Requirement), the relevant authority must give notice to the undertaker of its decision on the application within a period of ~~35~~<u>28</u> ~~business~~<u>days</u> beginning with— (a) where no further information is requested under paragraph 2 <u>and no changes to the submitted documents which form the application are made</u>, the day immediately following that on which the application is received by the authority; (b) where further information is requested under paragraph 2, the day immediately following that on which further information has been supplied by the undertaker; or	The Applicant position on this matter is contained in the updated draft DCO that is submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		(c) where new or updated documents are submitted by the undertaker, the day immediately following that on which the new or updated documents have been supplied by the undertaker; or (ed) such longer period as may be agreed in writing by the undertaker and the relevant authority. (2) Subject to sub-paragraph (3), in the event that the relevant authority does not determine an application within the period set out in sub-paragraph (1), the relevant authority is taken to have granted all parts of the application (without any condition or qualification) at the end of that period. (3) Where— (a) an application has been made to the relevant authority for any consent, agreement or approval required by a Requirement included in this Order; (b) the relevant authority does not determine such application within the period set out in sub- paragraph (1); and (c) the application is accompanied by a report that considers it likely that the subject matter of the application is to give rise to any materially new or materially different environmental effects in comparison with those reported in the environmental statement, then the application is taken to have been refused by the relevant authority at the end of that period. Justification The rationale for this change is unchanged from that set out by SCC in chapter 15 of its LIR [REP1-130]. However, SCC has changed its proposal from 56 days to 28 business days which is considered to be a more amenable proposal when considering the Applicant's desire to progress the project at speed. It also ensures that the presence of non-working days, such as bank holidays, do not put undue pressure on the Council. Importantly, the addition of paragraph 1(c) would resolve a key issue SCC has with the original wording of paragraph 1 of schedule 4 as set out in SCC's LIR relating to the pressures put on the Council when it is expected to discharge documents which have been updated in short order from experience on other projects. 1(c) ensures that the Council will have sufficient time to review any new submissions without undue pressure and burden put on the Council which is especially important in the context of the many NSIPs taking place in Suffolk. Without this change, the Council would consider that a longer period, such as the equivalent of 56 days in business days, is necessary.	

Reference	Matter	Point Raised	Applicant's Comments
23	Schedule 4 (2) Further Information	Mitigation (including how it is secured) 2.—(1) Where an application has been made under paragraph 1 the relevant authority may request such reasonable further information from the undertaker as it considers is necessary to enable it to consider the application. (2) If the relevant authority considers further information is necessary and the Requirement does not specify that consultation with a Requirement consultee is required, the relevant authority must, within 7 <u>business</u> days of receipt of the application, notify the undertaker in writing specifying the further information required. (3) If the Requirement specifies that consultation with a Requirement consultee is required, the relevant authority must issue the consultation to the Requirement consultee within 5 <u>business</u> days of receipt of the application and must notify the undertaker in writing specifying any further information requested by the Requirement consultee within <u>business</u> 5 days of receipt of such a request and in any event within 21 <u>business</u> days of receipt of the application. (4) If the relevant authority does not give the notification mentioned in sub-paragraphs (2) or (3) it is deemed to have sufficient information to consider the application and is not thereafter entitled to request further information without the prior agreement of the undertaker. (5) Where further information is requested under this paragraph in relation to part only of an application, that part is treated as separate from the remainder of the application for the purposes of calculating the time periods referred to in paragraph 1 and in this paragraph. <u>(6) In paragraph 2, “further information” refers only to information necessary for the relevant authority to decide the application. If the relevant authority requests any change to the application as it considers necessary to enable it to approve the application, then the procedure set out in paragraph 1 (1)(c) applies for the purposes of time limits.</u> Justification Changes here reflect the use of business days, rather than days in general, to reflect the unreasonable nature of expecting officers to use non-working days for the purposes of applications made under the Order. (6) has been added to reflect the distinction made in paragraph 1 of Schedule 4 between further information and changes to submission forming an application. SCC has experienced on other NSIPs that without the clarification of (6), the Council is expected to detail all required amendments for approvals within the timeframe of (2) which is unreasonably short and does not provide sufficient time for adequate consultations to	The Applicant position on this matter is contained in the updated draft DCO that is submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		expert officers to undertake a thorough review. SCC has detailed these concerns in previous submissions such as	

4. Applicant’s Comments on the Submission from David Stevens

4.1 Introduction

- 4.1.1 Table 4.1 summarises the Applicant’s comments on David Stevens Deadline 6 Response [REP6-142].
- 4.1.2 Table 4.2 summarises the Applicant’s comments on David Stevens Deadline 6 Response [REP6-200].
- 4.1.3 Table 4.3 summarises the Applicant’s comments on David Stevens Deadline 6 Response [REP6-279, which superseded REP6-199].

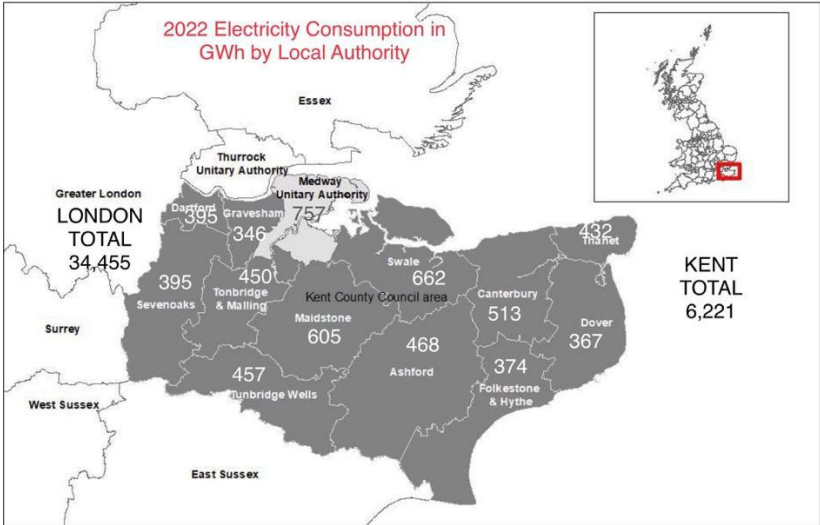
Table 4.1 Applicant’s Comments on the David Stevens Deadline 6 Submission [REP6-142]

Reference	Matter	Point Raised	Applicant’s Comments
Response to REP5-142 – The Need Case remains unproven			
	Executive Summary	· The Ex A recommendation report and the Secretary of State decision letter for the Five Estuaries DCO do not show that Sea Link is required for connection of Five Estuaries. · The Ex A recommendation report and the Secretary of State decision letter for the Rampion 2 DCO do not show that Sea Link is required for connection of Rampion 2. · NGET was consulted for both the Rampion 2 and Five Estuaries OWF DCOs but failed to mention at all that Sea Link was required for the connection of either of them. · The Applicant repeatedly uses incorrect values for the planned transfer and capacity. · The Applicant repeatedly calculates incorrectly the deficit for the Sizewell Group, EC5 and LE1. · When the correct values for planned transfer and capacity are used there is no deficit across EC5 and LE1. · When the correct values for planned transfer and capacity are used the deficit for the Sizewell Group is 352MW but only by 2035 at the earliest. · This deficit of 352MW can be dealt with by building a new OHL between Sizewell and Bramford before 2035. · Sea Link is not critical nor urgent and there are more efficient and economical alternatives. · There is a critical and urgent requirement to build a new OHL between Canterbury North and Kemsley to fully overcome the 6,516.2MW deficit identified for SC2. · N.B. Even if Sea Link were granted consent there would still be the requirement to reinforce the infrastructure within SC2 to deal with the remaining 4,516.2MW deficit. · Norwich to Tilbury is critical and urgent and the reinforcements suggested for the Sizewell Group and for SC2 will complement that project.	The applicant has addressed all of these points below, and demonstrated how the calculations in all versions of the Needs Case are accurate and correct. Providing evidence to show where the points raised have not evaluated the correct information or taken the correct approach. The Strategic Option Backcheck Report [APP-320] illustrates the needs case by presenting a snapshot of the current (at the time of DCO application) Transmission Entry Capacity (TEC) Register. This is supported (rather than undermined as submissions by others to this examination have sought to suggest) by the SOR Backcheck report as individual customers connection dates or locations change as the project is developed, but the underlying need remains. The change to the connection location of Nautilus illustrates this point. The Sizewell Generation group deficit exists with or without Nautilus connecting in Suffolk as the needs case is not predicated on a single customer connecting alone, but rather all of the customers referenced in the needs case. Further, the needs case is not solely to address the Sizewell Generation Gap, but rather a wider programme of reinforcement across East Anglia. The equivalent submission to the Norwich to Tilbury DCO examination presents a snapshot taken at the time of the Norwich to Tilbury application (some 4 months after the Sea Link application) which vary to the snapshot used for Sea Link, however the fundamental needs case remains. The need identified by the Applicant within East Anglia is met through a combination of both Sea Link and Norwich to Tilbury. Sea Link meets the need in Sizewell and Kent as a standalone project, while combined with Norwich to Tilbury, Sea Link jointly meets the need in EC5 and LE1. This demonstrates that the Proposed Project as designed delivers against the needs case as part of a holistic network design, as well as on a standalone basis. This demonstrates and support that the Proposed Project is well designed (as part of a holistic network design) to meet the needs case and is robust to individual customer changes over time.

Reference	Matter	Point Raised	Applicant's Comments																				
		The errors, omissions and misrepresentations cast doubt on the reliability of arguments and assumptions put by the Applicant.																					
	Rebuttal Point 3.1	I agree that the Applicant must “ensure sufficient capacity for connections and systems reinforcement to reach compliance with the NETS SQSS”. 1) For the Sizewell Group there is a shortfall of 352MW. This can be rectified by either: a) Installing a new 400kV 7,482MVA OHL between Sizewell and Bramford (55km). Using data produced by the Institute of Engineering and Technology (IET) “A Comparison of Electricity Transmission Technologies: Costs and Characteristics” by Mott MacDonald April 2025 this gives a cost of: 15km price / km = £3.20m gives a cost of £176m 75km price / km = £2.95m gives a cost of £162m This is a viable, more economic and efficient solution than Sea Link, to cover the minimal worst case post-fault deficit on the Sizewell Group and be SQSS compliant. b) Or installing a new 400kV 7,482MVA OHL between Sizewell and East Anglia Coastal NESO have recently published their “Transmission Works Register 02 April 2026” and at row 2398 gives details for a new OHL: <i>“Build a new 400 kV double circuit between Sizewell 400 kV and East Anglia Coastal 400 kV substations with a minimum rating of 3000 MVA winter postfault. Extension of Sizewell 400 kV substation to accommodate 2 feeders from East Anglia Coastal 400 kV”.</i> This would add 6,000 MVA of capacity to the Sizewell group and easily overcome the 352MW deficit. It should be noted that the deficit of 352MW only becomes applicable in the event that Lion link is consented but, in any event, only occurs when Sizewell C Stage 2 comes online which will be 2036 at the earliest. This deficit of 352MW is also dependent on EDF being granted permission for Sizewell B to extend its working life beyond 2035 which, at the time of writing, hadn’t been granted. This project could easily be completed before 2035 / 2036 then with no further reinforcement required. 2) For EC5 there is a deficit stated by the Applicant as circa 9,700MW in APP-320 p35. This figure is based on a planned transfer of 23,007.7MW and a post fault (Walpole to Pelham) capability of 13,304MW. However, the planned transfer of 23,007.7MW includes Nautilus which is no longer relevant to the EC5 boundary. This gives a planned transfer of 21,507.7MW. The figure of 13,304MW also appears to be incorrect:	In summary on the need case, as set out in the Strategic Options Back Check Report [APP-320] at paragraph 3.8.1 (and see generally Section 3: Need Case) the Proposed Project will address several distinct issues within the electricity transmission network: • Provision of minimum (no fossil fuel contribution) 9,703.7 MW of capacity across East Anglia EC5 Boundary and 5,271.8 MW of capacity across EC5N Boundary. • Provision of maximum 13,197 MW of capacity across East Anglia EC5 Boundary and 8,765.7 MW of capacity across EC5N Boundary. • Provision of 7,467 MW of capacity across the LE1 Boundary. • Provision of 1,852 MW of connection capacity for the Sizewell Generation Group. • Provision of 3,480 MW of connection capacity for the Essex Coast Generation Group • Provision of 6,516.2 MW of capacity from the SC2 Boundary Group. It should be noted that during the application, the requirement to provide additional capacity of 1,852MW of capacity from the Sizewell Generation Group has reduced to 352MW. However, the Sizewell Generation Group deficit exists with or without Nautilus connecting in Suffolk as the needs case is not predicated on a single customer connecting alone. 352MW is a sizeable requirement and as set out in this document is only one of numerous network capacity issues across the East Anglia region and the South-East addressed by the Applicant’s proposal - with the others being addressed including the contribution to capacity of boundaries EC5, LE1 and SC2 (Kent). Table 3.3 page 35, Strategic Options Back Check Report [APP-320] set out the deficits for the minimum required transfer Table 3.3: Planned Transfer requirements <table><tr><th colspan="2">Planned Transfer</th><th>Post Fault Capability by 2031</th><th>Planned Transfer Boundary Deficit</th></tr><tr><td>EC5N (Maximum)</td><td>15,417.7 MW</td><td>6,652 MW</td><td>-8,765.7 MW</td></tr><tr><td>EC5 (Maximum)</td><td>26,501.6 MW</td><td>13,304 MW</td><td>-13,197.6 MW</td></tr><tr><td>EC5N (Minimum*)</td><td>11,923.8 MW</td><td>6,652 MW</td><td>-5,271.8 MW</td></tr><tr><td>EC5 (Minimum)</td><td>23,007.7 MW</td><td>13,304 MW</td><td>-9,703.7 MW</td></tr></table> The Strategic Options Back Check Report [APP-320] shows EC5 requires a minimum transfer of -9,703MW, calculated using the latest available TEC Register at the time of application. There is a suite of separate NGET projects which contribute to reinforcing the transmission network cross the East of England, including the proposed new overhead line between Bramford and Twinstead and between Norwich and Tilbury.	Planned Transfer		Post Fault Capability by 2031	Planned Transfer Boundary Deficit	EC5N (Maximum)	15,417.7 MW	6,652 MW	-8,765.7 MW	EC5 (Maximum)	26,501.6 MW	13,304 MW	-13,197.6 MW	EC5N (Minimum*)	11,923.8 MW	6,652 MW	-5,271.8 MW	EC5 (Minimum)	23,007.7 MW	13,304 MW	-9,703.7 MW
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Reference	Matter	Point Raised	Applicant’s Comments																								
		Norwich to Tilbury new OHL 6,930MW (EN020027) Bramford to Twinstead new OHL 6,930MW (EN020002) Bramford to Pelham existing 3,102MW (EN020002 APP-161 Table 3.3). Bramford to Rayleigh with upgrade 6,380MW (APP-320 p36). Total capability across EC5 23,339MW This exceeds the planned transfer of 21,507.7MW. Unfortunately, the Applicant does not give details as to how they arrive at the 13,304MW but the difference could be explained by the Applicant omitting the existing Bramford to Pelham and the Norwich to Tilbury project in their calculations. It is not clear why any additional measures, including Sea Link, are required as there is no deficit if the post fault scenario indicated above occurs. Norwich to Tilbury is critical, Sea Link is not. 3) For LE1 there is a deficit stated by the Applicant as 7,467MW in APP-320 p36 and 37. This figure is based on a planned transfer of 11,000MW + 2,856MW =13,856MW and a post fault (Pelham to Rye House) capability of 6380MW. However, the 11,000MW includes Nautilus which is no longer relevant reducing the planned transfer to 12,356MW. The post fault capability across LE1 only appears to include (Pelham to Rye House) of 6380MW and does not include the Norwich to Tilbury new OHL of 6.930MW. The post fault capability across LE1 is, in reality, 13,310MW which exceeds the planned transfer of 12,456MW. It is not clear why any additional measures, including Sea Link, are required as there is no deficit if the post fault scenario indicated above occurs. Norwich to Tilbury is critical, Sea Link is not. 4) For SC2 there is a deficit of 6,516.2MVA. It appears there are two alternatives: a) Sea Link at a cost of at least £1.1 billion. Unfortunately, this project only deals with 2.000MVA which leaves an unsatisfied deficit of 4,516.2MVA. Even by replacing the switchgear for the existing OHL to handle up to 4,192MVA would still leave a large deficit of a least 2,738MVA. This solution is therefore not NETS SQSS compliant. b) Installing a new 400kV 7,482MVA OHL between Canterbury North and Kemsley at a cost of circa £90m. This would be NETS SQSS compliant and would give resilience to the network In ALL cases there is no justification for Sea Link.	It should be noted the Needs Case is set out within Strategic Options Back Check Report [APP-320]. This technical need supplements the National Need, timing and urgency for electricity infrastructure is referred to within NPS EN-1 (2024). ‘3.3.68 The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial. National Grid ESO forecasts that over the next decade the onshore and offshore transmission network, some of which is located offshore will require a doubling of north-south power transfer capacity due to increased wind generation in Scotland; [...] and substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation (this may also require additional offshore connections coming to land in England).’ ‘3.3.83 <i>Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.</i>’ <i>The needs case as set out in [APP-320] demonstrates the need for the project without the proposed reinforcements at Norwich to Tilbury and Sea Link.</i> <i>The existing system ahead of the completion of the Bramford to Twinstead Project has the following capacity.</i> <i>The needs case was based upon the completion of the Bramford to Twinstead connection giving a needs case background of</i> <table><tr><th colspan="3">System following Completion of Bramford to Twinstead (Background set out in the Needs Case)</th></tr><tr><td rowspan="2">Walpole - Necton - Norwich</td><td>Walpole - Necton - Norwich 1</td><td>3,326 MW</td></tr><tr><td>Walpole - Necton - Norwich 1</td><td>3,326 MW</td></tr><tr><td rowspan="2">Bramford - Twinstead - Pelham</td><td>Bramford – Twinstead - Pelham 1</td><td>3,465 MW</td></tr><tr><td>Bramford – Twinstead - Pelham 2</td><td>3,465 MW</td></tr><tr><td rowspan="2">Bramford - Braintree - Rayleigh Main</td><td>Bramford - Braintree - Rayleigh Main 1</td><td>3,326 MW</td></tr><tr><td>Bramford - Braintree - Rayleigh Main 2</td><td>3,326 MW</td></tr><tr><td colspan="2">Total Capacity of Existing Transmission Circuits</td><td>20,234 MW</td></tr><tr><td colspan="2">Total Capacity less the worst double-circuit fault (Bramford - Twinstead - Pelham 1 & 2)</td><td>13,304 MW</td></tr></table> <i>With the transfer requirement of 23,007.7MW to a deficit of 9703.7MW.</i> <i>If we now include the full uprating of EC5 to the maximum capacity and the new Norwich to Tilbury, alongside Sealink</i> We show that the post fault capability will rise to 22,790MW matching closely the required transfer of 23,007.7MW and removing significant constraints to consumers. This shows the need for Sea Link and Norwich to Tilbury is clear and consistent with the Needs Case set out in [APP-320]. It should be noted that when commenting on the planned transfers and the capacity of network boundaries EC5 and LE1, the interested party has not correctly accounted for the increasing contracted generation (although the needs case is effectively illustrated without this). The interested party has also not correctly characterised the capacities of the existing EC5 boundary, noting	System following Completion of Bramford to Twinstead (Background set out in the Needs Case)			Walpole - Necton - Norwich	Walpole - Necton - Norwich 1	3,326 MW	Walpole - Necton - Norwich 1	3,326 MW	Bramford - Twinstead - Pelham	Bramford – Twinstead - Pelham 1	3,465 MW	Bramford – Twinstead - Pelham 2	3,465 MW	Bramford - Braintree - Rayleigh Main	Bramford - Braintree - Rayleigh Main 1	3,326 MW	Bramford - Braintree - Rayleigh Main 2	3,326 MW	Total Capacity of Existing Transmission Circuits		20,234 MW	Total Capacity less the worst double-circuit fault (Bramford - Twinstead - Pelham 1 & 2)		13,304 MW
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Reference	Matter	Point Raised	Applicant's Comments
		Infrastructure improvements that are already in place or planned, excluding Sea Link, enable the system to be NETS SQSS compliant for the Sizewell Group up to 2035 at the earliest and for EC5 and LE1 completely. - The Norwich to Tilbury upgrade is critical and urgent to address the identified deficits across EC5, LE1 and to facilitate the connection of Five Estuaries and North Falls. - A new Canterbury North to Kemsley OHL is critical and urgent to address the 6,516.2MW identified. - A new Sizewell to Bramford OHL is not urgent because: For the worst case fault identified for the Sizewell Group, a deficit of 352MW will not arise until the late 2030s at the earliest, and only then if: both Sizewell C reactors are fully operational and Sizewell B is granted an extension to its operating life and all the current OWF contracted connections are made AND Lion Link (a non-consented interconnector proposed by NGV, a sister company of NGET) is fully operational. Without Lion Link, there would be a healthy surplus on the Sizewell Generation Group.	that they have both included Norwich to Tilbury (which the numbers in the Sea Link need case do not), and not included a worst-case fault scenario (which the Applicant must to plan for). In all cases the justification for Sea Link is clear and the figures provided within the points raised do not reflect the requirements set out in [APP-320].
	Rebuttal point 3.2	The Applicant suggests that “such options would only address the Sizewell Group demand and the SC2 Kent demands in isolation”. This seems, at best, an odd accusation. The reality is that: a) Sizewell to Bramford: i) Links with the new Bramford to Twinstead reinforcement. (EN020002) ii) Links with the proposed Norwich-Bramford Tilbury upgrade. (EN020027) iii) Links with the proposed Pelham to Rayleigh upgrade. b) Canterbury North to Kemsley: i) Links to Tilbury via the new upgraded OHL between Kemsley and Littlebrook. ii) Links with Tilbury via Grain. iii) Links with the London Power tunnels via Littlebrook. In combination: Sizewell to Bramford to Tilbury to Littlebrook to Kemsley to Canterbury North. c) Canterbury North to Kemsley new OHL The Applicant included a new OHL between Canterbury North and Kemsley in its option choices for the Norwich to Tilbury upgrade (EN020027) which is the subject of a separate DCO.	As set out in para 2.1.3 and 2.1.4, page 2 9.129 Applicants Response to 2GEN1 and 2GEN2 in respect of Need [REP5-142] In summary on the need case, as set out in the Strategic Options Back Check Report [APP-320] at paragraph 3.8.1 (and see generally Section 3: Need Case) the Proposed Project will address several distinct issues within the electricity transmission network: - Provision of minimum (no fossil fuel contribution) 9,703.7 MW of capacity across East Anglia EC5 Boundary and 5,271.8 MW of capacity across EC5N Boundary. - Provision of maximum 13,197 MW of capacity across East Anglia EC5 Boundary and 8,765.7 MW of capacity across EC5N Boundary. - Provision of 7,467 MW of capacity across the LE1 Boundary. - Provision of 352 MW (previously 1,852 MW) of connection capacity for the Sizewell Generation Group. - Provision of 3,480 MW of connection capacity for the Essex Coast Generation Group - Provision of 6,516.2 MW of capacity from the SC2 Boundary Group. Sea Link as described above in detail provides capacity across all of these with the exception of EC5N. The proposals from the interested party shown opposite only provide capacity across Sizewell Generation Group and SC2 (Kent) and therefore do not satisfy all the needs that the applicants proposal addresses. This includes the full explanation to Rebuttal Point 3.1 above showing clear need for the project across EC5. As set out in para 3.4.2, page 9, 9.129 Applicants Response to 2GEN1 and 2GEN2 in respect of Need [REP5-142]

Reference	Matter	Point Raised	Applicant's Comments
		In EN020027 APP-357 pages 45 and 46 the new Canterbury North to Kemsley OHL is referred to as CAKE. The East 3 option, fully analysed by the Applicant, included the Canterbury North to Kemsley (CAKE) and Bramford to Tilbury (ATNC) upgrades. The East 3 option also included Tilbury to Grain (TENC) but this does not have a proceed signal. However, according to EN020027 APP-357 p46 the “Tilbury to Grain and Tilbury to Kingsnorth upgrade (TKRE) does have a proceed signal”. This gives an additional connection: Sizewell to Bramford to Tilbury to Grain to Kemsley to Canterbury North. In reality, there is no reason for electricity to flow from Sizewell to Kent and vice versa because both have an excess of supply over demand. What is achieved by the two upgrades suggested by SEAS, in addition to the points already made, is it enables electricity to flow from Sizewell to Tilbury and from Canterbury North to Littlebrook via Kemsley to serve the high electricity demands of the London area. For example, both Tilbury and Kemsley have links to Littlebrook which in turn links to the newly constructed London Power Tunnels via Hurst. In response to the Applicants pre-application consultations, I submitted information which I think is relevant to this point. Using “subnational electricity consumption statistics” published by the government I produced a map showing the electricity consumption in GWh for each local authority and for the Greater London area for 2022. The results are shown on the map below:	The Applicant’s Strategic Options Back Check Report [APP 320] sets out the requirements of the NETS SQSS to consider “worst-case” fault outages. These are generally based on one “worst-case” fault outage at a time. Therefore, the Applicant’s design in particular utilises the Sea Link HVDC link to manage “worst-case” faults in: • EC5 East Anglia by the Sea Link HVDC link exporting to Kent; • Sizewell Generation Group by the Sea Link HVDC link exporting to Kent; • SC2 Kent by the Sea Link HVDC link exporting to East Anglia. This statement regarding peak demands does not change the use of the link to transfer power for transmission faults under all conditions as previously described.
		The Kent County Council area and neighbouring authorities 	

Reference	Matter	Point Raised	Applicant's Comments
		The consumption in East Kent is minimal compared with West Kent and the consumption for the whole of Kent (6,221GWh) is dwarfed by the consumption in Inner plus Outer London (34,455GWh). N.B. Updated (2024) figures give Kent as 5,427GWh and for Inner plus Outer London as 34,801GWh. It is logical, efficient and economical for the new Sizewell to Bramford OHL to connect at Bramford to the Norwich to Tilbury upgrade bringing renewable energy to where it is needed rather than East Kent. It is logical, efficient and economical for the new Canterbury North to Kemsley OHL to connect to the newly upgraded Kemsley to Littlebrook OHL bringing renewable energy to where it is needed rather than Sizewell.	
	Rebuttal Point 3.3	I can find no reference in any of the representations by SEAS that suggest that calculations should be nonscaled. Unfortunately, the Applicant provides no reference to where this statement by SEAS appears.	As set out in section 3.3, pages 8-9, 9.129 Applicants Response to 2GEN1 and 2GEN2 in respect of Need [REP5-142] the applicant was clarifying the approach it had taken in conveying issues within the Sizewell Generation group.
	Rebuttal Point 3.4	3.4.1 The deficit outlined by the Applicant for SC2 is based on the Planned Generation shown in APP-320 Table 3.4. APP-320 Para 3.6.3 and Para 3.6.4 outline how the “Economy Planned Transfer” is calculated using a “scaling factor”. For interconnectors, the scaling factor is 1.0 so all calculations already assume “high (100%) connector flows into Kent”. This argument is therefore fatuous. 3.4.2 This has already been addressed since: a) there is no deficit across EC1 and LE1 when all correct values of planned generation and capacity are used. b) Sea Link does not address fully the deficit in SC2 so further reinforcement would be required. 3.4.3 - 3.4.6 These points have already been addressed in my answer to Rebuttal points 3.1 and 3.2 above but in summary “a new OHL between Canterbury North to Kemsley fully addresses the deficit across SC2, Sea Link does not”.	The Applicant has above shown, that the numbers as set out in para 2.1.3 and 2.1.4, page 2 9.129 Applicants Response to 2GEN1 and 2GEN2 in respect of Need [REP5-142] The technical need addressed across all boundaries and generation groups remain robust as set out in detail above. Table 3.2 “Planned Generation for East Anglia” page 30-31 and Table 3.4 “Planned Generation and Planned Transfer for Boundary SC2” page 40 of Strategic Options Back Check Report [APP 320]. Each of these tables use the scaling factors set out in paragraph 3.6.4 which in turn come from the Economy Planned Transfer Appendix E of the NETS SQSS (National Electricity Transmission System Security and Quality of Supply Standards) The SQSS defines the technique that should be used to scale generation outputs for certain types of generators. Generators with fixed scaling factors (DT) are: • Nuclear and fossil fuel power with carbon capture and storage DT = 0.85. • Wind, Wave and Tidal DT = 0.7. • Pumped Storage DT = 0.5. • Interconnectors Considered importing at Peak DT = 1.0. All of the transfers set out in the needs case [App 320] apply the correct scaling factors. Therefore, the repeated comment that the wrong figures have been applied is incorrect all transfers across boundaries are scaled to meet the required factors above.

Reference	Matter	Point Raised	Applicant’s Comments																	
	Rebuttal Point 3.5	Introduction At 3.5.3 the Applicant includes a screen grab of the Clean Power Annex 2 Table 1 but mistakenly use the part referring to the Norwich to Tilbury project. I assume they meant to show the part referring to Sea Link and its relevance to Five Estuaries and Rampion Extension (Rampion 2): It says that Sea Link is “required for connection of Five Estuaries OWF and firm connection of Rampion Extension”. The Applicant states at 3.5.4 that: <i>“As set out in the Strategic Options Back Check Report [APP 320] “Needs Case”, Sea Link is required to ensure there is sufficient cross boundary capacity, on boundaries EC5, LE1 and SC2, to allow these generators to connect while maintaining NETS SQSS compliance and avoid constraints. Specifically, Rampion Extension connects within SC2 boundary and Sea Link is required to reinforce this boundary to facilitate the firm connection of Rampion Extension”.</i> A) Taking 3.5.4 first: The issue of cross boundary capacity across the Sizewell Group, EC5, LE1 and SC2 has already been dealt with in 3.1 above. The Applicant is implying in 3.5.4 that APP-320 details why Sea Link is required to reinforce this [SC2] boundary to facilitate the “firm connection of Rampion Extension”. This is somewhat perplexing because the Rampion Extension (Rampion 2) is not mentioned at all in APP- 320 and to imply otherwise is, at best, misleading. B) Reliance on Clean Power 2030 (CP30) i) The claim that Sea Link is “required for the firm connection of Rampion 2” - At no time throughout this Sea Link examination, has the Applicant presented any evidence as to why Sea Link is required to enable a firm connection of Rampion Extension. - Rampion Extension was the subject of a DCO1 examination which completed in August 2024. - The Ex A recommendation report, published on 6th November 2024, 3.3.4, says, in relation to connection points: <i>“...This part of the process is not fully in the control of the Applicant. NGET ultimately determine where the most appropriate connection point should be as part of the Connections Infrastructure Option Notice (CION) process and in this case, ran parallel with the Applicants</i>	The applicant has above shown, that the numbers as set out in para 2.1.3 and 2.1.4, page 2 9.129 Applicants Response to 2GEN1 and 2GEN2 in respect of Need [REP5-142] In summary on the need case, as set out in the Strategic Options Back Check Report [APP-320] at paragraph 3.8.1 (and see generally Section 3: Need Case) the Proposed Project will address several distinct issues within the electricity transmission network: - Provision of minimum (no fossil fuel contribution) 9,703.7 MW of capacity across East Anglia EC5 Boundary and 5,271.8 MW of capacity across EC5N Boundary. - Provision of maximum 13,197 MW of capacity across East Anglia EC5 Boundary and 8,765.7 MW of capacity across EC5N Boundary. - Provision of 7,467 MW of capacity across the LE1 Boundary. - Provision of 352 MW (previously 1,852 MW) of connection capacity for the Sizewell Generation Group. - Provision of 3,480 MW of connection capacity for the Essex Coast Generation Group - Provision of 6,516.2 MW of capacity from the SC2 Boundary Group. With respect to the NESO Celan power 2030, NESO has continued to emphasise the independent need for the Project in the NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis, Section 2.4: Securing Works for a 2030 delivery page 8, which states: <i>‘There are three key schemes originally signalled as being delivered in 2030 in the Pathway to 2030, but where delivery will now be in 2031. The impact of these schemes is shown below. The percentages shown represent the difference in modelled percentage clean power generation across a typical year across the pathways.</i> Image 4.1 Impact of key projects for delivery in 2031 if not accelerated (Table from NESO Clean Power 2030 Report, Annex 2) <table><tr><th rowspan="2">Project</th><th rowspan="2">Connections / Support</th><th colspan="2">Impact on Clean Power / Constraint Impact</th><th rowspan="2">Latest Status from TOs</th></tr><tr><th>Further Flex and Renewables</th><th>New Dispatch</th></tr><tr><td>Norwich to Tilbury (AENC and ATNC)</td><td>Delivers new substation connecting • North Falls OWF • Five Estuaries OWF • Tarchon Interconnector Facilitates transfer of clean power through and out of East Anglia</td><td>-1.04% +£2.8 billion constraints in 2030</td><td>-1.0% clean power +£2.7 billion constraints in 2030</td><td>Planned for 2031</td></tr><tr><td>Sealink HVDC from Suffolk to Kent (SCD1)</td><td>Facilitates transfer of clean power through and out of East Anglia Required for connection of Five Estuaries OWF and firm connection of Rampion Extension</td><td>-0.6% +£1.4 billion constraints in 2030</td><td>-0.25% +£1.1 billion constraints in 2030</td><td>Planned for 2031</td></tr></table>	Project	Connections / Support	Impact on Clean Power / Constraint Impact		Latest Status from TOs	Further Flex and Renewables	New Dispatch	Norwich to Tilbury (AENC and ATNC)	Delivers new substation connecting • North Falls OWF • Five Estuaries OWF • Tarchon Interconnector Facilitates transfer of clean power through and out of East Anglia	-1.04% +£2.8 billion constraints in 2030	-1.0% clean power +£2.7 billion constraints in 2030	Planned for 2031	Sealink HVDC from Suffolk to Kent (SCD1)	Facilitates transfer of clean power through and out of East Anglia Required for connection of Five Estuaries OWF and firm connection of Rampion Extension	-0.6% +£1.4 billion constraints in 2030	-0.25% +£1.1 billion constraints in 2030	Planned for 2031
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Reference	Matter	Point Raised	Applicant's Comments
		<i>options appraisal process and focussed on the technical and system capacity for facilitating an efficient new connection to the transmission network and overall consideration of cost to the consumer.”</i> - At 3.3.5, says, in relation to connection points, NGET: <i>“...was asked to identify potential substation locations along transmission lines which largely run in an east/west alignment in the south of England. While many were identified, only three were considered as capable or potentially capable of accommodating the 1200MW to be generated by the Proposed Development. They were:</i> <i>* The Bolney substation, which is the proposed choice.</i> <i>* Fawley.</i> <i>* Little Horsted, which is not currently operational but is expected to be by the time the</i> <i>Proposed Development would be completed.”</i> - NGET was clearly consulted for the Rampion 2 DCO but did not raise any concerns on the need for further infrastructure reinforcement for SC2 to enable Rampion 2 to be connected. - There is no mention of Sea Link anywhere in the Rampion Extension DCO recommendation report nor any indication that further infrastructure reinforcement would be required for the “firm connection of Rampion Extension” (which will be made at a 400kv substation at Bolney, West Sussex, close to the western edge of the SC2 boundary) - The Secretary of State’s Decision of 4 April 2025 refers to CP30, but it is simply to say this at 4.5: <i>“...Following the consultation on reforms to the 2023 NPPF, a new NPPF was published 12 December</i> <i>2024 (“2024 NPPF”) Clean Power 2030 Action Plan (“CP2030”) was published 13 December 2024 and sets out a pathway to a clean power system”.</i> - The Secretary of State considered the Clean Power 2030 Action Plan in coming to his decision and at no time was the capacity within SC2 raised as a concern. Indeed, it was never mentioned at all. The Secretary of State did not indicate that Sea Link was required for the “firm connection of Rampion Extension”. As this connection can be made without any need for Sea Link, we conclude that Sea Link is not required to support a firm connection of Rampion Extension. i) The claim that Sea Link is “required for connection of Five Estuaries” - Five Estuaries was the also subject to a DCO2 which culminated in a Report dated 17th June 2025, well before the start of this Sea Link Examination.	<i>There is a significant capacity of offshore wind planned to connect this decade into East Anglia, which is a key enabler for clean power. Without the significant network capacity provided by these schemes a significant proportion of the wind power generated off East Anglia, around 23 TWh (in the Further Flex and Renewables pathway) will not be able to reach demand, leading to increased balancing costs and a need to replace some 4 TWh (in the same pathway) of this generation with unabated gas.’</i> The NESO Clean Power 2030 report identifies the Project as critical to delivering a network which supports the clean power pathways. Rampion 2 and Five Estuaries The Rampion 2 windfarm will connect within SC2 boundary, and the Five Estuaries windfarm will connect between the EC5 and LE1 boundaries (and forms part of the Essex Generation Group). The Proposed Project is needed, in part, to reinforce these transmission network boundaries and the Essex Generation Group (as set out extensively and consistently throughout the Applicant’s various submissions on this subject). It was never assumed that these projects would connect directly into the Proposed Project. This situation (both the Proposed Project needs case and the Five Estuaries and Rampion 2 connection locations) has not changed since the publication of the Clean Power 2030 Report. The Clean Power Report remains valid and attracts significant weight Nautilus On 12 November 2024, Ofgem announced that it had approved the Initial Project Assessment (IPA) for the NGV interconnector Nautilus at the Isle of Grain, Kent, rather than at Friston Substation in Suffolk. The IPA is a consultation process run by Ofgem to determine an interconnector project’s suitability. Notwithstanding this, NGV retained a connection offer at Friston until this was terminated in March 2025, meaning that NGET was required under its licence to consider a potential Nautilus connection at Friston until this time. <i>During</i> the application, the requirement to provide additional capacity of 1,852MW of capacity from the Sizewell Generation Group has reduced to 352MW. However, the Sizewell Generation Group deficit exists with or without Nautilus connecting in Suffolk as the needs case is not predicated on a single customer connecting alone. 352MW is a sizeable requirement and as set out in this document is only one of numerous network capacity issues across the East Anglia region and the South-East addressed by the Applicant’s proposal - with the others being addressed including the contribution to capacity of boundaries EC5, LE1 and SC2 (Kent). Intra-Project Consistency The generation figures presented in the needs cases for different projects represent the contracted generation at any given moment. Generators might modify their connection dates and new generators offered connection agreements over time. This means that the figures will change. While figures used to illustrate the needs case in different project may (correctly) be different, the overall needs cases are consistent.

Reference	Matter	Point Raised	Applicant's Comments
		· NGET were consulted as part of the DCO but did not stipulate that Sea Link was required for the connection of the Five Estuaries OWT. · The Five Estuaries recommendation report mentions Sea Link repeatedly, but only in order to discuss the abandoned feasibility work exploring offshore connection: 3.2.9 <i>The single main alternative option to the development as proposed would be to connect the Five Estuaries wind turbine generator (WTG) array areas to National Grid's proposed Sea Link project, a point-to-point offshore cable link between Suffolk and Kent to reinforce the nation's onshore transmission network. This alternative option would have the effect of removing the need for any of the proposed onshore development within Essex. The application for the Sea Link project (EN020026) was accepted for examination on 23 April 2025.</i> 3.2.11 <i>The applicant, along with the NF OWF and Sea Link (NGET), applied as a consortium for grant funding as part of the Offshore Coordination Support Scheme (OCSS). In December 2023 the Government announced that the consortium had been successful in receiving grant funding to explore the feasibility of a coordinated offshore solution. In March 2024, the consortium submitted a feasibility study [PD4-008] to the Department for Energy Security & Net Zero (DESNZ) as the next step of the grant funding agreement.</i> 3.3.11. <i>In respect of the potential alternative option of an offshore connection, the applicant confirmed to us in section 2 of [PD4-006] that DESNZ on 3 September 2024, having reviewed the feasibility study [PD4-008] had decided not to grant further funding to explore the option of a coordinated offshore connection. Accordingly, the applicant confirmed in [PD4-006] that without further funding it would no longer be pursuing the option of an offshore connection.</i> 3.3.12. <i>Further to our request during CAH1, Essex County Council submitted a copy of the letter issued by DESNZ [AS-011]. During CAH1, the ExA questioned the applicant about the feasibility study [PD4-008], with the applicant providing reassurance on the independence of the author of the study in investigating the practicalities of connecting to Sea Link and arriving at conclusions regarding costs and timescales in paragraph 1.3.19 of [REP1-059].</i> 3.3.13. <i>During the examination no parties queried the proposed landfall location. Whilst there were some issues raised regarding the siting of the proposed substation and the onshore and offshore cable routes, these were micro-siting issues rather than challenges regarding alternative routes or locations.</i> 3.3.14. <i>We are content that as part of the submitted ES [APP-066] the applicant has considered reasonable alternatives to the proposal for</i>	

Reference	Matter	Point Raised	Applicant's Comments
		<i>which it is seeking consent and has provided sufficient information as to why those alternatives were discounted</i> . The recommendation report makes clear exactly what is required to connect Five Estuaries OWF to the grid, and it is not Sea Link, rather it is the Norwich to Tilbury Reinforcement Project and the associated East Anglia Connection Node substation: <i>6.5.8 In order for the proposed development to connect to National Grid's transmission system, the proposed Norwich to Tilbury Reinforcement Project and the associated East Anglia Connection Node (EACN) substation would need to be operational. Despite the pre-application stage that National Grid's project is at, given the proposed development's dependency on it, the applicant's CEA affords that project greater consideration than other projects at a similar stage in the planning process. For the purposes of the cumulative assessment of the two projects, the worst-case delivery scenario, with limited co-ordination was assessed for the direct and indirect impacts.</i> On 17th December 2025, the Secretary of State accepted the recommendation report, and said nothing material to alter the above. Regarding the claim that CP30 confirms that Sea Link is still “required for connection of Five Estuaries OWF and firm connection of Rampion Extension” is not supported within the decision letters issued by the Secretary of State for either Five Estuaries OWF or Rampion 2. a) Urgency i) Sizewell Group In 3.5.7 the Applicant talks about urgency but as has already been stated, the Applicant has until at least 2035 to complete any upgrade in the Sizewell group. ii) SC2 The Applicant will have to upgrade the infrastructure anyway to overcome the 4,516.2MW even if Sea Link is approved. Therefore, the Applicant will have to fast track such improvement i.e. build the new OHL as soon as possible making Sea Link unnecessary. As has already been stated, NGET have already investigated the viability of a new OHL between Canterbury North and Kemsley (CAKE) as part of the Norwich to Tilbury upgrade which should speed up the process. Lack of consistency and accuracy from the Applicant	

Reference	Matter	Point Raised	Applicant's Comments
		Throughout the examination, the Ex A will be aware that there have been numerous examples where the documentation presented by the Applicant has contained many errors, omissions and generally lack attention to detail. There are a number of these issues which, I feel, are necessary to draw to your attention because they highlight a concern that it is difficult to trust any facts, figures and arguments the Applicant produces. Mistakes will inevitably occur in a projects as big as this but when they are within key documents that are used to argue the need case then it is difficult to accept. 1) Repeated inclusion of the Nautilus interconnector Although it was known by the Applicant before the project was accepted for examination, the incorrect inclusion of Nautilus connecting within the Sizewell group gave rise to incorrect values for the deficits for the Sizewell group, across EC5 and across LE1. Why was APP-320 not superseded by a document that contained the correct tables and calculations? 2) Lack of intra project consistency One would expect that the two projects, Norwich to Tilbury and Sea Link, both brought forward by NGET, both being examined at the same time and both involving the same groups and boundaries (Sizewell, EC5, LE1 and SC2) would use the same data and assessment methods. a) Different years used for examination i) Gives rise to different deficits for the Sizewell group, EC5, LE1 and SC2. - For the Sea Link project, in APP-320 Table 3.2 and Table 3.4, the Planned Generation and Planned Transfer for East Anglia and SC2 respectively go up to 2037. - For the Norwich to Tilbury project, in APP-357 Table 3.2, the Planned Generation and Planned Transfer for East Anglia only goes to 2031. There is no corresponding Table for SC2. The data was clearly available for both DCOs so why the discrepancy? For example, in the Sizewell group, if the 2031 data had been presented for examination for the Sea Link project, there would be no deficit once Nautilus is removed from the calculations. EN020027 APP-357 Table 3.8 shows a deficit of 600MW but that becomes a 900MW surplus when Nautilus is removed.	

Reference	Matter	Point Raised	Applicant's Comments
		There is a real problem with using planned generation too far in advance because it has been acknowledged that a large percentage of consented projects will never get built. Matthew Magill from National Energy System Operator (NESO) said in October 2025 in an article “Connections Reform: The Key to unlocking GB growth”: <i>“For years, Great Britain’s grid connection process operated on a first-come, first-served basis, designed for a simpler energy market, with only a few big fossil projects, in an orderly queue.</i> <i>The outcome? A connections queue now exceeding 800GW, over four times the capacity needed to deliver clean power by 2030, and twice what’s required to reach net zero by 2050. This reflects the extraordinary ambition across Great Britain, but the current system was never built to handle the scale or urgency of today’s energy transition, and the connections process was in dire need of modernisation.”</i> He goes on to say: <i>“As a result, only projects that are both critical to delivering clean energy and ready to progress will be prioritised and assigned firm connection dates”. Has the Applicant carried out a re-evaluation of the planned generation listed in APP-320 Table 3.2 and Table 3.4 to check which ones are likely to proceed and / or are required to achieve Net Zero by 2030?</i> <i>Such a re-evaluation is surely essential to enable an informed decision regarding infrastructure upgrades.</i> b) Different selection criteria used For the EC5 boundary, the Applicant gives a range of reinforcement required for both the Norwich to Tilbury project and also for the Sea Link project. Unfortunately, due to using different years we end up with two completely different ranges. In EN020027 APP-357 4.7.12 it gives the range as 3,500MW to 8,000MW. In APP-320 3.7.12 it gives the range of 9,700MW to circa 13,000MW. In EN020027 APP-357 4.7.12 the Applicant states: <i>“With the SQSS requiring us to design the network to accommodate the 8,000MW upper range.”</i> (my emphasis). In APP-320 3.7.12 the Applicant states:	

Reference	Matter	Point Raised	Applicant's Comments
		<i>"With the SQSS requiring us to design the network to accommodate the 9,700MW lower range."</i> (my emphasis). How can the lower value be applicable for one project but not the other? c) Discrepancy in calculated values In EN020027 APP-357 3.7.1 the Applicant calculates incorrectly additional transfer as 2,956MW giving rise to an incorrect deficit for LE1 of 7576MW. In APP-320 3.7.15 the Applicant correctly calculates the additional transfer as 2,856MW giving a deficit for LE1 of 7,476MW. N.B. Although this is a minor error by NGET it is symptomatic of a wider issue. d) Omission of other connections in calculations i) As outlined in our reply to the 3.1 rebuttal for the EC5 boundary the capability across EC5 appears to have been grossly wrong with the Applicant omitting known capabilities. ii) As outlined in our reply to the 3.1 rebuttal for the LE1 boundary the capability across LE1 appeared to omit the Norwich to Tilbury capacity. For all the reasons outlined above one starts to question whether any of the data and assumptions put forward by the Applicant can be trusted.	

Table 4.2 Applicant’s Comments on David Stevens Deadline 6 Submission [REP6-200]

Reference	Matter	Point Raised	Applicant's Comments
Open Hearing 2 Session 3 – Written summary of my oral submission			
1)		Notwithstanding that I believe there is no need for Sea Link as there is a better, cheaper and more economically friendly solution that satisfies the need for additional infrastructure, I will address the specific issue of Change 1.	The applicant has provided information and calculations above showing the consistent urgent need for the Sea Link Project.
2)		I do not believe the Applicant can justify the increase in order limits simply by saying it gives them more flexibility	The reason for requiring the flexibility was clearly set out in the change request application Applicant’s response to the ExA’s Rule 9 letter of 25 September 2025 [CR1a-001] , which was subsequently accepted by the ExA for examination.

Reference	Matter	Point Raised	Applicant's Comments
		In my REP4-209 I explained why areas that had already been ruled out by the Applicant, such as the area around the Manston Outfall, should be excluded from the change to the order limits. They cannot give an increase in flexibility if they can't be used and I would urge the Ex A to not allow these areas to be included within the new order limits. Due to the need to avoid the saltmarsh as stated in CR1a-002 and from the alternative routes shown in REP3-070, the Applicant has ruled out using the southern edge of the apron. This area can and should also be removed from the order limits. As the Ex A are aware EN1 5.4.35 – states that “the Applicant should demonstrate that during construction, they will seek to ensure that activities will be confined to the minimum areas required for the works.” Thanet District Council (TDC) are opposed to the use of the Hoverport: “TDC objects to the proposed activity of siting and operating up to 40-tonne vehicles on the former hoverport site, particularly involving crossings over the concrete skirt into Pegwell Bay. The potential for environmental damage outweighs the operational benefits; and alternative access methods should be considered and prioritised. Should the Examining Authority determine that some form of site access is unavoidable, TDC recommends the imposition of the following commitments to safeguard Pegwell Bay from contamination risks caused by structural damage. These commitments emphasize prevention, monitoring, and rapid response”. One of the conditions stipulated by TDC is: “Vehicles and machinery must not directly traverse the edge of the concrete skirt. Instead, access should be facilitated via engineered ramps or temporary bridging structures designed to distribute weight and prevent direct contact with the skirt. These structures must be constructed from non-contaminating materials (e.g., geotextile-reinforced matting) and approved by an independent structural engineer prior to use. The hoverport area and all access points must be pre-assessed via non-invasive surveys (e.g., ground-penetrating radar) to identify weak zones”. The use of an engineered ramp or temporary bridge would have the benefit of giving certainty to the route used by the Applicant and would reduce the area of the Hoverport required to give “flexibility”.	

Reference	Matter	Point Raised	Applicant's Comments
		The Hoverport is used extensively by the public and every effort must be made to minimise the area lost to them. TDC have also asked for wheel-washing as the vehicles move from the Hoverport to the intertidal region and back so land needs to be set aside for that but that should still leave the majority of the site available for the public to use. This is, of course, dependant on the Applicant allowing adequate access but this was discussed in my REP4-207, REP4-208 and particularly REP5-154. The Ex A must decide on the request to change the order limits and based on my previous points it is my belief that the area required by the Applicant could be reduced to the area highlighted in purple in the map below including the wheel-wash and bridge: 	
3)	The need for surveys	The fact that the Applicant talks of the need for flexibility shows that they have no idea which areas are suitable for use. If a suitable structural survey had been carried out, they would know and they would not need to set aside land that is unlikely to be used. It is not acceptable to wait until after the DCO has been granted for them to then carry out a precondition survey. What happens if there are no suitable routes following this survey? We know from Thanet District Council that Edge Enviro was granted permission under Section 172 of the Housing and Planning Act 2016 to carry out survey work at the Hoverport presumably for the Applicant. This permission was granted in October 2025. Do we know if any surveys have been carried out by them?	The Flexibility was not requested because the applicant has “no idea which areas are suitable for use”; it is simply to ensure there is flexibility to work around saltmarsh habitat, should it continue to encroach on the hoverport. he draft DCO sets out the commitments regarding the use of the hoverport. Reference is also made to the Application Document 9.92 Outline Cable Specification and Installation Plan, an updated version of which is submitted at Deadline 7.
		4) The route across the apron passes within 10m of dense vegetation which has been acknowledged by the Applicant in AS-093 to be suitable for reptiles. No doubt the Applicant will argue, as they did during ISH1, that the effect of very noisy equipment of up to 99dB is not significant because it is just passing by.	No vegetation removal is to be undertaken (other than lateral trimming of bushes) and no significant vibration will be caused by HGV movement and no ‘high impact works’ or indeed any construction works, are proposed for the hoverport. To avoid accidental damage to plant stands from accidental encroachment during construction phase the route through the hoverport will be fenced. Once the route has been fenced there should be no need for an

Reference	Matter	Point Raised	Applicant's Comments
		The reality is very different, and it will cause serious disturbance to creatures living within that habitat. The routes as they stand are totally unacceptable. On the morning of the 18th March 2026, by coincidence exactly a week after the unaccompanied site visit by the Ex A, I was lucky enough to accompany , a recognised wildlife photographer on a visit to the Hoverport. Whilst there we were able to witness a Greenfinch, which are on the Red List, the location of Bee Orchids and the rosettes of Lizard Orchids which are a protected species. I was also shown the locations of reptile maps, one of which is within 10m of the proposed route. Although it was too early for these to be occupied, Slow worms, Grass Snakes and Common Lizards have all been spotted there previously. One of the grass snakes found at Pegwell Bay was apparently due to be part of the BBC Springwatch but didn't make the final edit. Both the photographs below were taken at the Hoverport. The first was taken on 18th March 2026 and the second taken previously when it was in flower.	ecologist to be present although the Environmental Clerk of Works will be present throughout the project to check matters such as retention of fencing. The number of vehicles traversing the hoverport is low (a few dozen per day even at peak times) and they will be slow moving. Vibration arises when driving over uneven surfaces. Photographs submitted into the examination show that through the vegetated areas where invertebrates and reptiles are most likely to be present due to the availability of cover from predators, and which are the areas discussed by Mr Stevens, the access roads are flat intact tarmac with no crevices. The concrete apron is much more sparsely vegetated and therefore there is a lower likelihood of relevant species being present due to the high exposure to predators. Moreover, in this area only low-pressure vehicles will be used to move to and from the intertidal area. These produce little to no ground vibration. Commitment B66 already states that a route through the hoverport will be marked out, which avoids tracking over vegetation, including orchids and particularly the foodplants of the two Schedule 5 species, specifically naming dock and wild carrot. Commitment B70 commits to this route being shared with key stakeholders.



Lizard Orchid Rosette



Reference	Matter	Point Raised	Applicant's Comments
		Lizard Orchid (photo courtesy of Keith Ross) Just before we left,[redacted] spotted a pair of long tailed tits in the distance and he told me that they were preparing their nest. The nest site was in undergrowth that is on the intended route across the Hoverport.[redacted] stayed afterwards and quietly filmed them and I have a copy if the Ex A wish to see it. Both the photographs below are stills taken from videos by [redacted] and published in the last 3 weeks.	
			
		Common Lizards at the Hoverport 	
		Long tailed tit nest building on the proposed route 	

Reference	Matter	Point Raised	Applicant's Comments
		 The photographs indicate the location and proximity to the route of the observed wildlife. Obviously, the reptiles will not just be located under the mats but are likely to be found in and around that area when it is warm enough to do so.	
5)	Conclusion:	· I object to the project in its entirety because there is a more efficient and economical solution. · There is no justification for the Compulsory Acquisition of such a large area of the Hoverport. · I ask the Ex A to reduce the size of the order limits on the Hoverport site. · The Applicant needs to ensure easy access for all members of the public that want to use it. · The Applicant should carry out the necessary surveys of the Hoverport. · The route selected by the Applicant is totally unsuitable because of the devastating effect on Fauna and Flora. · I would urge the Ex A to request that the Applicant finds an alternative way of accessing the intertidal area that doesn't use the Hoverport and doesn't involve damaging the Saltmarsh.	The Applicant has responded to these points above.

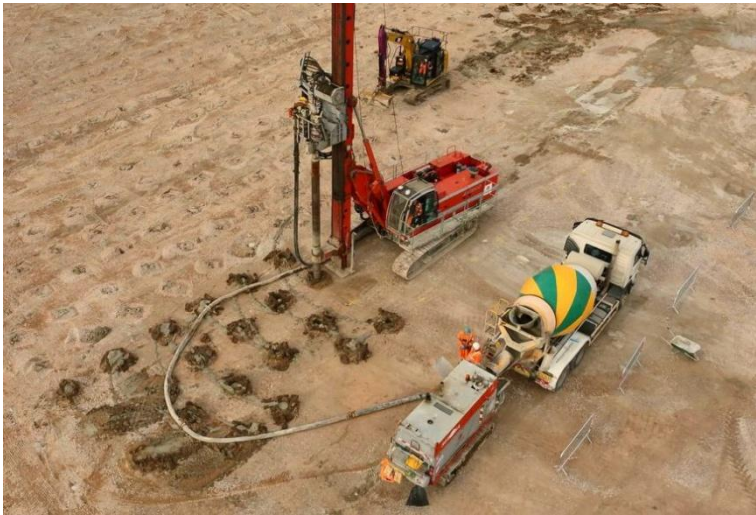
Table 4.3 Applicant’s Comments on David Stevens Deadline 6 Submission [REP6-279, which superseded REP6-199]

Reference	Matter	Point Raised	Applicant's Comments
	Executive Summary	The ground at the proposed Minster Converter station needs stabilising. The method used is unclear but both risk pollution unless properly mitigated. The method used is unclear but, whatever method, HGVs will use K-BM02.	Improving ground conditions is a standard practice that is often used in construction projects. For the Proposed Project a raised platform is required at the site of the proposed Minster Converter Station and Substation due to the high groundwater table within the area. Raising the platform would provide sufficient gradients for drainage to be achieved and will allow cable troughs to be raised above the groundwater level. The appointed contractor

Reference	Matter	Point Raised	Applicant's Comments
		Using the hydrovac method will require the disposal of 40,000m3 of Sulphate rich material. Using the hydrovac method will require over 2,500 HGV movements. Using the Controlled Modulus Column (CMC) method will displace laterally over 14,500m3 of Sulphate rich material. Using the Controlled Modulus Column (CMC) method will require over 14,500m3 of concrete. Using the Controlled Modulus Column (CMC) method will require over 3,500 HGV movements. To raising the base by 2m will require 250,000m3 of “fill” (aggregate). To deliver the 250,000m3 of aggregate will require at least 47,500 HGV movements. There will be more than 50,000 HGV movements at K-BM02 for the “Enabling Works”. The Enabling Works are scheduled to begin Q4 2026 but, despite the huge number of HGV movements required at K-BM02 for this stage, the Applicant suggests the peak for K-BM02 will be in 2028. The Applicant has failed to show the cumulative effects of the proposed Kulizumboo Interconnector. The HGV information for K-RJ1 in APP-181 is different from The HGV information for K-RJ1 in APP-266. The route selected for HGVs to get to and from K-BM07 seems illogical. There are several issues concerning sound modelling and contours that need to be addressed by the Applicant for deadline 6. The issue of wheel-washing and associated lighting needs to be addressed because of the negative effect on the Dauberton bat colony at the Hoverport. The use of a bridge over the Apron will reduce the risk of pollution and the area of the Hoverport required to be Compulsorily Acquired from Thanet District Council. Reducing the area of the Hoverport lost will increase the area available to the public. All the issues raised highlight once again how poor the application is.	has proposed that the structures and the raised platform associated with the Minster Converter Station and Substation will be piled using modular columns, in conjunction with the installation of Prefabricated Vertical Drains (PVDs) and proposed surcharging. The PVDs allow for the release of ground water pressure that builds up when the modular columns are installed and surcharge applied, allowing the density of the ground to be increased. The columns along with the denser ground then act together to provide a stiffer surface for construction of the converter station and substation. Further information can be found in Application Document 9.32: Minster Converter Station Ground Conditions and Water Management – Technical Note [APP6-127] The proposed method above has been fully considered within the traffic assessment for the project including the peak year figures for 2028. Construction of the size of the Proposed Project does require a large number of HGV and other construction related traffic. This has been fully assessed within the submission, and in consultation with Kent Highways. Daily peak traffic is used to assess the impacts of the project from a traffic perspective as it is this value that would identify whether there is a traffic impact from the project. Noting that the A256 has approximately 25,000 vehicle movements per day, the Proposed Projects daily peak is relatively low and although there are a large number of movements required for the project these are spread over the duration of the construction programme. The Applicant recognises that over the programme of the project thousands of vehicles will be required for the construction of the project. The Applicant has assessed the maximum number of HGV’s accessing the Minster Converter Station site via the main proposed site access on the A256 (access K-BM02) as previously noted in a number of responses to documents submitted by the members of the public and by questions from interested Parties and the ExA. The number of vehicles mentioned by Mr Stevens in the Hearings relates to vehicles importing material to the Minster Converter Site for the creation of the piling platform. The number of these vehicles has been assessed as part of the ES and this has concluded no significant effects. The applicant has assessed a peak number of 236 vehicles per day (which includes 100 HGVs per day) for works associated with the Minster Converter Site (taken from Table 7.31 of Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] for access K-BM02) and it is this daily peak that has been used to assess impact. As previously mentioned during ISH3, the single busiest construction day would involve a daily maximum of 108 HGVs across all access points. The proposed HGV routing to access K-BM07 on Sandwich Road is shown on the HGV Routing Plan (Application Document 6.4.3.7 ES Figures Kent Traffic and Transport [APP-266]), including both routes to Sandwich Road via the Lord of the Manor Roundabout to the northeast and via the Ebbsfleet roundabout to the southwest. These are the logical routes which HGVs will use to access Sandwich Road from the surrounding highway network including via the A299 and A256. The traffic flows diagrams within Application Document 6.3.3.7.G ES Appendix 3.7.G Traffic Flow Diagrams [APP-181] show the HGV routes which have been assessed within Application Document 6.2.3.7 Part 3

Reference	Matter	Point Raised	Applicant's Comments
			Kent Chapter 7 Traffic and Transport [APP-067]. Only 10% of HGVs (equating to a daily maximum of 11 HGVs, or 22 HGV movements) are expected to originate from the A299 to the east (via the Lord of the Manor Roundabout), with the remaining 90% of HGVs either travelling to/ from the A299 to the west (via the Sevenscore and Ebbsfleet Roundabouts) or to/ from the A256 to the south (via the Ebbsfleet Roundabout). To provide a worst-case assessment within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] and Application Document 6.3.3.7.A (B) Environmental Statement Appendix 3.7.A Transport Assessment Note [REP5-029], including for the junction modelling of the Sevenscore and Ebbsfleet Roundabouts, the traffic flow diagrams show 90% HGVs travelling via the Sevenscore Roundabout and 100% HGVs travelling to/ from access K-BM07 via the Ebbsfleet Roundabout. This therefore explains the differences in the information provided. The Applicant has no information about the Kulizumboo Interconnector other than what is provided on the LMTR website (https://ltmr.uk/projects). Although this states that the project plans for “an HVDC converter station located alongside National Grid’s 400kV substation at Richborough” the Applicant has access to no other information about the project. It should be noted, however, that in the NESO Interconnector Register the connection point is identified as the Canterbury 400kV GIS Substation, not the Richborough or Minster substations. Protection measures have been committed to for the Hoverport including pre and post condition surveys and protective matting/tracking.
3.1	Pollution risk and possible flood risk	Unfortunately, the Applicant is very vague about the method that will be used to stabilise the ground at the site of the Minster Marshes Converter Station. a) One possible method put forward by the Applicant in AS-093 is the excavation and removal of at least 400mm of “soft ground”. APP-171 page 102 shows: <i>“At the proposed converter site, the Tidal Flat Deposits have very high Sulphate levels (2000mg/l) and the Thanet Formation even higher (2200mg/l)”.</i> AS-093 at 4.3.6 gives the area of the site as approximately 9ha which equates to 90,000m². Even ignoring the volume of water added: Just the removal of soft ground without the added water = 90,000 x 0.4 = 36,000m³ In AS-093 4.6.18 the Applicant gives a figure of 40,000m³.	Improving ground conditions is a standard practice that is often used in construction projects. For the Proposed Project a raised platform is required at the site of the proposed Minster Converter Station and Substation due to the high groundwater table within the area. Raising the platform would provide sufficient gradients for drainage to be achieved and will allow cable troughs to be raised above the groundwater level. The appointed contractor has proposed that the structures and the raised platform associated with the Minster Converter Station and Substation will be piled using modular columns, in conjunction with the installation of Prefabricated Vertical Drains (PVDs) and proposed surcharging. The PVDs allow for the release of ground water pressure that builds up when the modular columns are installed and surcharge applied, allowing the density of the ground to be increased. The columns along with the denser ground then act together to provide a stiffer surface for construction of the converter station and substation. Further information can be found in Application Document 9.32: Minster Converter Station Ground Conditions and Water Management – Technical Note [REP6-127] The proposed method above has been fully considered within the traffic assessment for the project including the peak year figures for 2028. Construction of the size of the Proposed Project does require a large number of HGV and other construction related traffic. This has been fully assessed within the submission, and in consultation with Kent Highways. Daily peak traffic is used to assess the impacts of the project from a traffic

Reference	Matter	Point Raised	Applicant's Comments
		Since this material is Sulphate rich it will need to be disposed of safely. Is this outlined anywhere within the documentation? b) The use of Controlled Modulus Columns (CMC) APP-171 makes clear that the ground beneath the proposed site for the convertor station requires stabilising and, on page 106, it suggests the use of Controlled Modulus Columns (CMC). This method involves using a displacement auger (between 250 and 500mm in diameter to displace “soil” laterally up to depths of 50m. The resulting space is filled with concrete to produce columns. This is a recognised practice for stabilising ground with similar characteristics to those found on Minster Marshes. For example, this method was used at the nearby Discovery Park site in Sandwich to stabilise the ground for a fast-food restaurant. The project was carried out by Keller who stated on their website (Keller.co.uk) that the CMC (they referred to it as rigid inclusions) method was required because: <i>“The main challenge was to provide a solution through the very low strength strata of the Tidal Flat Deposits while avoiding the formation of a pathway for contamination to the aquifer below”.</i> The CMC method was used in the Plocks Farm Manufacturing Factory by Menard (Menard.co.uk) to stabilise the ground and enable a 2m raising (the same as planned at Minster) of the site to avoid flooding risk. Menard explain: <i>“The site is underlain by intermixed loose to very loose silty sands and clayey sands of alluvium origin, to depths of up to 9.0m. Below these weak soils are firm to stiff clays which overlie mudstone at approximately 15m below existing ground levels”.</i> These ground conditions are comparable with those identified in APP-171 for the Minster Marshes Convertor. To achieve stability at Plocks Farm: <i>“Menard installed 320mm diameter controlled modulus columns (CMC’s) on a 2.0m x 2.0m grid to provide support to the upfill and also the slab dead and live loads. The upfill specified was granular, allowing the majority of the structural loads to be transferred more efficiently between the CMCs and the soil, thus allowing the adoption of a ground bearing floor slab”.</i>	perspective as it is this value that would identify whether there is a traffic impact from the project. Noting that the A256 has approximately 25,000 vehicle movements per day, the Proposed Projects daily peak is relatively low and although there are a large number of movements required for the project these are spread over the duration of the construction programme.



The Minster Marshes convertor site is 90,000m2. For ease of calculation this equates to a square of dimensions 300m x 300m. Using the CMC method to stabilise the ground with a 2m x 2m grid would require approximately 22,500 (150 x 150) columns. Assuming the depth is 8m:

The volume of each column	= $\pi \times r^2 \times \text{depth}$ = 0.6463m ³
Total volume of all columns	= volume of each column x number of columns
	= 0.6463 x 22,500 = 14,542m ³

This is the volume that will be displaced laterally and, since the Tidal Flats are saturated with Sulphate rich water and water does not compress easily, there is a risk of polluting the drainage ditches and the River Stour. It may also pose a flood risk.

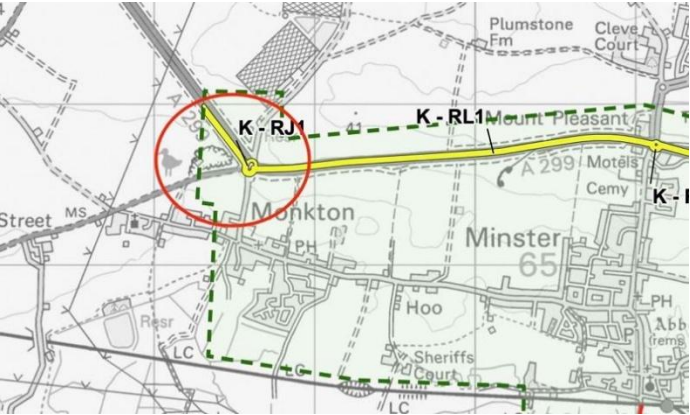
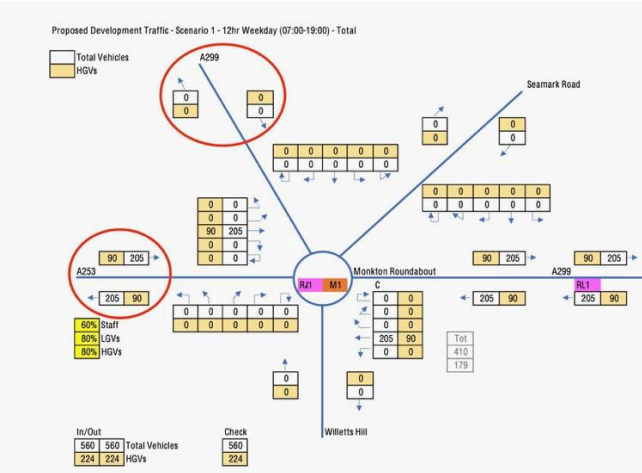
- 2)4.1 Junction Capacity Modelling
- a) Use of the Hydrovac to remove at least 400mm over an area of 90,000m2
- In APP-090 the Applicant refers to the use of a 44t Hydrovac. These units use high-pressure water (often thousands of PSI) to break up soil and a powerful vacuum system to extract it into the tank. A typical 44t hydrovac (Tardis.co.uk) has a capacity of 30,000 litres which is 30m3. To remove the 36,000m3 of Sulphate rich material would involve:
- 40,000 / 30 = 1,333 x 44t HGV arrivals and departures which gives:
- 2,666 HGV movements at K-BM02
- It should be noted that in APP-90 Table 1.1 the Applicant only lists 1 hydrovac on site 100% of the time to inform its construction noise assessment.
- b) Concrete mixer movements for CMC

The Applicant recognises that over the programme of the project thousands of vehicles will be required for the construction of the project. The Applicant has assessed the maximum number of HGV's accessing the Minster Converter Station site via the main proposed site access on the A256 (access K-BM02) as previously noted in a number of responses to documents submitted by the members of the public and by questions from interested Parties and the ExA. The number of vehicles mentioned by Mr Stevens in the Hearings relates to vehicles importing material to the Minster Converter Site for the creation of the piling platform. The number of these vehicles has been assessed as part of the ES and this has concluded no significant effects.

The applicant has assessed a peak number of 236 vehicles per day (which includes 100 HGVs per day) for works associated with the Minster Converter Site (taken from Table 7.31 of **Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]** for access K-BM02) and it is this daily peak that has been used to assess impact. As previously mentioned during ISH3, the single busiest construction day would involve a daily maximum of 108 HGVs across all access points. This has also been assessed as part of the junction capacity modelling within

Reference	Matter	Point Raised	Applicant's Comments
		Using the CMC method described above to stabilise the ground beneath the proposed convertor station involves filling the spaces left by the auger with concrete. In the case of the Minster Marshes this will need to be concrete that is capable of dealing with high Sulphate levels of 2000mg/l. In APP-90, the Applicant lists the use of 32t 8m3 concrete mixers for its noise assessment for construction. To deliver 14,542m3 of concrete using 8m3 concrete mixers would require: 14,542 / 8 = 1,818 concrete mixers which gives: 3,636 HGV movements at K-BM02. It should be noted that in APP-90 Table 1.1 the Applicant only lists 2 on site (90% working, 10% idling) to inform its construction noise assessment. These concrete mixers will almost certainly have come from / go to the Brett site on Ramsgate Harbour c) HGV movements for aggregate This issue was raised at ISH3 but both the Applicant and KCC seemed to be dismissive of the thought that there might be thousands of HGV movements to deliver aggregate to the site. I know that the Ex A have asked the Applicant to respond to AP-10 from ISH3 but I thought it helpful to give some context. i) Raising the base by 2m In AS-093 4.6.18 the Applicant gives a figure of 250,000m3 of “fill” and in APP-320 it lists the use of an 8-wheeled tipper lorry with a 20t capacity for its noise assessment. Unfortunately, the Applicant does not give details of the type of aggregate to be used but Mainland Aggregates (Mainlandaggregates.co.uk) refer to MOT type 1 sub-base as being suitable because it “is the most widely used approved sub-base in the construction industry”. They give the weight as between 1.9 and 2.2t/m3. Using the lowest figure gives a weight of (250,000 x 1.9) = 475,000t. Number of HGV tipper lorry = 475,000 / 20 = 23,750 arrivals and 23,750 departures. 47,500 HGV movements at K-BM02.	Application Document 6.3.3.7.A (B) Environmental Statement Appendix 3.7.A Transport Assessment Note [REP5-029]. In addition, Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] is based on the busiest days of the construction programme in terms of total construction vehicle movements and HGV movements, to provide a worst-case assessment. The figures in Table 7.28 represent the daily construction vehicle peak of the A256 access (K-BM02) in 2026, which includes 39 HGV arrivals and 39 HGV departures per day. However, the peak in terms of HGV activity at this access (K-BM02) is expected to occur in 2028 as shown in Table 7.31, equating to 100 HGV arrivals and 100 HGV departures per day. This is the level of activity which has been assessed, accounting for peak construction activity associated with Minster Converter Station. The Applicant has assessed the maximum number of HGVs accessing the Minster Converter Station site via the main proposed site access on the A256 (access K-BM02). This response has also been provided to respond to ISH3 Action Point 24 within Application Document 9.135 Applicants Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110].

Reference	Matter	Point Raised	Applicant's Comments
		It should be noted that in APP-90 Table 1.1 the Applicant only lists 4 x 8-wheeled tipper lorry on site 25% of the time to inform its construction noise assessment. d) Total movements Either: Hydrovac (2,666) + aggregate for 2m rise (47,500) = 50,166 movements Total HGV movements at the new A256 junction = 50,166. Or: Concrete mixers (3,636) + aggregate for 2m rise (47,500) = 51,136 movements Total HGV movements at K-BM02 = 51,136. It is clear that there will be in excess of 50,000 HGV movements using K-BM3. Have these movements been included in the Junction Capacity Modelling? e) Access peaks for junctions In AS-093 Table 4.10 the Applicant indicates that “Enabling Works” for the Minster Converter Station will begin in Q4 of 2026. The details are given in 4.6.12 – 4.6.18 but include the building of haul roads, Bellmouths (including K-BM3) and ground improvements. These Enabling Works will require, amongst other things aggregate and concrete as described above with the resulting HGV movements. APP-067 Table 7.28 shows a peak daily construction movement for 2026 and includes HGVs of 39 arrivals and 39 departures from / to the A256 which is the main access route to the Minster Converter Station. With at least 50,000 movements and a maximum of 78 HGV movements a day at K-MB3 that will take approximately 22 months at least just to stabilise the base and construct a 2m platform. It is difficult to understand why the Applicant does not identify 2026 into 2027 as being a potential peak approaching the number of HGV movements predicted in 2028 (200) for K-BM02?	
3)	4.1 Junction Capacity Modelling and 8.1 Intra-project cumulative effects	In APP-320 Table 3.4 the Applicant lists the Planned Generation for the SC2 group and it includes the Kulizumboo Interconnector with a 2027 completion date. According to the LTMR website (ltmr.uk) the Kulizumboo Interconnector is: <i>“..... a major 70MWp solar energy project across 250 acres of land next to Richborough Energy Park in Sandwich, Kent”.</i>	The Applicant has no information about the Kulizumboo Interconnector other than what is provided on the LMTR website (https://ltmr.uk/projects). Although this states that the project plans for “an HVDC converter station located alongside National Grid’s 400kV substation at Richborough” the Applicant has access to no other information about the project. It should be noted, however, that in the NESO Interconnector Register the connection point is identified as the Canterbury 400kV GIS Substation, not the Richborough or Minster substations.

Reference	Matter	Point Raised	Applicant's Comments
		I am surprised that the Applicant has not raised this as potentially having an intra-project cumulative effect because: · It has completion date within the window for construction of the Sea Link. · The site chosen is in proximity to the Sea Link Converter Station. · The high likelihood that the Kulizumboo Interconnector would need to make landfall at Pegwell Bay. Has the intra-project cumulative effect of this project been assessed by the Applicant?	
4)	4.1 Junction Capacity Modelling inconsistencies	a) In APP-181 Traffic Flow diagrams 12hr weekday (07.00-19.00) on the next page shows 90 HGVs (and 205 other vehicles) using the A253 whereas in APP-266 HGV routing map it shows HGVs using the A299 not the A253. 	The Applicant's responses are as follows: a) The A299 and A253 to the west of the Monkton Roundabout (receptor K-RJ1) fall outside of the study area as agreed with KCC Highways and assessed within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]. Therefore, whilst the traffic flow diagrams within Application Document 6.3.3.7.G ES Appendix 3.7.G Traffic Flow Diagrams [APP-181] show construction vehicles entering/exiting the study area via the A253 to the west, it is acknowledged that construction vehicles will also utilise the A299 to the west. Nonetheless, the assessment work within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] is based on 80% HGVs, 80% LGVs and 60% staff travelling via the Monkton Roundabout and then the A299 Hengist Way towards the Proposed Project, as shown by Table 7.33 of Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067], as well as the traffic flow diagrams (Application Document 6.3.3.7.G ES Appendix 3.7.G Traffic Flow Diagrams [APP-181]). As such, the assessment work is robust and no reassessment of the Monkton Roundabout (K-RJ1) is necessary, given this is based on total vehicle movements through the junction, irrespective of whether they use the A299 or A253 to the west. b) As set out above in response to the Executive Summary above, the traffic flows diagrams within Application Document 6.3.3.7.G ES Appendix 3.7.G Traffic Flow Diagrams [APP-181] show the HGV routes which have been assessed within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]. Only 10% of HGVs (equating to a daily maximum of 11 HGVs, or 22 HGV movements) are expected to originate from the A299 to the east (via the Lord of the Manor Roundabout), with the remaining 90% of HGVs either travelling to/ from the A299 to the west (via the Sevenscore and Ebbsfleet Roundabouts) or to/ from the A256 to the south (via the Ebbsfleet Roundabout). To provide a worst-case assessment within Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] and Application Document 6.3.3.7.A (B) Environmental Statement Appendix 3.7.A Transport Assessment Note [REP5-029], including for the junction modelling of the Sevenscore and Ebbsfleet Roundabouts, the traffic flow diagrams show 90% HGVs travelling via the Sevenscore Roundabout and 100% HGVs travelling to/ from access K-BM07 via the Ebbsfleet Roundabout. It is acknowledged that construction vehicles travelling to/ from access K-BM07 via the A299 and the Lord of the Manor Roundabout to the west are more likely to use the alternative (shorter) route via Sandwich Road, however, this was not assessed as this

Reference Matter	Point Raised	Applicant's Comments
	In APP-181 Traffic Flow diagrams 12hr weekday (07.00-19.00) it shows 11 HGVs turning left at K-RJ4 (circled top left). The diagram is a detailed traffic flow model for a 12-hour weekday period (07.00-19.00). It shows a network of roads including the A299, A253, and various local roads. A specific junction, K-RJ4, is circled in red at the top left, with arrows indicating 11 HGVs turning left. Other junctions like K-BM7 and K-RJ6 are also marked. The diagram includes various traffic flow data points and labels for different road sections. This is an aerial map of the study area, showing the geographical context of the traffic flow diagram. Key locations labeled include SEVENSORE, PEGWELL BAY, Cliffsend, Pegwell Bay Country Park, Elbsfleet, and Sandwich. The map highlights the roads K-RJ4, K-BM7, and K-RJ6, which correspond to the junctions in the traffic flow diagram. A blue arrow on the right-hand map indicates a route that avoids passing receptors on the Sandwich Road.	would have resulted in a less robust assessment of the highway network within the study area. The points of origin for HGVs are not currently known, but the 10% assumption to/ from the A299 to the east reflects the potential for these to travel to/ from area in the vicinity of the Port of Ramsgate. With respect to the final point, the majority of HGVs are expected to travel via the A299 and the Monkton Roundabout to the west of the study area, and then onward routes via the A299 or A253. See response to point a) above for further details.
	It is not clear to me why the 33 HGVs don't do the same onto the dual carriageway (as shown by the blue arrow on the right-hand map) and turn right at the next roundabout to reach K-BM07? This is a much shorter route, on better roads and avoids passing receptors on the Sandwich Road. The Applicant does not make clear where the 11 HGV vehicles, identified earlier, are going to and from but the assumption is that it is to and from Bretts on Ramsgate Port. It is also not clear where the Applicant is sourcing the 250,000m3 of aggregate but referring to APP-181 and APP-266, the majority of HGVs carrying aggregate must be coming from the west via either the A253 (APP-181) or the A299 (APP-266). Logically, the HGVs will be using the A299 but clarification would be useful.	

Reference	Matter	Point Raised	Applicant's Comments
5)	10.1 Construction noise effects	a) In response to Action Point AP68 from ISH2, the Applicant (REP4-086) states: <i>“A setting of soft ground is used for this project because most of the ground between sources and receptors is natural rather than man-made and considered acoustically soft. Adding a small area of hard ground would create inaccuracy in the results, and, given its likely negligible influence on the overall results, it is not considered proportionate to model in this way.”</i> The result of this astonishing admission is that the sound contours for the entire Hoverport site are meaningless. The Applicant has to respond to this point in EV9-018 Action Point 56 and I look forward to reading their response. b) Surface or R-waves Concrete is a very good conductor of sound vibrations close to the surface reaching speeds of up to 2500m/s with little attenuation. The Applicant does not appear to have modelled the effect of these surface waves. This is of particular importance because it has been acknowledged by the Applicant that the Hoverport site is home to rare invertebrates and these live close to or in cracks just below the surface. It should be noted that grass snakes, slowworms and lizards have been spotted and photographed at a location approximately 10m from the proposed access route. In addition, on the 18th March, a pair of Long Tailed Tits were observed and filmed building their nest in vegetation ON the access route. The Applicant has to respond to this point in EV9-018 Action Point 57 and I look forward to reading their response. c) Sound contours for receptors on the Sandwich Road The Applicant has confirmed that no construction vehicles will be “parked” at the Hoverport so all construction vehicles will travel to and from the compound at points of high tide. This will be up to 40 movements a day. The Applicant does not appear to have produced up to date contours for the access route from Sandwich Road to the compound. This is important because there are properties close to the exit / entry point to the Hoverport.	The Applicant has responded to this point in REP6-110.

Reference	Matter	Point Raised	Applicant's Comments
		Contours should include both airborne noise but also a separate one for surface vibrations.	
		The Applicant has to respond to this point in EV9-018 Action Point 56 and I look forward to reading their response.	
6)	Ecology and Biodiversity	a) 13.3 Mitigation for Daubenton's bats in Pegwell Bay It has been acknowledged by the Applicant that Daubenton's bats are present at the Hoverport site. Thanet District Council (TDC) in REP4-160 1.1.9 indicated that: <i>"TDC objects to the proposed activity of siting and operating up to 40-tonne vehicles on the former hoverport site, particularly involving crossings over the concrete skirt into Pegwell Bay. The potential for environmental damage outweighs the operational benefits; and alternative access methods should be considered and prioritised.</i> <i>Should the Examining Authority determine that some form of site access is unavoidable, TDC recommends the imposition of the following commitments to safeguard Pegwell Bay from contamination risks caused by structural damage. These commitments emphasize prevention, monitoring, and rapid response".</i> One of these conditions involves the use of wheel-wash facilities: <i>"All entry/exit points must incorporate wheel-wash facilities (non-toxic to marine environment and aquatic organisms) or decontamination zones to prevent tracking of materials from the pad into the bay. Vehicles should be inspected and cleaned before and after bay access".</i> Contrary to what the Applicant suggested at the ISH3, TDC are asking for these wheel-wash facilities at the point where the vehicles transition from the intertidal area to the Hoverport site. To suggest, as the Applicant did, that these facilities could be at the junction between the Hoverport Access route and Sandwich Road is to miss the point. Since the construction at Pegwell Bay will be during low tides both day and night it seems inconceivable that the wheel-wash facility will not require lighting to enable the vehicles to <i>"be inspected and cleaned before and after bay access"</i>. This lighting will have a severe detrimental effect on the Daubenton's bat colony and it is hard to see how this can be mitigated. b) 13.4 Pegwell Bay and former Hoverport access and disturbance	The Applicant has not acknowledged that Daubenton's bats are present at the hoverport site and to the Applicant's knowledge no consultee has stated they are present. Natural England stated that Daubenton's bats use the Kent coast which is not the same thing. An assessment of impacts on Daubenton's bats was included in the Kent Ecology and Biodiversity Chapter submitted at D6 and concluded no mitigation is required. To mitigate any risk to Schedule 5 invertebrates, including disturbance during use of places of shelter or protection, a REAC commitment has been secured at Deadline 6. This commits to avoiding any incidental or direct lighting of vegetated areas by locating any temporary task lighting, where required, as close as practicable to the seawards edge of the hoverport and/or as close as practicable to Sandwich Road.

Reference	Matter	Point Raised	Applicant's Comments
		As indicated above TDC are very concerned at the serious risk of pollution caused by the movement of very heavy vehicles over the weakened Hoverport site and require: <i>“Vehicles and machinery must not directly traverse the edge of the concrete skirt. Instead, access should be facilitated via engineered ramps or temporary bridging structures designed to distribute weight and prevent direct contact with the skirt. These structures must be constructed from non- contaminating materials (e.g., geotextile-reinforced matting) and approved by an independent structural engineer prior to use. The hoverport area and all access points must be pre-assessed via non-invasive surveys (e.g., ground-penetrating radar) to identify weak zones.</i> <i>Limit vehicle movements to designated structurally sound pathways within the apron, avoiding proximity to the bay edge by at least 5 meters unless bridged”.</i> The use of an engineered ramp or temporary bridge would have the added benefit of giving certainty to the route used by the Applicant and would reduce the area of the Hoverport required to give “flexibility”. Obviously, there would be the additional area set aside for wheel- washing but the uncertainty would be removed giving clarity to the Ex A in their change of order limits decision.	
7)	Conclusion	Throughout this examination it has become clear that the documentation provided by the Applicant contain frequent errors, omissions, contradictions and misrepresentations. The Ex A will know whether this Application is normal for NSIPs or is worse than normal, but it seems to me that the Applicant was underprepared because they assumed it was a fait accompli. Considering the resources at their disposal it is unacceptable to me that their work is so poor.	The Applicant rejects the suggestion that the application was underprepared.

5. Applicant’s Comments on the Submission from Five Estuaries Offshore Wind Farm Ltd

5.1 Introduction

5.1.1 Table 5.1 summarises the Applicant’s comments on Five Estuaries Offshore Wind Farm Ltd Deadline 6 Response [REP6-143]

Table 5.1 Applicant’s Comments on the Five Estuaries Offshore Wind Farm Ltd Deadline 6 Submission [REP6-143]

Reference	Matter	Point Raised	Applicant’s Comments
Deadline 6 Representation			
	Non Concurrent working areas (RAM Vessels)	VEOWFL held a meeting with North Falls Offshore Wind Farm and the Applicant to discuss the logistics of concurrent working on 20 March 2026. A series of regular co-ordination meetings have been scheduled between all three parties. VEOWFL notes the Maritime and Coastguard Agency (MCA)’s submission (REP4-165); Action points 98 points 1 and 3) which requested and provided justification of the enlarged area, for restrictions on concurrent working of RAM vessels, in the SUNK area. Under point 3, the MCA highlighted that the proximity of the Five Estuaries (VE), North Falls and Sea Link cable corridors. If operations were to occur for all three projects at the same time there is the potential to reduce the width of available searoom, for large vessels, following the IMO routing towards the Strait of Dover to less than 1NM. It is VEOWFL’s understanding that the area proposed by the MCA for the Sea Link project would only apply to Sea Link’s RAM vessels (from an intra-project perspective) as the equivalent restriction is not included in the control documents secured under the Five Estuaries Development Consent Order (DCO). VEOWFL further notes that it would not be appropriate to seek to impose further restrictions on the VE project (a consented scheme) through the Sea Link DCO when such restrictions were not considered necessary in the VE DCO. VEOWL considers that though it is not committed to in the VEOWL DCO the likelihood of concurrent RAMS vessel in the SUNK area is very low, but due to the detailed schedules not being available during the planning process it is not possible for VEOWL to confirm this at this time. VEOWL confirms that as the projects develop VEOWFL will continue to work with Sea Link and North Falls during the regular co-ordination to ensure that the projects do not create a 1NM pinch point that would be a risk to maritime traffic. VEOWFL recognises the area Sea Link define in the drawing appended to this letter. VEOWFL is willing to co-ordinate with Sea Link to ensure that RAMs vessels for the two projects do not operate	These comments are acknowledged.

Reference	Matter	Point Raised	Applicant's Comments
		concurrently in the “Outer Sunk Central” and “Outer Sunk East” concurrent areas presented in the appended drawing. VEOWFL also wishes to highlight that the process of identifying the sensitive area for pilotage boarding at Sunk, as defined for the concurrent area for the VEOWFL DCO, was determined and agreed through a workshop which included pilots from Harwich Haven and the Port of London Authority operating in the area. Representatives of the Sea Link and North Falls projects were also in attendance at this workshop. Therefore, VE would be strongly opposed to increasing this area, to the proposed “Sealink_Simultaneous RAM&RV Stop Ops Area” shown in Fig.1 of REP4-163; particularly as it increases the extent of the VEOWFL consented cable corridor restricted in terms of concurrent activities. Whilst it is assumed that the proposed concurrent working area for RAM vessels would only apply to Sea Link vessels; this in itself would add further complexity to the co-ordination between the three Projects.	
	Navigable depth	VEOWFL has reviewed the following documents: • Areas of Safeguarded Water Depth Plan [REP4-098]; • Areas of Safeguarded Water Depth - Consideration of Additional Installation Requirements [REP5-139]; • Outline Cable Specification and Installation Plan [REP5-117]; and • The relevant Protective Provisions in draft Development Consent Order [REP5-005]. As noted in the Deadline 5 Representation and at ISH2, VEOWFL is concerned that without the safeguarding provisions, which have been afforded to GridLink, there is a risk that VE will be unable to meet the relevant requirements within its DCO. Specifically, at the location of the Sea Link and VE cable crossings to ensure navigable depth is not reduced by greater than 5%. It is entirely reasonable that as a consented project, VE should be afforded the same degree of consideration as GridLink within the outline CSIP. VEOWFL notes that Sea Link has committed to undertake a crossing in the deeper water in their Order Limits with GridLink (para 5.2.8 of REP5-117) but the equivalent provision has not been made for VE in the Outline Cable Specification and Installation Plan, despite this concern being identical for the VE project and the requests previously made by VEOWFL in the Sea Link examination for the equivalent protection to be secured. In the absence of the requested protections, VEOWFL must insist that protective provisions are included in the Sea Link DCO for the protection of VEOWFL in relation to the cable crossing; to ensure that the cable crossing is undertaken in suitably deep water to ensure that the water depth is not reduced by greater than five percent. VEOWFL will seek to agree the wording of protective provisions with the Applicant prior to Deadline 7. However, if agreement cannot be reached then VEOWFL will submit its preferred wording for the protective provisions at that deadline. Without adequate safeguarding provisions, VEOWFL must	The Applicant will continue to liaise with VEOWFL and has created commitment SN40 to address this concern, as presented in the updated 7.5.2.Offshore Construction Environmental Management Plan and 9.84 Register of Environmental Actions and Commitments (REAC) to be submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		continue to maintain its representations against the Sea Link application. VEOWFL is confident that suitable wording can be agreed before the end of the Sea Link examination to address VEOWFL's concerns given the close working between the parties on the concurrent working arrangements.	

6. Applicant’s Comments on the Submission from Jane Hetherington

6.1 Introduction

6.1.1 Table 6.1 summarises the Applicant’s comments on Jane Hetherington Deadline 6 Response [REP6-144].

Table 6.1 Applicant’s Comments on the Jane Hetherington Deadline 6 Submission [REP6-144]

Reference	Matter	Point Raised	Applicant’s Comments
		As a RTC councillor I wish to submit some concerns. RTC attempts to encourage residents to make use of our wide open spaces including the Pegwell Bay/ Hoverport area. This area has unique flora and fauna linked to the wider ecology of this area, resulting from the rewinding of the last 30 years.	The reasons for the Change Request in relation to the hoverport, Change Request 1, are set out throughout the Application, including within the Application Document 9.76.2 (A) Change Request Report [CR1-052] . As set out in REP6-109 there are no plans to close any of the registered public rights of way, where they interact with the access to the Hoverport these will be managed during the periods of time when construction traffic is using the site. The access route across the hoverport will be fenced off, however crossing points will be provided to maintain public access where necessary.
		There is considerable risk of pollution at the site which the NG has not addressed in the form of the fragile hoverport base built on colliery spoil, this is a significant environmental hazard. There is a potential risk of water pollution which is of considerable concern to the public as is the depositing of plastics and synthetics at sea. I am concerned about the loss of amenity of the hoverport myself and many others regularly use this area for walks and bird watching and the biodiversity will be severely impacted. There seems to have been little thought put into the choice of this site other than convenience.	The measures that the Applicant proposes to take to prevent any interactions with potential contamination through avoiding ground disturbance and conserving the existing overlying hardstanding barrier are set out in its response to this question in REP5-135. The Applicant has added a new commitment W37 to the Outline Onshore Construction Environmental Management Plan that was submitted at Deadline 5 [REP5-068] as follows: ‘The Applicant will prepare a hoverport condition monitoring plan post consent to monitor the condition of the hoverport during construction. This will include measures for identifying and managing any potential contamination risk and will be prepared in consultation with the EA, NE, KWT and TDC.
		There are issues in relation to water management particularly in an area that is prone to flooding and my fear is discharges into the Stour or Minster stream because of the inadequacies of a SUD system, are there alternative plans? There are also concerns around fire risk would the fire service be able to cope with a major incident in one area, insufficient water plus insufficient pressure, if there was a fire in more than one location.	The Kent Drainage Strategy (Document 9.17.2, which was resubmitted with minor updates at deadline 5) has been prepared to demonstrate compliance with DEFRA’s SuDS Technical Standards and in accordance with the National Standard for SuDS.
		A recent incident in the tunnel highlighted problems and health and safety issues that would arise from the delivery of equipment and gravel, the road at the cliff top is already fragile and totally inappropriate for heavy use.	

Reference	Matter	Point Raised	Applicant's Comments
		There is also the concern relating to combined developments around the site and their cumulative impact on the proposed site and there needs to be a full and comprehensive assessment of the risk. There also needs to be an assessment of light and noise pollution and the visual impact.	The Applicant has carefully assessed the impacts of the proposed development on tourism, in itself and with regards to cumulative impacts arising from other relevant projects.

7. Applicant’s Comments on the Submission from Marianne Fellowes

7.1 Introduction

- 7.1.1 Table 7.1 summarises the Applicant’s comments on Marianne Fellowes Deadline 6 Response [REP6-145].
- 7.1.2 Table 7.2 summarises the Applicant’s comments on Marianne Fellowes Deadline 6 Response [REP6-218].
- 7.1.3 Table 7.3 summarises the Applicant’s comments on Marianne Fellowes Deadline 6 Response [REP6-219].
- 7.1.4 Table 7.4 summarises the Applicant’s comments on Marianne Fellowes Deadline 6 Response [REP6-220].

Table 7.1 Applicant’s Comments on the Marianne Fellowes Deadline 6 Submission [REP6-145]

Reference	Matter	Point Raised	Applicant’s Comments
		I will send a separate email with attached documents for your consideration in response to ISH3 Another other business. Question from ExA 90. Provide any further evidence on the need for the project that you consider is not already before the ExA.	Noted.

Table 7.2 Applicant’s Comments on the Marianne Fellowes Deadline 6 Submission [REP6-218]

Reference	Matter	Point Raised	Applicant’s Comments
Written representation of input to OFH3		Amidst uncertainty, one looks for constants - for connection to place and community, for peace and tranquillity, to find beauty in nature, do something to make a difference. In fact, that is exactly what social prescribers would prescribe. So this weekend I did a little pick at Benhall adjacent to the area that will be used to construct and access the potential convertor station proposed as part of this project. And I had what is known in theatre terms, as a presentiment. It's a taste of things to come. With the A12 junction with A1094 completed closed, I witnessed a dangerous increase in traffic and speeds along all the feeder roads that residents and visitors use and navigate. Later on the same day I had to use a diversion route and it was totally inappropriate, a single-track road – which meant that vehicles met head on, parking was not restricted, and HGVs had to mount pavements (where they existed) and verges. This is what it's going to be like if this these proposals are accepted. And 7 days a week from 6am in the morning as traffic starts to make its way to compounds, if the Applicant gets its way regarding working hours and preparatory work hours. Unfortunately, a focus purely on numbers, in traffic assessments which are under-estimated will not prevent a potentially fatal	The Applicant notes the disruption caused by other projects to local residents in the area. As explained at Open Floor Hearing 3, the Applicant held a further transport meeting with SCC Highways on 30 March 2026 when SCC confirmed that following the works, Friday Street (A12/ A1094 junction) had been opened that morning, and that Yoxford (A12/ B1122 junction) would be opened the day after on 31 March 2026. Therefore, whilst there will be ongoing landscaping works at these junctions into the summer of 2026, there will be no overlap between these specific junction works and the Suffolk Onshore Scheme. The improvements will increase the baseline capacity of the highway network, reducing existing levels of driver delay and providing a benefit to existing road users, as well as construction traffic associated with the Suffolk Onshore Scheme, particularly at Friday Street (A12/ A1094 junction) which is one of the principal access routes from the A12. Traffic impacts have been considered fully in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. Further, a comprehensive cumulative assessment of forecast traffic impacts of the Proposed Project together with other major infrastructure projects on the Suffolk highway network has been undertaken, the findings of which are reported in Application

accident caused by just one vehicle in the wrong place, at the wrong speed at the wrong time. The roads around here are not suitable for the sort of industrialisation that is needed for the deliver of the project, and this cannot be mitigated for. There is inadequate monitoring now or proposed, and action will be retrospective to any issue, not preventative. From the deterioration of the surfaces to the need for traffic calming, and alternative routing, road closures and formal TROs – the financial cost and time delay will far exceed any estimate by the Applicant currently. This application if granted would also risk the delivery of the NSIPs already approved.

As ExA during your visits, you will have already witnessed the scale of the disruption this community is experiencing. Your colleagues speaking about SPR EA1N and EA2 cautioned against any further infrastructure. I ask you to consider the people of Friston, Aldeburgh and Saxmundham and those along the cable routes, especially the 25 households of Manor Gardens, the White Arch retirement village of 20 homes, the 54 households in Stanfield and the 190 on the east side of the A12 in Bennell. And all the businesses in this area who are going to face a disproportionate harm to any benefit of this project. The Applicant themselves said it was going to be impossible to mitigate or compensation for some harms. And just because some harms cannot be quantified, we cannot presume they are negligible or insignificant, it could equally be the opposite magnitude.

There is clear evidence between uncertainty and reducing mental health and increased anxiety and depression. This is made worse by perceived poor communication that we've had from the developer, from the early stages of the consultation (which is supposed to be in the 'front ended' part of the NSIP) and their lack of assessment and their inadequate level of detail in this DCO.

The Applicant is being forced now to find other solutions very late within the DCO. As you have seen, in these OFHs and in the volume of individuals registered as Interested Parties, a lack of trust and limited involvement in decision making creates a feeling that personal well-being is not being prioritized. The people most affected are not being heard or considered. How can every harm be downgraded as 'not significant' when to a number of individual receptors - it certainly is. i.e. evaluation not just on overall numbers/volume of harm.

This increased harm is on top of what we are actually already experiencing. Disrespectfully called 'SZC background' by the Applicant. There is guidance and precedence, in the public domain, for the Applicant to be able to do more to support individuals and businesses.

This includes;

1. HS2 Phase Two report to a Commons Select Committee advocated for mental health monitoring and the project set up a Public Advisory group as a 'critical friend' and to give advice from a public perspective.
2. Public Health England now called 'UK Health Security Agency' in 2020 also stated that NSIP schemes can be of such scale in

Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].

A complete mental health and wellbeing assessment has been undertaken within **Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]** and the potential for mental health effects have been considered in accordance with the IEMA Guide to Effective Scoping of Human Health in EIA (2022). The assessment concludes that no significant adverse effects on mental health are anticipated. Similarly, no cumulative significant adverse effects on health and wellbeing are anticipated.

	nature (as a result of construction and operational aspects) that they will impact the overarching protective factors or good mental health – which are; • Enhancing control (or agency for individuals) • Increasing resilience and community assets, • Facilitating participation and promoting inclusion. Going back to my first point – to combat stress caused by these projects we should bathe in nature, walk along quiet footpaths and experience peace and birdsong etc. but these projects are taking away our nature and tranquillity and just adding to the stress not only by the impact of creating the infrastructure needed where there is no industrialisation here, but in the way they are engaging (with no protective factor of feeling engaged or involved) and propose to deliver the elements....their way, 24/7, at the best financial spend level to them (without our inclusion). Mental health and wellbeing should be assessed. Identified and mitigation provided locked down into the DCO with an adequate contingency to cover what we may face but do not know currently. An estimation of community anxiety and stress must be considered if you are minded to agree. The Applicant proposes to now use the SZC Link Road. Additional traffic added to this and the feeder roads, will also have negative consequences on the same cohort of people, as we travel around this small geographic area, that must be assessed and mitigated. The cost to the Applicant to include these better solutions and mitigate is actually going to be very, very high. I ask them - you may wish to reconsider, pause and reevaluate this whole scheme. I would certainly ask the ExA to decline to recommend, and enable a pause and re-evaluation to be undertaken and for the project to be located into an area which would not need as much infrastructure put in, on a brown field site where adequate roads exist, and where additional traffic or impacts already discussed at ISHs would not be as negatively harmful. It is in the wrong place. It is the wrong time. It is not needed. Thank you.

Table 7.3 Applicant’s Comments on the Marianne Fellowes Deadline 6 Submission [REP6-219]

Reference	Matter	Point Raised	Applicant’s Comments
	Wellbeing Impact Study of High-Speed 2	Submission contains the Wellbeing Impact Study of High Speed 2 - Overview and summary of work to date produced by Cambridge Centre for Health Services Research Cambridge Centre for Health Services Research.	The Applicant has reviewed this academic study and concluded that its themes are already captured within the adopted methodology and did not require changes to the assessment approach.

Table 7.4 Applicant’s Comments on the Marianne Fellowes Deadline 6 Submission [REP6-220]

Reference	Matter	Point Raised	Applicant’s Comments
Action Points for ISH3. Point 90.			
1	Need for the Proposed Project to be located here, because of no other option:	The network in and between East Anglia and the South-East of England specifically needs reinforcing the Applicant says because “the existing network was not designed to transport electricity from where we increasingly now generate it (largely offshore)” and due to the “growth in offshore wind...and nuclear power means that more electricity will be generated in the years ahead than the current network is able to securely and reliably transport”. If these statements are true then NG should have invested in a holistic and robust alternative off shore not rely on a series of small (2MW) interconnectors. Their failure to strategically plan for this predictable situation, requires a different more robust solution. Called the Great Grid Upgrade’ is anything but this. Other options have not been presented to the ExA to be costed, evaluated or examined to prove that there are no other options except to reinforce the network via a series of interconnectors, nor to locate Sealink here. The need for 50GW of offshore wind by 2030 again does not mean that the reinforcement by means of an interconnector is the answer and that can only be located here. Even if the project is of national importance and significance, and qualifies under NPS EN-1 as being urgently ‘needed’.... The policy is not location specific nor is it design/model specific. There is a difference between a national need for an action, and the need for that action to be located here. The Applicant has not proven the later. Other locations exist which have not been explored due to the false offer (through the failed COIN process based on the assumption that there was capacity to connect to the Grid). This and National Grid’s overall financial business ambition to create a hub here because it is more challenging to develop where there is other infrastructure on a brown field site - should not be weighted as strong evidence towards the needs case.	The Applicant has thoroughly assessed alternative options that can address the strategic issues in the transmission network. This includes the consideration of brownfield sites (albeit none were suitable within the areas of search to accommodate the required infrastructure). This is contained in: • Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368]; • Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]; • Application Document 8.3 Strategic Options Report (October 2023) [APP-370]; • Application Document 7.2 Strategic Options Back Check Report [APP-320]; and • Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]. The Proposed Project is promoted to meet statutory duties and national policy objectives for electricity transmission. The Proposed Project is subject to regulatory oversight and funding is secured via Ofgem’s framework. It is incorrect to suggest that the Applicant has not established the need for the Proposed Project in this location. It has consistently established this as part of its needs case. The Applicant refers to the need case for the authorised development set out in Application Document 7.1 (C) Planning Statement [AS-057], Application Document 9.129 Applicants Response to 2GEN1 and 2GEN2 in respect of Need [REP5-142] and Application Document 7.2 Strategic Options Back Check Report [APP-320]; and the considerable policy support for it set out in [AS-057]. Refer also to the Applicant’s response to 2GEN1 within Application Document 9.131 Applicant’s Comments on Responses to Second Written Questions [REP6-106].
2.	The claim by the Applicant of ‘unmet need’ for the Sizewell Generation Group:	The predicted output of SZB following its proposed lifetime extension and SZC, along with Greater Gabbard, Galloper wind farms and SPR EA1N and EA2 means that this area is not deficient of power, nor will it be even if the weather conditions are not conducive for wind generation. There is capacity for any excess volume of generation over demand to be transmitted via the 400KV lines with the upgrade reconducting included in the SZC DCO. There is no need for SeaLink to facilitate SZC, and this was not mentioned or examined in the DCO for SZC.	Please refer to documents above within which the Applicant has detailed its needs case, which it considers to be evidenced, consistent, and robust. REP5-142 contains specific discussion about the submissions relating to the Sizewell Generation Group and also the circumstances in which it may be necessary to transfer electricity from Suffolk to Kent and vice versa.

Reference	Matter	Point Raised	Applicant's Comments
		Reconducting (as required anyway for SZC) if completed with the newest technology (high thermal conductors) will increase load capacity for a much smaller cost than for Sealink. (SCC Report Sept 2023 reference to The Hoiorns Report para 10.6.2-10.6.3, pgs 32-33 explains). As such Sealink is not economic or efficient in comparison - so does not meet EN1 3.3.78. Our tourism economy generates £36B in visitor spend per year. With 245M visitors per year visiting National Landscapes and National Parks. This has to be included. The offer of connection in the 'Leiston area' somewhere on the 400KV line for SPR EA1N and EA2 was a false offer, as it was based on 'spare capacity' being available. And should have been discounted by SPR. If there is excess wind energy from SPR EA1N and EA2 which needs to be exported to elsewhere in the UK or to Europe, then this power should not come ashore and go to Friston substation, only to go to a new Converter station and leave the shore out to sea via Sealink. It should be transmitted from source of generation via an offshore Converter station, as being built for other projects. Nautilus has been removed from the calculation for the 'Sizewell Generation Group' with landfall now at Isle of Grain. And Sealink can not be perceived as a reinforcement or risk/fault back up for the main Bramford to Rayleigh line, as it is not part of this network.	
3.	That National Landscapes should be subject to an exceptional need case test:	The National Planning Policy Framework continues to require that 'greater weight' be given to conserving and enhancing scenic beauty, and scenic beauty is evidenced as a protective factor to balance mental health and well-being. In 2023 the Levelling up and Regeneration Act requires local Planning Authorities to "seek to further" not just have "regard to" the purpose of National Landscapes and National Parks. This enhanced duty could translate to a requirement for Bio- diversity Net Gain or legacy beyond just mitigation for that harmed. "To further" implies the need to protect natural beauty, wildlife and cultural heritage of this area, and must make it harder for damaging development to gain approval, especially where harms cannot be completely avoided, reduced, mitigated or compensated. ExA authority must consider how the protected landscape area can be "unharmd" overall by the project, which is a very high benchmark.	The Applicant has submitted a note expressly addressing section 85 of the Countryside and Rights of Way Act 2000 and the duties relating to National Landscapes: see Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120] .
4.	Government targets for 2030 should not be used inappropriately to support development of inappropriately located infrastructure:	National Landscapes Association September 2025 states that "the health of our environment underpins the health of our economy and the health of our people". And "skewing this balance (for the sake of 2030 targets) will have devastating consequences." The national 'Needs case' for an effective transmission network should not be confused with a needs case for location specifically here. There is no doubt that a coordinated, strategic review is needed.	The need case for Sea Link is set out in several application documents, primarily the Strategic Options Back Check Report [APP-320], the Planning Statement [AS-057], and the Design Development Report [APP-321]. The Applicant considers that national policy set out in NPS EN-1 is the proper and appropriate policy document for assessing projects.

Reference	Matter	Point Raised	Applicant's Comments
		There are also Government targets to “conserve 30% of land for nature by 2030”. The need to prioritise the delivery of renewable energy, although “will in general outweigh any other residual impacts not capable of being addressed by the application of the mitigation hierarchy” (Ex1.2.5) is not to be at the expense of National Landscapes. It is a dangerous precedent if infrastructure for previously agreed NSIPs (such as the SZC Link Road) is allowed to be used to facilitate further projects, which bring additional harm in areas of National Landscape. The Applicant (5.2.30) refers to more energy across London and in Kent and the need to exchange more energy with Europe (as a financial model, as well as in theory to increase stability of supply). If you consider a map of Europe and the UK it is more beneficial to connect direct to Kent from Belgium/Netherlands. And direct to Norfolk from Germany. This would also avoid the protected Coraline Cragg off the Suffolk Coast, and reduce risk of crossing existing cables and tunnels connected with SZB and SZC. The Tarchon project seeks to bring only 1.4GW power to and from Germany to Tendring, Essex. One must consider if it would be better and more effective to have greater volume of power in less connections, rather than a multiple series (each less than or equal to only 2GW each)? NPS EN-5 references the Horlock Rules providing guidelines for the siting of substations (and one can infer convertor stations) should “seek to avoid altogether internationally and nationally designated areas of the highest amenity, cultural or scientific value” by the overall planning of the system connections. Therefore NGET should be held account to provide a solution to do so. Policy SCLP10.4 (Landscape Character: of the East Suffolk Local Plan 2020 states that “development will not be permitted where it would have a significant adverse impact on the natural beauty and special qualities of the Suffolk Coasts and Heaths” (now called National Landscapes). As such the greatest possible weight must be given to protection, and any need must be 100% proven. And mitigation or compensation cannot be added as ‘benefit’ to strengthen the argument of ‘need’ by the Applicant. It is to redeem against loss and harm, it is not a benefit. The Applicant has sort to add weight to the need argument, by listing perceived benefits to the UK of the scheme. However, these benefits would be created where ever the project was located or if the project was delivered by a different model such as an offshore mesh and hybrid connectors with offshore convertor stations. In conclusion there is a great deal of evidence which requires an ISH to examine the case for ‘need’ as presented by the Applicant which underpins this whole application.	

8. Applicant’s Comments on the Submission from Paul Bongers de Rath

8.1 Introduction

8.1.1 Table 8.1 summarises the Applicant’s comments on Paul Bongers de Rath Deadline 6 Response [REP6-146].

Table 8.1 Applicant’s Comments on the Paul Bongers de Rath Deadline 6 Submission [REP6-146]

Reference	Matter	Point Raised	Applicant’s Comments
		I strongly oppose the SeaLink project and do not think it should be granted a DCO. My objections to the project are as follows: 1. As a matter of principle, large energy infrastructure projects should never be allowed in AONBs/ Protected Landscapes other than in highly exceptional circumstances which are set out in advance by Ministers in conjunction with the local authorities.	The impact of infrastructure has been considered fully in the assessment of landscape and visual effects (including the effect of transmission infrastructure) in Application Document 6.2.3.1 Part 3 Kent Chapter 1 Landscape and Visual [APP-061] which has been undertaken using worst-case scenario parameters. National Policy Statement EN-1 sets out the relevant policy test for assessing the landscape impacts of NSIP projects landscape.
		2. The case for pursuing SeaLink has not been made convincingly. Responsible opinion suggests that the claimed benefits could be obtained much more cheaply and with much less disruption through the reconfiguration of existing overhead cables to Bramford and in Kent.	The need case for Sea Link is set out in several application documents, primarily the Strategic Options Back Check Report [APP-320], the Planning Statement [AS-057], and the Design Development Report [APP-321]. The need for the Proposed Project is set out throughout the DCO Application, most recently in REP5-142.
		3. The construction of SeaLink’s onshore infrastructure would cause considerable damage to nature and wildlife in areas designated for a high level of official environmental protection.	There are numerous lighting protections during construction and operation secured in the REAC.
		4. In this area close to the Sizewell C project now underway construction traffic would add to existing cumulative impacts on the inadequate main road A12 and on the local network of rural roads which are unsuitable to carry high numbers of HGVs.	The Traffic and Transport cumulative assessment within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060] has been based on a worst-case scenario of peaks overlapping, and is robust.
		5. The imposition on the small historic market town of Saxmundham of a large industrial building as a converter station, generating disruption, noise and drainage issues, is unacceptable. Extending this site as proposed for a second converter station for LionLink compounds the offence.	This concern is noted.
		6. National Grid’s confused approach to providing access to this converter station site via Benhall Bridge and a new River Fromus crossing suggests an alarming lack of understanding and forward planning.	The Applicant’s approach has been clear and comprehensive. The Applicant presented three distinct options for managing the crossing for surety (see the crossing feasibility study [REP4-101])

Reference	Matter	Point Raised	Applicant's Comments
		7. The exceptionally large number of amendments to plans presented to PINS by National Grid also calls into question the soundness of the project.	It is ordinary for complex DCO projects to evolve in the course of the examination process.
		8. Construction of the proposed landfall on Aldeburgh's Haven Beach by horizontal direct drilling raises concerns about viability: a resort to open trench construction would be immensely damaging to a much loved recreational area and its adjoining wetland habitat. The landfall would also generate a serious traffic impact in Aldeburgh.	The Proposed Project is only seeking consent for trenchless techniques at the landfall, not open cut. It would not legally be possible to 'fall back' on open trenching without an amendment to the DCO.
		9. The economy of Aldeburgh is heavily dependent on tourism. Visitors, whether for traditional seaside pursuits or for the many cultural events and festivals that take place through the year, may be deterred from travelling here by the traffic congestion and air and noise pollution generated by the energy projects, causing losses to accommodation providers, hospitality businesses, and local shops.	Impacts on tourism have been carefully considered, and the Applicant has assessed that no significant impacts on tourism are likely – see Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-economics, Recreation and Tourism [REP1A-005].
		10. At this time of heightened international tensions, the concept of concentrating a significant proportion of UK energy production and distribution in a small area of East Suffolk gives rise to major concerns over public safety. In short, SeaLink should not proceed. Better options for achieving its stated objectives are available. The project should be brought to a halt before further irremediable damage is caused	The Applicant has had regard to security issues – see its response to 1GEN2 in Document 9.73: Applicant's Responses to First Written Questions [REP3-069].

9. Applicant’s Comments on the Submission from Roger Skinner and Wendy Skinner

9.1 Introduction

- 9.1.1 Table 9.1 summarises the Applicant’s comments on Roger Skinner Deadline 6 Response [REP6-147].
- 9.1.2 Table 9.2 summarises the Applicant’s comments on Wendy Skinner Deadline 6 Response [REP6-151].

Table 9.1 Applicant’s Comments on the Roger Skinner Deadline 6 Submission [REP6-147]

Reference	Matter	Point Raised	Applicant’s Comments
	Objection to the Scheme	Action point 27 Compulsory Acquisition Hearing 2 Interested party numbers AP209 and AP263 The Objectors have previously objected to the Scheme (RR-4578 and RR-5610). They are listed in the Book of Reference as having Category 2 and Category 3 interests in land within the proposed Scheme Order limits, namely in plots 1/2, 1/ 4, 1/5, 1/7, 1/8, 1/9, 1/10, 1/11. The Objectors are accordingly ‘Affected Persons’ for the purposes of the Planning Act 2008; they object to the compulsory acquisition of land/ compulsory creation of rights over land in which they have interests for the Sea Link Scheme proposal.	Noted thank you.
		Land immediately adjacent to the east and south of their home and grounds is within the Scheme Order limits; Two boundaries of their property sit in close proximity to the Scheme Order limits. The Scheme Promoter acknowledges that the Objectors have Category 2/3 interests in land which is required to deliver the Scheme. The Objector’s home (a listed Grade II building) and its gardens and setting, in which they have made a significant investment to refurbish, maintain and cherish to a high standard, will be negatively impacted by the Scheme proposals; views to and from their property will be adversely affected. The Objectors do not accept the Scheme promoters’ assertion that there will not be any significant impact on the setting of their home (as a heritage asset). If the Scheme is confirmed and implemented The Objector’s home will be subject to intrusive, adverse and ongoing impacts in terms of construction disruption, noise, increased traffic, dust, vibration artificial light etc flowing from the authorized works which will impact on their enjoyment of their property as their home and which represents an unwarranted interference with their expectation of and right to quiet enjoyment.	The Application is supported by a full environmental impact assessment that assess the impacts of the Proposed Project, including on heritage assets. The Application includes a robust set of environmental undertaking and commitments which are secured in the Draft DCO.
		Their home will be blighted by the Scheme proposals which will impact not only on their enjoyment and use of their home but also its value.	Statutory Blight is a mechanism whereby a property owner can bring forward the intended purchase of a property. It only applies where a developer intends to purchase the property to deliver the scheme. There are some useful Government Guides in relation to the impact of Compulsory Purchase, available at Compulsory

Reference	Matter	Point Raised	Applicant's Comments
			purchase and compensation: guide 1 - procedure - GOV.UK with Guides 1 and 4 being the most applicable.
		This compulsory acquisition proposal represents a serious interference with the family's right to private and family life and property.	One of the tests of Compulsory Acquisition is that the public benefit must outweigh the private loss. This information and how the Applicant believes it has met the necessary tests is set out in the Statement of Reasons (REP6-008).
		The proposed use of compulsory acquisition powers in relation to land in which The Objectors have an interest is unjustified and disproportionate; no attempt has been made by National Grid to engage meaningfully with The Objectors to discuss ways of minimizing/ alleviating any likely impacts on their home and its grounds.	The Applicant is not seeking any land interest or property rights from this affected party. Their Category 2 interest is in relation to the services supplying the objector's property. There is no impact to these services. They will be maintained at all times. Their Category 3 interest is where an owner may be in a position to bring about a claim for loss due to the construction or operation of the scheme. There are some useful Government Guides in relation to the impact of Compulsory Purchase, available at Compulsory purchase and compensation: guide 1 - procedure - GOV.UK with Guides 1 and 4 being the most applicable.
		The lack of any discretionary purchase scheme offered by the Scheme promoter effectively means that The Objectors will not be able to move away from their home except at a financial loss in circumstances where the blighting impact of the Scheme makes it difficult for them to continue living there or where they may have other compelling reasons for needing to move away.	The Compensation Code adequately addresses any property impact without the need for a separate purchase scheme. There are some useful Government Guides in relation to the impact of Compulsory Purchase, available at Compulsory purchase and compensation: guide 1 - procedure - GOV.UK with Guides 1 and 4 being the most applicable.
		National Grid should not be allowed to proceed with the Scheme without the introduction of a discretionary purchase scheme which would offer blighted home-owners some form of redress.	The Applicant is not aware that this owner has taken the necessary steps to market their property or has any intention of moving house. Should this not be the case we would be pleased to engage with this property owner.

Table 9.2 Applicant’s Comments on the Wendy Skinner Deadline 6 Submission [REP6-151]

Reference	Matter	Point Raised	Applicant's Comments
	Objection to the Scheme	Action point 27 Compulsory Acquisition Hearing 2 Interested party numbers AP209 and AP263 The Objectors have previously objected to the Scheme (RR-4578 and RR-5610). They are listed in the Book of Reference as having Category 2 and Category 3 interests in land within the proposed Scheme Order limits, namely in plots 1/2, 1/ 4, 1/5, 1/7, 1/8, 1/9, 1/10, 1/11. The Objectors are accordingly ‘Affected Persons’ for the purposes of the Planning Act 2008; they object to the compulsory acquisition of land/ compulsory creation of rights over land in which they have interests for the Sea Link Scheme proposal.	Noted thank you.

Reference	Matter	Point Raised	Applicant's Comments
		Land immediately adjacent to the east and south of their home and grounds is within the Scheme Order limits; Two boundaries of their property sit in close proximity to the Scheme Order limits. The Scheme Promoter acknowledges that the Objectors have Category 2/3 interests in land which is required to deliver the Scheme. The Objector's home (a listed Grade II building) and its gardens and setting, in which they have made a significant investment to refurbish, maintain and cherish to a high standard, will be negatively impacted by the Scheme proposals; views to and from their property will be adversely affected. The Objectors do not accept the Scheme promoters' assertion that there will not be any significant impact on the setting of their home (as a heritage asset). If the Scheme is confirmed and implemented The Objector's home will be subject to intrusive, adverse and ongoing impacts in terms of construction disruption, noise, increased traffic, dust, vibration artificial light etc flowing from the authorized works which will impact on their enjoyment of their property as their home and which represents an unwarranted interference with their expectation of and right to quiet enjoyment.	The Application is supported by a full environmental impact assessment that assess the impacts of the Proposed Project, including on heritage assets. The Application includes a robust set of environmental undertaking and commitments which are secured in the Draft DCO.
		Their home will be blighted by the Scheme proposals which will impact not only on their enjoyment and use of their home but also its value.	Statutory Blight is a mechanism whereby a property owner can bring forward the intended purchase of a property. It only applies where a developer intends to purchase the property to deliver the scheme. There are some useful Government Guides in relation to the impact of Compulsory Purchase, available at Compulsory purchase and compensation: guide 1 - procedure - GOV.UK with Guides 1 and 4 being the most applicable.
		This compulsory acquisition proposal represents a serious interference with the family's right to private and family life and property.	One of the tests of Compulsory Acquisition is that the public benefit must outweigh the private loss. This information and how the Applicant believes it has met the necessary tests is set out in the Statement of Reasons (REP6-008).
		The proposed use of compulsory acquisition powers in relation to land in which The Objectors have an interest is unjustified and disproportionate; no attempt has been made by National Grid to engage meaningfully with The Objectors to discuss ways of minimizing/ alleviating any likely impacts on their home and its grounds.	The Applicant is not seeking any land interest or property rights from this affected party. Their Category 2 interest is in relation to the services supplying the objector's property. There is no impact to these services. They will be maintained at all times. Their Category 3 interest is where an owner may be in a position to bring about a claim for loss due to the construction or operation of the scheme. There are some useful Government Guides in relation to the impact of Compulsory Purchase, available at Compulsory purchase and compensation: guide 1 - procedure - GOV.UK with Guides 1 and 4 being the most applicable.
		The lack of any discretionary purchase scheme offered by the Scheme promoter effectively means that The Objectors will not be able to move away from their home except at a financial loss in circumstances where the blighting impact of the Scheme makes it difficult for them to continue living there or where they may have other compelling reasons for needing to move away.	The Compensation Code adequately addresses any property impact without the need for a separate purchase scheme. There are some useful Government Guides in relation to the impact of Compulsory Purchase, available at Compulsory purchase and compensation: guide 1 - procedure - GOV.UK with Guides 1 and 4 being the most applicable.

Reference	Matter	Point Raised	Applicant's Comments
		National Grid should not be allowed to proceed with the Scheme without the introduction of a discretionary purchase scheme which would offer blighted home-owners some form of redress.	The Applicant is not aware that this owner has taken the necessary steps to market their property or has any intention of moving house. Should this not be the case we would be pleased to engage with this property owner.

10. Applicant’s Comments on the Submission from Save Minster Marshes

10.1 Introduction

- 10.1.1 Table 10.1 summarises the Applicant’s comments on Save Minster Marshes Deadline 6 Response [REP6-148] on ISH3 and Deadline 6.
- 10.1.2 Table 10.2 summarises the Applicant’s comments on Save Minster Marshes Deadline 6 Response [REP6-172]
- 10.1.3 Table 10.3 summarises the Applicant’s comments on Save Minster Marshes Deadline 6 Response [REP6-173]

Table 10.1 Applicant’s Comments on the Save Minster Marshes Deadline 6 Submission [REP6-148]

Reference	Matter	Point Raised	Applicant’s Comments
Matters arising from ExQ3			
2-4	Benthic ecology	Agenda Item 2 concerns matters arising from the ExA’s third written questions (ExQ3) published on 23 March 2026. Question 3BE5 of ExQ3 relates to benthic mitigation plans and monitoring conditions. The Applicant at paragraph 2.9.6 of Rep5-022 states as follows: <i>“At the Kent Landfall, the entry/exit points will be located within the intertidal range, located within an area of mudflat (Figure 6.4.4.2.4 Habitats Present at, and Location of, Trenchless Solution Entry/Exit Points in Application Document 6.4.4.2 ES Figures Marine Benthic Ecology). Intertidal mudflat is listed as a Habitat of Principal Importance under Section 41 of the NERC Act (2006). However, infaunal species associated with these habitats, such as L. conchilega, M. balthica and H. diversicolor, exhibit rapid recovery to disturbance (McQuillan, et al., 2024; Tillin, et al., 2024). Therefore, intertidal mudflats have a low sensitivity to temporary physical disturbance.”</i> The Applicant claims intertidal mudflats have “low sensitivity” and that infaunal species have a “rapid recovery” to disturbance. Information provided by the Marine Life Information Network, however, indicates that species such as Macoma balthica and Laniche conchilega are “highly” intolerant to substratum loss (which would be a direct result of the dredging and rock matting works being proposed).³ It is unclear how the Applicant has been able to square this apparent inconsistency (between the high benthic intolerance of these species on the one hand, and the conclusion that the mudflat habitats will be able to tolerate any temporary disturbance on the other). SMM would invite the Applicant to clarify this point. It would also be of assistance if the relevant statutory bodies could comment on whether they agree with the Applicant’s conclusions on this issue.	The Applicant notes that questions in relation to the potential for disturbance at Pegwell Bay have been addressed and updates were made to Application Document 6.2.4.2 (F) Part 4 Marine Chapter 2 Benthic Ecology. However, for information for SMM some of this detail is provided below. The duration of the Pegwell Bay installation activities, and hence disturbance to the mudflats, is periodic and short-term. It includes construction of the HDD exit pit and the subsequent cable pull in and burial in the mudflats. Where small areas of sediment are excavated, such as for the cofferdam and the cable trenching and burial, these will be backfilled using excavators. It is also known that the benthic communities will not exhibit any long-term effects from such temporary disturbance. In particular, benthic surveys at Pegwell Bay, to investigate the effect of cable installation by trenching across the mudflats, were undertaken for the NEMO cable installation project. The Nemo Link Interconnector Year 3 Post-Construction Intertidal Technical Report (MarineEco, 2020) reports that “following an initial decrease in abundance and diversity in 2018, intertidal communities have been resilient to the physical disturbance resulting from the burial of the cable in 2017. Natural tolerance coupled with fast natural recruitment has resulted in a rapid recovery of faunal communities in 2020”. Furthermore, the monitoring report also states ‘data collected during the year-one and year-three post-construction surveys showed that the loss of intertidal fauna was localised and temporary, and by 2020 faunal communities and habitats present along the cable route reflect those seen during the baseline survey’. ⁰The only other activities at Pegwell Bay, that have the potential to cause disturbance to benthic habitats, involve the movement of plant and vehicles across the mudflats within the Order Limits, during the different stages of the construction period. All plant and vehicles operating on the mudflats in Pegwell Bay will be low ground pressure (LGP) vehicles. For example, the typical ground pressure for a 36-ton excavator on standard tracks is approximately 8-9 psi (pounds per square inch), which is lower than the pressure exerted by the average human, of 8 to 16 psi of ground pressure while standing. Thus, disturbance from the movement of LGP plant and vehicles will be limited to tracks and shallow indentations on the surface of the mudflat, which will be undetectable after a single, or at most, a few tidal cycles. The possible placement of protective mats at the Nemo and Thanet cable crossings, between the

Reference	Matter	Point Raised	Applicant's Comments
			hoverport and the HDD work area, will also minimise potential disturbance to the existing cables, and hence the mudflat, from transiting plant and vehicles. A detailed description of the construction works in Pegwell Bay is provided in Application Document 9.13 Pegwell Bay Construction Method Technical Note.
5	Benthic ecology	Furthermore, at paragraph 2.9.16 of REP5-021, the Applicant states that “ <i>The placement of protective mats between the hoverport and the HDD work area will minimise disturbance to the mudflat from transiting plant and vehicles.</i> ” SMM questions how this is possible when the flats contain soft-bodied invertebrate species (including those identified above) which are a principal food source for wading birds, and where 20 tonne vehicles will be driving over them. The protective mats do not address the crushing of benthic fauna beneath them.	The Applicant refers SMM to the response above and the use of low-ground pressure vehicles at Pegwell Bay, which will limit impacts to infaunal communities. The Applicant has identified in the assessment in Application Document 6.2.4.2 (F) Part 4 Marine Chapter 2 Benthic Ecology there is potential for some mortality of infaunal invertebrates but these communities are generally rapidly reproducing and effects will be temporary. As evidenced by the benthic monitoring for the Nemo project, also reference above, any effects to benthic infaunal communities were temporary.
6	Benthic ecology	At paragraph 2.9.17 of REP5-021, the Applicant claims that disturbance will be limited to “the top 30 cm of sediment” and that fauna are “generally restricted” to this zone. SMM seeks clarification as to how restricting disturbance to this zone, where the fauna actually reside, constitutes adequate mitigation. The logic of this statement is unclear.	The reference to disturbance being limited to the top 30 cm of the sediment is not meant as a mitigation measure, rather part of an argument about the extent of disturbance to benthic communities. Disturbance activities go much deeper than this (to around 2 m at the HDD exit pit for example) but disturbance to animals is limited to where there animals actually reside, which is the top 30 cm of the mudflat. It was included to demonstrate that not all areas disturbed support infaunal.
7	Benthic ecology	At paragraph 2.9.19 of REP5-021, the Applicant states it will prepare a “Benthic Mitigation Plan” in consultation with stakeholders. SMM requests that the Applicant provide examples of working Benthic Mitigation Plans that have been successfully implemented in comparable projects, so that stakeholders can understand what such a plan might involve and assess its likely effectiveness.	The Applicant confirms that as part of consultation with Natural England, an Outline In-Principle Monitoring Plan was submitted at Deadline 6 (Application Document 9.140 Outline In-Principle Monitoring Plan [REP6-116]) and has been updated for Deadline 7 (Application Document 9.140 (B) Outline In-Principle Monitoring Plan) following calls with Natural England on the 14th and 16th April. REAC commitment BE06 was deleted at Deadline 6 Application Document 7.5.2 (D) Outline Offshore Construction Environmental Management Plan (Tracked) [REP6-073] and Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) (Tracked) [REP6-135] and has been replaced with a new commitment. REAC commitment BE05 was also updated at Deadline 6 to include specific reference to the Outline In-Principle Monitoring Plan [REP6-116]. BE05 has subsequently been further updated in Application Document 7.5.2 (E) Outline Offshore Construction Environmental Management Plan and Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 7: In accordance with the Environmental Principles set out in the Outline Cable Specification and Installation Plan, where benthic habitats of principal importance (qualifying as Habitats Regulations Annex I habitats; Natural Environment and Rural Communities or (NERC) Section 41 habitats and species) are identified during pre-construction surveys and additional mitigation is required to avoid or reduce impacts on these habitats, National Grid must prepare a Benthic Mitigation Plan. Any necessary Benthic Mitigation Plan(s) must be submitted to and approved in writing by the MMO prior to Work 6 in the dML commencing and should include a timetable for implementation of the mitigation and details of any necessary monitoring. Any agreed mitigation and/or monitoring must be implemented in accordance with the agreed timetable. A monitoring plan, in substantial accordance with the outline In-Principle Monitoring Plan will be submitted to the MMO (unless otherwise agreed in writing by the MMO) within three months of the 'as-built survey'

Reference	Matter	Point Raised	Applicant's Comments
8	Benthic ecology	At paragraph 2.9.45 of REP5-021, the Applicant acknowledges that up to 40m³ of drilling fluid will be discharged at the Kent landfall. Bentonite, although of low toxicity, has a smothering effect on sediment given that it is a clay. The Applicant's position appears to be that this is simply an acceptable by-product of the project in this sensitive Ramsar location. SMM questions whether this is appropriate and invites the ExA to seek the views of Natural England on whether this is acceptable in a site of such environmental sensitivity.	All drilling fluids used, such as bentonite, will be selected from the OSPAR List of Substances/Preparations Used and Discharged Offshore (2021) which are considered to 'Pose Little or No Risk to the Environment' (PLONOR). Additionally, where entry/exit points are in the intertidal area (i.e. at the Pegwell Bay landfall) drilling fluid will be captured where possible (control measure LVS05 in Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan and Application Document 9.84 Register of Environmental Actions and Commitments (REAC)). Therefore, the magnitude of any changes to marine water quality from the use of drilling fluids is considered to be small. The Applicant has also committed (commitment B59) to preparing HDD Landfall Method Statements and Drilling Fluid Management Plans for both the Kent and Suffolk landfalls in consultation with key stakeholders and to using hand-held low pressure pumps only to flush saltmarsh habitat in the event of a frac-out (B61). Both these commitments are included in Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan and Application Document 9.84 Register of Environmental Actions and Commitments (REAC)).
Item 3: Water Environment			
9 - 10	Flood risk-outstanding documents	During ISH3 we heard from the Environment Agency that a considerable number of documents still need to be submitted by the Applicant, including an updated Flood Risk Assessment. The Environment Agency were clear that there are several topics on which it requires more information in order to "take a view" and decide whether the proposals are "acceptable" from a flood risk perspective. In respect of Kent, some of the key outstanding issues included temporary crossings and the loss of flood storage during the construction phase. While the Environment Agency indicated these issues were "capable" of resolution in principle, crucially, this depends on the right evidence base being presented. We are a considerable way into the Examination process. There is now limited time remaining for these documents to be put before the ExA, and for all consultees and interested parties to be able to consider them. The DCO process is intended to be "front-loaded", and it is highly unsatisfactory that the Applicant has failed to come to the start of the Examination with the majority of this work already completed, as it ought to have done so.	At deadline 6 the Applicant submitted an update to the Flood Risk Assessment 6.8 (B) Flood Risk Assessment [REP6-052]. The update provides additional flood risk and coastal erosion information and assessment to address and resolve all remaining flood risk matters that were under discussion with the Environment Agency. It is in no way unusual for an applicant to engage with a statutory consultee and for documents to be updated and evolve over the course of an examination.
11 - 13	Groundwater flooding	The ExA will be aware of recent additional submissions made by SMM in respect of flooding at Minster Marshes due to high groundwater. SMM submitted video footage and, at the ExA's request, a map of the extent of the marsh and recent flood warning advice for the area. It is not clear to SMM that these concerns have been properly addressed by the Applicant in REP5-122, let alone resolved. The Applicant's response in section 3 of REP5-122 is as follows: "3.1.2 The footage shows agricultural fields with a patchy coverage of shallow water that has ponded on the surface. It is understood Save Minster Marshes' concern is that the site is prone to groundwater flooding and the land is also referred to as a floodplain. However, as described in Section 2, the observed conditions are not driven by groundwater rising from the bedrock. With regard to the area functioning as a floodplain, the video footage shows no evidence of the local watercourses having overtopped their banks and the shallow water is standing, not flowing anywhere.	The Applicant's assessment of groundwater flooding risks have been scoped through engaging with the Environment Agency and Kent County Council. As noted by the Environment Agency at Issue Specific Hearing 3, no matters linked to groundwater flooding are unresolved. Kent County Council has confirmed in their deadline 6 submission Responses to ExQ3 (if required) [REP6-265] that they defer to the Environment Agency's expertise on groundwater flood risk. The groundwater flood risk alert for East Kent issued by the Environment Agency in February 2026 is addressed by the Applicant in REP5-122, which confirms that the alert was targeted to several listed specific areas in east Kent and each of these areas is underlain by unconfined chalk bedrock, with no lower permeability deposits, a markedly different geology to that within the proposed Minster Converter and Substation site.

Reference	Matter	Point Raised	Applicant's Comments
		3.1.3 A review of the ground elevations using LIDAR data (Department for Environment, Food & Rural Affairs, 2025) shows that the observed areas of ponded water generally align with the lowest elevations in the landscape. The waterlogging that is seasonally experienced is therefore considered to be driven by the poor drainage characteristics of the land which does not allow rainfall to freely soak away. Conditions as shown within the drone footage are representative of a very sustained period of rainfall, between December 2025 and February 2026. 3.1.4 Save Minster Marshes also raise concerns about the Proposed Project reducing the ability of the land to 'store' water. However, within the Proposed Project's footprint all new areas of impermeable land cover would be served by drainage infrastructure, including the creation of large, shallow basins. The basins would hold both direct rainfall (i.e. rainfall which in wet periods would temporarily sit on the surface of the fields as observed in the drone footage), as well as accommodate rainfall runoff from the permanent above ground infrastructure. Sufficient capacity would be provided to allow discharges back to the surrounding ditch network at pre-development (greenfield) rates. The current function of the land in providing temporary storage for rainfall would therefore be formalised within the basins, compared to the existing ad-hoc ponding that is experienced across the site. Specific details of the drainage strategy are included in Application Document 9.17.2 (B) Kent Drainage Strategy submitted at Deadline 5." As set out above, the Applicant's overall response is to say that flooding conditions are simply representative of sustained periods of rainfall, combined with poor infiltration properties of the soil, rather than an indication that this area is prone to groundwater flooding or acts as functional floodplain. It appears therefore that groundwater flooding is still not considered by the Applicant to be a considerable risk despite the evidence provided in SMM's submitted videos and the local flood risk alerts. In light of this, we would respectfully suggest that it would be appropriate if the relevant statutory bodies (particularly Environment Agency) can comment on whether they agree with the Applicant's conclusions on this issue.	
14	Groundwater Flooding: Ground Investigation report by Mott MacDonald (APP-171)	a) The Applicant claims that groundwater levels are not high; however, this is inconsistent with its own surveys in APP-171 which state that borehole R22 BH501 flooded to 0.1m above ground level for four visits in a row (see p.48). This borehole appears to have been discounted in the Applicant's assessment, with no justification given for ignoring those findings and their potential implications for identifying whether there are any groundwater flooding issues. b) The Applicant states at p.117 that "Low-lying ground and poor drainage characteristics of the shallow geology present a risk of temporary flooding, for which SuDS drainage is unlikely to be feasible". Page 102 of APP-171 shows 5/26 that at the proposed converter site the tidal flat deposits have very high sulphate levels (2000mg/l) and even higher at the Thanet Formation (2200mg/l). SMM is concerned that the construction methods proposed by the Applicant risk forcing sulphate-rich solutions into the draining ditches and River Stour. c) The Applicant proposes the use of Controlled Modulus Columns (p.106) – a method which would involve using a displacement auger (between 250mm and 500mm in diameter) to displace soil laterally up	Application Document 6.2.3.5 Kent Chapter 5 Geology and Hydrogeology [APP-065] Paragraph 5.7.29 acknowledges that groundwater is likely to be close to the surface at the proposed Minster Converter and Substation sites. The referenced borehole (R22 BH501) is one of a number of exploratory holes that were completed as part of preliminary ground investigations. Application Document 6.3.3.5.D Generic Quantitative Risk Assessment – [AS-051] indicates that trial pits close to BH501 and within the footprint of the converter and substation sites were completed to depths of up to 3.5m below ground level without encountering groundwater. Application Document 9.99 Groundwater Flood Risk at the Minster Converter Station Site [REP5 -122] Section 2.3 describes the geology and hydrogeology at the Minster Converter and Substation site, including that groundwater is shallow, and consistent with the flat low elevation setting within the general area. 9.32 Minster Converter Station Ground Conditions and Water Management – Technical Note [REP6-127] submitted at Deadline 6, provides further detail on the surface water and groundwater quality management and pollution control measures that would be adopted at the Minster Converter and Substation construction sites.

Reference	Matter	Point Raised	Applicant's Comments
		to depths of 50m, with the resulting space filled with concrete to produce columns. There could therefore be as many as 22,500 such columns for the Minster Converter Station, displacing up to 16,000m³ of material containing water with high sulphate levels. Further, given that these columns only stabilise the land, there would still need to be aggregate placed on top to produce a 2m high stable platform to enable the installation of the main foundation piles. Again, it is not clear where this has been taken into account in the Applicant's analysis. d) Finally, it is not understood why the Applicant continues to rely on SuDS solutions despite the Ground Investigation Report by Mott MacDonald making it very clear that SuDS drainage is "unlikely to be feasible" (p.117)⁴ 4 SMM also notes that the adjacent BESS site (planning application F/TH/20/1467) ruled out SuDS because of shallow groundwater and was required to discharge straight to the River Stour. This approach from an immediately adjacent site casts further doubt on the Applicant's reliance on SuDS solutions in this location	Appendix A of this document includes the core principles and standard water protection measures that will be developed in the Proposed Project's Environmental Management Plan, which will align with Application Document 7.5.3 (D) Outline Onshore Construction Environmental Management Plan submitted at Deadline 6. Monitoring would be undertaken to ensure full compliance with bespoke permit conditions, including routine onsite testing and laboratory analysis of discharge water for key permit parameters such as pH, suspended solids, oils, contaminants and site-specific parameters, which would be defined based on the results of the Proposed Project's Ground Investigation works. Monitoring would be adaptive, for example increasing in frequency during heavy rainfall events. Where water contains high concentrations of any parameter, treatment would be provided to achieve consentable limits as agreed with the Environment Agency. The comments relating to SuDS drainage excludes reliance of measures that incorporate infiltration to ground. There are many different forms of SuDS, suited to application under different site specific conditions. The Kent Onshore Scheme would be served by SuDS that provide for above ground storage basins, which hold surface water runoff and discharge it back to the local environment at controlled rates.
15	Groundwater flooding: Works Plan (REP4-007, p.5, work no.13)	Works Plan (REP4-007, p.5, work no.13) shows a temporary drainage pond directly positioned over the Minster Stream – a river recently declassified as a major river by the Environment Agency, which is also tidal like the Stour. Drainage ponds will be essential for haul roads, but the Applicant has left no room for drainage and clearly cannot position drainage infrastructure over the Minster Stream. SMM seeks clarification as to how this will be addressed.	The temporary pond will be formed using a shallow excavation and with an embanked perimeter, to create the storage volume required to attenuate surface water runoff, whilst excluding floodwaters from the River Stour, should there be a floodplain inundation during the construction period, and limiting potential for groundwater ingress. The design will be cognisant of the prevailing ground and groundwater conditions, as detailed in 9.17.2 (B) Kent Drainage Strategy [REP5-085] .
16	Groundwater flooding: REP4-086 (AP85)	Further, REP4-086 (AP85) states that the temporary drainage pond in the fluvial Flood Zone 3 of the River Stour will be in place for approximately two years. SMM questions how attenuation ponds can mitigate run-off when the water table is already found at 1.5m below surface. Once dug, these ponds will simply fill with groundwater and no additional capacity will be available.	
17	Groundwater flooding Document 9.101: Kent Onshore Scheme – Fluvial Flooding from the River Stour (REP4-096)	Document 9.101: Kent Onshore Scheme – Fluvial Flooding from the River Stour (REP4-096) addresses fluvial flooding but ignores groundwater flooding issues. Paragraph 2.3.2 states that final floodplain storage compensation proposals would be presented by the appointed contractor and secured through the REAC. SMM questions whether it is acceptable that floodplain compensation is still not planned at this late stage and is being left to the contractor to deliver post-consent.	This document was produced by the Applicant specifically to provide the information requested by the Environment Agency regarding development within the fluvial floodplain of the River Stour and the mitigation measures proposed to prevent fluvial flood risk increases. Mitigation for loss of floodplain attenuation capacity is secured by commitment W35 in 7.5.3 (D) Outline Onshore Construction Environmental Management Plan [REP6-074] , which was updated at Deadline 6. This states that where pylons and a temporary drainage pond would be located within the fluvial floodplain of the River Stour as part of the Kent Onshore Scheme, compensatory storage within the Order Limits will be provided for loss of floodplain storage, in accordance with a Floodplain Compensation Strategy detailed in the Drainage Management Plan that is secured under Requirement 6 of the DCO and to which the Environment Agency is a consultee.
18	Groundwater flooding	In addition to the above, the Environment Agency has stated that that a statement of common ground is "being prepared but not yet shared with the other party." SMM is concerned that this fundamental document has not yet been shared, and seeks clarification as to when this will be delivered and made available to interested parties.	The latest position between the Applicant and the Environment Agency is summarised in [REP6-162] . However, this does not reflect the contents of the Applicant's deadline 6 submissions, including the update to the FRA provided in 6.8 (B) Flood Risk Assessment [REP6-052] . The update provides additional flood risk and coastal erosion information and assessment to address and resolve all remaining flood risk matters that

Reference	Matter	Point Raised	Applicant's Comments
			were under discussion with the Environment Agency. The Environment Agency's latest position will be submitted at deadline 7.
19	Groundwater flooding	The Wantsum Channel is a former sea channel which once made Thanet an island, having silted up 900 years ago. Minster Marshes forms part of this former sea channel. It is unprecedented to build on a former silted-up sea channel at this scale anywhere in the world. Borehole data from West Stourmouth (once part of the Wantsum Channel) shows that saltwater was drawn in from freshwater boreholes, which would be an environmental disaster for the marshes if not contained. Given that the 1980s West Stourmouth borehole recorded saltwater at depth, SMM questions how the Applicant can maintain that the Tidal Flat Deposits act as a sealed aquitard, and seeks clarification as to the specific plan for disposing of saline effluent during dewatering.	Application document 6.3.3.5.B Qualitative Groundwater Risk Assessment – Kent [APP-170] describes that whilst small scale dewatering of rainwater and groundwater seepages from excavations are anticipated, dewatering that lowers groundwater levels, and might therefore draw surrounding groundwater towards the abstraction point, is not generally anticipated. Section 4.3 of the document includes a saline intrusion assessment, which concludes that there is a low risk of creating saline intrusion. If unexpected dewatering is found to be required (following detailed design), Commitment GH09 in 9.83 Outline Code of Construction Practice [REP4-232] secures the requirement for Hydrogeological Risk Assessment to be undertaken to assess the specific risks to groundwater and groundwater receptors at those locations and identify any additional mitigation or remediation that may be required (nature and scope to be agreed with the EA or other stakeholders as appropriate).
20 -22	Water Framework Directive	The Water Framework Directive 2000/60/EC (“the WFD”) established a strategic framework for protecting and improving the water environment in the European Union. The WFD was transposed domestically in England and Wales by the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 (“the WFD Regulations”). The key European case on the WFD is Case C-461/13 Bund für Umwelt und Naturschutz Deutschland e.V. v Bundesrepublik Deutschland (“Bund”), which confirmed that States are required, unless a derogation is granted, to refuse authorisation for an individual project where it may cause a deterioration of the status of a body of surface water or where it jeopardises the attainment of good surface water status or of good ecological potential and good surface water chemical status. Bund has been endorsed in subsequent cases, for example in Case C-535/18 Land Nordrhein-Westfalen, where the Court said (bold emphasis added): <i>“75. [...] when a project is liable to have adverse effects on water, consent may be given to it only if the conditions set out in Article 4(7)(a) to (d) of that directive are satisfied. Without prejudice to the possibility of judicial review, the national authorities which are competent to authorise a project are required to review whether those conditions are satisfied before the grant of such an authorisation (see, to that effect, judgment of 1 June 2017, Folk, C-529/15, EU:C:2017:419, paragraphs 36 and 39). 76. It follows from the foregoing that, during the procedure for approval of a project, and therefore before the decision is taken, the competent authorities are required, under Article 4 of Directive 2000/60, to check whether that project may have adverse effects on water which would be contrary to the requirements to prevent deterioration and to improve the status of bodies of surface water and groundwater. That provision therefore precludes such a check from taking place only after that time.”</i> In other words, prior to granting consent, the Secretary of State is required to check for compliance with the WFD.	Noted. The Applicant has prepared a Water Framework Directive Assessment 6.9 Water Framework Directive Assessment [APP-293].
23-24	Water Framework Directive	For the purposes of NSIP applications, the Planning Inspectorate's Guidance states that the WFD applies as follows (emphasis added):	In accordance with the requirements of EN-1, the Applicant has provided the following plan 2.11 Water Bodies in the River Basin Management Plans [CR1-022] that identifies water bodies from the relevant river basin management plans and has presented an assessment of any effects on such bodies likely to be caused by the

Reference	Matter	Point Raised	Applicant's Comments
		<i>“When deciding NSIP applications, the Secretary of State will need to consider the potential effects of any proposed development on:</i> <i>• the environmental objectives and measures within River Basin Management Plan and any supplementary plans and</i> <i>• the ability of the UK to comply with the WFD, including (if applicable) the derogation provisions of Article 4.7</i> <i>The Examining Authority for an NSIP application must also report on these effects and ensure the Secretary of State has enough information to decide whether the development has implications for the UK’s obligations under the WFD. This includes information in support of any derogation that may be sought.”</i> In this respect, EN-1 provides that an applicant’s environmental statement should contain information on impacts arising from the proposed development on water bodies or protected areas under the WFD (para. 5.6.17).7 Moreover, regulation 5(2)(l)(iii) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 requires applicants to provide a plan and information identifying water bodies in a river basin management plan, together with an assessment of any effects on such bodies likely to be caused by the proposed development.	proposed development within 6.9 Water Framework Directive Assessment [APP-293]; 6.2.2.4 Part 2 Suffolk Chapter 4 Water Environment [APP-051] and 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064].
25-27	Water Framework Directive	The Applicant has submitted document ‘6.9 Water Framework Directive Assessment’ (March 2025) which states that a screening assessment was undertaken in relation to the Sea Link project.8 The initial assessment undertaken in Stages 1 to 3 concluded that there was potential for negative effects linked to specific construction activities and some operational activities (paras Ex.1.3.1 and 5.1.3). The Stage 4 assessment, however, concluded that the residual effects “would be negligible following the implementation of the embedded and good practice measures” (paras Ex.1.3.1 and 5.1.6). Overall, the Applicant’s assessment concludes (para. 5.1.7): “... that the project is compliant with the objectives of the WFD, including preventing any deterioration in the status of a waterbody, and when considering the potential for cumulative effects. On this basis, no further assessment is proposed.” Although the Applicant has submitted that the project is “compliant” with the WFD, the ExA will of course need to be satisfied that the Secretary of State has sufficient information to decide whether the project has implications of the United Kingdom’s obligations under the WFD. In SMM’s view, insufficient information has been provided to satisfactorily show that there will be no significant WFD implications. In particular: a) The measures set out at Appendix A of Document: 6.9 Water Framework Directive Assessment are generic in nature, vague and often unenforceable e.g. “Land used temporarily will be reinstated where practicable”, “Where practicable, [fuels, oils and chemicals] will be stored >15 m from watercourses,” etc. These measures do not sufficiently demonstrate that deterioration will be prevented. It would therefore be of assistance if the measures relied upon by the Applicant could be drawn together into one place or, if they have already been provided, that the Applicant signpost where they are located. b) b) SMM provided REP1-2489 which covered a range of matters, including the impact of silt, phosphate, nitrates and pesticides on river bodies; as well as the construction impacts of the converter station on the River Stour. Many of these concerns have been ignored or remain	Point a - The Applicant prepared the assessment presented in 6.9 Water Framework Directive Assessment [APP-293] liaising closely with the Environment Agency. The measures set out in Appendix A of the document are commitments that are secured through inclusion within the 7.5.3 (D) Outline Onshore Construction Environmental Management Plan. This plan has been updated several times by the Applicant during the examination, to take on board comments and to address issues raised by key regulatory authorities. In the most recent iteration is provided as [REP6-075]. Point b – The Applicant directs the Interested Party to 9.32 Minster Converter Station Ground Conditions and Water Management – Technical Note [REP6-127]. The Applicant strongly refutes that the ExA and/or the Secretary of State does not have information and assessment before them that is of an adequate or appropriate standard to allow it to consider the potential effects of the proposals on the UK’s ability to comply with the WFD.

Reference	Matter	Point Raised	Applicant's Comments
		inadequately rebutted by the Applicant. Again, SMM requests that the Applicant signpost where these matters have been addressed, if indeed they have been. Given these issues, SMM's position is that the ExA cannot consider, to any adequate or appropriate standard, the potential effects of the proposals on the UK's ability to comply with the WFD, or to ensure that the Secretary of State has been furnished with sufficient information to assess the implications for the UK's obligations under the WFD, including whether to make a derogation.	
Item 4: Traffic and transport			
28.	Junction Capacity Modelling	SMM has outstanding concerns in relation to the Applicant's Junction Capacity Modelling: a) Abnormal Indivisible Loads (AILs) such as transformers and major converter station components require removal of street furniture, road widening, and temporary closures on routes including the A256 and local accesses (Ebbsfleet Lane and Sandwich Road). The project requires 75m transformer haul vehicles and 25m cable drum vehicles to service the six generators within the planned converter. While AIL routing and "managed road closures" are mentioned in general terms in the Outline Construction Traffic Management and Travel Plan (CTMTP, APP-338 / 7.5.1.2) and the Preliminary Environmental Information Report, they are not integrated into the junction capacity modelling itself. b) Further, the modelling relies on standard vehicle parameters and percentage flow increases rather than full capacity tools (e.g., ARCADY or similar) that factor in closures, temporary signals, or narrowed carriageways.	The Applicant has carried out junction capacity modelling in Kent as agreed with KCC Highways. As set out within KCC Highways' Deadline 6 submission [REP6-168], the specific modelled junctions were agreed between KCC and the Applicant, as these represented the junctions where the level of cumulative impact was considered to be the greatest and most indicative (Reference 23). In addition, KCC considers that sufficient evidence has been submitted by the Applicant to demonstrate the specific and cumulative impacts of the Proposed Project's construction phase (Reference 22). Therefore, further junction capacity modelling is not considered to be necessary. In terms of Abnormal Indivisible Loads (AILs), these will be managed through the measures set out within Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-064], which is secured under Requirement 6 of the DCO.
q	Junction Capacity Modelling	The Applicant also claims that any delays will be "negligible" on account of mitigation measures set out in the Outline CTMTP. These include routing measures, HGV booking systems, GPS tracking and temporary traffic management. This mitigation, however, is flawed in at least two serious respects: a) First, the junction models do not input the actual closures or furniture removals required for 75m AILs (see paragraph 29 above for full details of AIL requirements). b) Second, no allowance appears to have been made for the additional concrete movements from CMCs. As set out in paragraph 14(c) above, Controlled Modulus Columns for the Minster Converter Station would require approximately 4,000 concrete mixer HGV movements. At the Applicant's stated peak of 39 arrivals/day (APP-067, Table 7.28), this alone would take 52 days, exceeding current traffic forecasts. Until these flaws are addressed, the CTMTP cannot be relied on as "robust" mitigation. Further, more recent examination documents (including e.g. REP5 updates to the CTMTP and responses from Kent County Council) indicate that there are ongoing highway concerns about the scope of the Applicant's modelling, which only serves to confirm the deficiencies in the original Environmental Statement.	See response above. In addition, Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] is based on the busiest days of the construction programme in terms of total construction vehicle movements and HGV movements, to provide a worst-case assessment. The figures in Table 7.28 represent the daily construction vehicle peak of the A256 access (K-BM02) in 2026, which includes 39 HGV arrivals and 39 HGV departures per day. However, the peak in terms of HGV activity at this access (K-BM02) is expected to occur in 2028 as shown in Table 7.31, equating to 100 HGV arrivals and 100 HGV departures per day. This is the level of activity which has been assessed, accounting for peak construction activity associated with Minster Converter Station. The Applicant has assessed the maximum number of HGVs accessing the Minster Converter Station site via the main proposed site access on the A256 (access K-BM02). This response has also been provided to respond to ISH3 Action Point 24 within Application Document 9.135 Applicants Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110]. The Applicant updated and submitted Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-064] at Deadline 6 to reflect discussions held with KCC Highways on 31 March 2026. The Applicant does not consider there to be any on-going highway concerns or deficiencies in the Traffic and Transport assessment work that need to be addressed

Reference	Matter	Point Raised	Applicant's Comments
			and this position has been agreed by Kent County Council as local highway authority in its responses to this examination.
31-32	Traffic from the Port of Ramsgate	In addition, SMM notes that during ISH3 it was stated that traffic from the Port of Ramsgate had not been assessed. The Applicant stated that the arrival of aggregate was a misguided assumption; however, p.107 (section 8.5 Pavements) of APP-171 states that construction of the platform is likely to be required to achieve sufficient CBR to support the larger wheel loadings, and that CBRs in the range of 10%+ should be achievable “assuming a granular engineered fill is utilised.” The Applicant cannot state that aggregate is not required when its own documentation indicates otherwise. If Controlled Modulus Columns are used, approximately 1,818 arrivals and 1,818 departures of 8m³ concrete mixer HGVs would be required. It is likely these HGVs will be travelling from Ramsgate Port (where Bretts aggregate facilities are located). SMM seeks confirmation as to whether these movements have been included within the traffic modelling. The ExA’s attention is drawn to documents APP-067, REP4-039, APP-338 (CTMTP, ES Appendix 3.5.C) in this respect.	See responses above. Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067] is based on the busiest days of the construction programme in terms of total construction vehicle movements and HGV movements, to provide a worst-case assessment. The Applicant has assessed the maximum number of HGVs accessing the Minster Converter Station site via the main proposed site access on the A256 (access K-BM02). This accounts for peak activity associated with Minster Converter Station, including HGVs travelling to/ from the A299 to the east of the Order Limits (i.e. travelling to/ from Ramsgate Port), which has therefore been accounted for as part of the traffic modelling.
Item 5: Socioeconomics and tourism			
33-34	Tourism impact monitoring and mitigation	The Applicant has provided both contradictory and incomplete information in relation to matters of access and the impact of the proposals on public footpaths. REP5-132 states that there are anticipated to be HGV movements along the existing Pegwell Road foreshore access which would interact with Footpaths TR15 and TR33 for six months of the construction programme; however, this is inconsistent with 9.13 Pegwell Bay Construction Technical Note (version C, February 2026) which describes a 14 month programme of works (paragraph 6.1.2, indicative programme of works at Kent Landfall), and elsewhere where the Applicant has indicated that they will require access to the hoverport area for eight months of 2027 and three months in 2029. SMM seeks clarification from the Applicant as to whether these footpaths will be closed and, if so, for how long.	As set out within Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353], as well as the updated version of this document submitted at Deadline 6 [REP6-088], movements along the existing foreshore access (Pegwell Road) track during the construction phase will be required for compound installation (foreshore) including soil stripping, haul road installation, compound stone and surfacing, and drainage, as well as for duct installation and cable installation. The movements would interact with Public Rights of Way (PRoW) TR15 and PRoW TR33 for circa six months of the programme (at different times); therefore, site fencing and crossing gates will be installed to separate construction vehicles and PRoW users, which would be monitored when in use. This provision would remain in place for the full duration of the construction works at this part of the Site, given that these works would be carried out at different times during the construction programme. This will ensure that the PRoW remain open and can continue to be safely used during the construction phase.
35	Tourism impact monitoring and mitigation	Further, SMM notes that the Applicant also wishes to retain access for maintenance purposes. This is potentially problematic, as this area forms part of the newly opened King Charles III Coastal Path (which opened in March 2026). Any proposed changes to the Charles III Coastal Path are not clear, nor is it made clear in any of the Applicant’s documentation that TR15 and TR33 in fact form part of the King Charles III Coastal Path and Cantii Way. Similarly, the Applicant has failed to mention the fact that the St Augustine Way pilgrimage route will be diverted during construction.	As set out within Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353], as well as the updated version of this document submitted at Deadline 6 [REP6-088], during the operational phase, infrequent movements along the existing foreshore access (Pegwell Road) track may be needed to undertake maintenance in the rare event of a fault within the intertidal zone. The movements would interact with Public Rights of Way (PRoW) TR15 and PRoW TR33, and site fencing and crossing gates will be installed to separate vehicles and PRoW users. This provision would remain in place for the full duration of any maintenance works. This will ensure that the PRoW remain open and can continue to be safely used during any maintenance works. In terms of the King Charles III England Coast Path and the Cantii Way, these will be managed during trenchless works, although no crossing points or diversions are expected during the construction phase. The St Augustine’s Way follows the alignment of PRoW TE37 as this runs along the northern boundary of the Kent Onshore Scheme Order Limits from Cottington Road in the east to Minster in the west. Cottington Lane is to be used during construction for

Reference	Matter	Point Raised	Applicant's Comments
			mobilisation and staff movements. It is therefore proposed to temporarily (and locally) divert PRow TE37 (and therefore St Augustine's Way) along the northern grass verge of Cottington lane, with site fencing to be installed along the diverted route that will sit parallel to Cottington Lane before this connects back into the existing route to the west. This diversion is to be in place for the full construction phase of the project, to avoid any interactions between PRow users and construction vehicles. The existing route will be reinstated after construction. Further details are provided within Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353], as well as the updated version of this document submitted at Deadline 6 [REP6-088]. Temporary and managed interventions affecting PRow and recreational routes, including the King Charles III Coastal Path and St Augustine's Way, are assessed within Application Document 6.2.3.10(B) Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-007] and Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]. Those assessments conclude that, with embedded mitigation secured through the Outline PRow Management Plan [APP-353] (updated [REP6-088]), routes will remain open and usable, with no sustained loss of access or deterioration in user experience. These conclusions are reflected in Application Document 6.2.3.11(B) Part 3 Kent Chapter 11 Health and Wellbeing [AS-003], which confirms that, in accordance with IEMA (2022) guidance, effects on access to open space and PRow are not significant during either construction or operation.
36	Tourism impact monitoring and mitigation	SMM also notes that footpaths TE37 and TE39 connect Minster to Cliffsend and form part of the Way of St Augustine (TE39). The Applicant stated at ISH3 that these would be likely stopped up for the duration of construction (potentially four years). However, none of the sheets in CR1-011 provide a clear view of the Way of St Augustine – the footpath maps in the latest iteration show only a small portion with a diversion, and the start and end of the route are not made clear. SMM seeks clarification as to the arrangements for the footpaths once they cross the railway line in the fields to the north of the Converter Station, and whether they will be left intact.	Details relating to the proposed diversions of footpaths TE37 and TE39 are provided within Application Document 7.5.9.2 Outline Public Rights of Way Management Plan – Kent [APP-353] , as well as the updated version of this document submitted at Deadline 6 [REP6-088] . The proposed short diversions of these routes will be in place for the full construction phase of the project, to avoid any interactions between PRow users and construction vehicles. The existing routes will be reinstated after construction. No PRow will be closed without an appropriate diversion being provided.
37	Tourism impact monitoring and mitigation	In respect of the hoverport scrub area, the Applicant states that pedestrian access will be possible during the construction phase. However, the required 7m wide access route will prevent pedestrian access via the ramp road and limit it to the footbridge from the Viking Ship, which is unsuitable for disabled users or pushchair users (see also paragraph 40 below regarding accessibility concerns). Moreover, this area suffers from poor drainage and is frequently underwater in winter months.	Section 10.9 of Application Document 6.2.3.10 (B): ES Part 3 Kent Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-007] assesses potential effects of the Proposed Project on private and community assets, recreation and tourism. The assessment considers impacts on these receptors within a 500 m study area from the Proposed Project's Order Limits. This is in line with the DMRB LA112 as 500 m is the distance threshold beyond which it is considered that people are likely to be deterred from making trips to an extent that they would change their habits. Where appropriate, receptors located beyond 500 m of the Kent Onshore Scheme have also been included in the assessment to allow for assessment flexibility. The assessment concludes that there are no businesses within the Study Area which would be significantly affected by the land required for the Kent Onshore Scheme or to which access would be required.
38	Tourism impact monitoring and mitigation	SMM also notes that biodiversity enhancement ponds on both sides of the River Stour are located on a public footpath (REP4-068). The implications of this for public access during and after construction have not been adequately addressed.	
39	Tourism impact monitoring and mitigation	SMM are also concerned by the scale of assessment area employed by the Applicant, who has focussed their assessment of the impact on business, tourism and residential properties on those within 500m of the draft order limits, and on communities within 1km of those limits. The obvious point to	

Reference	Matter	Point Raised	Applicant's Comments
		anyone familiar with the area is that there is only one route in and out of Thanet. The Applicant's approach is wholly unrealistic given that all communities and businesses across the Isle of Thanet will be impacted by the scale and length of the construction phase, and the vast number of vehicle movements which will serve a development of this nature and extent. The impact on the whole area should therefore be included.	
Item 6: Health and wellbeing			
40	Mental health impacts	The Applicant dismisses the loss of the Hoverport as merely a “recreational space”. However, SMM’s surveys show that over 300 people use the hoverport for recreation several times a month. The hoverport/viking ship has free parking and a bus stop outside, and is fully accessible for people with disabilities. By contrast, Pegwell Bay Country Park charges a minimum of £2 (even with a blue badge) and has limited opening hours with no nearby bus stop. The Applicant therefore appears to have ignored the hoverport’s particular value for the disabled and those of limited means.	The Applicant acknowledges the points raised regarding the accessibility and use of the Hoverport, including its value as a recreational asset. These characteristics are recognised as part of the wider baseline and have informed the assessment of potential effects on health and wellbeing within APP-058. The Applicant’s health and wellbeing assessment presented within Application Document 6.2.3.11 (B) Part 3 Kent Chapter 11 Health and Wellbeing [AS-003] conclude that no significant adverse effects on health and wellbeing are anticipated for the Kent Onshore Scheme. Additionally, measures to address disruption and potential effects on mental health and wellbeing arising from construction activities are secured within Application Document 9.84 Register of Environmental Actions and Commitments (REAC). A detailed response regarding the existing commitments, and further proportionate measures in recognition of the LPA and community’s concerns regarding health and wellbeing is set out in Application Document 9.136 Applicant’s Responses to Third Written Questions in response to 3HW3.
41	Mental health impacts	SMM further notes that the Habitats of Protected Species and Important Habitats plan (sheet 3 of 6) does not recognise that the Hoverport is an Open Mosaic Habitat on Previously Developed Land according to the DEFRA definition of such sites. This is a habitat of principal importance under Section 41 of the Natural Environment and Rural Communities Act 2006. The failure to classify the site correctly has significant implications for the assessment of impacts.	As SMM notes below the Applicant does not propose to remove vegetation except to trim back seasonal lateral growth of shrubs/bushes where necessary. The Applicant has submitted photographs into the Examination in response to the ExA first written questions, which clearly show open unvegetated hardstanding routes. Having walked the site, the Applicant is confident that sufficiently open and unvegetated routes exist. Since the Applicant does not propose to traverse, remove, or store materials on, vegetation there will be no effect on the habitat present at the hoverport.
42	Mental health impacts	During ISH3, the Applicant’s representative stated that there would be “no vegetation removal on the port” and “no habitat losses there”. However, this is contradicted by B05 of the Outline Code of Construction Practice (REP4-233) which states clearly that vegetation suitable for reptiles will be removed. Furthermore, the Applicant’s own documentation indicates that a 7m wide access route is required, but SMM’s analysis demonstrates that this is not achievable without vegetation removal given the existing layout of the site.	Measure B05 sets out the vegetation clearance method to be applied to protect reptiles <u>where vegetation removal is proposed</u> . There is no vegetation removal proposed at the hoverport except lateral trimming back of bushes and shrubs in response to seasonal growth. However, elsewhere in the Order Limits there is proposed removal to ground level of vegetation where reptiles have been recorded. It is these areas to which B05 will apply.
43	Mental health impacts	It is also noted that the Applicant has not carried out any ecological surveys of the hoverport. Given that the site is known to support fiery clearwing and Sussex emerald moths (species associated with certain plant species present across the Hoverport), as well as grass snakes, slow worms, and lizards that have been observed approximately 10m from the proposed access route, this is a significant omission.	The Applicant has submitted photographs into the Examination in response to the ExA first written questions, which clearly show open unvegetated hardstanding routes. Having walked the site, the Applicant is confident that sufficiently open and unvegetated routes exist. The Applicant does not intend to traverse habitat within which reptiles or Schedule 5 invertebrates may be found (restricting access to open unvegetated hardstanding). Therefore, surveys of the adjacent habitats, even if it confirmed the presence of reptiles, would not affect the approach to using the site for access.

Reference	Matter	Point Raised	Applicant's Comments
			No vegetation removal (i.e. height reduction including clearance to ground level) is proposed at the former hoverport and a REAC commitment exists (B66) to ensure that a route through the hoverport is marked out and (B70) shared with key stakeholders, which avoids tracking over vegetation and particularly the foodplants of the two Schedule 5 species.
44	Mental health impacts	The Applicant has also not responded to questions from Kent Wildlife Trust regarding reptiles at the hoverport. SMM requests that the Applicant address these outstanding concerns.	Responses to these points have been provided in 9.131 Applicants Comments on Responses to Second Written Questions, response to Kent Wildlife Trusts response to ExA question 2ECOL29.
45	Mental health impacts	SMM further notes that the wording of B01, B02 and B03 in REP4-233 allows too much room for the Applicant to ignore requirements to avoid damage. SMM requests that these provisions be strengthened to provide enforceable protections.	Measures B01 to B03 are intended to set out the general requirements placed on the contractor as standard to protect wildlife. Where more detailed provisions are required for particular species these are covered by other REAC measures.
46	Mental health impacts	At ISH3, the Applicant's representative stated that the hoverport "is required for the permanent access to the mud flats for both construction and maintenance" and "will not materially impact other users." SMM is at a loss to understand how this can be the case given the extent of use and accessibility issues identified above.	
Item 8: Cumulative effects			
47	Intra-project cumulative effects	SMM is concerned that the Applicant has failed to adequately assess the intra project cumulative effects of the various elements of the Sea Link project as they interact with each other and with the sensitive environment of Minster Marshes. The following paragraphs set out SMM's principal concerns in this regard. As set out under Item 3 above, Minster Marshes is characterised by high groundwater levels (typically 0.5-1m below ground level), saturated alluvial clays and silts, and a network of canalised ditches and drains. The Applicant has relied on predictive and desk-based data, and has dismissed SMM's groundwater flooding concerns without undertaking full quantitative hydrogeological modelling or detailed pre-DCO site surveys.	The Applicant has addressed the groundwater flood concerns raised within 9.99 Groundwater Flood Risk at the Minster Converter Station Site [REP5-122] . Detailed ground investigations have been recently completed by the Applicant, the data from which will inform the detailed designs of the Project.
48	(1) Watercourses	As set out under Item 3 above, Minster Marshes is characterised by high groundwater levels (typically 0.5-1m below ground level), saturated alluvial clays and silts, and a network of canalised ditches and drains. The Applicant has relied on predictive and desk-based data, and has dismissed SMM's groundwater flooding concerns without undertaking full quantitative hydrogeological modelling or detailed pre-DCO site surveys.	The Applicant has addressed the groundwater flood concerns raised within 9.99 Groundwater Flood Risk at the Minster Converter Station Site [REP5-122] . Detailed ground investigations have been recently completed by the Applicant, the data from which will inform the detailed designs of the Project.
49	(1) Watercourses	SMM is concerned that the cumulative effect of multiple project elements interacting on the same watercourses has not been adequately acknowledged. These elements include: the HDD landfall works; cable trenching; converter station dewatering; access tracks; haul roads; and temporary outfalls. The combined effects of these activities risk causing pollution, sedimentation, flow alteration, groundwater drawdown, and floodplain severance. The potential for these effects to interact and compound one another has not been properly assessed.	The Applicant confirms that all of these aspects have been considered and that is concluded that legislative and policy drivers safeguarding the water environment and preventing increases in flood risk would act such that Projects individually, and therefore cumulatively, would not have significant determinantal effects on common water receptors.
50	(1) Watercourses	In relation to the River Stour specifically, there remain ongoing concerns from the Environment Agency (as reflected in unresolved items in the Statement of Common Ground) regarding channel mouth migration at Pegwell Bay and the	The Applicant and the Environment Agency have agreed wording for a DCO Requirement addressing the risk of movement of the mouth of the River Stour by Pegwell Bay.

Reference	Matter	Point Raised	Applicant's Comments
		dynamic morphology of this area. SMM notes that the cable burial depth of 1.5m proposed by the Applicant is insufficient in the Environment Agency's view, which has indicated that a minimum of 3m below the low-flow bed level is required.	
51	(2) Soils	The Applicant claims that there will be no cumulative escalation of effects on soils, despite major individual losses of Best and Most Versatile (BMV) agricultural land across the cable corridor, HDD compounds, converter station footprint, and overhead line works. SMM considers that this assessment ignores the interactive effects on the same farmland receptors.	The assessment presented in 6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023] covers all the aspects of the proposed development, including the temporary and permanent impacts resulting from the construction of the cable, compounds, converter station and overhead line works. The assessment accounts for all agricultural land and receptors within the draft Order Limits and as such interactive effects have been covered.
52	(2) Soils	In particular, the combined effects of soil compaction, land severance, temporary access disruption, hydrology changes, and dust deposition are likely to result in greater long-term productivity loss for the sensitive marsh soils than assessed by the Applicant. The Applicant's reinstatement assumptions are optimistic and unproven, particularly given the unique sensitivities of Minster Marshes: saturated soft clays and silts overlying the former Wantsum Sea Channel, with groundwater at 0.5-1m depth.	The assessment presented in 6.2.3.6 (B) Part 3 Kent Chapter 6 Agriculture and Soils [PDA-023] all agricultural land and receptors within the draft Order Limits and as such combined effects have been covered. A detailed Agricultural Land Classification survey has now been completed, as set out in 9.31 (B) Agricultural Land Classification (ALC) Survey Results – Kent [REP6-125]. This comprises a survey and description of the soil physical characteristics to 1.2m below ground level and the survey information is now referenced in the Outline Soil Management Plan (7.5.10.2 (B) Outline Soil Management Plan – Kent [REP-069] which has also been revised to state at paragraph 2.3.3 that “<i>The Soil Scientist is responsible for ensuring the final SMP covers the required aspects and includes and takes account of all available soil survey data, ...</i>” and at paragraph 3.1.5 that “<i>A report on these surveys and analyses, along with a final collation of all available information, will be made available for the development of the final SMP to ensure the approaches to soil handling are targeted to the actual soil conditions (for example actual topsoil thicknesses) and re-use plans can be developed aligned to the required end uses.</i>” This survey data and the strengthened commitment in the Outline Soil Management Plan that work plans will take account of this data and further surveys will ensure that soil management requirements in the final Soil Management Plan do account for the sensitivities of the soils in this location.
53	(2) Soils	Research on soil compaction indicates that vehicle trafficking on saturated soils can cause irreversible compaction to depths of 0.6-1.2m (based on Boussinesq pressure bulb analysis). This would result in reduced permeability, the potential creation of methanogenic and anaerobic conditions, and pollutant and sediment runoff pathways to the River Stour and Pegwell Bay. SMM has requested that a physical soil survey be undertaken to determine more accurate soil management requirements, and is awaiting the Applicant's response.	A detailed Agricultural Land Classification survey has now been completed, as set out in 9.31 (B) Agricultural Land Classification (ALC) Survey Results – Kent [REP6-125]. This comprises a survey and description of the soil physical characteristics to 1.2 m below ground level. This information is now referenced in the Outline Soil Management Plan (7.5.10.2 (B) Outline Soil Management Plan – Kent [REP-069] which has also been revised to state at paragraph 2.3.3 that “<i>The Soil Scientist is responsible for ensuring the final SMP covers the required aspects and includes and takes account of all available soil survey data, ...</i>” and at paragraph 3.1.5 that “<i>A report on these surveys and analyses, along with a final collation of all available information, will be made available for the development of the final SMP to ensure the approaches to soil handling are targeted to the actual soil conditions (for example actual topsoil thicknesses) and re-use plans can be developed aligned to the required end uses.</i>” This survey data and the strengthened commitment in the Outline Soil Management Plan that work plans will take account of this data and further surveys will ensure that soil management requirements in the final Soil Management Plan do account for the sensitivities of the soils in this location.
54	(3) Ornithology	SMM notes with concern that the Applicant's baseline data for golden plover dropped from 700 birds in the Preliminary Environmental Information Report	Refer to the Applicant's explanation of this change in 9.34.5 (B) Applicant's Response to Selected Relevant Representation Responses (Clean), Table 6.17 page 99.

Reference	Matter	Point Raised	Applicant's Comments
		(PEIR) to 370 birds in the Environmental Statement, without any adequate justification being provided for this reduction. This raises questions about the reliability of the ornithological baseline data underpinning the cumulative effects assessment.	
55	(4) Invasive Species	On p.50 of Table 2.17 of REP5-021, the Applicant identifies a risk of introducing and spreading non-native invasive species, particularly at the HDD exit points. There will be four coffer dams in Pegwell Bay. SMM seeks clarification as to what mitigation measures are proposed for this risk, or whether the Applicant is saying that no mitigation is available.	The Applicant advises SMM that as well as the submission of the following documents in the DCO Application: - Application Document 7.5.12 Outline Offshore Invasive Non Native Species Management Plan; and - Application Document 7.7 Marine Biosecurity Plan. a number of mitigation measures have been included in relation to INNS, in Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan and Application Document 9.84 Register of Environmental Actions and Commitments (REAC) as detailed below: • BE01 - a biosecurity plan will be produced for the project, following the latest guidance on INNS from the Great Britain Non-Native Species Secretariat. • BE02 - all project vessels will adhere to the International Maritime Organisation (IMO) Guidelines for the control and management of ships' biofouling to minimize the transfer of invasive aquatic species (Biofouling Guidelines 2011). • BE03 - any material introduced into the marine environment, such as rock protection material, will be from a suitable source or cleaned to ensure no INNS can be introduced.
56.	Inter-project cumulative effects	In APP-320 Table 3.4, the Applicant lists the Kulizumboo Interconnector as one of the planned generators of electricity. This 700MW interconnector development has plans for a HVDC converter station located alongside National Grid's 400kV substation at Richborough, and has been accepted for grid connection in April 2031. SMM questions whether the Applicant has carried out adequate cumulative assessments for traffic, noise, and environmental impacts arising from this development in combination with Sea Link.	The Applicant has no information about the Kulizumboo Interconnector other than what is provided on the LMTR website (https://ltmr.uk/projects). Although this states that the project plans for "an HVDC converter station located alongside National Grid's 400kV substation at Richborough" the Applicant has access to no other information. It should be noted, however, that in the NESO Interconnector Register the connection point is identified as the Canterbury 400kV GIS Substation, not the Richborough or Minster substations.
57	Deferred Mitigation Plans	SMM is also concerned that a number of essential mitigation measures and plans are being deferred to post-consent, preventing adequate scrutiny during the Examination process. In particular: - The Applicant has committed in the latest version of the REAC (REP4-235) to providing a Pegwell Bay Landfall Method Statement. This statement has not yet been produced. SMM questions whether it is acceptable for such a critical document to be produced post-consent, given that it relates to works in a highly sensitive environment and stakeholders will have no opportunity to comment on its contents. - Similarly, the Applicant has committed to providing a Drilling Fluid Management Plan (GH10) post-consent. Given the acknowledged risk of drilling fluid discharge into the Ramsar site, SMM considers this to be unacceptable. Stakeholders should have the opportunity to scrutinise and comment on this plan before consent is granted. - The Applicant is also committed to undertaking a Structural Integrity Assessment of the hardstanding at the hoverport to ensure it is	The Applicant confirms that this is common for large DCOs where detailed design occurs post-consent. Construction methods proposed within the Pegwell Bay method statement will need to align with the methods assessed in the Environmental Statement and associated Volume 7 and Volume 9 documents. The method statement requires the approval of the Marine Management Organisation. The Drilling Fluid Management Plan will set out detailed management proposals, however it will be based upon the measures committed to in measure B09 in Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan and the measures set out in Table 1.8 in Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan. Requirement 22 in the draft DCO sets out the commitments regarding the use of the hoverport. Reference is also made to the Application Document 9.92 Outline Cable Specification and Installation Plan, an updated version of which is submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		suitable for the limited construction and maintenance access proposed. This assessment has not been undertaken. SMM notes that the total weight of vehicles is approximately 500 tonnes. The Applicant has not explained when this assessment will be carried out, nor what the consequences would be if it is found that the hardstanding cannot support such weight without causing contamination to the underlying soils.	
Item 9: Marine Physical Environment			
58 - 59	Sediment modelling	SMM is concerned that the Applicant's subtidal survey work contains significant gaps that undermine the robustness of its environmental assessment. Document AS-035 (Subtidal Survey Report (Additional Surveys), Version A, May 2025) reveals that six locations were removed from the survey scope. Section 3.3 (Deviations from the Work Scope, page 17) sets out the following deviations: a) In Area 5, two grab locations (A5_OPB_02 and A5_OPB_03) were removed from the scope of work due to shallow depth, as recorded in discussions with the Client (Document ref.: ECF_001, Reference No: 2353, Appendix R – Environmental Concession Forms). b) One grab location (A4_GLC_02) was unsuccessful after attempts using both the DVV and Mini Hamon grab, including after moving the location 50m from the original position. c) Three transects in Area 5 were removed from the scope of work due to shallow depths. The shallowest station (A5_OPB_03) was attempted during high tide; however, camera and grab operations could not be completed due to vessel working limits and shallow depth. SMM seeks clarification from the Applicant on the following matters arising from these survey deviations: a) The reasons for removing the two grab locations in Area 5 are not clear from the public documentation. SMM requests that the Applicant explain the basis for this decision and whether this is set out in any publicly available document. It is not clear whether the unsuccessful grab location (A4_GLC_02) was subsequently resurveyed. SMM requests confirmation as to whether alternative data was obtained for this location.	The Applicant directs SMM to the MMO's Deadline 5 Response [REP5-175] which states: <i>'The MMO has no concerns regarding the submitted subtidal and intertidal surveys submitted and considers that they provide sufficient coverage at this stage'.</i> The MMO are the Competent Authority and Regulator Offshore. Robust baseline data has been completed both in 2021 and 2024 for the Sea Link Offshore Scheme.
60	Sediment modelling	SMM also has concerns regarding the Applicant's survey findings for Ocean Quahog (<i>Arctica islandica</i>). Section 5.7.6 of AS-035 (p.129) acknowledges that field assessment of this species can be challenging for specimens with shell sizes below 5cm due to morphological similarities to other species such as <i>Dosinia</i>. The Applicant's sediment grabs found no specimens of Ocean Quahog. However, SMM notes that these shells are visible across local beaches in the area, which raises questions about the reliability of the grab sampling methodology for this species.	The Applicant confirms that all analysis for the Offshore Baseline survey [AS-035] data has been contracted by marine professionals with the following credentials: - ISO 9001 for the provision of scientific marine survey and associated consultancy, and are audited annually by Citation International plc. - NMBAQC quality assurance scheme for macro-invertebrate and particle size analysis and supporting laboratories provide certified testing (typically to the United Kingdom Accreditation Scheme UKAS) on routine low level marine sediments and waters following regulatory standards in Europe (typically UK DECC, OSPAR etc.). - ISO 14001 certified in recognition of our Environmental Management System (EMS).

Reference	Matter	Point Raised	Applicant's Comments
			The Applicant therefore considers that the analysis presented in these reports is robust.
61 - 62	Cable Burial Depth at Pegwell Bay	The Applicant's proposed cable burial depth at Pegwell Bay raises significant concerns. In REP4-086 (AP74), the Applicant explains that lowering the cables to 6.5m "may be technically feasible from a burial assessment perspective but is on the upper limit of typical techniques" and "may create a thermal constraint on the cable system and its performance." The Applicant therefore proposes burial at a depth of only 1.5m. However, the Applicant acknowledges in AP75 that if cables buried at 1.5m are later dislodged by movement of the mouth of the River Stour, trenching and concrete matting would be required to stabilise them. The Environment Agency has ongoing concerns about channel mouth migration at Pegwell Bay due to the dynamic morphology of this area, and has indicated that deeper burial (a minimum of 3m below low-flow bed level) may be required. SMM is concerned that the Applicant appears to be choosing the cheaper, less robust option despite the acknowledged risks, and seeks clarification as to how the Applicant will address the Environment Agency's concerns.	The Applicant confirms that it has been working closely with the Environment Agency over the last few months and have jointly developed a Requirement (18) at Deadline 6 to ensure the River Stour's movements are appropriately monitored throughout the lifetime of the Proposed Project.
63 - 64	Goodwin Sands Marine Conservation Zone	The ExA asked whether the Applicant has undertaken any modelling, or whether there is any other relevant precedent from comparable projects, to support its position that the low-lying nature of the rock berms would not affect coastal processes at the Goodwin Sands Marine Conservation Zone. The Applicant has confirmed that it has not carried out any specific modelling for this protected site and has instead relied on comparison with other marine projects. SMM questions whether this approach provides sufficient confidence that there will be no adverse effects on this Marine Conservation Zone. In particular, SMM seeks clarification as to what level of confidence the Applicant has in these assessments, and whether the underlying assessments (including the taxonomic review) are available for public scrutiny	The Applicant confirms that further updates to the MCZ Assessment including additional quantitative calculations have been included at Deadline 6 and Deadline 7. These documents are available in the public examination library.
Item 10: Noise and Vibration			
65		SMM has significant concerns regarding the Applicant's approach to noise and vibration assessment, particularly in relation to the Hoverport site. These concerns fall into three categories: (i) the inconsistent characterisation of ground conditions; (ii) inadequate noise modelling for the Hoverport access route; and (iii) outstanding matters from ISH2 Action Point AP68 that have not been satisfactorily addressed.	See detailed responses below.
66 - 67	Ground Conditions at the Hoverport	In response to Question A86 concerning sound receptors in Pegwell Bay, the Applicant has characterised the Hoverport as "soft ground" for the purposes of its noise modelling. However, the Applicant has also stated that the site will comprise hardstanding suitable for 20 tonne excavators. SMM does not understand how the Applicant can simultaneously argue that the site is soft ground for acoustic modelling purposes whilst also asserting that it constitutes hardstanding capable of supporting heavy plant machinery. SMM requests that the Applicant clarify this apparent contradiction. This inconsistency is significant because concrete and hardstanding are efficient conductors of sound vibrations close to the surface, with propagation speeds of up to 2,500 metres per second and minimal attenuation. The Applicant does not appear to have modelled the effect of these surface	The Applicant's submitted Application Document 9.148 Hoverport Construction Access Noise Modelling - Technical Note [REP5-123] at Deadline 5 which provides noise modelling of the hoverport and access road applying a hardground assumption to the hoverport. Significant adverse effects are not expected. In addition, the contractor will manage and mitigate adverse effects from noise in line with the various commitments for noise in Application Document 9.84 Register of Environmental Actions [REP6-134] and Commitments, including NV01, NV02, NV03, NV06, and NV10. Additionally, works will be conducted in accordance with Application Document 7.5.8.2 Outline Construction Noise and Vibration Management Plan - Kent [REP6-084] and will have oversight by Thanet District Council through the agreed Section 61 process.

Reference	Matter	Point Raised	Applicant's Comments
		waves (also known as Rayleigh waves or R-waves). This is of particular concern given the acknowledged presence of rare invertebrates and reptiles at the site, as set out above, which live on or in cracks just below the surface and are therefore vulnerable to ground-borne vibration.	
68	Ground Conditions at the Hoverport	SMM therefore requests that the Examining Authority put the following questions to the Applicant: a) Q1: Do the Applicant's technical experts maintain that the use of "soft ground" assumptions for the Hoverport site is appropriate and justified, given the presence of hardstanding? b) Q2: Why is Applicant unable or unwilling to undertake modelling to produce sound contours for the entire Hoverport site access route from the compound to Sandwich Road, and if this is technically possible, why it has not been done? c) Q3: Has the Applicant modelled surface waves (R-waves) generated by heavy machinery travelling over the hardstanding, and if not, why not, given the potential for significant adverse effects on reptiles and invertebrates that inhabit the surface and near-surface environment?	
69	Outstanding Matters from ISH2 Action Point AP68	In addition to the ground condition concerns set out above, there are several outstanding matters arising from ISH2 Action Point AP68 where the Applicant has not satisfactorily addressed the questions raised or provided the information it undertook to supply: a) Hovercraft use: In response to Point (3), which asked whether the use of hovercraft could be limited to emergency use in the draft DCO or REAC, the Applicant did not provide a clear answer. The Applicant stated only that it "will include a commitment to limiting the use of hovercraft in the next update to the REAC." SMM requests that the Applicant confirm whether hovercraft use can be limited to emergency use only, and if not, explain why not. b) Piling noise levels: In response to Point (4) concerning piling noise levels, the Applicant confirmed that the maximum piling noise level in its dataset was 104dB, although values were more typically in the low 90dB range. The Applicant has since provided a noise profile document (REP4-088), but this does not appear to include piling noise data. Moreover, the dataset shows piling noise of LE108.8 at 2kHz, which is a level significantly above the threshold of hearing and sufficient to cause hearing damage if exposed for extended periods. SMM requests that this upper limit be shown in the noise profile together with an assessment of any effect on the SSSI. c) Operational noise contours: In response to Point (5), the Applicant was asked to produce a noise contour plan for the Minster converter station. Operational noise contours were not supplied until March 2026, despite the Applicant having had two years to prepare this information. SMM notes that the upper noise limit shown is greater than 10dBA but does not show the upper range, and the proximity of the SSSI (which is important for breeding birds) is not shown on the contour map. SMM requests that the Applicant provide complete noise contour information showing the full range of operational noise and the relationship to the SSSI boundary.	Construction traffic noise on Sandwich Road was assessed in Application Document 6.3.3.9.C ES Appendix 3.9.C Kent Construction Traffic Noise Assessment [APP-190], with the impact being negligible and therefore not significant. A noise contour plan showing traffic on the hoverport is provided in 9.148 Hoverport Construction Access Noise Modelling - Technical Note [REP6-123].

Reference	Matter	Point Raised	Applicant's Comments
		d) Sound contours for Sandwich Road: The Applicant has confirmed that no construction vehicles will be parked at the Hoverport, meaning all vehicles will travel to and from the compound at points of high tide, amounting to up to 40 movements per day. The Applicant does not appear to have produced up-to date noise contours for the access route from Sandwich Road to the compound. This is a significant omission because there are residential properties close to the exit and entry point to the Hoverport. SMM requests that the Applicant produce noise contours for this route covering both airborne noise and surface vibrations.	
Item 12: Ornithology			
70		The Sandwich Bay Bird Observatory Trust's written representations (REP1-242) indicate that it offered detailed tidal bird survey records to the Applicant's ecological team but the Trust was never contacted. The Applicant's comments on written representations (REP2-034) explain that it drew on the public record for these datasets. SMM understands that the Trust has confirmed it still holds data that the Applicant should have taken into account in its assessment. SMM requests that the Applicant explain why this offer of detailed local data was not taken up.	The Applicant provided a response to this in REP2-034, where they detail the surveys undertaken and datasets used, and how these have been compiled to characterise the ornithological baseline.
71		Additionally, SMM notes that at ISH2 the Applicant was asked to provide further information to support evidence of dormice crossing motorways, and to provide more detail on bird deflectors. SMM is not aware that these requests have been addressed and would welcome confirmation from the Applicant.	The Applicant provided this on page 162 of its D6 submission 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5.
72		It is also noted that stakeholder evidence regarding bats (REP4-241) appears to have been ignored in the Applicant's Deadline 3 comments. SMM requests that the Applicant confirm whether it has taken this evidence into account and, if so, how it has influenced the assessment.	The document number appears incorrect as REP4-241 is a document submitted by the Applicant.
Item 13: Ecology and Biodiversity			
73		SMM has provided detailed representations on matters related to Ecology and Biodiversity. These were most recently set out in SMM's Deadline 4 submissions. Those points will not be repeated here. The ExA and Applicant are invited to refer those earlier submissions which raise a number of significant concerns regarding the proposal's environmental and biodiversity impacts. In particular: a) Noise disturbance on seals (page 11 of 41). b) Prey impact for marine mammals and seabirds (page 11 of 41). c) Impacts on eels (page 13 of 41). d) Fragmentation of dormice habitats (page 13 of 41) e) Impact on turtle dove habitats, skylarks and other important birds, the East Atlantic Flyway, and risk of bird strikes (pages 13-16 of 41). f) The effect of EMF emissions on cetaceans (page 17 of 41).	See the Applicant's responses to these points in responses to SMM submissions throughout the Examination.

Table 10.2 Applicant’s Comments on the Save Minster Marshes Deadline 6 Submission [REP6-172]

Reference	Matter	Point Raised	Applicant’s Comments
		We request your indulgence to send our Comments on REIS and our Written Summary of Oral Presentation in the next day or two, please. We are members of the public and do not have the resources of National Grid, to get our documents together to meet this short timetable.	The Applicant has no comments on this matter.

Table 10.3 Applicant’s Comments on the Save Minster Marshes Deadline 6 Submission [REP6-173]

Reference	Matter	Point Raised	Applicant’s Comments
<i>Written submission of oral cases made at hearings the w/c 23 March 2026</i>			
	Old Pegwell Hoverport as a compound-ecology	I'm objecting to National Grid proposed use the old Pegwell Hoverport as a compound for the Sealink project. This is a very special area that is located between the chalk cliffs of Ramsgate and next to the Sandwich and Pegwell Bay National Nature Reserve. The Hoverport is now a sensitive area for wildlife as it has been left to nature to reclaim it since it closed down in 1987. Kestrels and Sparrowhawks use it to nest and hunt. It is one of the last remaining strongholds for breeding Greenfinch in the area. Migrant birds use it to rest and feed before and after crossing the channel including Wryneck and Hoopoe. Kingfishers also use this site as they pass along the coast in autumn and winter. The hoverport is famous for its wild orchids that grow there, including Man, Bee and more recently rare Lizard Orchids. It also has a population of reptiles including Common Lizards, Slow worms and Grass snakes. In fact one of the hoverport Grass snakes was going to star in David Attenborough's wildlife documentary 'Wild Isles' but sadly the other Grass snakes at the nearby Monkton nature reserve didn't perform as hoped so sadly it didn't make it into the episode. However this area is so special that it has featured in numerous wildlife films made for BBC Springwatch and BBC Countryfile over the past few years. The hoverport is one of the best places to find nesting Long-tailed Tits. Wildlife cameraman and presenter Richard Taylor-Jones filmed them nest building for BBC Countryfile and he also filmed the mass arrival of Cormorants that lined the edge of the hoverport on one spectacular occasion a few years ago. The reedbed at the side of the hoverport attracts Bearded tits most years as they irrupt from their breeding grounds at Stodmarsh in the autumn. Last year I watched Green woodpeckers raise 2 chicks from their nest in a tree along the hoverport cliff edge. Every spring and autumn the hoverport attracts Ring Ouzel and Spotted Flycatchers on migration. During the summer months Cuckoos can sometimes be seen perched at the top of the tallest cypress tree on the hoverport where it calls to the female as they make their way up and down the coast looking for nests to lay their eggs in.	The former hoverport is not proposed for use as a compound. See above responses for how vegetation on the hoverport will be preserved during works.

Reference	Matter	Point Raised	Applicant's Comments
		One of my most memorable wildlife experiences was watching a Sparrowhawk catch a wood pigeon and drag it out of the bushes to eat it in front of me on the edge of the hoverport tarmac. Butterflies love the hoverport too with Painted lady, Green hairstreaks and rare White letter hairstreaks. The most amazing huge buddleia bushes line the back edge of the hoverport. In summer these are alive with feeding butterflies like the Red Admiral and Peacock. It's also a great spot to see Hummingbird Hawk moths feeding on the nectar produced by their flowers. Foxes also breed on the hoverport, rabbit and even weasels. For these reasons part of my nature walk is around the old Pegwell Hoverport as it is a great example of nature recovery. Any closure or disruption to the area will affect these walks and will be a backwards step for nature, wildlife and tourism in the area. The idea that the hoverport would be taken over by heavy machinery for years, depriving the local population and visitors of such a tranquil place to walk around and for wildlife to rest, feed and breed would be appalling. National Grid needs to be more sensitive where it develops it projects so that it doesn't cause damage to wildlife and the environment.	

11. Applicant’s Comments on the Submission from Suffolk Energy Action Solutions Ltd

11.1 Introduction

- 11.1.1 Table 11.1 summarises the Applicant’s comments on Suffolk Energy Action Solutions Ltd (SEAS) Deadline 6 Fiona Gilmore for SEAS- ORH3 Oral Testimony [REP6-175].
- 11.1.2 Table 11.2 summarises the Applicant’s comments on Suffolk Energy Action Solutions Ltd (SEAS) Deadline 6 Deadline 6 – SEAS responses to Applicants D5 responses, ISH3, Action Points and ExQ3 [REP6-255].
- 11.1.3 Table 11.3 summarises the Applicant’s comments on Suffolk Energy Action Solutions Ltd (SEAS) Deadline 6 NEED on D5, ISH3, Action Points & ExQ3 [REP6-256A].
- 11.1.4 Table 11.4 summarises the Applicant’s comments on Suffolk Energy Action Solutions Ltd (SEAS) Deadline 6 TRAFFIC on D5 ISH3, Action Points and ExQ3 [REP6-256B].
- 11.1.5 Table 11.5 summarises the Applicant’s comments on Suffolk Energy Action Solutions Ltd (SEAS) Deadline 6 NOISE on D5, ISH3, Action Points & ExQ3- v1 [REP6-256C].
- 11.1.6 Table 11.6 summarises the Applicant’s comments on Suffolk Energy Action Solutions Ltd (SEAS) Deadline 6 LANDSCAPE AND VISUAL/ CULTURAL HERITAGE [REP6-149 & REP6-256D].
- 11.1.7 Table 11.7 summarises the Applicant’s comments on Suffolk Energy Action Solutions Ltd (SEAS) Deadline 6 TOURISM on D5, ISH3, Action Points & ExQ3 [REP6-256E].
- 11.1.8 Table 11.8 summarises the Applicant’s comments on Suffolk Energy Action Solutions Ltd (SEAS) Deadline 6 Ecology ISH3 [REP6-256F]
- 11.1.9 Table 11.9 summarises the Applicant’s comments on Suffolk Energy Action Solutions Ltd (SEAS) Deadline 6 CUMULATIVE IMPACT on D5, ISH3, Action Points & ExQ3 [REP6-150 & REP6-256G].
- 11.1.10 Table 11.10 summarises the Applicant’s comments on Suffolk Energy Action Solutions Ltd (SEAS) Deadline 6 SEAS COUNTER-RESPONSE TO THE APPLICANT’S D5 COVER LETTER- [REP5-001] [REP6-256H]

Table 11.1 Applicant’s Comments on the Suffolk Energy Action Solutions Ltd Deadline 6 Submission [REP6-175]

Reference	Matter	Point Raised	Applicant’s Comments
Deadline 6 – OFH3 ORAL TESTIMONY			
n/a	Introduction	At Deadline 5, the Applicant has provided some further material on accommodation monitoring, particularly in REP5-135 and REP5-136, but it has not produced any updated tourism assessment or broader reassessment of tourism effects. The position continues to rely on the original Environmental Statement assessment (REP1A-005) and earlier submissions, including accommodation material at Deadline 4 (REP4-237). This is particularly important given the economic significance and sensitivity of the Suffolk coastal tourism economy, which is highly dependent on landscape quality and visitor perception. The updated REAC (REP5-115) does not introduce new evidence or a revised assessment. Instead, it introduces process-based commitments — primarily liaison with tourism bodies and monitoring of worker accommodation. Those commitments are limited. They do not secure mitigation outcomes, they do not prevent displacement of tourism accommodation, and they rely on the Applicant only considering action if certain thresholds are reached. These commitments are not secured at the point of consent, but are deferred to outline	The Applicant’s responses below address the points raised in the introduction section of SEAS submission.

Reference	Matter	Point Raised	Applicant's Comments
		management plans that are approved and developed post-consent. As a result, the position at Deadline 5 is essentially unchanged: impacts are being monitored rather than prevented, and the key concerns raised by SEAS and others - particularly around accommodation pressure and effects on the tourism economy - remain unresolved. Against that background, I will address the two specific agenda items.	
5.1	Accommodation for workers	Turning to accommodation, the Applicant's position remains limited to monitoring and the potential to "consider" action. It does not provide any mechanism that would prevent displacement of local residents or the use of tourism accommodation. The Applicant has not secured a robust or enforceable accommodation strategy within the DCO. The updated REAC (REP5-115) introduces monitoring of worker accommodation; however, this is inherently reactive. It requires the Applicant only to consider measures if a threshold is exceeded, and does not place any restriction on the use of tourism or private rental accommodation. Indeed, Appendix E to REP5-136 makes clear that SE05 is regarded by the Applicant as additional reassurance rather than essential mitigation, which underlines the limited status of this measure. The Outline Onshore CEMP (AS-127 – Application Document 7.5.3(B)), secured through Requirement 6, does not remedy this. It contains no provisions that control where workers are housed, and instead relies on high-level management principles and future plan development. As confirmed within AS-127, the CEMP is a framework document that will be finalised post consent and updated as a "live" document during construction, meaning that mitigation is not fixed or secured at the point of decision. Accordingly, there is no secured or effective mechanism to prevent pressure on the local housing and tourism market. Given the cumulative workforce across multiple NSIPs, and concerns raised by local authorities (REP4-184), accommodation impacts remain materially unmitigated.	The Applicant has undertaken a comprehensive and robust EIA and maintains its position that the Project will not give rise to significant effects on socio-economics, leisure and tourism following the application of appropriate mitigation. As such it is entirely appropriate that the measures proposed are reactive because there is anticipated to be no significant effect to mitigate. Overall, the Applicant considers that the combination of the EIA and supporting technical documents provide a robust, proportionate, and policy-compliant framework for assessing and managing socio-economic effects. Further, the Applicant has provided detailed response regarding tourism impact monitoring and mitigation within Document 9.136: Applicant's Responses to Third Written Questions [REP6-111] (see 3SERT2). This incorporates updates made by the Applicant following the meeting held with LPAs on 1 April 2026. Full details of secured commitments relevant to tourism, including SE04 and SE05, are provided within Application Document 9.84 Register of Environmental Actions and Commitments (REAC). The Applicant would highlight that it is completely standard practice to have outline management plans at the point of decision with a requirement that secures the final versions. Measures in outline plans can absolutely be relied upon to secure the mitigation therein for two reasons; firstly, because the final plan must be substantially in accordance with the outline plan, and secondly because the final plans need to be approved by the discharging authority.
5.2	Tourism impact monitoring and mitigation	Turning to tourism, the approach remains process-based rather than evidence-based and does not provide confidence that impacts on this particularly sensitive coastal tourism economy will be avoided. As with accommodation, reliance is placed on outline management plans secured through Requirement 6, which are framework documents finalised post-consent and do not secure defined mitigation outcomes.	See response above regarding monitoring of tourism impacts. In terms of visitor perception, the Applicant has responded to these comments previously. It acknowledges the need to consider potential effects on the visitor economy, particularly in a cumulative context. A response to this matter is provided in Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065]. The findings confirm there is limited robust evidence of material adverse effects on visitor numbers,

Reference	Matter	Point Raised	Applicant's Comments
		The REAC commitment (SE04 in REP5-115) provides for liaison with tourism businesses but does not secure any specific mitigation or outcome. There is no requirement for visitor perception monitoring, no defined tourism indicators, and no trigger-based mitigation framework. That is now explicit in REP5-135. In response to ExQ2 2SERT4 (PD-021), the Applicant says it is not willing to commit to broader tourism monitoring beyond worker and tourist accommodation, and that worker accommodation is the only area where monitoring and management would provide a meaningful commitment. This is despite the sensitivity of the Suffolk coastal tourism economy and the issues raised in previous SEAS submissions (REP3-139). Evidence presented during the Examination indicates that even modest changes in visitor perception over a prolonged construction period could result in substantial economic effects. In a tourism economy as place dependent as the Suffolk coast, reliance on limited liaison and accommodation monitoring cannot be regarded as adequate mitigation. Evidence presented in SEAS submissions, drawing on DMO research, indicates that a sustained reduction in visitor numbers over the construction period could result in very substantial economic loss to the local area (in the order of c.£0.5bn over the construction period, based on DMO evidence referenced in SEAS submissions). The scale, duration and cumulative nature of construction across multiple NSIPs means that such effects are not short-term or localised, but structural and prolonged in nature. In these circumstances, process-based commitments to monitoring and liaison cannot realistically address fundamental changes to landscape character or destination perception. The Aldeburgh–Snape area functions as a recognised tourism destination with a distinct identity built over decades. That identity is inherently sensitive to cumulative change and cannot readily be restored once degraded, reinforcing the need for a precautionary and evidence-based approach. In these circumstances, and in the absence of robust, location-specific evidence, it is not appropriate to assume that significant adverse tourism effects will not arise. Given the scale, duration and sensitivity of the receiving environment, there is a realistic prospect of significant adverse effects which must be taken into account in decision-making. Monitoring alone cannot substitute for a robust, location-specific assessment and secured mitigation. Impacts are monitored rather than prevented, and mitigation is not secured at the point of decision.	spending, or the wider tourism economy. This supports the conclusion in Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 [REP1A-005] that no significant adverse effects on tourism are anticipated.

Table 11.2 Applicant’s Comments on the Suffolk Energy Action Solutions Ltd Deadline 6 Submission [REP6-255]

Reference	Matter	Point Raised	Applicant’s Comments
Deadline 6 – SEAS responses to Applicants D5 responses, ISH3, Action Points and ExQ3			
1	Introduction	Suffolk Energy Action Solutions (SEAS) wishes to place on record its profound disappointment that, despite the passage of this examination and the volume of detailed submissions made by local authorities, parish councils, expert groups and residents, many of the most fundamental issues raised at the outset remain unresolved or insufficiently addressed by National Grid. Across these hearings, a consistent and deeply concerning picture has emerged. Participants from both Kent and Suffolk have articulated, with clarity and evidence, a series of interrelated risks: the cumulative burden of multiple major infrastructure projects on a single locality; the unsuitability of proposed sites, particularly in relation to marshland conditions and flood risk; the inadequacy of traffic and access proposals; and the potentially severe impacts on landscape, tourism, biodiversity and community wellbeing. What is striking is not simply the number of these concerns, but their consistency across different locations and stakeholder groups, and the extent to which they remain live issues at this stage of the examination. SEAS is particularly concerned that: • Cumulative impacts continue to be treated in a fragmented way, without a convincing assessment of the real-world combined effects of concurrent major developments in East Suffolk and beyond; • SEAS contends that the need for Sea Link is overstated, not robustly evidenced, and can be met more economically through alternative network solutions • Alternatives, including materially different access routes and site strategies, do not appear to have been robustly or transparently evaluated against the current proposals; • Traffic and construction impacts - especially on junction modelling, narrow rural roads - remain inadequately resolved, despite credible alternative solutions being put forward by statutory bodies; • Noise and vibration impacts, particularly during prolonged construction phases and night-time operations, have not been satisfactorily assessed or mitigated, giving rise to significant concern regarding disturbance to nearby residents and the longer-term effects on health and wellbeing; • And critically, there remains a perceived gap between the Applicant’s assessments and the lived experience of affected communities, particularly in relation to health, wellbeing and the cumulative stress of prolonged, overlapping construction activity	All of the points raised by SEAS have been robustly addressed throughout the examination and the Applicant does not propose to re-rebut then here.

Reference	Matter	Point Raised	Applicant's Comments
n/a	-	SEAS also notes a broader concern regarding engagement and responsiveness. Many contributors have highlighted the difficulty of navigating the process and a sense that their evidence—whether technical or experiential—has not been meaningfully reflected in the evolution of the scheme.	All evidence has been responded to appropriately. All views raised have been considered by the Applicant but have only influenced the evolution of the project there they were considered to have merit.
n/a	-	At this stage in the examination, the expectation must be that the Applicant demonstrates not only compliance with minimum policy requirements, but that it has actively and transparently responded to the substantive concerns raised. On the evidence before us, that threshold has not yet been met.	The Applicant has repeatedly demonstrated that the Proposed Project is compliant with national policy and has actively and transparently responded to all concerns raised.
n/a		In conclusion, SEAS considers that the current proposals still give rise to significant and unresolved questions in relation to cumulative impact, site suitability, environmental risk, and community harm. These are not minor or peripheral matters; they go to the heart of whether this scheme can be considered acceptable in planning terms. We therefore submit further evidence for Deadline 6 as follows: 1.SEAS D6 - NEED on D5, ISH3, Action Points & ExQ3 2.SEAS D6 - TRAFFIC on D5 ISH3, Action Points and ExQ3 3.SEAS D6 - NOISE on D5, ISH3, Action Points & ExQ3- v1 4.SEAS D6 - LANDSCAPE/HERITAGE 5.SEAS D6 - TOURISM on D5, ISH3, Action Points & ExQ3 6.SEAS D6 - ECOLOGY on D5, ISH3, Action Points & ExQ3 7.SEAS D6 - CUMULATIVE IMPACT on D5, ISH3, Action Points & ExQ3 8.SEAS D6 - Counter Response to Applicants D5 Cover Letter REP5-001 Taken together, these submissions demonstrate that key elements of the proposed development remain insufficiently justified, inadequately assessed, or unresolved. In SEAS's view, these are material issues that go to the core requirements of the relevant National Policy Statements and the Planning Act 2008. SEAS therefore asks the Examining Authority to consider carefully whether the Applicant has demonstrated that adverse impacts can be made acceptable, particularly in relation to cumulative effects, site suitability, and community impacts. Where this has not been established, these concerns should carry significant weight in the planning balance. On the evidence currently available, SEAS maintains that the case for development consent has not yet been made.	The Applicant provides responses to each of these submissions below.

Table 11.3 Applicant’s Comments on the Suffolk Energy Action Solutions Ltd Deadline 6 Submission [REP6-256A]

Reference	Matter	Point Raised	Applicant's Comments
SEAS D6 REBUTTAL OF THE APPLICANT’S REP5-142 (‘Applicant’s Response to 2GEN1 and 2GEN2 in respect of Need’) NEED			
1	INTRODUCTION	1.1 At Deadline 5, the Applicant submitted REP5-142, in response to 2GEN1 and 2GEN2. REP5-142 includes what is described as “rebuttal” to SEAS’ earlier	The Applicant acknowledges the submission and welcomes its aim of informing the examination.

Reference	Matter	Point Raised	Applicant's Comments
		submissions regarding the Applicant's "need" case for the Proposals (stated as specifically in response to REP3-144, REP4-156, REP4-238). 1.2 It is apparent that the Applicant continues to attempt to re-invent its "need" case, in the face of the reality that the c.2,000MW transmission "need" claimed in the Application documentation cannot stand scrutiny, and with it the justification for the 2,000MW HVDC primarily offshore link at the heart of the Proposals (and SEAS has made the point before, but the Application documentation confirms that the critical document setting out the Applicant's "need" case for the Proposals is the "Strategic Options Back Check Report" APP-320 – see the Applicant's original Planning Statement, APP-319, at e.g. 5.2.3). The ExA is please asked to note the extent to which the Applicant's "need" case has shifted since APP-320 (which shifting is briefly sketched below). 1.3 Also included in REP5-142 are various attempts by the Applicant to set up and then knock down false targets, including apparently deliberate mischaracterisation of SEAS' points, and arguments by which the Applicant seeks to pull itself up by its bootstraps¹ (reliance on early construction funding as supporting "need" being a paradigm example). 1.4 Putting to one side the frustrating reality that the Applicant has made its "need" case a moving target, SEAS engages fully with it, and by this Deadline 6 document SEAS responds to and rebuts REP5-142, demonstrating that the Applicant's reworked "need" case stands scrutiny no better than did the Applicant's original "need" case. The lead author is, again, Mr Geoffrey Dunn. 1.5 As ever SEAS advances evidence to inform the examination, rather than relying on assertion, and this submission includes further evidence in response to the Applicant's various claims. Amongst other things, SEAS includes here consideration of on-point DCO examining authority reporting and Secretary of State DCO decision-making which further confirms the category error in the Applicant's reliance on the 2024 Clean Power 2030 report, and its related further reliance on the 2024 Clean Power Action Plan, to show the Proposals are required as "critical" and "urgent". Further, in light of latest evidence, we set out a revised NETS-SQSS compliant and economically efficient solution that can be securely delivered sooner than the Proposals, albeit (as we have pointed out) the claimed "worst case" "need" of c.352MW (not the previously asserted c2,000MW the Proposals are obviously designed for) will not eventuate until at least 2035 and possibly much later than that. But the demonstration of a deliverable and efficient alternative that greatly reduces the need for mitigation of environmental impacts is in itself a demonstration that Sea Link is not "required". 1.6 SEAS continues to accept the clear and urgent national need for reinforcement of the electricity transmission network as a matter of generality. But that does not absolve these Proposals of the need to satisfy policy and to pass the overarching statutory test. The Applicant has not shown, and cannot show, that Sea Link is necessary, proportionate, economical or efficient, rather than a deeply unfortunate waste of bill payers' (and tax payers') money. 1.7 The fact that the Applicant decided on a course years ago, and has refused to change tack in response to changing facts, is no good reason for continuing to pursue these Proposals, and certainly does not meet the national policy tests or amount to a compelling case for compulsory acquisition. As SEAS noted at ISH3, it is striking that whereas the Suffolk local authorities had previously kept their counsel	The Applicant is conscious that the ExA is being asked to consider a wide range of factors here that are presented as relating to the need case for the Proposed Project. As such the Applicant considers that it is worth reiterating the point made in REP5-142: when considering the need for the Proposed Project the the 'primary policy document' is NPS EN-1, which sets out the general context for need as well as the basic need test for the Proposed Project at paragraph 3.3.78: 'the case for a new connection or network reinforcement is demonstrated if the proposed development represents an efficient and economical means of: • connecting a new generating station or storage facility to the network • reinforcing the network to accommodate such connections, or • reinforcing the network to ensure that it is sufficiently resilient and capacious (per any performance standards set by Ofgem) to reliably supply present and/or anticipated future levels of demand.' The points are responded to in detail, below.

Reference	Matter	Point Raised	Applicant's Comments
		regarding “need”, East Suffolk Council has now seen the strength in SEAS’ position, and set out its endorsement in writing (in its response to EXQ2 at deadline 5 [REP5-189]), whilst Suffolk County Council then added its voice at ISH3. 1.8 We start with brief consideration of the shifting sands of the Applicant’s “need” case, noting and quickly disposing of points we have already addressed, before moving on to the detail of points in REP5-142 on which there is more to be said.	
2	SHIFTING NATURE OF THE APPLICANT’S “NEED” CASE AND SHORT RESUME REBUTTAL OF POINTS ALREADY ADDRESSED	2.1 The Applicant from the outset stated that its 2025 Strategic Options Back Check Report [APP-320] set out the full detail of the need case (see the Applicant’s Planning Statement, APP-319, at e.g. 5.2.3). As SEAS has previously noted, the “need” presented and purportedly evidenced by APP-320 as justifying a means to move electricity out of Suffolk was the claimed “Sizewell Generation Group” worst case transmission deficit of c.2,000MW. It was said Sea Link would contribute to meeting other asserted network issues (see list at APP-320 para. 3.8.1), but the Sizewell Group “need” of c.2m000MW was the foundational need for which detailed analysis was presented and on which the Suffolk need case hung (see para.3.8.2). It is no coincidence that the heart of the Proposals is the 2,000MW HVDC link. It is obvious the Proposals were designed and advanced as the solution to this purported problem. 2.2 It was this asserted c.2,000MW worst case “need” to move electricity out of Suffolk, and the infrastructure said to be required for that, that was then used as the basis for the case that it made sense for the same infrastructure (i.e. the Proposals) to take any excess electricity out of Kent in the event of a worst-case fault there. This despite the obvious lack of any demand for additional electricity in Suffolk (see SEAS’ previous submissions). 2.3 To emphasise the centrality of the Sizewell Group claimed c.2,000MW transmission “need” to the “need” case for this Suffolk-landfalling 2,000MV HVDC “Sea Link”, and the consequential nature of Sea Link as a contributor to meeting Kent issues, paragraph 3.8.2 of APP-320, which sits at electronic page 48 of a 148 page document (so with two thirds remaining), says this: <i>‘The remainder of this report considers the options required to resolve the provision of circa 2000 MW (i.e. greater than 1,800 MW) between Sizewell and the SC2 Boundary, resolving the Sizewell need and providing a significant reduction to the future capacity requirements in SC2.’</i> 2.4 In these circumstances, one of the more telling paragraphs of REP5-142 is para. 2.1.3, where the Applicant purports to summarise its “need” case by reference only to para. 3.8.1 of its 2025 Strategic Options Back Check Report [APP-320], skipping over para.3.8.2 of APP-320 and thus attempting to shift attention from the reality that the foundational “need” at the heart of APP-320 was the claimed Sizewell Group c2,000MW “need”. 2.5 The Sizewell Group “need” case having collapsed pre-Application from a claimed worst case need of c.2,000MW to just 352MW with the removal of Nautilus (and even that 352MW not until sometime in the late 2030s, and only because the Applicant’s sister company NGV has chosen to site LionLink here), and in circumstances where it is clear that both this putative need, and any Kent need, can	The Applicant’s position is that the Proposed Project is required to address several distinct issues within the electricity transmission network. These are identified at Paragraph 3.8.1 of APP-320: • Provision of minimum (no fossil fuel contribution) 9,703.7 MW of capacity across East Anglia EC5 Boundary and 5,271.8 MW of capacity across EC5N Boundary. • Provision of maximum 13,197 MW of capacity across East Anglia EC5 Boundary and 8,765.7 MW of capacity across EC5N Boundary. • Provision of 7,467 MW of capacity across the LE1 Boundary. • Provision of 352 MW (previously 1,852 MW) of connection capacity for the Sizewell Generation Group. • Provision of 3,480 MW of connection capacity for the Essex Coast Generation Group • Provision of 6,516.2 MW of capacity from the SC2 Boundary Group. The Applicant does make the point that APP-320 was part of the original suite of documents submitted with the DCO Application and cannot agree that using this document amounts to a ‘shifting’ of the need case. Whilst addressing the Sizewell Generation Gap has always been one of the issues that the Proposed Project will address, the Applicant does not accept that this is the only or the ‘foundational’ purpose of the Proposed Project. There is no fair or objective basis on which this can be presented as a ‘mere’ gap of ‘only’ 352 MW as SEAS have done. For the reasons set out in REP5-146, the Sizewell Gap has not ‘collapsed’ and a gap of 352 MW is a significant shortfall in provision in its own right, that the Applicant is requires to address.

Reference	Matter	Point Raised	Applicant’s Comments																	
		be met by more cost effective and less environmentally harmful means, the Applicant has sought to pivot in various ways.																		
		2.6 One such way is the assertion that Sea Link is “critical” by reason of NESO’s Clean Power 2030 report of November 2024 (“CP30R”) in combination with the 2026 EN-1 (see REP5-142 para. 2.2.4, section 2.5 etc). SEAS has already addressed this, but the Applicant makes an unmeritorious attempt to knock down SEAS’ arguments (which includes a notable attempt to mischaracterise those arguments and so duck the issues). SEAS deals with that below. The Applicant also seeks to rely on the Government’s Clean Power 2030 Action Plan of December 2024 (“CP30AP”), on the basis it endorsed CP30R (see REP5-142 para. 2.5.4 etc). This is similarly dealt with below. 2.7 Another is the assertion at para. 2.3.4 that the present (applicable) EN-1 provides “specific” support for the Proposals, as follows: <i>‘Paragraph 3.3.68 of NPS EN-1 notes that “The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial” and that “National Grid ESO forecasts that over the next decade the onshore and offshore transmission network” will require, inter alia, “substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation”. That provides specific policy support for Sea Link.’</i> Again, SEAS has already dealt with this, which clearly does not provide “specific policy support for Sea Link”. General support for "reinforcement in East Anglia" is not synonymous with support for the "Sea Link Proposals" specifically. The NPS text (para. 3.3.68) reflects a high-level forecast, but as SEAS has demonstrated (REP4-156), the "substantial reinforcement" required can be delivered (and is already being in part delivered) via more efficient and less damaging means. The Applicant cannot use this policy paragraph to justify a specific, multi-billion pound 2,000MW HVDC "bootstrap" if a lower-impact alternative can resolve what remains of a putative transmission capability gap. SEAS says no more about this. 2.8 As to para. 2.3.5, this is a misapplication of the policy: while the Secretary of State may not need to quantify an individual project's contribution to national net-zero targets, it is material to consider whether the project is actually necessary to meet the locational need it claims to serve and does not represent a diversion of funds from more efficient and economic projects. As explained in SEAS' Deadline 1 submission (SEAS’ written representation) (REP1-281), transmission infrastructure is inherently locational. If the "need case" for a specific location (Sizewell) is based on a contracted background that has fundamentally changed (the removal of Nautilus), then the project’s "contribution" is no longer satisfying an actual need, but rather addressing a "construct" or a "manufactured deficit." This is a fortiori if the residual “need” could be met more cheaply, in financial and environmental terms.	With respect to the NESO Clean power 2030, NESO has continued to emphasise the independent need for the Project in the NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis, Section 2.4: Securing Works for a 2030 delivery¹ page 8, which states: <i>‘There are three key schemes originally signalled as being delivered in 2030 in the Pathway to 2030, but where delivery will now be in 2031. The impact of these schemes is shown below. The percentages shown represent the difference in modelled percentage clean power generation across a typical year across the pathways.</i> Image 11.1 Impact of key projects for delivery in 2031 if not accelerated (Table from NESO Clean Power 2030 Report, Annex 2) <table><tr><th rowspan="2">Project</th><th rowspan="2">Connections / Support</th><th colspan="2">Impact on Clean Power / Constraint Impact</th><th rowspan="2">Latest Status from TOs</th></tr><tr><th>Further Flex and Renewables</th><th>New Dispatch</th></tr><tr><td>Norwich to Tilbury (AENC and ATNC)</td><td>Delivers new substation connecting • North Falls OWF • Five Estuaries OWF • Tarchon Interconnector Facilitates transfer of clean power through and out of East Anglia</td><td>-1.04% +£2.8 billion constraints in 2030</td><td>-1.0% clean power +£2.7 billion constraints in 2030</td><td>Planned for 2031</td></tr><tr><td>Sealink HVDC from Suffolk to Kent (SCD1)</td><td>Facilitates transfer of clean power through and out of East Anglia Required for connection of Five Estuaries OWF and firm connection of Rampion Extension</td><td>-0.6% +£1.4 billion constraints in 2030</td><td>-0.25% +£1.1 billion constraints in 2030</td><td>Planned for 2031</td></tr></table> <i>There is a significant capacity of offshore wind planned to connect this decade into East Anglia, which is a key enabler for clean power. Without the significant network capacity provided by these schemes a significant proportion of the wind power generated off East Anglia, around 23 TWh (in the Further Flex and Renewables pathway) will not be able to reach demand, leading to increased balancing costs and a need to replace some 4 TWh (in the same pathway) of this generation with unabated gas.</i> <i>The NESO Clean Power 2030 report identifies the Project as critical to delivering a network which supports the clean power pathways, Constraint costs arise when NESO has to manage this problem by paying generators to reduce (turn-down) their electricity output in areas that are congested and switch on (turn-up) in locations closer to electricity users. The specific reference to the Project in the Clean Power 2030 report provides additional</i>	Project	Connections / Support	Impact on Clean Power / Constraint Impact		Latest Status from TOs	Further Flex and Renewables	New Dispatch	Norwich to Tilbury (AENC and ATNC)	Delivers new substation connecting • North Falls OWF • Five Estuaries OWF • Tarchon Interconnector Facilitates transfer of clean power through and out of East Anglia	-1.04% +£2.8 billion constraints in 2030	-1.0% clean power +£2.7 billion constraints in 2030	Planned for 2031	Sealink HVDC from Suffolk to Kent (SCD1)	Facilitates transfer of clean power through and out of East Anglia Required for connection of Five Estuaries OWF and firm connection of Rampion Extension	-0.6% +£1.4 billion constraints in 2030	-0.25% +£1.1 billion constraints in 2030	Planned for 2031
Project	Connections / Support	Impact on Clean Power / Constraint Impact				Latest Status from TOs														
		Further Flex and Renewables	New Dispatch																	
Norwich to Tilbury (AENC and ATNC)	Delivers new substation connecting • North Falls OWF • Five Estuaries OWF • Tarchon Interconnector Facilitates transfer of clean power through and out of East Anglia	-1.04% +£2.8 billion constraints in 2030	-1.0% clean power +£2.7 billion constraints in 2030	Planned for 2031																
Sealink HVDC from Suffolk to Kent (SCD1)	Facilitates transfer of clean power through and out of East Anglia Required for connection of Five Estuaries OWF and firm connection of Rampion Extension	-0.6% +£1.4 billion constraints in 2030	-0.25% +£1.1 billion constraints in 2030	Planned for 2031																

¹ National Energy System Operator (NESO) (2024) *Clean Power 2030, Annex 2: Networks, Connections and network access analysis.*

Reference	Matter	Point Raised	Applicant's Comments
		2.9 Paragraphs 2.3.6-2.3.12 of APP5-142 contain similar misunderstandings/ misapplications of national policy: As to para. 2.3.6, being designated CNP does not grant a project "immunity" from rigorous examination of alternatives or costs, let alone the need to show a "compelling case" for compulsory acquisition. EN-1 paras. 4.2.5 and 4.2.16 emphasise that even CNP projects must minimise impacts and demonstrate that they have been designed to be efficient and economical. Furthermore, CNP status is intended to accelerate the "right" projects. If Sea Link is designed for 2GW of load when only 0.35GW might eventuate in that corridor, it becomes an "inefficient" project. Speeding up an inefficient and environmentally damaging project is not the intent of the CNP policy. See also below in this document regarding Clean Power 2030 and criticality and urgency. - As to paras. 2.3.7 - 2.3.8, there is a fundamental distinction between energy generation and transmission, which the Applicant studiously ignores. While a megawatt of clean energy is useful anywhere on the grid, transmission infrastructure is, by its very nature, location-specific. As stated in RR-5210 (e.g. para. i) and REP1-281 (e.g. para. 15), it is illogical to presume a need for reinforcement in a particular place without evidence of a specific transmission capability gap. National policy does not grant a mandate to build any transmission infrastructure, anywhere; it grants a mandate to solve identified bottlenecks. If the worst-case bottleneck at Sizewell has shrunk from 1,852MW to 352MW, the "locational need" has fundamentally changed, rendering the current Proposals a solution in search of a problem. - As to paras. 2.3.9-2.3.10, see immediately below. - As to para.2.3.11, the Applicant's "demonstration" of "locational need" is a construct based on stale data and circular logic, as SEAS has previously shown. It remains inexplicable that the Applicant failed to revisit its "need" case to take account of the removal of Nautilus before it submitted the Application and long before the Application was accepted, and the remaining 352MW worst case "need" cited to justify SQSS compliance is not only something that will not materialise until the mid-2030s at the earliest but also something that relies entirely on the inclusion of LionLink - a project by NGET's sister company (NGV) that could landfall elsewhere. Relying on a sister company's optional siting decision to assert a "license breach" risk that "requires" a £2bn reinforcement is not a demonstration of locational need; it is an attempt to rely on one speculative project to provide a "criticality" shield for something that is the wrong thing in the wrong place. -As to para. 2.3.12, claimed "urgency" does not absolve a proposal of compliance with the policy tests, and is certainly not a mandate for lack of economy and for inefficiency. While the national transition to clean power is urgent, the NPS does not seek, let alone require, the construction of mislocated or inefficient infrastructure. Bringing a project forward "at pace" using a faulty c.2GW deficit model risks stranded investment and unnecessary environmental destruction. True urgency demands that the right solutions are deployed quickly, rather than the wrong solutions being forced through despite a 1.5GW reduction in required transmission "need". 2.10 Related to the above, another way the Applicant has sought to pivot, is the claim that NPS EN-1 paragraph 3.3.78 "efficient and economical" means only that (REP5-142 para.2.3.10, with para.2.3.9):	<i>recognition of the need for the Project to what is stated on the need for new electricity networks.</i> Addressing the Difference between Transmission Connection offers and Development Connection Orders. Both Rampion and Five Estuaries are referenced as needing Sea Link in the Clean Power 2030 document in reference to their firm connection to the transmission system. It is not a mistake that both Rampion and Five Estuaries have this restriction, Rampion affect SC2 and therefore until Sea Link SC2 capacity arrives it is restricted. Five Estuaries affects LE1 and until Sea Link capacity arrives it is restricted there is no error and these are not restrictions to them achieving there own planning and would not be flagged as such in any DCO as this is a transmission contract restriction not impacting upon their planning hence why such transmission contractual restrictions would not arise in generation projects DCO. The applicant has above shown, that the numbers as set out in para 2.1.3 and 2.1.4, page 2 9.129 Applicants Response to 2GEN1 and 2GEN2 in respect of Need [REP5-142]. In summary on the need case, as set out in the Strategic Options Back Check Report [APP-320] at paragraph 3.8.1 (and see generally Section 3: Need Case) the Proposed Project will address several distinct issues within the electricity transmission network: • Provision of minimum (no fossil fuel contribution) 9,703.7 MW of capacity across East Anglia EC5 Boundary and 5,271.8 MW of capacity across EC5N Boundary. • Provision of maximum 13,197 MW of capacity across East Anglia EC5 Boundary and 8,765.7 MW of capacity across EC5N Boundary. • Provision of 7,467 MW of capacity across the LE1 Boundary. • Provision of 352 MW (previously 1,852 MW) of connection capacity for the Sizewell Generation Group. • Provision of 3,480 MW of connection capacity for the Essex Coast Generation Group • Provision of 6,516.2 MW of capacity from the SC2 Boundary Group. The Applicant's position is that the need case is not merely asserted in policy terms, but is grounded in quantified technical system deficits. Overarching National Policy Statement [NPS] for Energy (EN-1) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. Electricity infrastructure of the type proposed is critical national infrastructure, which is so urgent and important that we are told it will, in general, outweigh any other residual impacts and should be '<i>progressed as quickly as possible</i>' (NPS EN-1 paragraph 3.3.63 (2024)). The timing and urgency for electricity infrastructure is referred to within NPS EN-1 (2024). <i>'3.3.68 The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial. National Grid ESO forecasts that over the next decade the onshore and offshore transmission network, some of</i>

Reference	Matter	Point Raised	Applicant's Comments
		<i>‘...the network project needs to follow good design, avoidance and mitigation principles (and / or biodiversity compensation where needed for transmission in the marine environment), as referenced in EN-5.’</i> - with the Applicant also plainly implying that “good design” is a narrower concept than whether the proposal is needed at all. Thus, the Applicant misunderstands the plain language “efficient and economical” and makes a markedly weak attempt to undermine SEAS’ evidence that the modest worst case deficit that might arise by a point in the mid-2030s could be met with minimal cost and minimal environmental impact by comparison with the Proposals. The notion that “efficient and economical” does not even include, let alone turn substantially on, minimisation of cost and environmental impact is so obviously wrong SEAS says no more about it. But the fact the Applicant seeks to advance that argument is highly revealing of the lack of substance in its “need” case. A multi-billion pound, 2,000MW HVDC link is neither efficient nor economical when applied to a residual 352MW deficit. As evidenced in REP4-156 and REP5-206, lower impact solutions would resolve this 352MW N-1 fault requirement at a fraction of the cost (c.£170m, IET 2025 p.48). These are basic "Good Design" principles, and to ignore them in favor of an over-scaled project is a direct violation of the very policy the Applicant cites. 2.11 Of a piece with these pivots from the Applicant are its suggestions (e.g. section 2.4, paras.3.1.3-3.1.5 etc) that the Proposals are the only way the Applicant can be in compliance with its electricity licence (which has requirements similar to the “efficient and economical” policy test). 2.12 In addition to the above are the assertions at 2.1.4-2.1.6 of REP5-142, by which the Applicant argues that 352MW is “still a sizeable figure” and that (in a run of assertions the ExA will note even now lack evidential support): <i>‘2.1.4...as set out in this document is only one of the multiple requirements set out above that needs to be addressed by the Applicant’s proposal - with the others being addressed including the contribution to capacity of boundaries EC5, LE1 and SC2 (Kent).</i> <i>2.1.5 It is important to note that each one of these issues on its own would have to be addressed by a specific investment in the network, and that by providing additional capacity and greater resilience in the network, the Proposed Project will help to address each of these issues.</i> <i>2.1.6 Further, whilst the additional capacity that Sea Link will provide will help to accommodate individual generation projects and also provide additional capacity to overcome specific network constraints, it is also important to recognise and give weight to the fact that the Proposed Project is a holistic and strategic investment designed to reinforce the national electricity transmission network as a whole.’</i> See also 3.1.6, and note the interesting language the Applicant slips into, which is not the language of hard-edged “need”, e.g. ‘Whilst a shortfall of 352MW is significant in its own right, the rationale for the Proposed Project is in any case to provide additional capacity, resilience and transmission capacity and to tackle a number of issues in the network as a whole...’ (our emphasis).	<i>which is located offshore will require a doubling of north-south power transfer capacity due to increased wind generation in Scotland; [...] and substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation (this may also require additional offshore connections coming to land in England).’</i> <i>‘3.3.83 Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.’</i> At each key stage of the consultation and submission process, in addition to the policy terms, the technical basis for the need case is reviewed and updated. The contracted background, as contained in both the National Energy System Operator (NESO) Transmission Entry ²³ and the NESO Electricity Ten Year Statement⁴, is reviewed. The most recent update was completed to capture the latest information as of Jan 2025, the need case, as set out in the Strategic Options Back Check Report [APP-320] Table 3.2 “Planned Generation for East Anglia” page 30-31 and Table 3.4 “Planned Generation and Planned Transfer for Boundary SC2” page 40 of Strategic Options Back Check Report [APP 320]. Each of these tables use the scaling factors set out in paragraph 3.6.4 which in turn come from the Economy Planned Transfer Appendix E of the NETS SQSS (National Electricity Transmission System Security and Quality of Supply Standards) The SQSS defines the technique that should be used to scale generation outputs for certain types of generators. Generators with fixed scaling factors (DT) are: • Nuclear and fossil fuel power with carbon capture and storage DT = 0.85. • Wind, Wave and Tidal DT = 0.7. • Pumped Storage DT = 0.5. • Interconnectors Considered importing at Peak DT = 1.0. National Policy Statement for Electricity Networks infrastructure (EN-5) (2024) also states the following regarding Transmission Owners: <i>‘2.8.4 The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design.</i>

² National Energy System Operator (NESO) (2026) *Transmission Entry Capacity Register*

⁴ National Energy System Operator (2024) *Electricity Ten Year Statement*

Reference	Matter	Point Raised	Applicant's Comments
		2.13 Of the various pivots from the original “need” case not summarily addressed above, we deal with the Applicant’s claims regarding CP30R/CP30AP first, in the section immediately following.	<i>2.8.5 TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested.’</i> Given the above the applicants technical need supporting the NPS-1 Overarching National need is consistent, fully documented, auditable via the Tec Register in tables Table 3.2 “Planned Generation for East Anglia” page 30-31 and Table 3.4 “Planned Generation and Planned Transfer for Boundary SC2” page 40 of Strategic Options Back Check Report [APP 320]. Consistent in its approach and every version has confirmed the urgent need for the Sea Link project.
3	WHY APPLICANT IS WRONG TO CLAIM THE 2024 CLEAN POWER 2030 REPORT AND THE 2024 CLEAN POWER 2030 ACTION PLAN EVIDENCE “CRITICAL” AND “URGENT” NEED FOR THE PROPOSALS	3.1 The Applicant continues to advance its new argument (see e.g. REP4-092, quoted at REP5-142 para. 2.2.4) relying on CP30R, that: ‘...As a project which was identified in the NESO’s Advice on Achieving Clean Power by 2030 (NESO, 2024), the critical and urgent nature of the project is therefore reinforced by the inclusion of the Clean Power Mission in the 2026 NPSs.’ To this, the Applicant adds reliance on CP30AP, on the basis that this endorsed CP30R. 3.2 First, the ExA is asked to note that the Applicant did not rely on CP30R/CP30AP in its 2025 Strategic Options Back Check Report [APP-320], which NGET has always emphasised as setting out the full detail of the need case. This is despite the Applicant plainly being aware of both, as shown by the (single) passing reference to CP30AP in footnote 3 at para.2.1.4 of APP-320. 3.3 Second, the ExA is asked to note that the Applicant has rather cleverly sought to mischaracterise SEAS’ arguments in order to set up and knock down a false target, and so avoid having to deal with the evidenced case against it. This is at section 3.5 of REP5 142. However, contrary to the Applicant’s attempts to frame matters, the issue is not at all whether or not Five Estuaries or Rampion Extension (Rampion 2) connect physically into Sea Link. Rather, the issue, which the Applicant attempts to sidestep, is that CP30R Annex 2 expressly states that Sea Link is “required for connection of Five Estuaries OWF and firm connection of Rampion Extension”. 3.4 Whereas, as SEAS has pointed out, whatever may have been in NESO’s mind when it wrote those words, it is plainly incorrect to say that either Five Estuaries offshore wind farm or the extension to the Rampion offshore windfarm require the Proposals to feed their electricity into the grid. The Applicant tries to characterise SEAS’ arguments as being simply (and mistakenly) that CP30R envisaged those proposals would physically connect to the grid via Sea Link, whereas it is apparent from elsewhere in CP30R NESO knew that was not the case. This mischaracterisation of SEAS’ case and attempt to paint SEAS as incorrect is an attempt at misdirection and distraction, pure and simple. The basic point SEAS has made is that CP30R is wrong (and in so far as it carries this forward CP30AP is also wrong) to say that Sea Link is required for Five Estuaries OWF or Rampion Extension to be brought onstream and feed in. Any suggestion otherwise cannot possibly stand with the Secretary of State’s own decision-making subsequent to CP30R/CP30AP.	The Applicant’s overarching view of Clean Power 2030 Report is a very simple one: that when the National Energy System Operator (NESO) was asked to set out its analysis of what it considers to be the pathway to a clean power system by 2030 it concluded that Sea Link is “critical” to delivering a network which supports the clean power pathways; that constraint costs that would arise if Sea Link was not delivered by 2030; that Sea Link will facilitate the transfer of clean power through and out of East Anglia; and that the project is ‘required’ for connection of Five Estuaries and Rampion Extensions OWFs. These points have previously been set out in REP5-142. The point made in Clean Power 2030 is not that the Proposed Project is required to allow either Five Estuaries offshore wind farm or the extension to the Rampion offshore windfarm to ‘<i>feed in to the grid</i>’ – it is rather that Sea Link is required to reinforce the transmission system to facilitate the transport of the electricity to where it is used. This is set out in 3.5 of REP5-142 and below. The NESO is an independent System Operator as created as a result of the UK’s Energy Act 2023, and the report was published in in accordance with its statutory duties. As such the Applicant’s view is that a great deal of weight can be attached to Clean Power 2030 Report as an important and relevant consideration.

Reference	Matter	Point Raised	Applicant's Comments														
		We are conscious that the ExA will be familiar with this decision-making, and at least some of the ExA intimately so, but it is apparent the Applicant is not, hence we spend time setting out the detail. It is also very interesting to consider the contributions NGET itself made to those DCO examinations, which it is apparent from the examining authority reporting did not include argument that Sea Link was necessary for those proposals to come forward (or even identification of the asserted boundary deficits the Applicant seeks to rely upon here).															
		3.5 We will deal first of all with Five Estuaries offshore wind farm. 3.5.1 Five Estuaries OWF was subject to an application for a DCO which led to a recommendation report published on 17 June 2025 and a decision letter from the Secretary of State dated 17 December 2025. 3.5.2 The chronology is significant, in that CP30R and CP30AP were published well within the Five Estuaries examination (as the recommendation report explains at the outset, the examination of the application began on 17 September 2024 and was completed on 17 March 2025), and long before the Secretary of State's decision. Moreover, the recommendation report, with which the Secretary of State agreed, includes various references to the Clean Power 2030 "Action Plan" (see 3.3.3, 4.8.42 and Table A4). 3.5.3 It is also significant that NGET was one of a very few parties that entered into a statement of common ground with the applicant (in fact a tripartite SoCG with another party), as recorded at 1.4.6 of the recommendation report. 3.5.4 In those circumstances, it is telling that the Five Estuaries recommendation report mentions Sea Link repeatedly, but only in order to discuss the abandoned feasibility work exploring a physical offshore connection to Sea Link. This is important, and we quote here extensively from the report - see 3.2.7-3.2.11 in particular (within Section 3.2, under the sub-heading "Alternatives") and 3.3.11-3.3.14 in particular (within Section 3.3, again under a sub-heading "Alternatives"), as follows: '3.2.9 The single main alternative option to the development as proposed would be to connect the Five Estuaries wind turbine generator (WTG) array areas to National Grid's proposed Sea Link project, a point-to-point offshore cable link between Suffolk 2Five Estuaries recommendation report and decision letter and Kent to reinforce the nation's onshore transmission network. This alternative option would have the effect of removing the need for any of the proposed onshore development within Essex. The application for the Sea Link project (EN020026) was accepted for examination on 23 April 2025. 3.2.11 The applicant, along with the NF OWF and Sea Link (NGET), applied as a consortium for grant funding as part of the Offshore Coordination Support Scheme (OCSS). In December 2023 the Government announced that the consortium had been successful in receiving grant funding to explore the feasibility of a coordinated offshore solution. In March 2024, the consortium submitted a feasibility study [PD4 008] to the Department for Energy Security & Net Zero (DESNZ) as the next step of the grant funding agreement. 3.3.11. In respect of the potential alternative option of an offshore connection, the applicant confirmed to us in section 2 of [PD4-006] that DESNZ on 3 September	The Applicant agrees that Annex 2 of the Clean Power 2030 Report expressly states that Sea Link is "required for connection of Five Estuaries OWF and firm connection of Rampion Extension". With respect to the NESO Clean power 2030, NESO has continued to emphasise the independent need for the Project in the NESO Clean Power 2030 Report, Annex 2: Networks, Connections and network access analysis, Section 2.4: Securing Works for a 2030 delivery⁵ page 8, which states: <i>'There are three key schemes originally signalled as being delivered in 2030 in the Pathway to 2030, but where delivery will now be in 2031. The impact of these schemes is shown below. The percentages shown represent the difference in modelled percentage clean power generation across a typical year across the pathways.</i> Image 11.2 Impact of key projects for delivery in 2031 if not accelerated (Table from NESO Clean Power 2030 Report, Annex 2) <table><tr><th rowspan="2">Project</th><th rowspan="2">Connections / Support</th><th colspan="2">Impact on Clean Power / Constraint Impact</th></tr><tr><th>Further Flex and Renewables</th><th>New Dispatch</th></tr><tr><td>Norwich to Tilbury (AENC and ATNC)</td><td>Delivers new substation connecting • North Falls OWF • Five Estuaries OWF • Tarchon Interconnector Facilitates transfer of clean power through and out of East Anglia</td><td>-1.04% +£2.8 billion constraints in 2030</td><td>-1.0% clean power +£2.7 billion constraints in 2030</td></tr><tr><td>Sealink HVDC from Suffolk to Kent (SCD1)</td><td>Facilitates transfer of clean power through and out of East Anglia Required for connection of Five Estuaries OWF and firm connection of Rampion Extension</td><td>-0.6% +£1.4 billion constraints in 2030</td><td>-0.25% +£1.1 billion constraints in 2030</td></tr></table> <i>There is a significant capacity of offshore wind planned to connect this decade into East Anglia, which is a key enabler for clean power. Without the significant network capacity provided by these schemes a significant proportion of the</i>	Project	Connections / Support	Impact on Clean Power / Constraint Impact		Further Flex and Renewables	New Dispatch	Norwich to Tilbury (AENC and ATNC)	Delivers new substation connecting • North Falls OWF • Five Estuaries OWF • Tarchon Interconnector Facilitates transfer of clean power through and out of East Anglia	-1.04% +£2.8 billion constraints in 2030	-1.0% clean power +£2.7 billion constraints in 2030	Sealink HVDC from Suffolk to Kent (SCD1)	Facilitates transfer of clean power through and out of East Anglia Required for connection of Five Estuaries OWF and firm connection of Rampion Extension	-0.6% +£1.4 billion constraints in 2030	-0.25% +£1.1 billion constraints in 2030
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⁵ National Energy System Operator (NESO) (2024) *Clean Power 2030, Annex 2: Networks, Connections and network access analysis*.

Reference	Matter	Point Raised	Applicant's Comments
		2024, having reviewed the feasibility study [PD4-008] had decided not to grant further funding to explore the option of a coordinated offshore connection. Accordingly, the applicant confirmed in [PD4-006] that without further funding it would no longer be pursuing the option of an offshore connection. 3.3.12. Further to our request during CAH1, Essex County Council submitted a copy of the letter issued by DESNZ [AS-011]. During CAH1, the ExA questioned the applicant about the feasibility study [PD4-008], with the applicant providing reassurance on the independence of the author of the study in investigating the practicalities of connecting to Sea Link and arriving at conclusions regarding costs and timescales in paragraph 1.3.19 of [REP1-059]. 3.3.13. During the examination no parties queried the proposed landfall location. Whilst there were some issues raised regarding the siting of the proposed substation and the onshore and offshore cable routes, these were micro-siting issues rather than challenges regarding alternative routes or locations. 3.3.14. We are content that as part of the submitted ES [APP-066] the applicant has considered reasonable alternatives to the proposal for which it is seeking consent and has provided sufficient information as to why those alternatives were discounted.' See also 9.6.18 and surrounding of the recommendation report. 3.5.4 Thus, the recommendation report makes clear exactly what is required for Five Estuaries OWF to feed in to the transmission system, and it is not Sea Link, rather it is the Norwich to Tilbury Reinforcement Project and the associated East Anglia Connection Node substation - see also in particular 6.5.8 (within Section 6.5 "Cumulative and interrelated effects") as follows: '6.5.8 In order for the proposed development to connect to National Grid's transmission system, the proposed Norwich to Tilbury Reinforcement Project and the associated East Anglia Connection Node (EACN) substation would need to be operational. Despite the pre-application stage that National Grid's project is at, given the proposed development's dependency on it, the applicant's CEA affords that project greater consideration than other projects at a similar stage in the planning process. For the purposes of the cumulative assessment of the two projects, the worst-case delivery scenario, with limited co-ordination was assessed for the direct and indirect impacts.' See also e.g. 10.6.1. 3.5.5 Thus we are faced with a conundrum. NGET asserts, for this Application, that CP30R/CP30AP shows the Proposals are "critical", because CP30R says Sea Link is "required" for Five Estuaries to feed in to the grid, yet NGET itself does not appear to have made that case to the Five Estuaries examining authority even though NGET participated in the examination and CP30R/CP30AP were published well within the examination. That is a remarkable curiosity. 3.5.6 Most importantly, though, if the Five Estuaries examining authority had thought Sea Link would be required for Five Estuaries to feed in to the grid, or even if there was a possibility Sea Link might be required, the examining authority would have said so, rather than dismissing Sea Link as a potential alternative for an offshore connection that had reasonably not been pursued. 3.5.7 On 17 December 2025, the Secretary of State decided to grant a DCO, accepting the recommendation report, and saying nothing material to alter the above.	<i>wind power generated off East Anglia, around 23 TWh (in the Further Flex and Renewables pathway) will not be able to reach demand, leading to increased balancing costs and a need to replace some 4 TWh (in the same pathway) of this generation with unabated gas.'</i> The NESO Clean Power 2030 report identifies the Project as critical to delivering a network which supports the clean power pathways, Constraint costs arise when NESO has to manage this problem by paying generators to reduce (turn-down) their electricity output in areas that are congested and switch on (turn-up) in locations closer to electricity users. The specific reference to the Project in the Clean Power 2030 report provides additional recognition of the need for the Project to what is stated on the need for new electricity networks. In summary on the need case, as set out in the Strategic Options Back Check Report [APP-320] at paragraph 3.8.1 (and see generally Section 3: Need Case) the Proposed Project will address several distinct issues within the electricity transmission network: • Provision of minimum (no fossil fuel contribution) 9,703.7 MW of capacity across East Anglia EC5 Boundary and 5,271.8 MW of capacity across EC5N Boundary. • Provision of maximum 13,197 MW of capacity across East Anglia EC5 Boundary and 8,765.7 MW of capacity across EC5N Boundary. • Provision of 7,467 MW of capacity across the LE1 Boundary. • Provision of 352 MW (previously 1,852 MW) of connection capacity for the Sizewell Generation Group. • Provision of 3,480 MW of connection capacity for the Essex Coast Generation Group • Provision of 6,516.2 MW of capacity from the SC2 Boundary Group. The Applicant's position is that the need case is not merely asserted in policy terms, but is grounded in quantified technical system deficits. Overarching National Policy Statement [NPS] for Energy (EN-1) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. Electricity infrastructure of the type proposed is critical national infrastructure, which is so urgent and important that we are told it will, in general, outweigh any other residual impacts and should be '<i>progressed as quickly as possible</i>' (NPS EN-1 paragraph 3.3.63 (2024)). The timing and urgency for electricity infrastructure is referred to within NPS EN-1 (2024). <i>'3.3.68 The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial. National Grid ESO forecasts that over the next decade the onshore and offshore transmission network, some of which is located offshore will require a doubling of north-south power transfer capacity due to increased wind generation in Scotland; [...] and substantial reinforcement in East Anglia to handle increased power flows from offshore</i>

Reference	Matter	Point Raised	Applicant’s Comments
		3.5.8 As such, what CP30R says about Sea Link being needed to connect Five Estuaries as part of the justification for why CP30R badges Sea Link as “critical”, simply does not stand up, and the Applicant is wrong to claim otherwise. Necessarily, the same is true of CP30AP. 3.5.9 That is even before coming to the remarkable curiosity that NGET was heavily engaged in the Five Estuaries DCO examination, into which CP30R/CP30AP were published, yet apparently did not advance the “need” argument for Sea Link and Five Estuaries OWF it is advancing here (and nor does it appear NGET advanced the assertions regarding boundary deficits it is also advancing here). 3.6 As regards Rampion Extension (Rampion 2), much the same applies, albeit the examination and decision there were slightly earlier. 3.6.1 The extension to Rampion OWF (“Rampion Extension” or “Rampion 2”) was the subject of a DCO application, the examination into which completed in August 2024.³ The examining authority’s recommendation report was presented on 6 November 2024, and the Secretary of State’s decision was made on 4 April 2025. 3.6.2 As such, as with Five Estuaries OWF, the chronology is important: the Secretary of State’s decision came well after CP30R/CP30AP. Further, once again, as with Five Estuaries, NGET was actively involved, including by (again) entering into a SoCG with the applicant (see recommendation report at eg 6.6.45). 3.6.3 As regards the recommendation report published on 6 November 2024, there is no mention of Sea Link anywhere in the report nor any indication that further infrastructure reinforcement would be required for the “firm connection of Rampion Extension” (which Rampion 2 recommendation report and decision letter will be made at a 400kv substation at Bolney, West Sussex, close to the western edge of the SC2 boundary). 3.6.4 The lack of reference to Sea Link is despite what was clearly direct NGET input into the process, not just the matters the subject of the SoCG between the applicant and NGET (see 6.6.45 and following), but also this at 3.3.4 specifically regarding connection: ‘...This part of the process is not fully in the control of the Applicant. NGET ultimately determines where the most appropriate connection point should be as part of the Connections Infrastructure Option Notice (CION) process and in this case, ran parallel with the Applicants options appraisal process and focused on the technical and system capacity for facilitating an efficient new connection to the transmission network and overall consideration of cost to the consumer.’ 3.6.5 The report then proceeds, at 3.3.5, to say that in relation to connection points, NGET: ‘...was asked to identify potential substation locations along transmission lines which largely run in an east/west alignment in the south of England. While many were identified, only three were considered as capable or potentially capable of accommodating the 1200MW to be generated by the Proposed Development. They were: o The Bolney substation, which is the proposed choice. o Fawley. o Little Horsted, which is not currently operational but is expected to be by the time the Proposed Development would be completed.’ 3.6.6 As regards the Secretary of State’s decision, this was published well after CP30R and CP30AP, and it refers specifically to CP30AP, but simply to say this, at 4.5:	<i>wind generation (this may also require additional offshore connections coming to land in England).’</i> <i>‘3.3.83 Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.’</i> At each key stage of the consultation and submission process, in addition to the policy terms, the technical basis for the need case is reviewed and updated. The contracted background, as contained in both the National Energy System Operator (NESO) Transmission Entry ⁶⁷ and the NESO Electricity Ten Year Statement⁶⁸, is reviewed. The most recent update was completed to capture the latest information as of Jan 2025, the need case, as set out in the Strategic Options Back Check Report [APP-320] This snapshot only reflects the Transmission Connection Entry Register at the time of development and then publication of the Needs Case. The applicants policy is that the needs case must be an accurate snapshot within 3 months of publication. In Jan 2025 Nautilus remained connecting into the Sizewell group on the interconnection register. National Policy Statement for Electricity Networks infrastructure (EN-5) (2024) also states the following regarding Transmission Owners: <i>‘2.8.4 The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design.</i> <i>2.8.5 TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested.’</i> Given the above the applicants technical need supporting the NPS-1 Overarching National need is consistent, fully documented, auditable via the Tec Register in tables Table 3.2 “Planned Generation for East Anglia” page 30-31 and Table 3.4 “Planned Generation and Planned Transfer for Boundary SC2” page 40 of Strategic Options Back Check Report [APP 320]. Consistent in its approach and every version has confirmed the urgent need for the Sealink project.

⁶ National Energy System Operator (NESO) (2026) *Transmission Entry Capacity Register*

⁷ National Energy System Operator (2024) *Electricity Ten Year Statement*

Reference	Matter	Point Raised	Applicant's Comments
		‘...Following the consultation on reforms to the 2023 NPPF, a new NPPF was published 12 December 2024 (“2024 NPPF”) Clean Power 2030 Action Plan (“CP2030”) was published 13 December 2024 and sets out a pathway to a clean power system.’ 3.6.7 Thus, the Secretary of State specifically considered CP30AP in coming to a decision, and in no way relied upon Sea Link for Rampion Extension to feed in to the grid, indeed did not mention Sea Link at all. 3.6.8 Nor, again strikingly, does it appear NGET itself suggested Sea Link was required, despite NGET’s extensive involvement in the examination (and nor, further, does it appear that NGET advanced the boundary assertions it has advanced here, including as regards SC2). Conclusion on Applicant’s attempts to rely on Clean Power 2030 as evidencing “criticality” and urgency (and, ultimately, need) 3.7 Thus, the Applicant has missed (or knowingly ignored) that the Secretary of State’s decision-making on both Five Estuaries and Rampion 2, subsequent to CP30R/CP30AP simply does not rely on Sea Link to allow for either Five Estuaries OWF and Rampion 2 OWF to feed their power into the grid, and flatly contradicts CP30R/CP30AP in that respect. Needless to say, the Applicant has also not dealt with its own apparent silence regarding a claimed need for Sea Link despite its extensive involvement in both the Five Estuaries and Rampion Extension DCO examinations. 3.8 Consistency in decision-making is a well-established principle of administrative law. The Secretary of State having granted DCOs for Five Estuaries OWF and the Rampion Extension without any suggestion that the Proposals will be needed for those projects to feed in to the grid, let alone reliance on the Proposals for that, and having done so in circumstances where the decision-making post-dated and had specific regard to CP30R/CP30AP and followed extensive NGET involvement, the Applicant’s case that CP30R/CP30AP establish “critical” and “urgent” need for the Proposals simply cannot stand. There is no contradiction between this and the Secretary of State’s general support for CP30R/CP30AP, including in the 2026 NPSs: CP30R/CP30AP cover many and various topics, and the fact they have been superseded as regards one item, these Proposals, would hardly be expected to invalidate them as a whole. 3.9 SEAS notes that its position in respect of the fatal flaws in the Applicant’s case relying on Clean Power 2030 is supported by East Suffolk Council (REP5-189, point 1 regarding ExA 2GEN2.). ESC aligns with SEAS, and ESC moreover highlights the consequential knock on for EN-1: that EN-1 cannot be said to “have effect” as regards these Proposals where the material on which EN-1 relevantly relies does not in fact evidence a need for the Proposals. 3.10 All of this is before coming to the interesting feature that it does not appear the Applicant advanced the various boundary claims it advances here in those DCO examinations.	

Reference	Matter	Point Raised	Applicant's Comments
4	WHY APPLICANT IS WRONG TO RELY ON GRANT OF EARLY CONSTRUCTION FUNDING IN SUPPORT OF ITS "NEED" CASE	4.1 At REP5-142 para 3.5.7 the Applicant attempts to pray in aid Ofgem's decision of 19 November 2025 granting "early construction funding" for the Proposals, as evidencing that the Proposals are something which is "in the national interest to be delivered as soon as possible". This is patently incorrect, and it is deeply depressing that the Applicant has resorted to such a bootstraps argument, which SEAS has long argued it would attempt if granted early construction funding. 4.2 OFGEM has stated clearly: 'Approval of ECF does not constitute a full funding decision on the project. It is also not a relevant consideration or predeterminant of the DCO approval process.' (Ofgem 19 November 2025 'Sea Link - Decision on Early Construction Funding and Modification to special conditions of the electricity transmission licence', point 3.13) 4.3 The Applicant's assertion is an unjustified distortion of Ofgem's decision-making. That the assertion is made at all is further evidence of the Applicant clutching at straws in an attempt to justify the Proposals. 4.4 To the contrary, a point of substance to emerge from the early construction funding process, was Ofgem's recognition that European wide demand for the materials required by the Proposals (particularly HVDC cable) had massively driven up the potential costs of the Proposals. All of which was before the Israel/US war on Iran, with its attendant consequences.	The point made at Paragraph 3.5.7 of REP-142 is actually quite a simple one: that when asked to take a decision on the release of early construction funding for the Proposed Project, OFGEM approved the request. In doing so OFGEM took the view that <i>'there will be significant growth in wind generation, and a range of reinforcements will be required to deliver the capacity to allow the system to operate in an economic and efficient manner'</i> and that: <i>'Sea Link will play an important role in this required reinforcement.'</i> OFGEM also took the position that Sea Link: <i>'will reduce network constraints on the heavily utilised network on the east coast. NESO's Clean Power 2030 advice identified the project as an investment required in order allow the Government's clean power objectives to be reached. The project has been highlighted as needing to be accelerated due to the consequences of it not being delivered by 2030. NESO has estimated that failure to accelerate Sea Link to 2030 could cost consumers between £1.1 – 1.4 billion in constraint costs.'</i> OFGEM has a statutory role as the independent regulator for Great Britain's energy markets and the grant of Early Construction Funding for Sea Link and the reasoning behind it will have been made consistent with OFGEM's statutory duties. Overall the Applicant cannot interpret its approval as anything other than evidence of the need for the Proposed Project.
5	COMMENT ON THE APPLICANT'S VARIOUS REP5-142 ASSERTIONS REGARDING "SIZEWELL GENERATION GROUP" "NEED"	5.1 SEAS has been over the technical detail of the collapse of the Applicant's "Sizewell Generation Group" "need" case before (see e.g. SEAS' written representation on "need" REP1-281), and does not repeat that. However, the Applicant makes various unjustified assertions in REP5-142 that we correct for completeness. We take them largely in order of appearance, but also thematically where possible. 5.2 At para. 2.1.4 the Applicant says this (our emphasis): <i>'During the application the requirement to provide additional capacity of 1,852MW of capacity from the Sizewell Generation Group has reduced to 352MW'.</i> This claim then forms the foundation for what follows in REP5-142, including section 3.1 where the Applicant simply ignores the 2024 reduction in the "worst case" "need" in favour of distracting arguments about licence obligations. The Applicant knows it is simply not true that the reduction occurred "during the application". As we have previously demonstrated, the Nautilus project was removed from NESO's Connections Register well before the Applicant made this Application in March 2025, and the Applicant knew Nautilus would not be a factor for Sea Link many months before the Application was made (since Ofgem announced its formal decision to move the Nautilus project connection to the Isle of	The applicant has above shown, that the numbers as set out in para 2.1.3 and 2.1.4, page 2 9.129 Applicants Response to 2GEN1 and 2GEN2 in respect of Need [REP5-142] In summary on the need case, as set out in the Strategic Options Back Check Report [APP-320] at paragraph 3.8.1 (and see generally Section 3: Need Case) the Proposed Project will address several distinct issues within the electricity transmission network: • Provision of minimum (no fossil fuel contribution) 9,703.7 MW of capacity across East Anglia EC5 Boundary and 5,271.8 MW of capacity across EC5N Boundary. • Provision of maximum 13,197 MW of capacity across East Anglia EC5 Boundary and 8,765.7 MW of capacity across EC5N Boundary. • Provision of 7,467 MW of capacity across the LE1 Boundary. • Provision of 352 MW (previously 1,852 MW) of connection capacity for the Sizewell Generation Group.

Reference	Matter	Point Raised	Applicant's Comments
		Grain in Kent in November 2024⁸, and the project owners, NGV, confirmed the change at the same date). The Applicant's continued insistence in pushing this false history speaks volumes: it was the Applicant's decision to press on with the Application despite knowing its "need" case had collapsed, and without even updating its documentation accordingly, and it is right the Applicant live with that. 5.3 In similar vein, the Applicant is plainly wrong to assert (para. 3.1.1) that: <i>'....there presently is a requirement to provide additional capacity of 352MW'</i>. Insofar as such a worst-case fault requirement might arise, it will not arise until the late 2030s at the earliest, and only then if: both Sizewell C reactors are fully operational and Sizewell B is granted an extension to its operating life and all the current OWF contracted connections are made and LionLink is fully operational (as SEAS has previously explained). Without LionLink, there would be a healthy surplus of transmission capability for the Sizewell Generation Group way beyond 2040. As the ExA knows, SEAS' position is that the non-consented LionLink Interconnector, can and should be taken elsewhere, and at this stage cannot be used to support the Applicant's argument for a 'present deficit.' or even a future deficit. 5.4 Turning to the scale of the deficit, para. 3.1.2 refers to 352MW as still being a "significant shortfall", and seeks to bolster that claim by reference to a notional number of households' demand (and para. 2.1.4 describes this as a "sizable need"). The problem the Applicant faces, though, is that it is clear that the Applicant's original "need" case and justification for these 2,000MW link Proposals was based on a c.2,000MW transmission deficit. In those circumstances, the 2000MW Sea Link HVDC solution might have seemed a proportionate solution, at least in terms of capacity (if not necessarily in terms of cost/economic efficiency or environmental impact) but now any "worst case" "need" is only 352MW, that rationale falls away, and with it any claims to proportionality, economy and efficiency. 5.5 We can similarly dismiss section 3.1, which is largely a recital of the Applicant's contractual obligations as an Electricity Transmission Licence owner and does not add materially to, or materially depart from, the policy tests and, ultimately, the overarching statutory tests. The use of a sledgehammer to crack a nut is as non-compliant with those contractual licence obligations, as it is with policy and the statute. The Proposals cannot be claimed as the solution to future 'network design' issues, unless those issues are clearly identified and their resolution tied to the Sea Link project. The attempt to do so brings into view the oddity that the "additional transmission system capacity" it notionally refers to may perhaps more simply be described as NGET's sister company NGV's LionLink project, which at present is the only forecast driver for the residual 352MW worse case fault need in the Sizewell group. 5.6 Ultimately, the Applicant has fallen well short of making out a case, let alone a "compelling case", that the Proposals, with their scale and impact, represents a policy compliant "economic and efficient" response to what remains of a further "worst case" transmission "need". Nor has the Applicant come close to showing that smaller, cheaper or more targeted infrastructure would not suffice. SEAS refers to	• Provision of 3,480 MW of connection capacity for the Essex Coast Generation Group • Provision of 6,516.2 MW of capacity from the SC2 Boundary Group. The Applicant's position is that the need case is not merely asserted in policy terms, but is grounded in quantified technical system deficits. Overarching National Policy Statement [NPS] for Energy (EN-1) identifies an urgent national need for electricity infrastructure of this nature, which is required in the national interest to be delivered as soon as possible. Electricity infrastructure of the type proposed is critical national infrastructure, which is so urgent and important that we are told it will, in general, outweigh any other residual impacts and should be <i>'progressed as quickly as possible'</i> (NPS EN-1 paragraph 3.3.63 (2024)). The timing and urgency for electricity infrastructure is referred to within NPS EN-1 (2024). <i>'3.3.68 The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial. National Grid ESO forecasts that over the next decade the onshore and offshore transmission network, some of which is located offshore will require a doubling of north-south power transfer capacity due to increased wind generation in Scotland; [...] and substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation (this may also require additional offshore connections coming to land in England).'</i> <i>'3.3.83 Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.'</i> At each key stage of the consultation and submission process, in addition to the policy terms, the technical basis for the need case is reviewed and updated. The contracted background, as contained in both the National Energy System Operator (NESO) Transmission Entry ⁹¹⁰ and the NESO Electricity Ten Year Statement⁹, is reviewed. The most recent update was completed to capture the latest information as of Jan 2025, the need case, as set out in the Strategic Options Back Check Report [APP-320] This snapshot only reflects the Transmission Connection Entry Register at the time of development and then publication of the Needs Case. The applicant's policy is that the needs case must be an accurate snapshot within 3 months of publication. In Jan 2025 Nautilus remained connecting into the Sizewell group on the interconnection register, regardless of announcements the TEC and Interconnection Registers reflect the current offer, the applicant on changes the reports when the register is updated indicating the applicant has accepted the new offer to move their connection.

⁸ <https://www.ofgem.gov.uk/press-release/empowering-great-britain-clean-and-flexible-energy-future-next-generation-interconnectors>

⁹ National Energy System Operator (NESO) (2026) *Transmission Entry Capacity Register*

¹⁰ National Energy System Operator (2024) *Electricity Ten Year Statement*

Reference	Matter	Point Raised	Applicant's Comments
		its case as set out previously that there are policy compliant alternatives, which meet the tests of economy and efficiency, and would provide transmission capability to deal with the 352MW worst case, along with meeting what the Applicant identifies as the Kent issue.	National Policy Statement for Electricity Networks infrastructure (EN-5) (2024) also states the following regarding Transmission Owners: <i>‘2.8.4 The Secretary of State should also take into account that Transmission Owners (TOs) and Distribution Network Operators (DNOs) are required under Section 9 of the Electricity Act 1989 to bring forward efficient and economical proposals in terms of network design.</i> <i>2.8.5 TOs and DNOs are also required to facilitate competition in the generation and supply of electricity, and electricity distributors have a statutory duty to provide a connection where requested.’</i> Given the above the applicants technical need supporting the NPS-1 Overarching National need is consistent, fully documented, auditable via the Tec Register in tables Table 3.2 “Planned Generation for East Anglia” page 30-31 and Table 3.4 “Planned Generation and Planned Transfer for Boundary SC2” page 40 of Strategic Options Back Check Report [APP 320]. Consistent in its approach and every version has confirmed the urgent need for the Sea Link project.
6	APPLICANT’S ASSERTIONS OF “NEED” BASED ON BOUNDARY CONSTRAINTS AT EC5, LE1, SC2	6.1 It is plainly right that (para 3.1.6 of [REP5-142]) the Applicant must ‘ensure sufficient capacity for connections and systems reinforcement to reach compliance with the NETS SQSS’. However, we firmly reject the further suggestion that the Proposals are required for reasons other than the Sizewell Generation Group “need”, in that ‘...addressing the shortfall in the Sizewell Generation Group is only one of a number of objectives including providing capacity contributions to EC5, LE1 and SC2 (Kent)’. We will show instead that - APP-320 is incorrect and defective in its calculations of boundary capacity for EC5 and LE1, and that in fact no deficits exist across those boundaries if all relevant upgrades and projects are included; - our suggested “Economic and Efficient” solutions (in Suffolk and Kent) fully solve both the Sizewell Group and SC2 deficits (similarly see next section below); - and, moreover, that Sea Link itself fails to solve the SC2 transfer deficit (see also REP5-206) and therefore, to borrow the Applicant’s logic, is not NETS SQSS compliant, and arguably the Applicant is in breach of its license; - and, whilst Sea Link might contribute to wider network reinforcement (EC5, LE1), there is no particular detailed or demonstrated requirement relating either to its deficit contributions or to the connection of specific projects. 6.2 Whilst the para. 3.1.6 claim that Sea Link is ‘required to add capacity to the EC5, LE1 and SC2’ is boldly made, as were the similar claims of “requirement” in APP-320, it is striking that for these claims the Applicant offers nothing by way of hard evidence, explanation or analysis. In APP-320 that is reserved for the Sizewell Generation Group need, which numbers have collapsed. 6.3 Rather, APP-320 sets out the various asserted boundary deficits, but does not disaggregate, model, analyse or quantify the contribution made by Sea Link to resolving those deficits. Indeed, we will show in some detail in section 7 immediately	In summary on the need case, as set out in the Strategic Options Back Check Report [APP-320] at paragraph 3.8.1 (and see generally Section 3: Need Case) the Proposed Project will address several distinct issues within the electricity transmission network: • Provision of minimum (no fossil fuel contribution) 9,703.7 MW of capacity across East Anglia EC5 Boundary and 5,271.8 MW of capacity across EC5N Boundary. • Provision of maximum 13,197 MW of capacity across East Anglia EC5 Boundary and 8,765.7 MW of capacity across EC5N Boundary. • Provision of 7,467 MW of capacity across the LE1 Boundary. • Provision of 1,852 MW of connection capacity for the Sizewell Generation Group. • Provision of 3,480 MW of connection capacity for the Essex Coast Generation Group • Provision of 6,516.2 MW of capacity from the SC2 Boundary Group. It should be noted that during the application, the requirement to provide additional capacity of 1,852MW of capacity from the Sizewell Generation Group has reduced to 352MW. However, the Sizewell Generation Group deficit exists with or without Nautilus connecting in Suffolk as the needs case is not predicated on a single customer connecting alone. 352MW is a sizeable requirement and as set out in this document is only one of numerous network capacity issues across the East Anglia region and the South-East addressed by the Applicant’s proposal - with the others being addressed including the contribution to capacity of boundaries EC5, LE1 and SC2 (Kent). Table 3.3 page 35, Strategic Options Back Check Report [APP-320] set out the deficits for the minimum required transfer

following that these deficit calculations are simply incorrect, or out of date. For example:

The EC5 boundary deficit is put forward by the Applicant as being around 9,700MW – the calculation being a planned transfer of c.23,008MW and a post-fault capacity of 13,304MW. Both of these figures are in error, the transfer still including Nautilus’1,500MW and the actual capacity being 23,339MW (the details are in 7.4.2 below). We cannot tell how this latter error has occurred, as the Applicant provides no evidence for their figure of 13,304MW; Using the correct figures, there is no deficit.

Similar errors are made in the calculation of the LE1 boundary – the planned transfer of 13,856 once more includes the no longer extant 1,500MW of the Nautilus project; and the 6,930MW post fault capacity of the planned Norwich to Tilbury OHL has been omitted. The apparent deficit of 7,467MW therefore disappears.

A different category of error has been made in the Applicant’s approach to the 6,516.2MW deficit across the SC2 boundary. The Sea Link proposal (£1.18bn baseline cost) will meet less than a third of this deficit, and will not be NETS SQSS compliant. SEAS’ revised proposal for a 400kV 6930 MVA OHL between Canterbury North and Kemsley at less than 10% of Sea Link’s cost would be compliant, and reduce or resolve other issues as well.

The same applies to the Conclusions, para. 3.6 of REP5-142, which merely demonstrate that ‘additional resilience’ would be derived from additional resource. The Applicant has not demonstrated that Sea Link itself is necessary, as opposed to being merely one of a number of alternative reinforcements, and almost certainly not the ideal alternative. The details in sections 7.4.1 to 7.4.6 below make this entirely clear.

6.4 As regards Kent specifically, whilst 3.1.6 refers to Sea Link’s contribution to capacity across the EC5, LE1 and SC2 boundaries, Sea Link addresses, as we have set out, only a portion of the SC2 transfer deficit identified by the Applicant, (2000MW of a 6,516.2MW deficit).

6.5 As regards EC5 and LE1, [APP-320] fails to quantify Sea Link’s contribution to the EC5 and LE1 boundary deficits. Essentially Sea Link would form part of a wider set of reinforcements addressing those boundary constraints, but the Applicant does not demonstrate that planned generation could not connect in Sea Link’s absence or via alternative reinforcement – it is a case relying on an unparticularised assertion that ‘Sea Link contributes to wider network reinforcement’, rather than a demonstrated requirement for the connection or firm connection of the specific projects identified. To say Sea Link is “required” is a material overstatement. SEAS will demonstrate in the next section that there is a more economic and efficient solution to contribute to wider network reinforcement.

Table 3.3: Planned Transfer requirements

Planned Transfer		Post Fault Capability by 2031	Planned Transfer Boundary Deficit
EC5N (Maximum)	15,417.7 MW	6,652 MW	-8,765.7 MW
EC5 (Maximum)	26,501.6 MW	13,304 MW	-13,197.6 MW
EC5N (Minimum*)	11,923.8 MW	6,652 MW	-5,271.8 MW
EC5 (Minimum)	23,007.7 MW	13,304 MW	-9,703.7 MW

The Strategic Options Back Check Report [APP-320] shows EC5 requires a minimum transfer of -9,703MW, calculated using the latest available TEC Register at the time of application.

There is a suite of separate NGET projects which contribute to reinforcing the transmission network cross the East of England, including the proposed new overhead line between Bramford and Twinstead and between Norwich and Tilbury.

It should be noted the Technical Needs Case is set out within Strategic Options Back Check Report [APP-320]. This technical need supplements the National Need, timing and urgency for electricity infrastructure is referred to within NPS EN-1 (2024).

‘3.3.68 The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial. National Grid ESO forecasts that over the next decade the onshore and offshore transmission network, some of which is located offshore will require a doubling of north-south power transfer capacity due to increased wind generation in Scotland; [...] and substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation (this may also require additional offshore connections coming to land in England).’

‘3.3.83 Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.’

The needs case as set out in [APP-320] demonstrates the need for the project without the proposed reinforcements at Norwich to Tilbury and Sealink.

The existing system ahead of the completion of the Bramford to Twinstead Project has the following capacity.

Existing System (Pre Bramford to Twinstead)		
Walpole - Necton - Norwich	Walpole - Necton - Norwich 1	3,326 MW
	Walpole - Necton - Norwich 1	3,326 MW
Bramford - Rayleigh and Bramford to Pelham	Bramford to Pelham	3,326 MW
	Bramford to Rayleigh	3,326 MW
Total Capacity of Existing Transmission Circuits		13,304 MW
Total Capacity less the worst double-circuit fault (Bramford - Twinstead - Pelham 1 & 2)		6,652 MW

The needs case was based upon the completion of the Bramford to Twinstead connection giving a needs case background of

System following Completion of Bramford to Twinstead (Background set out in the Needs Case)		
Walpole - Necton - Norwich	Walpole - Necton - Norwich 1	3,326 MW
	Walpole - Necton - Norwich 1	3,326 MW
Bramford - Twinstead - Pelham	Bramford – Twinstead - Pelham 1	3,465 MW
	Bramford – Twinstead - Pelham 2	3,465 MW
Bramford - Braintree - Rayleigh Main	Bramford - Braintree - Rayleigh Main 1	3,326 MW
	Bramford - Braintree - Rayleigh Main 2	3,326 MW
Total Capacity of Existing Transmission Circuits		20,234 MW
Total Capacity less the worst double-circuit fault (Bramford - Twinstead - Pelham 1 & 2)		13,304 MW

With the transfer requirement of 23,007.7MW to a deficit of 9703.7MW.

If we now include the full uprating of EC5 to the maximum capacity and the new Norwich to Tilbury, alongside Sea Link

Needs Cassettes Exclude the proposed investments - As they set the basis for investment (Included here to demonstrate need)		
Walpole - Necton - Norwich	Walpole - Necton - Norwich 1	3,465 MW
	Walpole - Necton - Norwich 1	3,465 MW
Bramford - Twinstead - Pelham	Bramford – Twinstead - Pelham 1	3,465 MW
	Bramford – Twinstead - Pelham 2	3,465 MW
Bramford - Braintree - Rayleigh Main	Bramford - Braintree - Rayleigh Main 1	3,465 MW
	Bramford - Braintree - Rayleigh Main 2	3,465 MW
Sealink	Sealink (Sizwell Area to North Kent)	2,000 MW
Bramford - Braintree - Rayleigh Main	Bramford - Braintree - Rayleigh Main 1	3,465 MW
	Bramford - Braintree - Rayleigh Main 2	3,465 MW
Total Capacity of Existing Transmission Circuits		29,720 MW
Total Capacity less the worst double-circuit fault (Bramford - Twinstead - Pelham 1 & 2)		22,790 MW

We show that the post fault capability will rise to 22,790MW matching closely the required transfer of 23,007.7MW and removing significant constraints to consumers. This shows the need for Sealink and Norwich to Tilbury is clear and consistent with the Needs Case set out in [APP-320].

In all cases the justification for Sea Link is clear and the figures provided within the points raised do not reflect the requirements set out in [APP-320].

7	ALTERNATIVE REINFORCEMENT OPTIONS – ENSURING AN EFFICIENT AND ECONOMICAL SOLUTION	7.1 We have noted elsewhere in this submission that we are able to demonstrate an alternative solution to the reinforcement and capacity issues to the Sea Link proposal, and here, for the avoidance of doubt, SEAS outlines the alternative solution of installing a new 400kV 6.930MVA double circuit OHL between Sizewell and Bramford over a distance of 55km. <i>NOTE In para 3.2 Rebuttal point 2 of REP5-142, the Applicant states that higher capacity cannot be achieved for the Sizewell Group through reconductoring of the Sizewell to Bramford double-circuits, as its assumed capacity limits of 6930MW (or MVA) per double circuit already takes into account a future upgrade/reconductoring programme. SEAS fully accepts this - the planned reconductoring had not been identified in any application document, and so we were unable take its future</i>	In summary on the need case, as set out in the Strategic Options Back Check Report [APP-320] at paragraph 3.8.1 (and see generally Section 3: Need Case) the Proposed Project will address several distinct issues within the electricity transmission network: - Provision of minimum (no fossil fuel contribution) 9,703.7 MW of capacity across East Anglia EC5 Boundary and 5,271.8 MW of capacity across EC5N Boundary. - Provision of maximum 13,197 MW of capacity across East Anglia EC5 Boundary and 8,765.7 MW of capacity across EC5N Boundary. - Provision of 7,467 MW of capacity across the LE1 Boundary.

Reference	Matter	Point Raised	Applicant's Comments																				
		<i>capacity contribution into account. This has no effect on our current proposed alternative as it is set out below.</i> 7.2 Cost. and Effectiveness 7.2.1 Using data produced by the Institute of Engineering and Technology’s “A Comparison of Electricity Transmission Technologies: Costs and Characteristics”, Mott MacDonald April 2025 (IET 2025, page 48), it is possible to calculate the cost of this proposal, which would be approximately £170m and: i. would readily solve the 352 MVA deficit problem, ii. be SQSS compliant and iii. provide much greater post fault network redundancy, resilience and security than a single point-to- point solution like Sea Link. This is a viable, more economic and efficient solution than Sea Link, to cover the minimal worst case post-fault deficit on the Sizewell Group. 7.3 SEAS suggests that (in addition to building a third double circuit between Sizewell and Bramford) there may also be other options here which could allow for additional capacity for the Sizewell to Bramford double-circuits. The Applicant states in APP-320 that the assumed capacity for the Sizewell to Bramford double circuits are "considered at" 6,930 MVA. This is a chosen assumption, not a fixed parameter, and we have carried out a more detailed analysis to determine the likely capacity in practice. The additional capacity for the existing double circuits could include: 7.3.1 An increase from 6,930 MVA to approximately 7,482 MVA (2 x 3,741 MVA) transfer capability, using industry standard assumptions and IET 2025 benchmarks. This would be more than sufficient to address the 352 MVA deficit. The IET 2025 report , identifies a “high” rating case benchmark of 3,741 MVA per circuit for 400 kV overhead lines (Table 4.1, p.35; Table A.7, p.158), based on standard double-circuit configurations and derived from National Grid TGN1026 (Issue 6, Feb 2021) assumptions. This would equate to a transfer capability of approximately 7,482 MVA (2 × 3,741 MVA) in comparison to NGET's more conservative assumption in APP-320 of 6,930 MVA (2 x 3,465 MVA) and would therefore be more than sufficient to address the 352 MVA deficit. 7.3.2 Using IET 2025 benchmarks, we can show that switchgear may have post-fault loading capability of up to c.4,192 MVA under winter conditions (10°C ambient), based on current levels of around 6,050A. This additional capacity could be available for up to 24 hours post-fault, increasing the transfer capability from 3,741 MVA under certain standard circumstances. Whilst in the IET (2025) high-case scenario, the overall circuit rating is constrained to 3,741 MVA by the associated cable section (Table A.7, p.158), the overhead line and switchgear capability may be higher, with IET 2025 indicating that switchgear may have post-fault loading capability of up to c.4,192 MVA under winter conditions (10°C ambient), based on current levels of around 6,050 A (Table A.6, p.158). It therefore might also be possible, in addition to the 'high' capacity figure mentioned above, to run the circuit at higher temperatures and even higher capacity for up to 24 hours (24hrs is the assumption in Table A.7, p.158). Modern double-circuit technologies are known to be robust and faults are typically fixed in hours. 7.3.3 Given that we can assume that the Sizewell to Bramford double circuits will be reconductored/upgraded before Sizewell C is operational, and that network deficit issues practically only arise during peak winter demand periods, when	- Provision of 1,852 MW of connection capacity for the Sizewell Generation Group. - Provision of 3,480 MW of connection capacity for the Essex Coast Generation Group - Provision of 6,516.2 MW of capacity from the SC2 Boundary Group. It should be noted that during the application, the requirement to provide additional capacity of 1,852MW of capacity from the Sizewell Generation Group has reduced to 352MW. However, the Sizewell Generation Group deficit exists with or without Nautilus connecting in Suffolk as the needs case is not predicated on a single customer connecting alone. 352MW is a sizeable requirement and as set out in this document is only one of numerous network capacity issues across the East Anglia region and the South-East addressed by the Applicant’s proposal - with the others being addressed including the contribution to capacity of boundaries EC5, LE1 and SC2 (Kent). Table 3.3 page 35, Strategic Options Back Check Report [APP-320] set out the deficits for the minimum required transfer Table 3.3: Planned Transfer requirements <table> <tr> <th colspan="2">Planned Transfer</th><th>Post Fault Capability by 2031</th><th>Planned Transfer Boundary Deficit</th></tr> <tr> <td>EC5N (Maximum)</td><td>15,417.7 MW</td><td>6,652 MW</td><td>-8,765.7 MW</td></tr> <tr> <td>EC5 (Maximum)</td><td>26,501.6 MW</td><td>13,304 MW</td><td>-13,197.6 MW</td></tr> <tr> <td>EC5N (Minimum*)</td><td>11,923.8 MW</td><td>6,652 MW</td><td>-5,271.8 MW</td></tr> <tr> <td>EC5 (Minimum)</td><td>23,007.7 MW</td><td>13,304 MW</td><td>-9,703.7 MW</td></tr> </table> The Strategic Options Back Check Report [APP-320] shows EC5 requires a minimum transfer of -9,703MW, calculated using the latest available TEC Register at the time of application. There is a suite of separate NGET projects which contribute to reinforcing the transmission network cross the East of England, including the proposed new overhead line between Bramford and Twinstead and between Norwich and Tilbury. It should be noted the Technical Needs Case is set out within Strategic Options Back Check Report [APP-320]. This technical need supplements the National Need, timing and urgency for electricity infrastructure is referred to within NPS EN-1 (2024). ‘3.3.68 <i>The volume of onshore reinforcement works needed to meet decarbonisation targets is substantial. National Grid ESO forecasts that over the next decade the onshore and offshore transmission network, some of which is located offshore will require a doubling of north-south power transfer capacity due to increased wind generation in Scotland; [...] and substantial reinforcement in East Anglia to handle increased power flows from offshore wind generation (this may also require additional offshore connections coming to land in England).</i>’ ‘3.3.83 <i>Given the urgent need for new electricity infrastructure and the time it takes for electricity NSIPs to move from design conception to operation, there is an urgent need for new (and particularly low carbon) electricity NSIPs</i>	Planned Transfer		Post Fault Capability by 2031	Planned Transfer Boundary Deficit	EC5N (Maximum)	15,417.7 MW	6,652 MW	-8,765.7 MW	EC5 (Maximum)	26,501.6 MW	13,304 MW	-13,197.6 MW	EC5N (Minimum*)	11,923.8 MW	6,652 MW	-5,271.8 MW	EC5 (Minimum)	23,007.7 MW	13,304 MW	-9,703.7 MW
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EC5 (Minimum)	23,007.7 MW	13,304 MW	-9,703.7 MW																				

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		ambient temperatures are low, it is not unreasonable to assume that capacities closer to the high rating case of 7,482 MVA per circuit might be possible. 7.4 We turn now to Para 3.2.9, in which the Applicant states that solving the Sizewell Generation Group deficit in the manner described above “would not address the required need across EC5, LE1”. We will take each of those boundaries in turn, and will demonstrate that to the contrary, we can show that they do address these issues – whereas Sea Link, unfortunately, does not. 7.4.1 EC5 The EC5 deficit stated by the Applicant is circa 9,700MW, based on a planned transfer of 23,007.7MW and a post fault (Walpole to Pelham) capability of 13,304MW which once again incorrectly include the Nautilus project. and the correct planned transfer is 21,507.7MW. The Applicant provides a figure tor that EC5 post fault transfer capacity of 13304MW, which it claims leads to a transfer deficit of 9703.7MW (Table 3.3.). 7.4.2 However, SEAS suggests that the post fault transfer capacity of 13,304MW is also incorrect. It would appear that the Applicant has failed to include the Bramford to Twinstead upgrade (whose DCO approval would have been known to them some six months earlier) and the existing Bramford to Pelham OHL. Unfortunately, the Applicant does not appear to provide any evidence of how they arrive at their figure of 13,304MW. We understand that the correct transfer capability across is EC5 is (in round numbers): 3 <table><tr><td>Norwich to Tilbury new OHL</td><td>6,930MW</td></tr><tr><td>Bramford to Twinstead new OHL</td><td>6,930MW</td></tr><tr><td>Bramford to Pelham existing</td><td>,102MW EN020002 APP-161 (Table 3.3)</td></tr><tr><td>Bramford to Rayleigh with upgrade</td><td>6,380MW (APP-320 p36)</td></tr><tr><td>Total capability across EC5</td><td>23,339MW</td></tr></table> 7.4.3 This exceeds the planned transfer of 21,507.7MW. It is not clear why any additional measures, including Sea Link, are required as there is no deficit if the post fault scenario indicated above occurs. Norwich to Tilbury is critical, Sea Link is not. 7.4.4 LE1 For LE1, the Applicant states the deficit to be 7467MW, based on a planned transfer of 13,856MW and a post fault (Pelham to Rye House) capability of 6380MW. This once again incorrectly includes the Nautilus project. reducing the planned transfer to 12,356MW. 7.4.5 Further, the post fault capability across LE1 only appears to include (Pelham to Rye House) of 6380MW and does not appear to include the planned Norwich to Tilbury OHL capacity of 6930MW. The post fault capability across LE1 will in reality, therefore, be 13,310MW which exceeds the planned transfer of 12,356MW. Further figures supporting this are in Further Details. It is not clear why any additional measures, including Sea Link, are required as there is no deficit if the post fault scenario indicated above occurs. Norwich to Tilbury is critical, Sea Link is not. 7.4.6 SC2	Norwich to Tilbury new OHL	6,930MW	Bramford to Twinstead new OHL	6,930MW	Bramford to Pelham existing	,102MW EN020002 APP-161 (Table 3.3)	Bramford to Rayleigh with upgrade	6,380MW (APP-320 p36)	Total capability across EC5	23,339MW	<i>to be brought forward as soon as possible, given the crucial role of electricity as the UK decarbonises its economy.’</i> The needs case as set out in [APP-320] demonstrates the need for the project without the proposed reinforcements at Norwich to Tilbury and Sealink. The existing system ahead of the completion of the Bramford to Twinstead Project has the following capacity. <table><tr><td colspan="3">Existing System (Pre Bramford to Twinstead)</td></tr><tr><td rowspan="2">Walpole - Necton - Norwich</td><td>Walpole - Necton - Norwich 1</td><td>3,326 MW</td></tr><tr><td>Walpole - Necton - Norwich 1</td><td>3,326 MW</td></tr><tr><td rowspan="2">Bramford - Rayleigh and Bramford to Pelham</td><td>Bramford to Pelham</td><td>3,326 MW</td></tr><tr><td>Bramford to Rayleigh</td><td>3,326 MW</td></tr><tr><td colspan="2">Total Capacity of Existing Transmission Circuits</td><td>13,304 MW</td></tr><tr><td colspan="2">Total Capacity less the worst double-circuit fault (Bramford - Twinstead - Pelham 1 & 2)</td><td>6,652 MW</td></tr></table> The needs case was based upon the completion of the Bramford to Twinstead connection giving a needs case background of <table><tr><td colspan="3">System following Completion of Bramford to Twinstead (Background set out in the Needs Case)</td></tr><tr><td rowspan="2">Walpole - Necton - Norwich</td><td>Walpole - Necton - Norwich 1</td><td>3,326 MW</td></tr><tr><td>Walpole - Necton - Norwich 1</td><td>3,326 MW</td></tr><tr><td rowspan="2">Bramford - Twinstead - Pelham</td><td>Bramford – Twinstead - Pelham 1</td><td>3,465 MW</td></tr><tr><td>Bramford – Twinstead - Pelham 2</td><td>3,465 MW</td></tr><tr><td rowspan="2">Bramford - Braintree - Rayleigh Main</td><td>Bramford - Braintree - Rayleigh Main 1</td><td>3,326 MW</td></tr><tr><td>Bramford - Braintree - Rayleigh Main 2</td><td>3,326 MW</td></tr><tr><td colspan="2">Total Capacity of Existing Transmission Circuits</td><td>20,234 MW</td></tr><tr><td colspan="2">Total Capacity less the worst double-circuit fault (Bramford - Twinstead - Pelham 1 & 2)</td><td>13,304 MW</td></tr></table> With the transfer requirement of 23,007.7MW to a deficit of 9703.7MW. If we now include the full uprating of EC5 to the maximum capacity and the new Norwich to Tilbury, alongside Sea Link <table><tr><td colspan="3">Needs Casses Exclude the proposed investments - As they set the basis for investment (Included here to demonstrate need)</td></tr><tr><td rowspan="2">Walpole - Necton - Norwich</td><td>Walpole - Necton - Norwich 1</td><td>3,465 MW</td></tr><tr><td>Walpole - Necton - Norwich 1</td><td>3,465 MW</td></tr><tr><td rowspan="2">Bramford - Twinstead - Pelham</td><td>Bramford – Twinstead - Pelham 1</td><td>3,465 MW</td></tr><tr><td>Bramford – Twinstead - Pelham 2</td><td>3,465 MW</td></tr><tr><td rowspan="2">Bramford - Braintree - Rayleigh Main</td><td>Bramford - Braintree - Rayleigh Main 1</td><td>3,465 MW</td></tr><tr><td>Bramford - Braintree - Rayleigh Main 2</td><td>3,465 MW</td></tr><tr><td>Sealink</td><td>Sealink (Sizwell Area to North Kent)</td><td>2,000 MW</td></tr><tr><td rowspan="2">Bramford - Braintree - Rayleigh Main</td><td>Bramford - Braintree - Rayleigh Main 1</td><td>3,465 MW</td></tr><tr><td>Bramford - Braintree - Rayleigh Main 2</td><td>3,465 MW</td></tr><tr><td colspan="2">Total Capacity of Existing Transmission Circuits</td><td>29,720 MW</td></tr><tr><td colspan="2">Total Capacity less the worst double-circuit fault (Bramford - Twinstead - Pelham 1 & 2)</td><td>22,790 MW</td></tr></table> We show that the post fault capability will rise to 22,790MW matching closely the required transfer of 23,007.7MW and removing significant constraints to consumers. This shows the need for Sealink and Norwich to Tilbury is clear and consistent with the Needs Case set out in [APP-320].	Existing System (Pre Bramford to Twinstead)			Walpole - Necton - Norwich	Walpole - Necton - Norwich 1	3,326 MW	Walpole - Necton - Norwich 1	3,326 MW	Bramford - Rayleigh and Bramford to Pelham	Bramford to Pelham	3,326 MW	Bramford to Rayleigh	3,326 MW	Total Capacity of Existing Transmission Circuits		13,304 MW	Total Capacity less the worst double-circuit fault (Bramford - Twinstead - Pelham 1 & 2)		6,652 MW	System following Completion of Bramford to Twinstead (Background set out in the Needs Case)			Walpole - Necton - Norwich	Walpole - Necton - Norwich 1	3,326 MW	Walpole - Necton - Norwich 1	3,326 MW	Bramford - Twinstead - Pelham	Bramford – Twinstead - Pelham 1	3,465 MW	Bramford – Twinstead - Pelham 2	3,465 MW	Bramford - Braintree - Rayleigh Main	Bramford - Braintree - Rayleigh Main 1	3,326 MW	Bramford - Braintree - Rayleigh Main 2	3,326 MW	Total Capacity of Existing Transmission Circuits		20,234 MW	Total Capacity less the worst double-circuit fault (Bramford - Twinstead - Pelham 1 & 2)		13,304 MW	Needs Casses Exclude the proposed investments - As they set the basis for investment (Included here to demonstrate need)			Walpole - Necton - Norwich	Walpole - Necton - Norwich 1	3,465 MW	Walpole - Necton - Norwich 1	3,465 MW	Bramford - Twinstead - Pelham	Bramford – Twinstead - Pelham 1	3,465 MW	Bramford – Twinstead - Pelham 2	3,465 MW	Bramford - Braintree - Rayleigh Main	Bramford - Braintree - Rayleigh Main 1	3,465 MW	Bramford - Braintree - Rayleigh Main 2	3,465 MW	Sealink	Sealink (Sizwell Area to North Kent)	2,000 MW	Bramford - Braintree - Rayleigh Main	Bramford - Braintree - Rayleigh Main 1	3,465 MW	Bramford - Braintree - Rayleigh Main 2	3,465 MW	Total Capacity of Existing Transmission Circuits		29,720 MW	Total Capacity less the worst double-circuit fault (Bramford - Twinstead - Pelham 1 & 2)		22,790 MW
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Reference	Matter	Point Raised	Applicant's Comments
		For SC2, there is a transfer deficit of 6,516.2MW, and there appear to be two alternatives: - Sea Link, at a cost of at least £1.1 billion (in 2018/19 baseline cost). Unfortunately, this project only deals with 2000MVA which leaves an unsatisfied deficit of 4,516.2MVA. This solution is therefore not NETS SQSS compliant. - Installing a new 400kV 6930 MVA OHL between Canterbury North and Kemsley at a cost of circa £90m. This would be NETS SQSS compliant and would give extra resilience to the network. This solution would actually solve the SC2 transfer deficit, which Sea Link does not. NESO have noted that a fault at either end of Kemsley to Lovedean can turn it into a long radial feeder, placing all the load on the remaining two circuits" This problem would be reduced by the SEAS solution set out here. 7.5 In most cases, the infrastructure improvements that will enable the system to be NETS SQSS compliant are already in place or are planned,. It may be necessary for some minor infrastructure improvement, but this would be at a far lower cost in financial, environmental and socio-economic terms than Sea Link. It should be noted that even if. Sea Link were to be granted a DCO, there would still need to be infrastructure improvement in SC2 to overcome the remaining 4,192MW deficit. 7.6 In 3.2.10 of REP5-142, NGET claims that "The new circuits as suggested by SEAS would be a piecemeal approach that would not address the full need as described above". SEAS can show that the solutions presented, combined with existing planned infrastructure upgrades, offer a complete solution that covers all the stated boundary deficits, post-fault conditions, and most particularly that of SC2, which, as set out above, will never be discharged by Sea Link, alone. Far from being isolated solutions, as suggested by the Applicant, the upgrades put forward by SEAS provide a coordinated, economical and efficient grid system listed here in full: a) Sizewell to Bramford: i) Links with the new Bramford to Twinstead reinforcement. (EN020002) ii) Links with the proposed Norwich-Bramford Tilbury upgrade. (EN020027) iii) Links with the proposed Pelham to Rayleigh upgrade. b) Canterbury North to Kemsley: i) Links to Tilbury via the new upgraded OHL between Kemsley and Littlebrook. ii) Links with Tilbury via Grain. iii) Links with the London Power tunnels via Littlebrook. In combination: Sizewell to Bramford to Tilbury to Littlebrook to Kemsley to Canterbury North. c) Canterbury North to Kemsley new OHL The Applicant included a new OHL between Canterbury North and Kemsley in its option choices for the Norwich to Tilbury upgrade (EN020027) which is the subject of a separate DCO. In EN020027 APP-357 pages 45 and 46 the new Canterbury North to Kemsley OHL is referred to as CAKE. The East 3 option, fully analysed by the Applicant, included the Canterbury North to Kemsley (CAKE) and Bramford to Tilbury (ATNC) upgrades. The East 3 option also included Tilbury to Grain (TENC) but this does not have a proceed signal. However,	In all cases the justification for Sea Link is clear and the figures provided within the points raised do not reflect the requirements set out in [APP-320].

Reference	Matter	Point Raised	Applicant's Comments
		according to EN020027 APP-357 p46 the “Tilbury to Grain and Tilbury to Kingsnorth upgrade (TKRE) does have a proceed signal”. This gives an additional connection: Sizewell to Bramford to Tilbury to Grain to Kemsley to Canterbury North. In reality, there is no reason for electricity to flow from Sizewell to Kent and vice versa because both have an excess of supply over demand. What is achieved by the two upgrades suggested by SEAS, in addition to the points already made, is that it enables electricity to flow from Sizewell to Tilbury and from Canterbury North to Littlebrook via Kemsley to serve the high electricity demands of the London area. 7.7 The Applicant also suggests at 3.2.10 of the rebuttal document that the suggested new circuits could not be delivered in the timescales required to deliver system need and consumer benefit. The question of timescales has already been addressed above, but it is clear that for the Sizewell Group, as has already been stated, the 352MW deficit will only occur in the mid-late 2030s, which gives more than sufficient time for such an upgrade to occur. For the SC2 boundary, even if Sea Link were to be approved, there would still be a worst-case N-1 deficit of an additional 4,516.2MW to be addressed by further infrastructure reinforcement requiring separate planning permission. It is odd that in Beyond 2030 “A national blueprint for a decarbonised electricity system in Great Britain” published by NG ESO in March 2024, there are no proposals in this timeframe for additional capacity that would meet the boundary issues identified – for example (p111) the document states for the Southeast region “No new upgrades are currently required in this region”. 7.8 We have shown that the overall plan from SEAS is coordinated, economical and efficient and completely resolves the deficits for the Sizewell Group and SC2 boundary., and also that this is simply not the case for the Applicant's project.	
8	OVERALL CONCLUSIONS	8.1 For the reasons set out above, the Applicant's rebuttal does not materially address the core points raised by SEAS in relation to the Need case. In particular, the Applicant has not demonstrated that Sea Link is 'required' in the sense relied upon in its submissions, nor that it represents an 'economic and efficient' means of addressing the identified constraints. The evidence before the Examination therefore continues to indicate that the claimed need for Sea Link is overstated, uncertain, and dependent on assumptions that are no longer robust. 8.2 The foundational 2,000MW 'worst-case' deficit used to justify the scale of Sea Link has collapsed to a mere 352MW following the removal of Nautilus; consequently, the Applicant is now attempting to retrofit a multi-billion pound solution to a problem that has shrunk by nearly 85%. By pivoting to 'strategic' generalities, the Applicant is seeking to justify an over-scaled, 2,000MW HVDC project as a solution to a residual 352MW deficit that will not even materialize until the mid-to-late 2030s. 8.3 The Applicant's reliance on the Clean Power 2030 report to claim 'criticality' is flatly contradicted by the Secretary of State's DCO decisions for Five Estuaries and Rampion 2, which grant consent without any requirement for or reliance upon Sea Link for grid connection. It is a 'remarkable curiosity' that while the Applicant claims Sea Link is critical for other offshore projects in this Examination, it remained silent	The Applicant has responded to these points and does not address them granularly here, but in summary : • The primary policy document for assessing need is NPS EN-1, in particular paragraph 3.3.78, and for the reasons set out throughout the Examination the Proposed Project will meet the “urgent need for new electricity network infrastructure’ that should be '<i>brought forward at pace to meet our energy objectives</i>'; • Addressing Sizewell Gap is one of a range of issues that the Proposed Project will address. Sizewell Gap is not the sole or indeed the ‘foundational’ justification for the Proposed Project and it is simply wrong to say that the need ‘has shrunk by nearly 85%’; • SEAS has not understood Clean Power 2030 and the point that Sea Link is not required to provide a grid connection for Five Estuaries and Rampion 2, it is the onward transport of electricity that it will facilitate; • The Applicant cannot accept that OFGEM's grant of early construction funding as anything other than evidence of the need for the Proposed Project.

Reference	Matter	Point Raised	Applicant's Comments
		on this alleged dependency during the actual DCO examinations for those very projects. 8.4 The attempt to use Ofgem's grant of Early Construction Funding as evidence of 'national interest' is a transparent 'bootstrap' argument that ignores Ofgem's own explicit clarification that ECF is neither a full funding decision nor a pre-determinant of the DCO process. 8.5 The Applicant's assertions regarding boundary constraints at EC5 and LE1 are manufactured constructs based on stale data that fail to account for the dramatically reduced boundary deficits when all relevant projects and upgrades are taken into account. 8.6 The existence of credible, NETS-SQSS compliant alternatives - deliverable at a fraction of the cost - demonstrates that Sea Link is neither an 'economical' nor 'efficient' solution as required by National Policy Statement EN-1. True urgency in the clean energy transition demands that the 'right' solutions are deployed quickly; forcing through a mislocated and over-scaled project like Sea Link risks stranded assets and unnecessary environmental destruction. 8.7 Ultimately, the Applicant is pursuing a solution in search of a problem. By failing to revisit its "need" case after the removal of the Nautilus project, the Applicant has presented the Examination with a project designed for a scale of generation that no longer exists in the Sizewell Group. True urgency in the national transition to clean power demands the deployment of the right infrastructure, not the forced delivery of an over-scaled, mislocated, and environmentally damaging project that represents a waste of bill payers' money. Because the Applicant has failed to demonstrate that Sea Link is necessary, proportionate, or the most efficient means of meeting the actual transmission deficit, a compelling case for development consent has not been made.	There is no evidence presented to support the assertion that 'alternatives' exist and no assessment of the environmental constraints that such alternatives would have to address.

Table 11.4 Applicant’s comments on Suffolk Energy Action Solutions Ltd (SEAS) Deadline 6 TRAFFIC on D5 ISH3, Action Points and ExQ3 [REP6-256B]

Reference	Matter	Point Raised	Applicant's Comments
Traffic & Transport			
2.1.1	Issue Specific Hearing 3 (ISH3)	In response to the issues raised at the ISH3 hearing, we firstly note that at ISH2 it was agreed that the applicant would undertake a programme of detailed junction modelling within the study area. It is evident that this work has not be completed and submitted to the examination to date. As we stated at the ISH2 hearings, this is a critical piece of work to understand the impact of the development.	The Applicant refers to the latest responses provided on the junction modelling, baseline data and journey time analysis within the following Deadline 6 submissions: - Application Document 9.135 Applicants Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110] – Action Points 7, 20 and 24 - Application Document 9.131 Applicants Comments on Responses to Second Written Questions [REP6-106] – Written Questions 2TT1 and 2TT3 - Application Document 9.134 Applicant’s Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109]: - Responses to Kent County Council Deadline 4 Submission [REP4-123] in Table 10.1.
2.1.2		However, the equivalent work has been carried out for the Kent study, the modelling for the Suffolk area remains outstanding.	
2.1.3		We share Suffolk County Council’s (SCC) frustrations that despite asking for this modelling work to be carried out on numerous occasions, such a fundamental piece of work and its subsequent conclusions remain completely absent.	

Reference	Matter	Point Raised	Applicant's Comments
2.1.4		The need for junction modelling was set out in our June 2025 Transport Report (document reference 07705/A), which informed the SEAS Relevant Representation [RR-5210]. It was also identified by the County Council in their Local Impact report (REP1-130).	• Responses to Suffolk County Council Deadline 4 Submission [REP4-150] in Table 18.2. • Response to SEAS Deadline 4 Submission [REP4-153] in Table 19.2. • Responses to SEAS Deadline 4 Submission [REP4-159] in Table 19.7. Furthermore, a meeting was held with KCC Highways on 31 March 2026 when it was confirmed that the junction modelling had been completed to the satisfaction of KCC Highways. As set out in KCC's Deadline 6 submission [REP6-168] with respect to the junction modelling and the other information submitted by the applicant through Examination (Reference 22): <i>“Yes, we are of the view that there is sufficient evidence now submitted to demonstrate the specific and cumulative impacts of the proposed development's construction phase.”</i> KCC also provided the above response within their Deadline 6 response to the Examining Authority's Third Written Question 3TT3 [REP6-265] with respect to the junction modelling and cumulative assessment of highway impacts during the construction phase of the Proposed Project. A sufficiently robust assessment of traffic and highways issues has therefore been carried out by the Applicant, both for the proposed development alone and also when considered cumulatively. The junction modelling within Suffolk has also been carried out by the Applicant, and the results were shared with SCC and ESC on 1 April 2026, (prior to Deadline 6) following a meeting held with SCC and ESC on 30 March 2026. The junction modelling was also submitted at Deadline 6 within Application Document 6.3.2.7.A (B) Environmental Statement Appendix 2.7.A Transport Assessment Note [REP6-039] which provides a summary of the junction modelling scope, methodology and results. The junction modelling includes a Sensitivity Test to account for a potentially higher Baseline at other times of the year. A robust seasonality factor (representing a 21% uplift to the Baseline survey data) was applied to the Baseline traffic survey results to reflect busier network conditions. The junction modelling also includes scenarios with and without cumulative schemes. In view of the above, the Applicant considers the matters raised to have been addressed.
2.1.5		We also share SCC's concerns that the modelling scope has been arbitrarily limited to just three locations, the applicant has identified. A total of 14 junctions were surveyed as part of the data collection exercise and the proper process would be to consider the impact at all of these and discount those at which impacts are minimal, before determining the scope of detailed modelling.	
2.1.6		We share the Councils concern that they would like to see junction modelling for a wider range of junctions. This needs to properly consider not only the proposed sites traffic but also the considerable cumulative development trips associated with other proposals.	
2.1.7		The Applicant is effectively still agreeing the basic scope of the work with the overseeing Highway Authority, at this late juncture in the process. This is of considerable concern along with the absence of what are fundamental questions and impacts of the development transport implications.	
2.1.8		We understand the junction modelling work is to be released to the Council on the 1st of April and issued before the next deadline. To reiterate this is a fundamental piece of assessment and it's disappointing that the scope of this work hasn't been agreed at this stage, never mind the conclusions.	
2.1.9		We also note to date the applicant has not explicitly modelled any cumulative impacts, merely presented forecasts of traffic future flows and relied on the application having a low percentage impact to discount further assessment. We note SCC share our concerns about cumulative impacts and this needs to be explored fully in the junction modelling.	
2.1.10		The Applicant seems reluctant to accept the importance of looking at absolute impacts at key junctions and not just the percentage changes from the proposal. Without understanding the existing performance of the junction and its current capacity, it is impossible to understand the implications of additional traffic. For junctions at or near capacity, even small changes may have severe adverse impacts.	
2.1.11		Our concerns regarding the adequacy of the base survey data used to underpin the entire exercise and the collection of data in non-neutral months, remains a fundamental flaw in the work to date (and that pending) and one the applicant seems reluctant to explore. Despite data being available to explore the implications of neutral months, peak periods and seasonality, which are available in our June 2025 report.	
2.1.12		At ISH2, proposed journey time data was to be provided by the Applicant to assist with understanding the impacts of the scheme. We understand this is now not to be provided. Although the Council have a strategic model that would have provided an appropriate tool to explore this, the Applicant isn't seeking to do so.	

Reference	Matter	Point Raised	Applicant's Comments
2.1.13		In summary, out concerns that we have raised throughout the process remain almost entirely unaddressed by the applicant and fundamental issues around traffic impacts and cumulative impacts simply remain unanswered.	
3.1.1	Deadline 5 Submissions	We note the Construction Traffic Management Plan (REP5-065) has been updated and reissued. This includes the introduction of some caps on HGV numbers, which is generally welcome. Although this is limited to the junction of the B1121/B1119 in Saxmundham and is in advance of any detailed junction modelling at this location.	This is noted by the Applicant. Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan – Suffolk [REP6-062] was also updated at Deadline 6 to include additional measures. To confirm, this now includes the following caps and commitments, which are secured under Requirement 6 of the DCO: • A daily cap of ten HGV movements at the B1121 Main Road/ B1119 Church Street signalised junction within Saxmundham, to minimise potential impacts of construction traffic at this location (associated with works at access S-BM12) • A daily cap of ten HGV movements at the A1094/ B1122 roundabout junction within Aldeburgh, to minimise potential impacts of construction traffic at this location (associated with works at accesses S-BM01 and S-BM02). • The route along the B1121 Aldeburgh Road and B1121 Saxmundham Road through Friston (associated with access S-BM11) will be limited to access to existing overhead line towers and pylon works. This route will otherwise not be used by HGVs associated with the Proposed Project. • No HGVs will arrive or depart site on Sundays or public holidays, other than for specified exception activities when required (as listed), when they will be limited to a maximum of 30 HGVs permitted per day on Sundays and public holidays.
4.1.1	ISH 3 Action Points	In respect to the ISH3 Action points, given the above we consider items 7, 20 and 24 to be the key issues that require immediate action. These are summarised below: • 7. SCC and the applicant to meet to discuss whether journey time analysis, particularly for the A12 in the area of the proposed development in Suffolk, could be produced, maybe with the use of the junction modelling. Provide an update at DL6. • 20. Provide a joint submission from the applicant and SCC on the junction modelling, with a conclusion of how this influences the overall cumulative traffic assessment for Suffolk and whether this indicates the need for mitigation. • 24. Given the winter months the applicant undertook baseline traffic surveys, does there need to be a seasonal adjustment with the junction modelling to take into account busier summer months with tourism traffic? If so, please include with the junction modelling.	This is noted and the Applicant has addressed ISH3 Action Points 7, 20 and 24 based on the responses provided within Application Document 9.135 Applicants Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110] which was submitted at Deadline 6.
4.1.2	ISH 3 Action Points	With regard to point 24, we note data exists to allow adjustments to be made to reflect seasonable adjustments. Whilst the surveys were inexplicably carried out in the non-neutral months of January and February, our June 2025 Transport Report (document reference 07705/A), which informed the SEAS Relevant Representation [RR-5210] includes seasonal data.	The Applicant has addressed ISH3 Action Point 24 based on the response provided within Application Document 9.135 Applicants Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110] which was submitted at Deadline 6. To confirm, the junction modelling within Suffolk includes a Sensitivity Test to account for a potentially higher Baseline at other times of the year. A robust seasonality factor (representing a 21% uplift to the Baseline survey data) was applied to the Baseline traffic survey results to reflect busier network conditions.

Reference	Matter	Point Raised	Applicant's Comments
5.1.1	EXQ3 Examiner Questions	With regard to the examiner questions, in a similar vein we would identify 3TT3., 3TT4., and 3TT5., as the key questions in relation to action points described above.	The Applicant has responded to SCC's Deadline 6 responses [REP6-276] and KCC's Deadline 6 responses [REP6-265] to the Examining Authority's Third Written Questions 3TT3, 3TT4 and 3TT5 within Application Document 9.150 Applicant's Comments on Repones to Third Written Questions submitted at Deadline 7. See also the responses above with respect to the ISH3 Action Points.

Table 11.5 Applicant’s comments on Suffolk Energy Action Solutions Ltd (SEAS) Deadline 6 NOISE on D5, ISH3, Action Points & ExQ3- v1 [REP6-256C]

Reference	Matter	Point Raised	Applicant's Comments
1 - 3	Introduction and Overview	This submission addresses the Applicant’s Noise assessment, having regard to D5, ISH3, Action Points and ExQ3. SEAS remains concerned that operational noise proposals are unclear and unenforceable, that low-frequency noise has not been properly assessed in this exceptionally quiet area, and that tonal and cumulative effects may cause greater harm than predicted. At ISH3, SEAS acoustic expert Mr Richard Thornely-Taylor suggested that proposed commitments should be enforceable DCO requirements and, on the instruction of SEAS Council, has drafted some requirements in the hope of assisting the Examining Authorities: SEAS Proposed DCO Requirements for operational noise drafted by Mr. Rupert Thornely-Taylor “Detailed design parameters <i>(X) No stage of Works No. 1B or 3B may commence until written details of the specification of plant, and any noise mitigation proposed in respect of Works No. 1B or 3B together with updated modelling, have been submitted to and approved in writing by the relevant planning authority. Work No. 1B and 3B must thereafter be implemented in accordance with the approved details.</i> Control of noise during operation <i>(X) The combined noise rating level for the standard operation of Work No. 1B and 3B cumulatively with the operation of other developments detailed in the InterProject Cumulative Effects Short List as determined in accordance with BS 4142:2014+A1:2019 shall not exceed 34 dB LAr,T where T=15 minutes at any noise sensitive receptor, when assessed at a position 1 metre from the façade of the receptor (free field equivalent). The rating level shall include all applicable acoustic corrections, including (but not limited to) those for tonality, impulsivity, intermittency and any other characteristics identified by BS 4142:2014+A1:2019.”</i> Set out below is Mr Rupert Thornely-Taylor’s written ISH3 evidence :	Noted
10. Noise and vibration			
10.1	Construction noise effects and mitigation	The applicants have not done what the question 2NV4 asked for " <i>Update REAC [REP4-235] provision NV01 to include reference to securing 10dB reduction from predicted levels, in order to demonstrate that likely significant</i>	The Applicant can assist in clarifying the noise reductions in the construction noise assessment presented in the ES as presented in Application Document 6.2.2.9 Part 2 Suffolk Chapter 9 Noise and Vibration [AS-109]

Reference	Matter	Point Raised	Applicant's Comments
		<i>noise effects and exceedance of the significant observed adverse effect level would be avoided, or explain why this is not necessary."</i> The applicants say that <i>"construction noise levels....would, however, still be subject to further detailed assessments by the contractor, as per commitment NV03"</i> Nothing has been provided to demonstrate that the assumed 10 dB reduction is practicable in every case. The applicant says <i>"Detailed construction noise assessments have been undertaken for every noise sensitive receptor (NSR) along the Project based on the available information."</i> The available information does not include information on the practicability of the assumed mitigation measures. The Construction Noise and Vibration Management plan relies on a requirement to achieve “Best Practicable Means” and therefore if a mitigation measure capable of achieving a 10dB reduction proves impracticable, the stated results will not be achieved and significant effects will result.	and Application Document 6.2.3.9 Part 3 Kent Chapter 9 Noise and Vibration [AS-111] as set out below. Detailed construction noise assessments have been undertaken for every noise sensitive receptor (NSR) along the Project based on the available information. They present a relative worst-case outcome based on the worst-case (noisiest) task for each activity, for all works locations (including at limits of deviation (LoD)), without mitigation. Where applicable, the assessment considers activities that may occur concurrently (noting that this would reflect the worst-case tasks for each of those activities). The outcome of the assessments is therefore considered a reasonable worst-case. These worst-case, unmitigated noise levels are compared against the 65 dB LAeq,T threshold for potential significant effects during the main ‘weekday’ working periods. (Works during weekend, bank holiday, and night-time periods are considered separately, relative to lower thresholds). This separates NSRs into two categories: • Those where worst-case, without mitigation construction noise levels are below the threshold; and • Those where worst-case, without mitigation construction noise levels are potentially above the threshold (these NSR are identified as ‘hot-spots’). Significant adverse effects are not expected at NSR where worst-case, without mitigation construction noise levels are predicted to be below the threshold. These NSR would, however, still be subject to further detailed assessments by the contractor, as per commitment NV03 of Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP6-134]. Mitigation in the form of best practicable means (BPM) would still be employed to reduce potential adverse effects at these locations as per commitments NV01 and NV03 of the REAC, with the Noise and Vibration Management Plan (NVMP) being updated accordingly. NSR where worst-case, without mitigation construction noise levels are predicted to be above the threshold are referred to the ‘hot-spots’. These are locations where mitigation is likely to be required to avoid significant adverse effects, relative to the findings of the assessment presented in the ES. In most ‘hot-spot’ cases a reduction smaller than 10dB would be required to avoid significant effects. It is therefore not the case that mitigation providing at least a 10dB reduction is required to avoid significant adverse effects at these locations. These ‘hot-spot’ locations are where predicted construction noise levels fall between 65 dB and 75 dB. In these situations there is a high level of confidence that noise levels can be mitigated below the 65 dB LAeq,T threshold to avoid potential significant adverse effects. There are no locations with predicted noise levels exceeding 75 dB LAeq,T, where reductions greater than 10dB would be required to similarly avoid potential significant adverse effects. This confidence stems from a number of factors: • The assessment assumes relatively worst-case plant for source noise levels. If quieter plant were used, noise levels would be lower; • The assessment assumes the worst-case task for each activity. Noise levels from other tasks that form that activity would be lower;

Reference	Matter	Point Raised	Applicant's Comments
			• Where the assessment assumes multiple activities occurring simultaneously, each task uses the worst-case activity. Where activities do not occur simultaneously, or where the worst-case activity is not taking place, noise level would be lower; • The assessment includes the Limit of Deviation. Where works are located within the LoD, or at the proposed swathes or works location, they would be therefore further from the NSR than assumed in the ES assessment, and noise levels would be lower; • The assessment includes consideration of works at the nearest point to all NSR. As above, where works are located further from NSR, noise levels would be lower; • The assessment assumes activities occur over the whole assessment period (but include percentage on-times). If activities occurred over a shorter period, noise levels over the assessment period would be lower; • The assessment has no consideration of site layout or orientation (e.g. locating plant further from NSR). Where site layout and orientation is considered by the contractor(s), noise levels would be lower; • The assessment does not include consideration of alternative methods. Where quieter alternative methods can be used, noise levels would be lower; • The assessment does not include the effects of screening. Where activities are screened from NSR, noise levels would be lower; • The assessment does not include other BPM measures that may be identified by the contractor. Where measures are identified, noise levels would be lower. Based on these points, there is a high level of confidence that construction noise levels in the ES assessment falling in the range of 65 to 75 dB L_{Aeq,T} can be reduced to below 65 dB L_{Aeq,T} during the actual works. Many of the factors identified above relate to refinements to assumptions, rather than the introduction of mitigation. It is likely that many threshold exceedances would not occur (irrespective of mitigation) once assessment assumptions are refined by the contractor(s). That said, mitigation in the form of BPM would be implemented for all works, whether above the threshold or not. As a final consideration, should the contractor'(s)' detailed assessments identify exceedance of the noise level threshold, significant effects would only occur where the temporal criteria for significant effects are also exceeded. In such instances, temporal restrictions would be implemented as part of consideration of best practicable means (BPM), secured via commitments NV01 and NV03 of the Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP6-134] to ensure that threshold exceedances would not be of sufficient duration to cause a significant adverse effect. Additionally, the Applicant has updated 7.5.8.1 Outline Construction Noise and Vibration Management Plan – Suffolk [REP6-082] and 7.5.8.2 Outline Construction Noise and Vibration Management Plan – Kent [REP6-084] to include provision for the contractor's assessments to be shared with the local authorities, and the works to be conducted under Section 61 agreements in line with the requests and requirements of the local authorities. This ensures

Reference	Matter	Point Raised	Applicant's Comments
			sufficient oversight of the assessments and mitigation measures by the local authorities. In summary, for the reasons set out above, the Applicant does not consider that it is necessary for a requirement to be introduced with a specific dB attenuation to avoid significant adverse effects from construction noise associated with the Project.
10.2	Operational noise emissions from converter stations and substations including, but not limited to, low frequency noise emissions and evidence to demonstrate that 5dB below background level is unachievable	In answer to 2NV1 the applicant is adding the commitments quoted below to the REAC. These commitments should be inserted in the DCO as requirements, as was the case in the DCO for East Anglia One North and East Anglia Two, in order that they be readily and directly enforceable. However, as drafted they are incomplete and lack clarity. Firstly, the value of T in L_{Ar,T} should be expressly stated as 15 minutes, and the result should be for cumulative noise from all developments that may contribute to the predicted level. Secondly it is necessary to be very specific and not rely on general interpretations of BS4142. BS 4142 is not a precise standard, and two experts, without making any errors, can reach different conclusions from the methodology contained therein. For example, determination of background noise level, when measured values cover a wide range, requires a decision on what is a representative value. It must be borne in mind that background noise levels in this area are exceptionally low, a figure of 16 dBA being reported in the Environmental Statement APP-135 (EN020026-000313-6.3.2.9.A ES Appendix 2.9.A Suffolk Noise Survey Data Table 1.3). That is as low as any I have measured over the past 60 years (and the others were also in East Anglia). BS 4142 offers one possible way of arriving at a representative value (doing a statistical analysis of the results of a statistical analysis), namely the distribution of the 90th percentile and picking the mode—the most commonly occurring value), but this is not definitive even though it is often adopted by practitioners as if it were the standard method. <i>"For Saxmundham Converter Station (Suffolk) and for Minster Converter and Substation (Kent): During normal operation of the proposed converter station/substation, the rating level of noise emitted from the development, as determined in accordance with BS 4142:2014+A1:2019, shall not exceed 34 dB L_{Ar,T} at any noise sensitive receptor, when assessed at a position 1 metre from the façade of the receptor (free field equivalent). The rating level shall include all applicable acoustic corrections, including (but not limited to) those for tonality, impulsivity, intermittency and any other characteristics identified by BS 4142.</i> <i>Friston Substation (Suffolk): During normal operation of the proposed substation, the rating level of noise emitted from the development, as determined in accordance with BS 4142:2014+A1:2019, shall be at least 5dB below background noise levels at any noise sensitive receptor, when assessed at a position 1 metre from the façade of the receptor (freefield equivalent). The rating level shall include all applicable acoustic corrections, including (but not limited to) those for tonality, impulsivity, intermittency and any other characteristics identified by BS 4142."</i>	These points are noted. It is agreed that the limit time period T should be 15 minutes. Background sound levels were not determined simply by taking the mode value, as suggested, but used conservative values which were agreed with East Suffolk Council
N/A	Low frequency noise	The applicants have not addressed the matter of low frequency noise. The applicant stated under Action AP70 <i>"An assessment of low frequency noise, based on the most up to date level of design detail, will be provided at Deadline 5. The assessment will calculate dBC noise levels at nearby noise sensitive receptors and assess impact by comparison with baseline levels.</i>	A comparison of dBC and dBC values is not appropriate for determining the presence or impact of low frequency tones. Annex D of BS 4142 contains an appropriate method for determining tones, including the frequencies generated

Reference	Matter	Point Raised	Applicant's Comments
		<i>The dBC index includes a greater proportion of low frequency noise compared with the dBA index, and the assessment will include a comparison between dBA and dBC levels.</i>" This has not been provided. Document 9.108: Applicant's Response to January Hearing Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) – Deadline 5 states "An assessment, incorporating a comparison of A-weighted (dBA) and C-weighted (dBC) operational sound levels, is provided at Deadline 5 in Appendix D Comparison of dBA and dBC Operational Sound Levels of this document." The applicants have misunderstood the issue which is that an indicator of the presence of low frequency noise requiring further consideration is obtained from the difference between the C-weighted and A-weighted sound levels (i.e. dBC-dBA). Instead, they have done a different exercise which was to evaluate C-weighted noise against C-weighted background, which does not achieve the same objective. On the question of constructive interference leading to a combination of two 100Hz sources resulting in a 6dB rather than a 3dB increase, while this was an issue in the EA1N and EA2 examination, I do not have measurement results from another site where this has happened, and it is of particular concern at locations with very low background noise levels where tonal noise is prominent at significant distances. Many other comparable sites are located in areas where background noise levels are higher and this issue is less likely to be a concern.	by substation plant, and this method should be used. This method has been agreed with East Suffolk Council and Thanet District Council.

Table 11.6 Applicant’s comments on Suffolk Energy Action Solutions Ltd (SEAS) Deadline 6 LANDSCAPE AND VISUAL/ CULTURAL HERITAGE [REP6-149 & REP6-256D]

Reference	Matter	Point Raised	Applicant's Comments
SEAS Response to Applicant’s Submissions since Deadline 5, ISH3, Action Points and ExQ3 – Landscape & Visual and Cultural Heritage			
1 - 5	Introduction and Overview	SEAS welcomes and supports the Deadline 6 submission prepared by Nicholas Bridges in respect of the Sea Link DCO, which provides a detailed and technically grounded critique of the Applicant’s Zone of Theoretical Visibility (ZTV) analysis. SEAS Council Mr. James Burton attended the Issue Specific Hearings (ISH3) on January 25, 26 and 27 March and introduced Landscape & Visual and Cultural Heritage expert Nicholas Bridge on 26 March to speak on behalf of SEAS. Mr Bridges’ evidence highlights significant inconsistencies between the ZTV outputs presented at different stages of the application, and between Sea Link and comparable projects in the same location. As set out in his submission, these discrepancies raise fundamental questions regarding the reliability of the Applicant’s landscape and visual assessment, and whether the Environmental Statement has properly identified and assessed likely significant effects, particularly in relation to the Suffolk & Essex Coast and Heaths National Landscape and designated heritage assets. SEAS considers this work to be highly relevant to the Examination. It reinforces concerns that the current assessment may omit materially	The Applicant has responded in full to Nicholas Bridges’ written evidence below. The landscape and visual impact assessment has robustly assessed and identified the likely significant effects on landscape character and visual amenity. It is fully compliant with professional guidance (Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3)) and at all stages of the pre-application process has been informed by detailed stakeholder engagement particularly with ESC, SCC and Suffolk & Essex Coast & Heaths National Landscape Partnership (SECHNLP). All of these stakeholders consider that the LVIA follows appropriate methodology and guidance, are in agreement with the landscape and visual receptors assessed, the extent of the study area used and the representative viewpoint locations which were agreed at PEIR and subsequent pre-application stages. As evidenced in Application Document 9.128 Applicant’s Response to Nicholas Bridges Representations RR-3944 and REP3-132 and SEAS REP4-240 [REP5-141] and Application Document 9.90 (A) Applicant’s Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086] the Applicant has clearly set out that effects on the Alde estuary and heritage assets are not

Reference	Matter	Point Raised	Applicant's Comments
		important visibility and impact considerations, especially on the southern side of the Alde estuary. In this context, SEAS supports the call for clarification, further analysis, and, where necessary, extension of the ZTV study area to ensure a robust and policy-compliant assessment. This submission should therefore be afforded substantial weight in the Examination of landscape, visual and heritage effects. Please find Nicholas Bridge's written evidence below	significant which is underpinned by additional site survey assessment undertaken by the Applicant in February 2026.
EN020026 SEA LINK DCO – DL6: RESPONSE BY NICHOLAS BRIDGES			
1.1-1.4	INTRODUCTION	The questions I raised about the Applicant's submitted Zone of Theoretical Visibility (ZTV) plans remain unresolved. This Deadline 6 submission provides further evidence of the inconsistency between the Sea Link ZTV and those of different applicants for similar buildings in the same locations. It includes comparative plans which illustrate the problem. It requests the Applicant to explain why. It reiterates the consequent omission within the ES LVIA of appropriate assessment of effects on the Suffolk & Essex Coast and Heaths National Landscape (AONB) and designated heritage assets. Comments are made here on this topic in response to the applicant's rebuttal of my previous submissions in its [REP5 141], not in my separate response to the remaining matters raised. Relevant previous documents [RR-3944] Relevant Representation by Nicholas Bidges Drew attention to Sea Link PEIR ZTV plans demonstrating visibility across the Alde estuary and onto is south side. [OFH1 – xxx] EN02026-001727 NB Written submission [REP3-132] ExQ1-DL3 EN020026-XXXX NB written responses to ExA's questions. [REP4-240] EN020026-002708 NB on behalf of SEAS written reps following appearance at ISH2. [REP5-141] EN020026-002931-9.128 Applicant's response to NB's Representations RR-3944 and REP3-132 and SEAS REP4 240.	The Applicant strongly refutes that there is any omission within the ES LVIA of the assessment of effects on the Suffolk & Essex Coast & Heaths National Landscape (SECHNL) and designated heritage assets. The ES LVIA and Cultural Heritage assessment, along with the following supplementary assessments provided during this Examination process, thoroughly assess the effects of the Proposed Project on the SECHNL and designated heritage assets: • Additional assessment of heritage assets (Grade II listed Church of St Botolph and Scheduled Monument and Grade II* Listed Martello Tower) in Application Document 9.128 Applicant's Response to Nicholas Bridges Representations RR-3944 and REP3-132 and SEAS REP4-240 [REP5-141]. • Assessment of effects on Natural Beauty Indicators and their Sub-Factors (Application Document 9.73.1 Applicant's Responses to First Written Questions – Appendices [REP3-070]). • Assessment of effects on Special Qualities Indicators and their Sub-Factors (Table 6.1 of Application Document 9.94 (A) Planning Statement Addendum [REP4-092]). • Cumulative effects on the Natural Beauty and Special Qualities Indicators of the National Landscape (Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]). • Cumulative effects on the Sub-Factors of the Natural Beauty and Special Qualities Indicators of the National Landscape (Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendices [REP5-136]).
2.1-2.11	METHODOLOGY	I have produced many complex ES TVIAs with varying extents of heritage and landscape receptors. I have been tasked with the iterative process of identifying key viewpoints for visual assessments, working with visualisers, the architects, planning consultants and other disciplines contributing to the ES. The study area is not simply a fixed distance from the proposed Site. The policy constraints have to be identified and mapped to understand their extent and importance. Once the design has evolved and options for its massing have emerged, a visualiser produces the first ZTV, which could include a variety of heights to identify potentially critical issues. These are often tested in the CAD model and coincide with site inspections to understand the sensitivity of the receptors and potential effects.	The Applicant has followed a recognised and standard approach to establishing a study area for LVIAs, identified in GLVIA3. The study area for the Proposed Project was set out at the scoping stage and within the Preliminary Environmental Information Report (PEIR) and has been subsequently agreed with East Suffolk Council and Suffolk County Council (refer to Application Document 9.15 Draft Statement of Common Ground Between National Grid Electricity Transmission and the East Suffolk Council [REP3-058] and Application Document 9.23 Draft Statement of Common Ground Between National Grid Electricity Transmission and the Suffolk County Council [REP3-062]). As noted in Section 1.5 of Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023] the agreed study area defines the area within which it is judged

Reference	Matter	Point Raised	Applicant's Comments
		A Long List is produced using a combination of model views and site recce photos as part of the Candidate Views Study. These are usually presented for discussion with the LPA as part of pre-apps and design development. As the project settles down, baseline photography and surveying of camera positions allows Accurate Visual Representations (AVRs) to be produced. During the design and consultation process, officers often ask for additional viewpoints to be included as part of their assessments. My TVIA process allows for producing images, either model or wireline, to prove either invisibility or such limited visibility that no further assessment is needed. By doing this exercise before a Design Review Panel presentation or an application is submitted, the client has more certainty that this aspect of the proposal has been de-risked. The Sea Link application does not appear to have had this approach unlike its predecessors EA1N and EA2 at Friston. EA1N - 6.3.29.2 Appendix 29.2 LVIA Methodology, page 49. Its LVIA Methodology had a reasonable way to use ZTVs to understand what will be seen, where, and which should be investigated as potential viewpoints: These limitations mean that while the ZTV is used as a starting point in the assessment, providing an indication of where the East Anglia ONE North and TWO substation locations will theoretically be visible, the information drawn from the ZTV is checked in the field, to ensure that the assessment conclusions represent the visibility of the East Anglia ONE North and TWO substation locations a reasonably accurately. The Sea Link Area of Study was settled with ESC and SCC during the PEIR stage and has not been amended since. It is not clear what evidence was presented to the authorities and why they agreed to the 2km extent. In the Scoping Opinion, the ExA requested that the <i>“Study Area be kept under review for effects on sensitive visual receptors and it should agree with relevant consultation authorities.”</i> The ZTVs of the two Friston projects and Sea Link’s PEIR have a similar pattern of visibility around their projects (see Figures 1 to 11 below). Sea Link includes the National Grid substation at Friston which each of EA1N and EA2 also included. All Projects were modelled using OS contours, woodland and buildings at a generic height. Observer heights were a little higher for EA1N and EA2. The two Friston substations used the same parameter model as Sea Link. The ‘shadow’ patterns illustrate the ‘shading’ effects of woodland and buildings. The ZTV plans of the same proposed volumetric parameters (Figures 12 to 17 below) show far less visibility than its PEIR ZTV plans. The accompanying textual details of the model’s constraints are exactly the same (see the schedule below). The first question is: why are the PEIR and DCO plans so completely different? Were the heights in the model changed? Were the shadowing criteria altered? Which is correct? If the DCO is correct, were the EA1N and EA2 ZTVs incorrect? These are simple technical points which can be explained easily.	that potentially significant landscape or visual effects could occur, rather than the area from which the Proposed Project would be visible. The ZTVs presented in the PEIR along with extensive site work to ground truth them in summer and winter seasons were used to inform the extent of the study area and the scope of the landscape and visual receptors assessed in the LVIA. An initial list of representative viewpoints was identified at this stage. ESC, SCC and SECHNLP provided comment on the viewpoints and additional locations were added. Further engagement continued from PEIR stage up until DCO submission with landscape and visual thematic meetings held every eight weeks (para 1.2.78 of Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023]). During these meetings additional viewpoints were identified by stakeholders and incorporated into the final list of representative viewpoints assessed. The iterative process of design and assessment underpinned this approach in which an increasingly finer level of detail was presented in a collaborative manner with the relevant consultation authorities. Nicholas Bridges incorrectly states that the study area is 2 km, when paragraph 1.5.2 of Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023] clearly states that it is a 3 km area from the Order Limits surrounding the proposed Saxmundham Converter Station and Friston Substation and 1 km from the Order Limits around the proposed landfall and HVDC and HVAC cable corridors. A 2 km study area was used for assessment of effects through change to the setting of heritage assets and it may be this study that Mr Bridges is referring to. The extent of this study area was similarly agreed with Historic England and the Local Authority at Scoping and PEIR stage, both of whom have confirmed throughout the examination that they are in agreement with the receptors assessed, the extent of the study area used and the representative viewpoint locations which were agreed at PEIR and subsequent pre-application stages. ZTVs are computer generated using Geographical Information System (GIS) software. They are a tool used in the early stages of the assessment process and inform the scope of the LVIA. They use OS Terrain 5 digital terrain model and incorporate buildings from OS Open Map Local with an assumed height of 7.5 m and woodland from the National Forest Inventory (NFI) with an assumed height of 10 m. As explained in paragraph 1.5.6 of Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023], ZTVs are limited by the following factors: • The detail of the digital terrain model data used which does not consider local topographic variations. • Some areas of theoretical visibility may comprise woodland or other vegetation which is not accounted for in the NFI where the likelihood of views being experienced is consequently low. • ZTVs do not consider the likely orientation of a viewer, such as the direction of travel and there is no allowance for reduction of visibility with distance, weather or light. These limitations mean that the ZTVs tend to overestimate the extent of the visibility and consequently, they are a tool used to identify areas of potential visibility to be verified by detailed field survey and assessment. They are not a measure of the likely visual effect. ZTVs were produced at PEIR and ES

Reference	Matter	Point Raised	Applicant's Comments
			stages. The PEIR stage ZTVs were used to inform early decisions in the assessment process around the study area and scoping in and out of landscape and visual receptors for the subsequent assessment. This is a key stage in the LVIA process as it sets the scope which as noted above was reviewed and agreed with stakeholders. The Applicant has compared the PEIR and ES ZTVs and acknowledges that there is a discrepancy between them. The discrepancy between the PEIR ZTV and the ES ZTV is due to an error in the AOD height for the Saxmundham Converter Station platform height and Friston substation platform height (under Friston Scenario 2) which were applied when the ZTVs were re-generated at the ES stage. The mistaken AOD value has resulted from the computer generated ZTV erroneously applying the Kent (Minster Converter Station and Substation) 3.5 m AOD platform height to the Suffolk ZTVs. This has meant that the extent of theoretical visibility coverage in the Suffolk ES ZTVs for some areas is less extensive than it should have been compared with the correctly run ZTVs at PEIR stage. This discrepancy has now been rectified with updated ZTV figures provided in Application Document 6.4.2.1 (A) ES Figures Suffolk Landscape and Visual Part 1 of 7 and Application Document 6.4.2.1 (A) ES Figures Suffolk Landscape and Visual Part 7 of 7 at Deadline 7. As explained above, ZTVs are not a measure of the likely effect but are a tool used early in the assessment process (when the correctly generated PEIR ZTVs were used). The LVIA findings are informed by extensive site survey and applying professional judgement supported by clearly evidenced narrative. The ES ZTV figures were not used in the assessment and so the findings of the LVIA remain unchanged.
2.12-2.19	Methodology	The second question is: With the majority of the ZTV plans showing extensive visibility of both Friston substations (18m above ground level) and Sea Link (26m above ground level) on the south side of the Alde estuary, at high tide mark and on the 20m ridge above, why was the information on these plans not followed or commented upon? The ExA is familiar with the AONB, heritage and natural environmental policies covering the estuary. In answer to my query why Sea Link had not checked this area for visibility and impact on assets, the applicant replied in REP5-141, page 8 in reply to my comments on ISH2 Agenda Item 11 (Cultural Heritage): <i>This study area was determined using professional judgement and was agreed with the Local Authority and Historic England at the Scoping stage...The study is an appropriate and proportionate assessment area aimed at identifying potential significant effects to heritage assets, rather than the area from which the Suffolk Onshore Scheme would be theoretically visible. It is the Applicant's view that assets such as the Church of St. Botolph and Martello Tower CC, both located outside the study area, do not have the capacity for impacts due to the presence of the scheme within their settings.</i> The applicant then appraised the two listed buildings, albeit not accepting the conclusions of Norman Scarfe's detailed historical and evidential analysis, proving that the Icanho mentioned by Bede as the location of St. Botolph's monastery was indeed Iken.	The Applicant has fully explained in Application Document 9.97 Applicant's Responses to Supplementary Agenda Additional Questions for Issue Specific Hearing 2 [REP4-094] why the Alde estuary lies beyond the agreed landscape and visual study area. It explains that whilst theoretical visibility extends beyond the study area, that a combination of distance and intervening localised landform and vegetation would limit actual visibility of the Proposed Project and the potential for likely significant landscape and visual effects. The Applicant has undertaken additional site work in the Alde estuary on the 23 and 24 February 2026 (whilst undertaking the landscape and visual nighttime assessment) which included walking along the PRow to the south of the River Alde as well as travelling along the local road network. This site survey further verified that excluding the Alde estuary from the LVIA is appropriate and proportionate based on the lack of potential for significant effects. Furthermore, SCC, ESC and SECHNLP do not consider that the LVIA study area should have been extended further south to encompass the Alde estuary. The ExA have also undertaken a site visit to the Alde estuary so will be able to draw their own conclusions as to the validity of the Applicant's landscape, visual and heritage assessment work. In addition, as noted in the Applicant's response to ISH2 Action Point 52 (Application Document 9.128 Applicant's Response to Nicholas Bridges Representations RR-3944 and REP3-132 and SEAS REP4-240 [REP5-141]) Historic England have no concerns regarding the two assets in question (the church of St Botolph and Martello Tower CC) in the Alde estuary and do not

Reference	Matter	Point Raised	Applicant's Comments
		The applicant finished: <i>The permanent above ground infrastructure forming part of the Suffolk Onshore Scheme would be located inland across the Alde to the north of the asset at a distance of 4.5 km at its closest extent at the proposed Friston Substation, while the Saxmundham Converter Station would be approximately 5.5 km away. The land within the site of the Friston Substation and the sites of the other elements of above ground infrastructure forming the Suffolk Onshore Scheme does not form part of the functional or visual setting of the asset, being inland of the estuary and beyond areas of intervening woodland. It is not clear whether or not the proposed above ground infrastructure would be visible from the roof of the church tower, however, this would not impede understanding of the asset's heritage value and setting within the estuary. Therefore, no impact is identified to this asset, resulting in a neutral effect that is not significant in EIA terms.</i> The applicant does not seem aware of the EA1N and EA2 ZTV plans (Figures 1, 2 and 3 below) which show that those developments would be visible. Nor the Sea Link PEIR likewise. Visibility from the top of the church tower is not relevant as the public have no access nor is it important as a private viewing point, unlike the Martello Tower for which this use was its primary function. The applicant's response ascribes significance of the Friston substation when it is the reverse which should be assessed. Martello Tower CCs unique and largest plan of the east coast towers was because it faced potential threats from both sea and river. I have seen the Board of Ordnance surveyor's drawings assessing all the sites as part of my research 15 years ago, which were sited precisely for the best defensive locations. The setting on the Alde has historical and architectural special interest. The Sea Link ES LVIA decided not to extend the coverage of its ZTVs when its PEIR had already revealed visibility of the Proposed Project from the high ground on the south side of the Alde estuary. This is an area covered by multiple statutory and non-statutory policy designations.	see any capacity for impacts to these assets as a result of the Proposed Project.
3.1-3.2	OUTSTANDING ISSUES	The submitted DCO ZTV plans should be reviewed for their accuracy. If they are correct, the applicant must explain why the PEIR was so different.	As explained above the Applicant acknowledges that there was a discrepancy between the PEIR and ES ZTVs which has been rectified with updated ZTVs provided in Application Document 6.4.2.1 (A) ES Figures Suffolk Landscape and Visual Part 1 of 7 and Application Document 6.4.2.1 (A) ES Figures Suffolk Landscape and Visual Part 7 of 7 at Deadline 7.
3.3	OUTSTANDING ISSUES	Are the ZTV plans for EA1N and EA2 correct.	The ZTV which incorporates Friston Scenario 2 only includes Friston substation and not EA1N and EA2 substations as they do not constitute a scenario for the Proposed Project.
3.4	OUTSTANDING ISSUES	There has been and is sufficient evidence available to warrant further understanding of the visibility of the proposed project on the south side of the Alde estuary.	The Applicant has clearly evidenced in Application Document 9.128 Applicant's Response to Nicholas Bridges Representations RR-3944 and REP3-132 and SEAS REP4-240 [REP5-141] that effects on the Alde estuary are not significant. This is underpinned by additional site survey undertaken by the Applicant in February 2026.
3.5	OUTSTANDING ISSUES	Extend the ZTV, using the same parameters as the PEIR down to Ferry Road, Sandy Lane and Tunstall Road along the southern ridge. There are multiple gaps through which the estuary, northern side and the Sizewell pylons can be seen.	Updated ZTVs are contained in Application Document 6.4.2.1 (A) ES Figures Suffolk Landscape and Visual Part 1 of 7 and Application Document 6.4.2.1 (A) ES Figures Suffolk Landscape and Visual Part 7 of 7.

Reference	Matter	Point Raised	Applicant's Comments
			As explained in reference to 2.12-2.19 above, the presence of theoretical visibility does not necessarily result in actual visibility and nor is it a measure of an effect. The areas of theoretical visibility to the south of the Alde estuary evident on the PEIR ZTV and the updated ZTVs (Application Document 6.4.2.1 (A) ES Figures Suffolk Landscape and Visual Part 1 of 7 and Application Document 6.4.2.1 (A) ES Figures Suffolk Landscape and Visual Part 7 of 7) have been ground truthed through additional site survey in February 2026. Effects on the landscape character of the Alde estuary and on views experienced by people living and using this landscape would be negligible and not significant. Furthermore, whilst Nicholas Bridges is correct that the towers on the 4ZW and 4ZX overhead lines leading to Sizewell are visible in places from the south side of the Alde estuary, these towers would be seen against the skyline. The Saxmundham Converter Station at its tallest point would be 26 m, making such a comparison irrelevant in this context,
3.6	OUTSTANDING ISSUES	Assess the extent of the project visible using the CAD model.	The Applicant has already provided a visualisation from Viewpoint 18 which is located near to the northern edge of the Alde estuary (Application Document 6.3.2.1.D ES Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]). The effects are reported for Viewpoint 18 as negligible adverse at all project stages.
3.7	OUTSTANDING ISSUES	Assess potential landscape, visual and heritage effects.	The Applicant has clearly set out the landscape, visual and heritage effects in Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023] and Application Document 6.2.2.3 (B) Part 2 Suffolk Chapter 3 Cultural Heritage [REP6-020] .
3.8.	OUTSTANDING ISSUES	It is possible that the effects may not be significant. Or that the combined effects across the whole estuary are significant.	Refer to the Applicant's response set out above in reference to 2.12-2.19 and 3.5. Effects on the landscape character, visual amenity and heritage assets contained in the Alde estuary would not be significant.
3.9	OUTSTANDING ISSUES	Without this analysis, there will be an omission in the Environmental Assessment which cannot be justified.	It is clearly incorrect to suggest that there is an omission in the ES. The Applicant has undertaken appropriate and proportionate assessments of the landscape, visual and cultural heritage effects of the Proposed Project identifying the likely potential significant effects. The Applicant has provided justified evidence in the ES and subsequent submissions during this Examination including Application Document 9.128 Applicant's Response to Nicholas Bridges Representations RR-3944 and REP3-132 and SEAS REP4-240 [REP5-141] which clearly evidence that the Proposed Project would not result in significant effects on the Alde estuary,

Table 11.7 Applicant’s comments on Suffolk Energy Action Solutions Ltd (SEAS) Deadline 6 TOURISM on D5, ISH3, Action Points & ExQ3 [REP6-256E]

Reference	Matter	Point Raised	Applicant's Comments
<i>Socio-economics and Tourism</i>			

Reference	Matter	Point Raised	Applicant's Comments
1 -7	Introduction and Overview	This submission addresses the continued deficiencies in the Applicant's assessment of socio-economics, recreation and tourism, having regard to its Deadline 5 submissions, ISH3, the associated Action Points and ExQ3. This submission should therefore be read as: a. identifying where the Applicant's Deadline 5 submissions do not resolve previously raised concerns; and b. demonstrating how those same issues remain live, as reflected in the ISH3 Action Points and ExQ3. The context for these considerations remains that, the Suffolk coastal tourism economy is highly place-dependent and economically significant, with local authority and DMO evidence indicating substantial sensitivity to changes in landscape character, tranquillity and destination image, and evidence presented in earlier SEAS submissions indicating the potential for substantial economic loss over the construction period (c.£0.5bn) if these qualities are affected. At Deadline 5, the Applicant has not materially updated its tourism assessment. The additional material provided — including REP5-135, REP5-136 and the updated REAC (REP5-115) — relates primarily to monitoring and management proposals rather than any revised or location-specific assessment of tourism effects. In practice, the Applicant's position at Deadline 5 continues to rely primarily on: a. the original Environmental Statement assessment of socio-economics, recreation and tourism (Application Document 6.2.2.10, REP1A-005); b. the Applicant's tourism technical note and related submissions responding to earlier SEAS concerns; c. the accommodation assessment and commentary provided at Deadline 4 (including REP4-237); d. the Applicant's response to ExQ2 (PD-021) and supporting appendices at REP5-135 and REP5-136, which provide further justification and clarification of monitoring assumptions, but do not introduce any updated or location-specific tourism assessment; and e. general commitments to future monitoring and liaison, through outline management plans to be approved post-consent, rather than secured mitigation. The main substantive new material relevant to tourism and accommodation at Deadline 5 is the updated REAC (REP5-115), together with the Applicant's responses to ExQ2 and supporting appendices at REP5-135 and REP5-136. These introduce limited additional commitments, notably SE04 (liaison with tourism businesses via the DMO/LVEP) and SE05 (monitoring of worker accommodation use), and provide further explanation of the Applicant's approach to accommodation monitoring. However, they do not constitute an updated tourism assessment or a broader reassessment of tourism effects. Since ISH3, the Action Points and ExQ3, the Examination has now explicitly identified the need for further evidence in these areas. However, the Applicant has not provided: a. behavioural or market-based modelling; b. price or affordability analysis; c. tourism demand sensitivity testing; or	The Applicant's responses below address the points raised in the introduction section of SEAS submission. The Applicant has undertaken a comprehensive and robust EIA and maintains its position that the Project will not give rise to significant effects on socio-economics, leisure and tourism following the application of appropriate mitigation. Overall, the Applicant considers that the combination of the EIA and supporting technical documents provide a robust, proportionate, and policy-compliant framework for assessing and managing socio-economic effects.

Reference	Matter	Point Raised	Applicant's Comments
		d. cumulative scenario modelling In the absence of such evidence, the assessment remains incomplete and does not provide a reliable basis for determining effects. In these circumstances, and consistent with the need for a robust assessment under the EIA framework, it is not appropriate to assume that effects will be negligible in the absence of evidence. Where key aspects of impact are uncertain or unassessed, a precautionary approach is required. On that basis, the potential for significant adverse effects on tourism and socioeconomic receptors cannot be excluded and must be treated as a realistic and material outcome in the assessment.	Specifically, in response to the items SEAS set out in their submission regarding market modelling, affordability analysis, tourism demand sensitivity testing, and cumulative scenario modelling, the Applicant refers to the following submissions which include this detail: • Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 [REP1A-005] • Application Document 9.117 Applicant's Response to AP104 from Issue Specific Hearing 2 • Application Document 9.123 Applicant's Responses to Second Written Questions (please refer to 2SERT1 to 2SERT5). • Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065], • Application Document 9.136 Applicant's Responses to Third Written Questions (please refer to 3SERT1 to 3SERT5) • Document 9.135: Applicant's Response to March Hearing (CAH2 and ISH3) Action Points (please refer to AP26) On this basis, no further assessment or additional measures are considered necessary.
Accommodation and Workforce Effects			
12	No secured accommodation strategy	The Applicant has not secured a robust or enforceable accommodation strategy within the DCO.	A framework-based approach to mitigation is appropriate and consistent with established practice for Nationally Significant Infrastructure Projects. The REAC (Application Document 9.84) secures a series of commitments, which provide mechanisms for ongoing monitoring, stakeholder engagement, and the implementation of mitigation where required. These commitments are secured through the Development Consent Order (DCO) and are therefore enforceable. Full details of commitments relevant to tourism, including SE04 and SE05, are provided within Application Document 9.84 Register of Environmental Actions and Commitments (REAC). Further detail on tourism impact monitoring and mitigation within Document 9.136: Applicant's Responses to Third Written Questions [REP6-111] (see 3SERT2). This incorporates updates made by the Applicant following the meeting held with LPAs on 1 April 2026. Overall, the Applicant has undertaken a comprehensive and robust EIA and maintains its position that the Proposed Project will not give rise to significant effects on socio-economics, leisure and tourism following the application of appropriate mitigation. The Applicant considers that the combination of the EIA and supporting technical documents provide a robust, proportionate, and policy-compliant framework for assessing and managing socio-economic effects.
13		The REAC (REP5-115) and Outline Onshore CEMP (AS-127 – Application Document 7.5.3(B)), secured through Requirement 6, do not provide any mechanism that controls where workers are housed or prevents the use of tourism or private rental accommodation.	
14		As confirmed within AS-127, the CEMP is a framework document that will be finalised post-consent and updated as a “live” document during construction. Mitigation is therefore not fixed or secured at the point of decision.	
15		Accordingly, there is no secured or effective mechanism to prevent pressure on the local housing and tourism market.	
16		Given the cumulative workforce across multiple NSIPs, and concerns raised by local authorities (REP4-184), accommodation impacts remain materially unmitigated.	
17		There is also a risk that sustained pressure on accommodation markets could have consequential effects on tourism-dependent businesses, particularly small and medium-sized enterprises operating in peak-season locations. This has not been assessed in terms of business viability or longer-term economic effects.	

Reference	Matter	Point Raised	Applicant's Comments
18	SE05 is reactive and does not prevent impact	SE05 (REP5-115) does not prevent tourism displacement. It relies on monitoring and only requires the Applicant to consider measures if a threshold is exceeded.	See above responses.
19		There is no binding requirement to act and no defined mitigation measures are secured.	
20		Appendix E of REP5-136 makes clear that SE05 is regarded by the Applicant as additional reassurance rather than primary mitigation. This confirms that it is not a secured strategy for avoiding effects, but a limited monitoring response.	
21	Trigger mechanisms do not capture peak or cumulative effects	The monitoring trigger within SE05 is limited in both scope and geography. It is focused on hotel and B&B accommodation within a defined distance of Aldeburgh and does not capture: a. wider displacement into self-catering accommodation or private rental markets; b. peak seasonal tourism demand; or c. cumulative demand arising from multiple concurrent projects.	See above responses.
22		This is inconsistent with concerns raised in SEAS submissions (REP3-139) and local authority evidence (REP4-184), which highlight broader market pressures.	
23		The absence of a trigger framework aligned to peak and cumulative conditions means that the mechanism may not detect the most significant impacts.	
24	Tourism Assessment and Baseline	The Applicant has not provided any updated, location-specific tourism assessment at Deadline 5.	See responses above.
25		REP5-135 and REP5-136 provide further explanation of monitoring assumptions but do not revise the underlying tourism assessment in REP1A-005.	
26		The approach therefore continues to rely on earlier baseline assumptions, without assessment of: a. visitor perception; b. destination image; c. behavioural responses; or d. peak seasonal conditions.	
27		Commitments are secured through outline management plans (AS-127) to be approved post-consent. These provide monitoring proposals but do not constitute an updated assessment or resolve underlying concerns raised in SEAS submissions (including REP3-139).	
28		In response to ExQ2 2SERT4 (PD-021), the Applicant confirms that it does not consider it appropriate to commit to broader tourism monitoring beyond accommodation. This confirms that no wider framework for understanding tourism demand or behaviour is proposed.	
29		In a tourism economy such as the Suffolk coast, where visitor behaviour is closely linked to landscape, tranquillity and destination perception, the absence of such assessment represents a material gap in the evidence base.	

Reference	Matter	Point Raised	Applicant's Comments
30	Cumulative Effects on Tourism and Socio-Economics	In the absence of evidence on visitor behaviour and destination sensitivity, it is not appropriate to assume that tourism demand will not be significantly affected, and the potential for significant adverse effects cannot be excluded.	See responses above.
31		There is also no assessment of how transport conditions and accessibility may influence tourism behaviour, despite evidence that congestion and journey reliability are key determinants of visitor choice in coastal destinations.	
32		The Applicant has not provided a cumulative assessment of tourism effects that reflects concurrent construction activity across multiple NSIPs.	
33		The assessment does not include: a. a combined construction programme; b. an assessment of peak overlap scenarios; or c. a cumulative assessment of accommodation demand and tourism displacement.	
34		As a result, cumulative effects remain unquantified.	
35		Given the scale, duration and overlap of construction activity across projects, effects are likely to be experienced as combined and prolonged pressures on the same tourism economy and accommodation market.	
36		Unlike Sizewell C, which is geographically concentrated, the Proposed Development contributes to a pattern of distributed impacts across multiple settlements and sensitive locations, including coastal communities and key tourism corridors. These distributed effects have not been assessed as a coherent tourism or socio-economic impact.	
37		The cumulative presence of multiple cable routes, substations and associated infrastructure results in a materially different scale and character of impact than any single project assessed in isolation.	
38		The Examining Authority's Action Points and ExQ3 reinforce the need to understand these combined effects. However, no additional cumulative assessment has been provided.	
39		The scale and duration of overlapping construction activity also raises the prospect of sustained disruption to tourism-dependent businesses. These effects have not been assessed as structural or long-term economic impacts.	
40		In the absence of a cumulative assessment that reflects concurrent construction activity and combined pressures, it is not possible to conclude that effects will be limited or negligible.	
41	Reliance on Process and Lack of Secured Outcomes	Applying a precautionary approach, the combination of scale, duration and geographic spread indicates a realistic potential for significant adverse cumulative effects on the tourism economy.	See responses above.
42		The Applicant's Deadline 5 position is characterised by reliance on process based, post-consent controls rather than updated assessment or secured mitigation.	
43		REP5-135 and REP5-136 provide clarification of monitoring approaches but do not introduce new evidence.	

Reference	Matter	Point Raised	Applicant's Comments
44		The REAC (REP5-115) secures liaison (SE04) and monitoring (SE05), but does not secure any enforceable outcomes or control over construction activity.	
45		There is no requirement to: a. modify construction phasing; b. implement seasonal restrictions; or c. reduce impacts in response to tourism effects.	
46		Commitments are framed as “seeking to minimise” impacts rather than securing defined outcomes.	
47		There is also no secured governance structure ensuring that relevant local authorities are formally involved in tourism monitoring, data sharing or mitigation design.	
48		As a result, impacts are not controlled at the point of consent but deferred to postconsent processes.	
49		The scale and duration of potential impacts raises questions as to whether the current approach to mitigation is proportionate, and whether additional mechanisms may be required to address potential economic effects on tourismdependent businesses.	
50		This may include consideration of whether a more structured mitigation approach, for example a tourism-related compensation or support mechanism, is required.	
51	Monitoring and Evidence Gaps	The Applicant has not provided a robust tourism monitoring framework. SE04 provides for liaison but does not constitute a monitoring strategy. It does not include: a. visitor surveys; b. business impact monitoring; c. destination perception analysis; or d. defined indicators or thresholds.	See responses above.
52		This is confirmed in REP5-135, where the Applicant states that broader tourism monitoring is not proposed.	Regarding visitor perceptions, the Applicant acknowledges the need to consider potential effects on the visitor economy, particularly in a cumulative context. A response to this matter in provided in Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065] . The findings confirm there is limited robust evidence of material adverse effects on visitor numbers, spending, or the wider tourism economy. This supports the conclusion in Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 [REP1A-005] that no significant adverse effects on tourism are anticipated.
53		In contrast, local authority evidence and SEAS submissions (REP3-139) indicate that tourism impacts are closely linked to visitor perception and behaviour.	
54		In the absence of a robust monitoring framework, there is no mechanism to detect or respond to wider tourism effects.	
55		There is also no integration of tourism monitoring with transport or accessibility data, despite the relevance of traffic conditions to visitor behaviour and destination attractiveness.	In addition, the Applicant has provided detailed response regarding surveys of tourism impacts within Document 9.135 Applicant's Response to March Hearing (CAH2 and ISH3) Action Points (please refer to AP26).
56	Conclusion	In these circumstances, and in the absence of robust, location-specific and cumulative evidence, it is not appropriate to assume that effects will be negligible.	

Reference	Matter	Point Raised	Applicant's Comments
57		Applying a precautionary approach, there is a realistic prospect of significant adverse tourism and socio-economic effects.	The Applicant's responses above address the points raised in the conclusion section of SEAS submission.
58		Given the scale, duration and sensitivity of the receiving environment, there is a realistic prospect of significant adverse effects which must be taken into account in decision-making.	
59		Monitoring alone cannot substitute for a robust assessment and secured mitigation. Impacts are monitored rather than prevented, and mitigation is not secured at the point of decision.	

Table 11.8 Applicant’s comments on Suffolk Energy Action Solutions Ltd (SEAS) Deadline 6 Ecology ISH3 [REP6-256F]

Reference	Matter	Point Raised	Applicant's Comments
<i>Ecology</i>			
1 - 5	Introduction and Overview	SEAS continues to argue that the Sea Link proposal relies on inadequate ecological surveys, including insufficient assessment of reptiles, barbastelle bats, habitats, and SPA bird species, which undermines the validity of the impact assessments and the Habitats Regulations Assessment. SEAS Council Mr. James Burton attended the Issue Specific Hearings (ISH3) on January 25, 26 and 27 March and introduced Ecology expert Dr Matthew Denny on 27 March to speak on behalf of SEAS. SEAS supports the Examining Authority’s current position that it is not yet satisfied that all residual impacts have been demonstrated to be unavoidable. In our view, this goes to the heart of policy compliance under National Policy Statement EN-1 and the proper application of the mitigation hierarchy. Dr Denny’s evidence directly addresses these concerns, identifying clear gaps in survey effort, assessment, and the premature reliance on mitigation and compensation in circumstances where avoidance and reduction have not been adequately explored. His response should be read as reinforcing a central point for the Examination: that without a robust and evidence-led application of the mitigation hierarchy, the project cannot rely on the policy presumption associated with Critical National Priority infrastructure. Please find Dr Denny’s written evidence below:	See Applicant’s various responses to SEAS throughout the Examination including: Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA. Verbal submissions at ISH2 and ISH3 (Application Document 9.133 (A) Applicant’s Written Summaries of Oral Submissions at Issue Specific Hearing 3). Table 19.10 Applicant’s Comments on the SEAS Deadline 5 Submission of Application Document 9.134 Applicant’s Comments on Other Submissions Received at Deadline 4 and Deadline 5.
Issue Specific Hearing 3 (“ISH3”). Agenda Item 2. Matters arising from the Examining Authorities (“ExA”) third written questions (ExQ3)			
1	Agenda Item 2. Matters arising from the Examining Authorities (“ExA”) third written questions (ExQ3)	SEAS supports the ExA’s opening statement at ISH3 stating that “currently the Examining Authority is not convinced that the Applicant has demonstrated that all residual impacts are those that cannot be avoided, reduced, or mitigated.”	The Applicant has ensured that all significant residual effects have been subject to consideration of the mitigation hierarchy, and has provided evidence of this in response to the ExA’s WQ3 3GEN1 in both 9.136 Applicant’s Responses to Third Written Questions and 9.136.1 Applicant’s Responses to Third Written Questions - Appendices .
2	Agenda Item 2. Matters arising from the Examining Authorities	We agree with this statement as it reflects a core concern that the Applicant has not adequately applied the Mitigation Hierarchy.	

Reference	Matter	Point Raised	Applicant's Comments
	("ExA") third written questions (ExQ3)		
3	Agenda Item 2. Matters arising from the Examining Authorities ("ExA") third written questions (ExQ3)	As set out in National Policy Statement EN-1, the policy presumption in favour of granting consent for Critical National Priority ("CNP") infrastructure is contingent upon the proper and effective application of the Mitigation Hierarchy, requiring avoidance in the first instance, then reduction, then mitigation, with compensation only as a last resort. Where this process has not been robustly followed, reliance on CNP policy is not justified.	
4	Agenda Item 2. Matters arising from the Examining Authorities ("ExA") third written questions (ExQ3)	SEAS agrees with the ExA's current position that it has not been demonstrated that all residual impacts are genuinely unavoidable, including in some ecological areas, where the Applicant has, in our view, moved prematurely to mitigation or compensation without fully exploring opportunities for avoidance or reduction. This undermines the integrity of the Mitigation Hierarchy and, by extension, the applicability of the CNP policy.	
5	Agenda Item 2. Matters arising from the Examining Authorities ("ExA") third written questions (ExQ3)	An example of this is the proposed substation at Kiln Lane. The applicant's own surveys and assessment acknowledge there is likely to be a barbastelle bat roost near to the proposed substation, yet they did not utilise the standard tracking surveys to find the location and status of this roost. Instead, they have largely ignored this issue. Nearby hedgerow sections, which could form important dispersal corridors for the roost, are to be removed. Barbastelles are rare, and any disruption to a maternity roost would be an impact at the National, or possibly, international level. The improvised mitigation currently proposed - introducing fake hedge lines to fill gaps created during the works – is an obvious breach of the mitigation hierarchy, where such a potentially important ecological resource, should be avoided or reduced. The Applicant has not taken forward options that would either avoid the impact entirely or meaningfully reduce the risk (such as finding alternative cabling routes). In our view, this approach is not consistent with the Mitigation Hierarchy, as reasonable opportunities to avoid or reduce harm have not been adequately pursued.	See the Applicant's responses to these points as raised by Dr Denny on behalf of SEAS in verbal submissions at ISH2 and ISH3 (Application Document 9.133 (A) Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 3).
6	Agenda Item 2. Matters arising from the Examining Authorities ("ExA") third written questions (ExQ3)	This example illustrates a broader pattern within the application, where impacts have not been minimised to the fullest extent possible. SEAS supports the ExA's current position and considers that, unless and until the Applicant can clearly demonstrate that the Mitigation Hierarchy has been properly applied, the project should not be afforded the policy benefit of CNP.	Neither the 2017 EIA Regulations nor national policy require that all impacts, even if not significant to be ' <i>minimised to the fullest extent possible</i> '. The Applicant has ensured that all significant residual effects have been subject to consideration of the mitigation hierarchy, and has provided evidence of this in response to the ExA's WQ3 3GEN1 in both 9.136 Applicant's Responses to Third Written Questions and 9.136.1 Applicant's Responses to Third Written Questions - Appendices
7	Agenda Item 12. Ornithology	SEAS supports the ExA's concerns regarding the potential impacts of the project on the Outer Thames Estuary SPA and its internationally important population of red-throated diver. The SPA supports 16% of the European wintering population. In particular, we share the ExA's position on the significant evidence gap relating to emergency cable repair scenarios and the absence of clearly defined mitigation or contingency measures. Emergency repair works during the overwintering period, have the potential to cause significant disturbance to red-throated divers and therefore result in an adverse effect on the integrity of the SPA. Without this evidence and mitigation, a precautionary approach needs to be taken. We note the ExA's clear indication that, in the absence of adequate information on emergency	The Applicant directs SEAS to Natural England's submission at Deadline 6 in response to concerns raised regarding the Outer Thames Estuary SPA and to the Applicant's Response to Natural England/s Deadline 6 Submissions within this document.

Reference	Matter	Point Raised	Applicant's Comments
		repair scenarios and their potential impacts, it may be necessary to recommend refusal of the DCO. SEAS fully supports this position. Without this critical information, the Examination cannot conclude beyond reasonable scientific doubt that the project will not adversely affect the integrity of the SPA, and as such, the scheme should not be consented. Alternatively, the Applicant should apply for a Derogation Order, leading to the requirement of passing the derogation tests of the Habitats Regulations, including Test 1 – the exploration for alternatives with lower or no European Site impacts. SEAS maintains that the test for alternatives has not been adequately undertaken and should then be revisited.	
8	Agenda Item 12. Ornithology	SEAS maintains that there have been insufficient terrestrial bird surveys. There have been no dedicated marsh harrier surveys. The Order Limits have suitable foraging habitat for the species, well within their foraging home range from two SPAs for which marsh harrier is a qualifying species. The species also nests in the SSSI within the Order Limits. I believe the applicant is likely to have overlooked functionally linked land for marsh harrier in their HRA.	The Applicant refers to their response to SEAS Relevant Representation on this point on page 322 of Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA (Clean).
9	Agenda Item 12. Ornithology	The Applicant has not undertaken the most appropriate surveys for nightjars, with no acoustic recorder surveys carried out. Since a paper published over 10 years ago (Zwart et al 2013), it has been demonstrated that acoustic surveys are much more effective than traditional observer surveys, and I believe the surveys are therefore insufficient, given nightjar is a key Qualifying species of the adjacent Sandlings SPA, and are known to forage on grassland habitats across a wider area.	The Applicant notes that no organisation other than Dr Denny/SEAS has identified a need for such surveys, including Natural England, the local planning authorities, or RSPB.
10	Agenda Item 13. Biodiversity & Ecology	SEAS has significant procedural concerns, given the insufficient survey effort undertaken, particularly given the limited time remaining before the close of Examination.	See above responses.
11	Agenda Item 13. Biodiversity & Ecology	Under the Conservation of Habitats and Species Regulations 2017 (the "Habitats Regulations"), there is a clear legal requirement for competent authorities to ascertain, beyond reasonable scientific doubt, that a project will not adversely affect the integrity of European designated sites. The lack of survey effort for marsh harriers, nightjar and barbastelle bats means that this evidential threshold has not been met.	See above responses. Note that barbastelle bats are not a feature of any European sites in the locality and therefore are not an HRA consideration.
12	Agenda Item 13. Biodiversity & Ecology	This concern is particularly acute in relation to bats, and specifically Barbastelle bats are an Annex II European Protected Species. [As detailed above, there is a high probability that a roost is present close to the Kiln Lane substation, but this has not been determined, as not 'advanced technique' surveys have been undertaken. SEAS considers that advanced survey techniques, including bat trapping and radio-tracking, should have been undertaken. These methods would have enabled confirmation of presence or likely absence, identification of roost locations, and mapping of key commuting and foraging routes so that these areas could be avoided from direct impacts and therefore align with the Mitigation Hierarchy.	See the Applicant's responses to these points as raised by Dr Denny on behalf of SEAS in verbal submissions at ISH2 and ISH3 (Application Document 9.133 (A) Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 3). Note that barbastelle bats are not a feature of any European sites in the locality and therefore are not an HRA consideration.
13	Agenda Item 13. Biodiversity & Ecology	Contrary to the Applicant's assertions, radio-tracking is not an exceptional or disproportionate method in this context. The Bat Conservation Trust (BCT 2024) guidelines explicitly state that trapping, tagging, and radio-tracking should be considered for NSIPs and for developments with potential high impacts on rare or Annex II species. The guidance is clear that landscape-scale projects affecting rare bat species or SSSI features require	See the Applicant's responses to these points as raised by Dr Denny on behalf of SEAS in verbal submissions at ISH2 and ISH3 (Application Document 9.133 (A) Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 3). As discussed at both hearings, the scope of protected species surveys was discussed with Natural England and the local planning authorities prior to and during survey work for the DCO. None of these bodies have

Reference	Matter	Point Raised	Applicant's Comments
		more detailed and comprehensive datasets. Given the scale of this project and the potential presence of a rare Annex II species possibly an internationally significant breeding roost, the absence of such survey effort represents a significant deficiency in the evidence base. The Applicant's suggestion that this method has welfare issues, is not a sufficient justification for avoiding this level of survey effort. Level 4 bat licensees who can undertake such surveys, are very highly trained. Further surveys for this Annex II species must be undertaken, as they were for other nearby NSIP projects, LionLink and Sizewell C.	identified the need for such surveys. The only organisation that has insisted such surveys are essential are SEAS.
14	Agenda Item 13. Biodiversity & Ecology	Despite nine species of bats being recorded and amassing 22 points in the standard species assemblage evaluation methods, which correlates to National importance for species assemblage, the applicant has downgraded this value to Regional, citing the relatively low bat encounter rates. But this assessment method should not incorporate encounter rates, only the number of species recorded. Therefore, this downgrading is flawed.	The Suffolk Ecology and Biodiversity Chapter reports both the national and regional valuations in paragraphs 2.7.48 and 2.7.49 so there is no attempt to suppress the 'national' valuation. However, as explained in paragraph 2.7.49 activity levels of all species recorded during the walked transects were considered to generally be low across the Suffolk Onshore Scheme and the Applicant considers it is entirely reasonable to take into account in their valuation not only the number of species recorded but also the levels of activity. Otherwise, no distinction is drawn between an area heavily used by a given species of bat and one lightly used. The Applicant would, however, note that even if the regional evaluation is set aside, and only the national evaluation is used, this would not change the significance of any effect reported in the ES chapter (i.e. it would not change any effect from not-significant to significant) and it would also not change the mitigation required since the presence of rare species such as barbastelle was taken into account in devising that mitigation. Indeed, several REAC commitment specifically reference the measures to be put in place to protect this species and/or its habitat (e.g. REAC measures B30 and B39).
15	Agenda Item 13. Biodiversity & Ecology	There are still no adequate baseline surveys for the Pegwell Bay hoverport. Without knowing what cracks and fissures and vegetation are present, there is no way of assessing or addressing potential impacts on legally protected reptile and invertebrate species.	See the Applicant's response to this matter in point 12 of Table 19.10 Applicant's Comments on the SEAS Deadline 5 Submission of Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5.
16	Agenda Item 13. Biodiversity & Ecology	We continue to have concerns about the lack cumulative effect assessment, with treatment of this being cursory, and omitting key HRA/European site in-combination issues.	The Applicant considers the 'in combination' assessment in the HRA to be robust and does not omit any key European site 'in combination' issues.
17	Agenda Item 13. Biodiversity & Ecology	In conclusion, the applicant needs to acknowledge the limitations of their ecological surveys, assessments and proposed mitigation. It is clear an underprepared, insufficient DCO application has been submitted, and we urge the Examiners to recognise this and continue to press the applicant on the above points.	See detailed responses above.

Table 11.9 Applicant’s comments on Suffolk Energy Action Solutions Ltd (SEAS) Deadline 6 CUMULATIVE IMPACT on D5, ISH3, Action Points & ExQ3 [REP6-150 & REP6-256G]

Reference	Matter	Point Raised	Applicant’s Comments
1 - 7	Introduction	This submission addresses the continued deficiencies in the Applicant’s cumulative impact assessment, having regard to the Applicant’s Deadline 5 submissions, ISH3, the Action Points from ISH3 and ExQ3. SEAS’ position remains that the Application is not supported by a lawful or policy compliant cumulative impact assessment. Acceptance of the Application for Examination does not as the Applicant claims constitute any finding that the Environmental Statement is legally adequate or policy-compliant; these are matters for the Examination. The Environmental Statement does not demonstrate, on the evidence provided, a coherent, project-wide assessment of cumulative effects, instead relying on fragmented topic-based assessments, inconsistent project lists, and undefined mitigation only secured through outline plans such as the REAC (REP5-115). A lawful cumulative assessment requires a consistent and clearly defined set of other developments to be assessed across all environmental topics. The Application does not achieve this. Different environmental topics appear to apply different screening criteria, include different projects, and assume different temporal overlaps. As a result, there is no single, coherent cumulative scenario being assessed, and the combined effects of the Proposed Development with other major infrastructure projects in the area are likely to be materially understated. The Applicant has responded to the Examining Authority’s Second Written Questions (PD-021) in REP5-135 and REP5-136, and to the ISH2 Action Points (EV6-033) in REP5-126 and REP5-127. However, neither set of submissions provides the comprehensive cumulative assessment sought by the Examining Authority. This position is reinforced by ExQ3 (PD-023) and Action Points arising from ISH3, which indicate that aspects of cumulative effects, their assessment and the application of the mitigation hierarchy remain under active examination. The Examining Authority has sought confirmation as to whether the mitigation hierarchy has been fully applied. This reflects the absence of a coherent, integrated cumulative impact assessment across receptors, geography and time. In these circumstances, the Applicant cannot demonstrate that residual impacts are unavoidable, nor that mitigation is effective. This has direct implications for the application of Critical National Priority policy under EN-1. At this stage of the Examination, there is not sufficient evidence to conclude that cumulative impacts are understood or that mitigation is effective.	The Applicant considers the assessment of cumulative effects, but intra-project and inter-project, to be coherent, and ‘project wide’ and to also be in line with the requirements of the Infrastructure Planning (Environmental Impact Assessment) Regulations 2017 and the requirements as set out in National Policy Statements. The Applicant points out that the measures set out in section 1 of the REAC, which includes measure GG40 relating to revisiting the intra-project cumulative effects assessment based upon detailed design and construction information, is not secured in outlie; it is secured in full via Requirement 5 of the draft DCO. It is standard practice in cumulative effects assessment for individual topics to have their own Zol, meaning that some topics will consider a particular ‘other existing and, or approved development’ whereas others will not, because it falls outside of the Zol for that topic. This is confirmed in the PINS guidance on cumulative effects assessment, which states “<i>To establish which other existing and, or approved developments should be included in the assessment, the applicant should define and document the ZOI for each environmental aspect considered within the Environmental Statement.</i>” (emphasis added) The Applicant is unclear how the ExA request for evidence of the application of the mitigation hierarchy to the significant residual effects of the Proposed Development is, in any way, evidence of a lack of cumulative effects assessment; these are two separate points, excepting where the intra-project cumulative effects assessment has identified significant residual effects. As stated previously, the Applicant has ensured that all significant residual effects have been subject to consideration of the mitigation hierarchy, and has provided evidence of this in response to the ExA’s WQ3 3GEN1 in both 9.136 Applicant’s Responses to Third Written Questions and 9.136.1 Applicant’s Responses to Third Written Questions – Appendices. As such there are no implications for the application of CNP.
8	Failure to demonstrate mitigation hierarchy	The application of the mitigation hierarchy requires a clear understanding of likely significant effects. In this case, however, the cumulative assessment remains incomplete and fragmented. As a result, the Applicant has not demonstrated that impacts have been properly avoided, reduced or mitigated. This is consistent with the Examining Authority’s request for confirmation as to whether the mitigation hierarchy has been fully applied.	The Applicant strongly refutes the suggestion that the cumulative effects assessment is incomplete or fragmented. It is a proportionate assessment undertaken in line with PINS guidance, and is fully compliant with the requirements of both policy and Infrastructure Planning (Environmental Impact Assessment) Regulations 2017.
9 - 11	No integrated cumulative assessment has been provided	The Applicant continues to rely on: • application-stage material (e.g. APP-060), • cross-referenced documents (e.g. REP5-029),	Inter-project cumulative effects assessment is, by its nature, topic based. PINS guidance supports this when stating “<i>Where significant cumulative effects between the proposed NSIP and other existing and, or approved</i>

Reference	Matter	Point Raised	Applicant's Comments
		• and discipline-specific updates (e.g. REP5-137; REP5-138). REP5-135 and REP5-136 respond to intra- and inter-project cumulative effects within individual environmental topics. However, they do not provide a single, integrated cumulative assessment across receptors, geography and time. Accordingly, the Application does not present a coherent assessment of how effects combine across topics.	<i>development are likely to arise in relation to one environmental aspect area, the assessment should focus on that issue only. Some effects may only need brief information to indicate that they have been considered.</i> Document 9.141 Intra Project Cumulative Effect Significance - Technical Note and the original Application Document 6.2.2.12 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Intra Project Cumulative Effects [APP-059] consider individual receptor types i.e. residential receptors, transport and road users and PRow users, however for each receptor type multiple relevant sources of intra-project cumulative effects are considered, so it is unclear why SEAS continues to believe that there is no “<i>coherent assessment of how effects combine across topics</i>”.
12	ExA requests for further cumulative assessment have not been met	The ExA has sought further cumulative assessment, including: • Cumulative traffic issues were raised at ISH1 → addressed by the Applicant in REP1-110 • ISH2 Action Points (EV6-033) → partial responses including (REP5-137) and (REP5-138) • ExQ2 → responses in (REP5-135) and (REP5-136) • Further questions in ExQ3 (PD-023), including in relation to Traffic and Transport and intra-project cumulative effects, indicating that these matters continue to be examined These responses: • address limited topics or subsets of schemes, • rely on peak overlap assumptions, • or provide additional topic-specific analysis only.	It is not unusual for issues to continue to be examined during the examination stage of a DCO. It is important to note that the consideration of impacts provided in both (REP5-137) and (REP5-138) has concluded no potential for significant effects.
13		The Examining Authority has explicitly required further work to determine whether a sufficiently robust cumulative traffic assessment exists and whether impacts would be significant after mitigation. This confirms that, at this late stage of the Examination, the cumulative traffic assessment remains unresolved, including the need for junction modelling and assessment of seasonal traffic variations.	See previous responses regarding junction modelling. It is important to note that the junction modelling has confirmed that the Proposed Project would not have a significant effect on the operation of key local junctions.
14		This is further reflected in the Examining Authority's ExQ3 (PD-023), which continues to examine how traffic impacts, including cumulative effects, are assessed.	
16		No submission provides the comprehensive cumulative assessment requested by the ExA.	
17		Key components of the cumulative assessment, including junction modelling and related analysis, remain outstanding and are only due to be submitted at Deadline 6. This is at a very late stage in the Examination and leaves insufficient opportunity for proper scrutiny. In these circumstances, the assessment cannot be regarded as complete or robust.	
18	Continued under-scoping of cumulative projects	The Applicant continues to rely on a constrained project list (APP-060), and has not demonstrated that all relevant and foreseeable projects have been: • identified, • or incorporated into a cumulative framework.	The Applicant disagrees that the project list is constrained in any way.

Reference	Matter	Point Raised	Applicant's Comments
19		REP5-029 (transport) and REP5-064 (CTMTP) indicate that cumulative considerations are: • limited in scope, and • not reflective of the full NSIP context affecting East Suffolk.	The Applicant disagrees that there is any limitation in the scope of either 6.3.3.7.A (B) Environmental Statement Appendix 3.7.A Transport Assessment Note [REP5-129] or 7.5.1.1 (E) Construction Traffic Management and Travel Plan Suffolk [REP6-062] .
20		This remains inconsistent with SEAS submissions (e.g. REP3-140; REP4-153; REP5-148), which identify additional relevant and foreseeable projects not consistently included by the Applicant.	As highlighted previously by the Applicant, the projects referred to are sub-Tier 3; for example, one definition of Tier 3 is “projects on the Planning Inspectorate’s programme of projects where a scoping report has not been submitted”. The Suffolk Water Recycling, Transfer and Storage project, which SEAS consider is missing from the inter-project effects assessment, is not on the Planning Inspectorate’s programme of projects at all. Given the project is still at the routeing and siting stage, it is not considered necessary to include it on the long list for consideration at step 1. If it was included it would simply be dropped for a lack of project information, As part of the preparation of the document 9.110 Inter-Project Cumulative Effects Assessment Update - Technical Note [REP6-098] the applicant reviewed the NESO Tec Register again and there were no new connection agreements identified that were not already included on the original long list, but no carried through to assessment because of a lack of information.
21		Deadline 5 submissions confirm that the Applicant continues to rely on: • Outline mitigation documents (e.g. REP5-064), • REAC-based commitments (REP5-115), • and post-consent approvals secured through the DCO (REP5-005).	The Applicant has responded to matters regarding the outline nature of documents and the REAC above. The need for post consent approval to discharge requirements is completely normal under the DCO regime, so it is not clear what point is being made.
22		REP5-064 explicitly confirms that key mitigation details “will remain to be developed... after consent”	The Applicant is not reliant upon these post consent measures as no benefit has been taken in reducing reported significant cumulative effects. The Applicant has committed to revisiting the cumulative findings and proposed mitigation to see if there is anything more that can or needs to be done once the detailed construction programme and logistics information is available.
23		This demonstrates that mitigation is: • not fully defined, • not assessed cumulatively, • and dependent on future processes.	The Applicant considers that all mitigation relied upon for assessment purposes is fully defined, has been assessed cumulatively and is not dependent upon future processes.
24	Mitigation is not assessable without a complete cumulative baseline	Even where cumulative effects are identified (including significant effects in REP5-136), mitigation: • remains outline and non-specific, • is not tied to defined outcomes, • and is not tested against realistic cumulative scenarios.	See previous responses.
25		Accordingly, the Examination is being asked to consider mitigation without a reliable cumulative assessment of the impacts it is intended to address.	The Applicant considers the cumulative assessment work undertaken to be reliable but understands that there is a natural and unavoidable level of uncertainty in the practice of intra-project cumulative effects assessment. It is for this reason that those effects that are more uncertain have been identified as significant on a precautionary basis, and, without reducing the reported significance, commitments to further consideration and, if possible and necessary, mitigation, have been proposed.

Reference	Matter	Point Raised	Applicant's Comments
26		This aligns with the Examining Authority's requests, as reflected in PD-023 and the ISH3 Action Points, for further clarification of the application of the mitigation hierarchy and the treatment of residual significant effects.	As stated previously, the Applicant has ensured that all significant residual effects have been subject to consideration of the mitigation hierarchy, and has provided evidence of this in response to the ExA's WQ3 3GEN1 in both 9.136 Applicant's Responses to Third Written Questions and 9.136.1 Applicant's Responses to Third Written Questions – Appendices .
27	Conclusion	The Applicant does not demonstrate compliance with: a. the EIA Regulations, or b. NPS EN-1 and EN-5 requirements for cumulative assessment.	This is incorrect; the Applicant has provided intra-project cumulative effects assessment, the detail of which is over and above what it typically provided to support a DCO application, and is certainly compliant with the Infrastructure Planning (EIA)_Regulations 2017, and NPS EN-1 and EN-5.
28		Under NPS EN-1, the presumption in favour of Critical National Priority infrastructure applies only where the mitigation hierarchy has been demonstrated and residual impacts are understood. In this case, those conditions are not met. The Applicant has not demonstrated that cumulative impacts have been properly assessed, nor that mitigation is effective. Accordingly, the presumption in favour of consent cannot be relied upon.	The Applicant has ensured that all significant residual effects have been subject to consideration of the mitigation hierarchy, and has provided evidence of this in response to the ExA's WQ3 3GEN1 in both 9.136 Applicant's Responses to Third Written Questions and 9.136.1 Applicant's Responses to Third Written Questions – Appendices . It is notable that with very few exceptions (see below) when the councils have been asked to propose additional mitigation measures to address the reported potentially significant effects, none have been identified. Those that have been identified by SCC have been rebutted for being either unnecessary (there is no significant effect to mitigate) or unworkable (for example the inability to attribute mental health and wellbeing monitoring feedback to Sea Link alone).
29		The deficiencies identified in SEAS' Relevant Representations (REP1-278), Written Representation (REP3-140), and subsequent submissions (including REP5-148 and REP5-205) remain unresolved.	The Applicant has confirmed that no such deficiencies exist; SEAS simply disagree with this.
30		The continued need for clarification and further information, as evidenced by PD023 and the ISH3 Action Points, demonstrates that the cumulative impact assessment remains incomplete at a late stage in the Examination.	The assessment is not incomplete; it is simply being examined in the way that would be expected, and the Applicant is responding to requests from the ExA for further explanation and evidence as required.
31		In the absence of a lawful and policy-compliant cumulative impact assessment, and in circumstances where the mitigation hierarchy has not been demonstrated, the application fails to meet the requirements of EN-1, EN-5 and the EIA Regulations. The Examining Authority does not have sufficient evidence to conclude that impacts are acceptable or that mitigation is effective. On that basis, development consent should be refused.	
32	Additional Point on Cumulative Impact and Coastal Erosion	SEAS has previously set out evidence in REP4-142 that we do not repeat here, concerning coastal conditions in the Thorpeness–Aldeburgh area. However, the evidence now available demonstrates that coastal conditions are changing materially faster than assumed in the Applicant's assessment, calling into question the validity of the baseline used.	The baseline dataset used has been extended to include the most recent data available from the Anglian Coastal Monitoring Programme for the Suffolk landfall location. The updated beach profile data has been incorporated into the latest revision of the Marine Physical Environment ES chapter for issue at D7.
33		The recent examples of the rapid erosion of the Thorpeness Cliffs, ahead of expectations, and of buried infrastructure become unexpectedly exposed under extreme conditions, call into question the reliability of the Applicant's mitigation measures based solely on design assumptions.	The Thorpeness Cliffs are more than approx. 2km to the north of the Sea Link cable landfall and are characterised by a narrow beach width (approx. 10m) and soft cliffs that are eroded by undercutting of the base by wave action. In contrast, the beach fronting The Haven Local Nature Reserve is much wider (approx. 100m) and is therefore much more resilient to wave action. The Shoreline Management Plan policy for Aldeburgh immediately to the south is to 'Hold The Line', thus providing a hard point on the coast and preventing rapid erosion of the at the landfall site to the north. The current situation at Thorpeness Cliffs cannot therefore be applied at the landfall location due to the

Reference	Matter	Point Raised	Applicant's Comments
			very different coastal geomorphological setting and vulnerability to eorsion by waves.
34		In a system already close to physical thresholds, the interaction of multiple HDD landfalls and cable installations within the same sediment system introduces uncertainty that has not been assessed on a cumulative or durational basis.	Within the littoral transport zone, along the shoreline where the majority of sediment transport takes place, the Sea Link cable will be buried below a maximum erosion depth designed such that it will not become exposed during its operational life. The Applicant has also committed to using HDD for cable installation within the nearshore area and extending approximately 800m inland. There is therefore no pathway for the Sea Link cable to affect other HDD landfalls or cable installations within the same sedimentary system.
35		The absence of a robust, up-to-date and climate-informed assessment of coastal processes means it is not possible to conclude that impacts will be negligible or that mitigation measures, including burial depth and HDD design, will remain effective over the lifetime of the project.	The Applicant's approach in terms of the response of coastal processes to future climate change has been highly conservative due to the known uncertainties associated with making future projections of coastal erosion. For example, it has been assumed that an erosion rate similar to that predicted for the Thorpeness Cliffs coastline may be experienced at the location of the Sea Link cable landfall which covers the period up to 2105.
36		ScottishPower Renewables is expected to commence HDD landfall drilling beneath Thorpeness cliffs in the next five months, within the Examination period. This represents a material, real-world test of the Applicant's assumptions regarding the interaction between HDD works and coastal processes. The outcomes of those works are likely to be directly relevant to the assessment of cumulative effects, particularly in relation to sediment disturbance, burial stability and coastal change.	As noted in the Applicant's response to item Reference 33 above, in reality Thorpeness Cliffs represent a very different geomorphological setting and do not therefore provide a useful analogue for conditions at the Sea Link landfall for the reasons provided. The construction phase would provide the greatest potential opportunity for cumulative effects but since the timing of any works will be years apart, there would be no direct interaction between the works referred to at Thorpeness Cliffs and the Proposed Project.
37		Accordingly, SEAS urges the Examining Authority to review any available evidence from those works, including through site observation, if at all possible, before reaching conclusions on cumulative coastal impacts and submitting its recommendation report. If such evidence is not available within the Examination timetable, this reinforces the existing uncertainty in the assessment and the need for a precautionary approach in decision-making.	See response above to item Reference 36.
38		To ensure that decisions are based as much as possible on up-to-date, empirical evidence, rather than untested modelling assumptions, if this HDD activity has not occurred in time for consideration, SEAS requests that the ExA should formally recommend that the Secretary of State undertakes the same review of evidence prior to issuing any Development Consent Order decision.	

Table 11.10 Applicant's Comments on the Suffolk Energy Action Solutions Ltd Deadline 6 Submission [REP6-235H]

Reference	Matter	Point Raised	Applicant's Comments
SEAS COUNTER-RESPONSE TO THE APPLICANT'S D5 COVER LETTER- [REP5-001] RE: CROWN ESTATES [RR-5378]			
	APPLICANTS STATEMENT FROM DEADLINE 5 COVER LETTER- REP5-001 :-	“SEAS REP4-202: In response to the above submission from SEAS, the Applicant regrets to say that the wrong version of Appendix B to the Statement of Reasons was displayed during the Compulsory Acquisition Hearing 1. In the version displayed, the Relevant Representation was attributed to the incorrect Affected Party. The correct position is respect of the	

	Crown Estates is as set out in the Relevant Representation [RR-5378], which states: “The Crown Estate requests to be registered as an Interested Party in the examination of Sea Link. Our interest in the project relates to the proposed cable route and the agreement of land and seabed rights required to deliver the project.”	
Procedural Note on the Reliability of the Applicant’s Evidence	1. SEAS has considered the Applicant’s statement in its Deadline 5 Cover Letter (REP5-001), in which it claims that “the wrong version of Appendix B” was displayed at CAH1 and that the paraphrased summary of Relevant Representation AP458 “<i>was attributed to the incorrect Affected Party.</i>” 2. The Applicant now asserts that the Crown Estate’s position is limited to the short registration RR-5378. 3. This explanation does not resolve the issue. It exposes a deeper and more troubling problem: the Applicant has allowed inaccurate, unattributed, and potentially fabricated material to enter the Examination record and remain there for months without correction. 4. For many months, the Applicant’s own Schedule of Negotiations (REP3-016) has contained a detailed paraphrase attributed to the Crown Estate, including statements of “deep unease about the environmental consequences... <i>cumulative impact... long-term disruption... financial loss.</i>” 5. These are not incidental remarks. They go to the heart of the Examination. 6. Yet the Applicant now says these concerns were attached to the wrong party, cannot explain how this occurred, and offers no clarity on who actually raised them, or whether they were raised at all. This is not just a clerical oversight. It is a failure of evidential governance. 7. When an Applicant places information before the Examining Authority, it carries a duty to ensure that information is accurate, traceable, and properly attributed. That duty has not been met. 8. The Crown Estate is the King’s land. Its position carries constitutional weight and directly affects compulsory acquisition, deliverability, environmental assessment and Section 135 consent. 9. When the Applicant misrepresents the Crown Estate’s views, publishes them, leaves them in the Examination Library, presents them at a public hearing and then retreats to a one-line RR-5378 without explaining the discrepancy, it raises a simple but unavoidable question: <u>if the Applicant cannot accurately represent the position of the King’s land, how can any part of its evidence be trusted?</u> 10. The Applicant’s documentation underpins every major component of this Examination: environmental assessment, cumulative impacts, alternatives, consultation, land rights, compensation, and the project’s basic credibility. 11. If the Applicant can misattribute a representation of this importance, then the reliability of its wider evidence base is in doubt. 12. If the paraphrased concerns were not the Crown Estate’s, the Applicant must identify whose they were. 13. If they were the Crown Estate’s, the Applicant must disclose the full representation. 14. If they were neither, the Applicant must explain how such detailed objections came to be created, published, and presented as fact. 15. SEAS therefore respectfully asks the Examining Authority to direct the Applicant to:	The Applicant has responded to SEAS on this inadvertent error at p.297 of [REP6-109]. As the Applicant notes there, all relevant representations are available on the PINS website.

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1. Disclose the source of the paraphrased concerns, including any correspondence or negotiation records.
 2. Confirm whether these concerns were raised by the Crown Estate.
 3. Identify the Affected Party to whom the paraphrased concerns actually relate.
 4. Explain how incorrect information came to be included in REP3-016 and presented at CAH1.
16. Until these matters are clarified, SEAS submits that the Examination cannot safely rely on the Applicant's submissions in their current form.
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12. Applicant’s Comments on the Submission from Aldeburgh Town Council

12.1 Introduction

12.1.1 Table 12.1 summarises the Applicant’s comments on Aldeburgh Town Council Deadline 6 Response [REP6-152].

Table 12.1 Applicant’s Comments on the Aldeburgh Town Council Deadline 6 Submission [REP6-152]

Reference	Matter	Point Raised	Applicant’s Comments
1.	Meeting	Meeting. ATC is grateful to the Inspectors for requiring the Applicant to meet it promptly. ATC had pointed out at the hearing that it had on 26 February 2026 invited the Applicant to meet them before the March hearings. The Applicant had not replied to decline the meeting until the evening before the March hearings. The purpose of meetings, the first of which took place on 1 April was to discuss commitments made by the Applicant to engage with communities including ATC.	The meeting did take place, and the Applicant will engage with Aldeburgh Town Council and other stakeholders in future. Whilst noting their opposition to the Proposed Project, the Applicant will engage with the Town Council through a range of methods, including regular written updates and meetings at key stages of construction.
2.	Project overall	ATC’s primary position is that the whole project is misconceived and should be refused permission. These submissions are made only against the unwelcome possibility of permission being granted.	
3.	Town roads and roundabout	ATC submits that no traffic should pass through Aldeburgh. The Applicant accepts that During construction it is expected that HGV movements on the access road will be limited to less than 10 HGVs per day.2 . ATC pointed out that in the draft DCO and REAC there is no enforceable commitment to that effect. At the end of the hearing the Applicant accepted this, and that there should be a legally enforceable cap in place.	Following further consultation with SCC Highways and Aldeburgh Town Council in March/ April 2026, a daily cap of ten HGV movements will be imposed at the A1094 Leiston Road Roundabout within Aldeburgh, to minimise potential impacts of construction traffic at this location (associated with construction works at S-BM01 and S-BM02). Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041] was updated to include this commitment at Deadline 6.
4. – 6.	Tourism Mitigation	ATC submitted that the Applicant should abandon its absurd claim that the only aspect of Aldeburgh which required consideration was that within ‘500 m from Suffolk Onshore Scheme Boundary’ thus taking into account the Scallop and the Red House (but not the other 98 per cent of the town a few metres away). A better description was that of SEAS; The tourism economy of the Suffolk coast is closely tied to the distinctive qualities of the Aldeburgh area. Aldeburgh in particular combines an unspoilt coastal setting, historic townscape and internationally recognised arts culture centred on the Aldeburgh Festival and Snape Maltings. Visitors are drawn by the experience of tranquility, landscape character and cultural identity of the area rather than by conventional resort infrastructure. ATC fully supports and commends to the Inspectors the proposal by SCC in its LIR, that in collaboration with the Council, the Applicant	The Applicant retains the position that there will not be significant adverse effects on socio-economics and tourism resulting either from the Proposed Project alone or cumulatively. The Applicant has responded to Suffolk County Council’s suggestion [REP5-185] of a tourism fund in its response to Question 3SERT2 of [REP6-111]. For the reasons set out there the Applicant does not consider it necessary, justified or proportionate to contribute to a tourism fund.

		should identify and characterise the tourism businesses within 2km of the red line boundary of the project. Likely impacts on these businesses should be identified and a package of mitigation measures developed. If accepted this would reduce the risk of any compensation being spread round the county rather than here where it matters. This is particularly important given the uncertainties about what future local government in Suffolk will consist of.	
7.	Landfall	During the course of the Inquiry there has been further and very unexpected erosion at Thorpeness. As alarming as the erosion, is that not even the most eminent experts expected it to happen so fast. Given this new and additional uncertainty the Inspectors are urged to take a most cautious approach to all aspects of the landfall	The Applicant acknowledges this and is of the view that the landfall and related matters have been given full consideration during the Examination.
8.	Emergency Services	Neither SCC nor the Applicant appear to have addressed a serious concern raised by Aldeburgh residents in Relevant Representations. Aldeburgh has an elderly permanent population and vulnerable visitors, especially children, in the summer. Aldeburgh Hospital does not take emergencies. The nearest A and E hospital is 24 miles away in Ipswich, compared with what seems a national average of just over 6 miles. A hold up on the A1094 can mean unnecessary death. Why, for example, does the Applicant not provide an additional helicopter for East Anglian Air Ambulance?	A complete traffic and transport assessment for the Suffolk Onshore Scheme has been undertaken in Application Document 6.2.2.7: ES Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. This assessment does not identify any significant impacts on the highway network during the construction phase with the proposed embedded mitigation and control and measurements in place as set out within Application Document 7.5.1.1 (D): Outline Construction Traffic Management and Travel Plan Suffolk, which is secured through Requirement 6 of Schedule 3 of the dDCO [REP6-004].
9.	Community Benefit	The Applicant claims publicly ‘We welcome the Government’s guidance on community benefits, which supports our view that communities should be rewarded for hosting new transmission infrastructure’ (See-Frequently asked questions National Grid). Yet the Applicant has, as yet, made no offer of any kind to Aldeburgh.	The Applicant has provided details of a community benefit fund its response to 3SERT4 of Document 9.136: Applicant’s Responses to Third Written Questions [REP6-111]. The Applicant does highlight however that this will be a general fund and not one specific to Aldeburgh.
10.	ADDITIONAL SUBMISSION-VEHICLE STICKERS	At its 1st April meeting with the Applicant ATC asked about the number of identification stickers to be used on vehicles, if the Scheme proceeded. The Applicant responded that unlike Sizewell and Scottish Power, its vehicles would not carry stickers. This measure is crucial as the other companies recognise. Stickers provide visible monitoring and reassurance to the public. They deter drivers from using unpermitted routes. They are also an essential protection against sexual safeguarding risks. The projects will vastly increase the presence of men in vehicles and the obvious risks will be exacerbated if vehicles are unmarked. Please require the Applicant to observe the standards of other contractors and adopt vehicle stickers.	The Applicant does not consider vehicle stickers to be necessary. This is because mitigation measure TT02 within Application Document 7.5.3 (D) Outline Onshore Construction Environmental Management Plan requires the contractor(s) to implement a monitoring and reporting system, which includes a GPS tracking system to be fitted to HGVs to check for compliance with authorised construction routes, number of HGV limits, and timing restrictions. As explained at Application Document 7.5.1.1(E): Construction Traffic Management and Travel Plan Suffolk [REP6-062], the Applicant will develop a Traffic Management and Monitoring System (TMMS) to provide details of the technologies and other means for achieving such monitoring.

13. Applicant’s Comments on the Submission from Benhall and Sternfield Parish Council

13.1 Introduction

- 13.1.1 Table 13.1 summarises the Applicant’s comments on Benhall and Sternfield Parish Council Deadline 6 Response [REP6-153].
- 13.1.2 Table 13.2 summarises the Applicant’s comments on Benhall and Sternfield Parish Council Deadline 6 Response [REP6-154].

Table 13.1 Applicant’s Comments on the Benhall and Sternfield Parish Council Deadline 6 Submission [REP6-153]

Reference	Matter	Point Raised	Applicant’s Comments
Benhall and Sternfield Parish Council’s Submission for Deadline 6 of the Sea Link DCO			
		There is no doubt amongst the local population (many of whom experienced construction of Sizewell A and B), that the beginning of construction at Sizewell C (SZC) has been much more impactful than anyone was expecting and with extreme levels of disruption already having been experienced, it feels to the local community as though there has been a shift towards a whole new experiential “impact baseline”. It is understandable therefore that people are concerned that when levels of construction at SZC increase further and multiple other projects are added to this new impact baseline, East Suffolk’s community will be driven towards cumulative impacts that will have an unacceptable interference on our daily lives, especially our mental health and wellbeing. It seems that Sea Link’s infrastructure impacts are not being considered in the context of this shifting baseline though and NGET’s reference to construction impacts from SZC as “background noise” during Issue Specific Hearings 3 is evidence that NGET is considering Sea Link as a separate entity and that the changing impact baseline is not being taken into account. In addition to this apparent lack of assessing impacts cumulatively, it is evident throughout the Sea Link DCO that NGET has consistently played down Sea Link’s adverse impact profile: The vast majority of impacts have been assessed as negligible, minimal or insignificant etc and NGET seems to be maintaining a fixed, inflexible position with respect to any challenges made to these assessments.	The Applicant notes the Parish Council’s concerns raised in relation to the delivery of Sizewell C. The Applicant has prepared a cumulative impact assessment relating to onshore impacts in Suffolk – see [APP-059] and in particular section 13.4. The cumulative assessment that was undertaken included a consideration of the impacts from the delivery of Sizewell C.
		A clear example of this downplaying of impacts was seen in the Sea Link Community Update (attached) that was sent out to hundreds of local households in November 2025 and presented a completely unrealistic, deliberately misleading view of seemingly trivial construction impacts and made almost no mention of permanent infrastructure.	The Applicant notes that the DCO Application was submitted in March 2025 and that the examination started in November 2025. As such information about all aspects of the Proposed Project was publicly available at that time and has subsequently been the subject of full assessment during the examination.

Reference	Matter	Point Raised	Applicant's Comments
		One of the few impacts in the Sea Link DCO that has been deemed to be significant is in relation to compromise of a PRoW at the converter station site, but even in this openly acknowledged case, NGET has remained steadfast that it has no responsibility to mitigate for it by providing a new PRoW alongside the B1119, as proposed by ESC, because this would be an enhancement rather than mitigation. Surely in the light of a complete absence of benefits and the considerable adverse impacts being faced by the local community, creation of a new footpath would be a small “price” to pay to keep the public onside? The same apparent resistance to making amendments that would result in a “less-worse” situation for local people was seen during both Compulsory Acquisition Hearings (CAH) in relation to a hedge due to be planted as a form of mitigation planting at Red House Farm in Sternfield that threatens to impede access to the farmer’s land. In this case, NGET is insisting that it must proceed with this mitigation planting despite the adverse impacts that it will cause to the farmer and it was clear during discussion that, even though the farmer said he had been “banging on” about this issue for many months, he felt thoroughly disheartened that all his pleas seemed to have fallen on deaf ears with NGET refusing to make any compromise. Another example of the asymmetry between benefit to the Applicant versus benefit to the community was also seen during CAH1 when compulsory acquisition of large swathes of land alongside the access route to the site through the Fromus Valley was compared with the tiny little strip being acquired for mitigation planting to the South side of the converter station. In this case it appears that acquisition of land which would be beneficial to the Applicant is much more achievable than when compared with acquiring land for mitigation planting in order to minimise the extreme visual impacts of the converter stations that will be observable from Sternfield. One of the few points on which NGET was prepared to change its position during ISH3 was when impacts to the red throated diver bird were being discussed and it was interesting to see that, when recommendation for consent for development was threatened, a change in position was immediately adopted....	As set out at AP44 of the Applicants Response to March Hearing (CAH2 and ISH3) Action Points at Deadline 4 and Deadline 5 [REP6-110] the Applicant has developed wording for a commitment to deliver the permissive path from the B1121 along the Saxmundham Converter Station access to connect in to the permanently diverted PRoW E-491/005/0 and the reinstated PRoW E-491 006/0. The Applicant is also committing to creating permissive routes through the woodland planning, which is anticipated will be at least 750 m in length. Whilst it is not appropriate to engage with the Parish Council over matters relating to a private landowner, the rationale for the mitigation planting in that location is set out in 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk submitted at Deadline 6 [REP6-078] and the Applicant is continuing to engage directly with the landowner. The Applicant has made a number of commitments that are secured in the Register of Environmental Actions and Commitments (REAC) [REP6-134], a document that has continued to evolve throughout the examination.
		Benhall and Sternfield Parish Council (the PC) is concerned that, not only will our parish be hosting the Sea Link converter station, but that our two villages will also have to endure the majority of the adverse impacts arising from accessing the Saxmundham converter station site via the B1121 through Benhall. With its asymmetric approach to the DCO in mind and considering the prospect of such a heavy infrastructure burden to our villages, the PC would like to consider how NGET has – or more significantly, has not – applied the mitigation hierarchy, specifically with reference to the proposed access route. A major problem with the Saxmundham site that was not really addressed when the site emerged as the preferred location is that accessing it is fraught with difficulty. This inaccessibility has become more and more evident as the application has progressed with previously undisclosed problems associated with transporting AILs over Benhall Railway Bridge only emerging after the DCO examinations had already begun. Whenever advising on the feasibility of the proposed access route to the site through Benhall, [redacted] from Suffolk Highways (who has a wealth of experience	It is not accurate to say that an alternate access to the Converter Station Site has not been considered. As explained in Application Document 9.107: Applicant’s Response to Suffolk County Council’s Deadline 4 Submission on Alternate Access to Saxmundham Converter Station, the Applicant has appraised various route options (including the northern access proposed by SCC) in developing its proposals in Application Document 6.2.1.3: Chapter 3 Main Alternatives Considered of the Environmental Statement [APP-044]. The Applicant has concluded that the western access remains the preferred option as it provides the shortest access off the A12 and minimises the amount of construction traffic on the rest of the local road network whilst providing a dedicated purpose-built access into the site which would result in fewer complications with regards to maintenance activities, any planned maintenance and undertaking of any emergency maintenance during the operational stage of the Proposed Project.

Reference	Matter	Point Raised	Applicant's Comments
		and local knowledge), has repeatedly expressed his particular concerns relating to the A12/B1121 junction and the challenges presented by crossing Benhall Railway Bridge. There are also considerable problems with landscape and visual, heritage, environmental and flood risk impacts associated with building a bridge over the River Fromus, not to mention the major traffic and transport impacts that will affect Benhall, Sternfield, Saxmundham and the wider community from use of the Benhall access route. If the mitigation hierarchy is applied to all these issues, it is obvious that many of them can be completely avoided by using the alternative access route as proposed by Suffolk County Council (SCC) that shares the Sizewell Link Road (SLR) and then accesses the Saxmundham site via the old Leiston airfield. Obviously, SCC's proposed Northern route would increase impacts in other ways and to other local communities which is of course highly regrettable, but relates more to the underlying inaccessibility of the site rather than to the SCC route per se and on balance, impacts associated with SCC's route are considerably lower and would affect fewer people than the impacts associated with the route through Benhall. However, NGET has dismissed SCC's alternative route primarily on the basis of increased journey distances which demonstrates a failure to properly apply the mitigation hierarchy and displays a lack of acknowledgement of the community's cumulative infrastructure burden.	The Applicant has responded to SCC's alternate access route in REP5-125.
		The Scottish Power (SPR) AIL access route was also discussed briefly during ISH3 because, although NGET claims that the route is "certain" because it has already been consented as part of the SPR projects, actually, it has not been assessed yet and [redacted] holds concerns regarding the certainty of this route too, especially where it crosses the Victorian sewers in Leiston. At an SPR drop-in event in Friston on 26th February, the SPR transport representative acknowledged that there were uncertainties with the SPR AIL route where it crosses two culverts on the A12 – one at Little Glemham and the other at Kelsale. He went on to say that Suffolk Highways have the final say with AIL routes which, in other words, means that if [redated] says a route cannot be used, then the route cannot be used. SPR's AIL route uncertainty should be investigated immediately in conjunction with proper examination of SCC's proposed Northern route because, in addition to possibly providing access to the Saxmundham converter station site, it may transpire that SCC's route could potentially also provide access to the SPR Kiln Lane site as well. SCC's proposals for an alternative access route allows for meaningful application of the mitigation hierarchy with a significant avoidance of many impacts arising from accessing the site through Benhall. It also shows proper project coordination with sharing of the SLR – a route specifically designed to carry construction traffic – with SZC, Sea Link, Lion Link and possibly even EA1N and EA2 too. It would relieve extensive traffic problems in Saxmundham that would be experienced by the wider community in the face of frequent or prolonged road closures in Benhall. It would completely avoid the adverse visual, landscape, heritage, flood risk and environmental impacts of building a bridge over the River Fromus and would lead to a significant reduction in the local community's massive infrastructure burden. The PC therefore hopes that there will still be enough time during the examination for SCC's route proposals to be properly examined.	The Applicant has set out a number of options for AIL deliveries, as confirmed in REP4-101 The Applicant recognises the benefits of providing remediation to the Benhall Railway Bridge and confirms this as its preferred option, as discussed with the local highway authority. Additional options have been retained as they provide surety to the Applicant of the validity of construction access for all necessary construction traffic for the project.

Table 13.2 Applicant’s Comments on the Benhall and Sternfield Parish Council Deadline 6 Submission [REP6-154]

Reference	Matter	Point Raised	Applicant’s Comments
Benhall and Sternfield PC text for Sea Link Open Floor Hearing 3 – 24th March 2026			
		What’s worrying me is that the unprecedented number of major infrastructure projects being developed or due to be developed in East Suffolk at the moment is driving us into uncharted territory in terms of the cumulative adverse impacts that will be experienced by a single community and I’m particularly worried about how such a heavy infrastructure burden will impact on the local population’s health and wellbeing. It is of course well recognised that people’s mental health is intrinsically and fundamentally linked to stress, but since the whole DCO process is being viewed through a planning lens, stress, which is a highly subjective, perceived experience that cannot be objectively quantified is not actually being “seen”. Just because rising stress levels in response to major infrastructure imposition can’t be seen does not mean that they are not rising and it is imperative that the mental and physical health harms that may be experienced by the local community if all these projects proceed are properly addressed. The local community’s stress levels have already been rising ever since Sizewell C – the biggest infrastructure project in Europe – appeared on our horizon. Our landscape has been altered in front of our eyes and our local road network has become completely dysfunctional with journey times all over the shop, roads full of pot-holes and roadworks that are impacting on us on a daily basis. And yet we’re still only at the start of what threatens to be 10 to 15 years of construction of Sizewell C, EA1North, EA2, the National Grid connection hub, Sea Link, Lion Link, at least 4,000 acres of solar parks, almost 1,000 houses and the Suffolk water project due to deliver millions of litres of water every day to Sizewell C – a project that wasn’t even recommended consent for development on the grounds of an inadequate water supply – that had a desktop study putting the pipeline from Saxmundham to Sizewell straight through the Saxmundham converter stations site. This is infrastructure chaos and it will only get worse if the impacts of such extreme, disproportionate, unreasonable cumulative impacts are allowed to progress unchecked. If we look at how the more tangible direct impacts of Sea Link on health and wellbeing are being assessed, we can see that even with these more measurable impacts such as traffic disruption and cumulative impacts, National Grid is taking a very restricted view. The impacts of Sea Link on traffic are predicted to be negligible, but traffic disruption is already a big issue locally as a result of ongoing Sizewell C works and the limited traffic modelling carried out so far for Sea Link hasn’t taken this into account. In addition, National Grid has failed to comply with the request to produce extra junction modelling before Deadline 5, information that won’t now be available until Deadline 6 – three weeks before the end of the DCO examinations. Cumulative impacts are only predicted to be moderate with National Grid claiming that the mathematical equations that have been employed to reach this conclusion are reliable. It is galling to have our health and wellbeing assessment reduced to a few predictive equations that cannot ever be	The Applicant has undertaken a robust assessment of cumulative impacts, including on health and wellbeing. The most recent submission on this issue was the Applicant’s Written Summaries of Oral Submissions at Issue Specific Hearing 3 [REP6-104]. The Applicant has responded above on the alternate access and the delivery of AILs.

Reference	Matter	Point Raised	Applicant's Comments
		adequate to predict what's happening to us, the local population living experientially in the middle of everything. National Grid also insists that a precautionary approach to the effects of cumulative impacts is unnecessary, but if there is any uncertainty about the extent of adverse cumulative impacts, a precautionary approach must be adopted. Let's look at National Grid's response to Suffolk County Council's proposals for an alternative access route to the Saxmundham converter stations site that shares the Sizewell Link Road and avoids the adverse impacts and harms threatened by use of the current proposed route through Benhall. The problems – withheld at the statutory consultation – of transporting super-heavy loads over the weight restricted Benhall railway bridge and of building a new bridge over the River Fromus are considerable. These difficulties, along with the severe adverse impacts that would be experienced by local residents and the wider community as a result of the major traffic disruption that would ensue with use of the Benhall route could be largely avoided by using Suffolk County Council's new route. In addition, Suffolk County Council's proposals would be an excellent example of coordination between Developers because the Sizewell Link Road, specifically designed for transportation of construction vehicles, would be shared between Sizewell C, Sea Link, Lion Link and possibly even Scottish Power. However, in spite of all this, National Grid has dismissed Suffolk County Council's proposals predominantly on the grounds of increased journey times and distances. This shows a woeful lack of understanding of what the local community will have to endure if the route through Benhall is employed as well as a lack of willingness to work with the local population in order to try to find the least impactful and most balanced solution. East Suffolk is facing a state of extreme planning imbalance and infrastructure should not be imposed at our expense. The urgency of achieving an arbitrary, unachievable date by which to decarbonise the grid threatens to undermine the wellbeing of the local population and it feels reckless to be carrying on imposing infrastructure project after infrastructure project on the same long suffering local community. More consideration needs to be given to us, the human beings stuck in the middle of this cumulative impact crisis – I use the word advisedly.	

14. Applicant’s Comments on the Submission from East Anglia ONE North Limited, East Anglia TWO Limited and ScottishPower Renewables (UK) Limited

14.1 Introduction

14.1.1 Table 14.1 summarises the Applicant’s comments on East Anglia ONE North Limited, East Anglia TWO Limited and ScottishPower Renewables (UK) Limited Deadline 6 Response [REP6-155]. The Applicant has responded to East Anglia ONE North Limited, East Anglia TWO Limited and ScottishPower Renewables (UK) Limited’s responses to the Examiner’s Third Written Questions from REP6-155 in **Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions**.

Table 14.1 Applicant’s Comments on the East Anglia ONE North Limited, East Anglia TWO Limited and ScottishPower Renewables (UK) Limited Deadline 6 Submission [REP6-155]

Reference	Matter	Point Raised	Applicant’s Comments
	Introduction	We refer to the above Project and confirm we are instructed by ScottishPower Renewables (UK) Limited (“SPR”), East Anglia ONE North Limited (“EA1NL”) and East Anglia TWO Limited (“EA2L”) (together, the “SPR parties”). SPR is the parent company of EA1NL, who has the benefit of the East Anglia ONE North Offshore Wind Farm Order 2022 (“EA1N”), and EA2L, who has the benefit of the East Anglia TWO Offshore Wind Farm Order 2022 (“EA2”). This submission provides a written summary of oral case for Compulsory Acquisition Hearing 2 (“CAH2”) and responses to ExQ3.	Noted – Thank you
	Written Summary of Oral Case – CAH2	CAH2 for the Project took place in person and virtually on 25 March 2026. Mr Colin Innes, Partner at the law firm Shepherd and Wedderburn LLP, gave oral submissions on behalf of the SPR parties at CAH2 under Agenda Items 2 (Section 122 and 123 of the Planning Act 2008 (PA2008)) and 4 (Sections 127 and 138 of the PA2008 and Schedule 15 of the dDCO – Protective Provisions). Agenda Item 2 – Section 122 and 123 of the PA2008 The SPR parties are continuing to provide National Grid Electricity Transmission Plc (the “Applicant”) with up-to-date information various land interests held at the Kiln Lane Substation site. The Applicant prior to CAH2 had been relying on HM Land Registry searches which has resulted in the SPR parties’ land interests being misrepresented in the Book of Reference [REP5-015] and other land documents due to the delay in HM Land Registry processing applications and updating their records. These misrepresentations included SPR parties being identified as reputed owners of land that they do not own or having options over land which they do not.	Noted – Thank you The Applicant will always reply on publicly available information in the absence of anything to the contrary. The Land Referencing Methodology [APP-315], at Appendix G to the Consultation report sets out the process used by the Applicant which includes both non-contact and contact land referencing. HMLR apply restrictions on Title (i.e. SPR Option agreements) to the whole of the Title Number they are registered against. In the absence of being provided with ay information to the contrary the applicant has used this information to compile its Book of Reference. SPR were issued with a request for information (Land Information Questionnaire) in 2023 but did not respond.

Reference	Matter	Point Raised	Applicant's Comments
		The SPR parties and the Applicant held a meeting to discuss these points on Wednesday 1 April 2026. Following this on 2 April 2026, the SPR parties provided the Applicant with spreadsheets, shapefiles and notes to ensure the Applicant has all of the information required to accurately capture the land interests of the SPR parties. The Applicant provided the SPR parties with updated land documents (including the Book of Reference and Land Plans) on 10 April 2026. After review, the SPR parties confirm that the Applicant's updated land documents now accurately reflect the current interests of the SPR parties. Evidence of any additional land acquired by the SPR parties, including updated spatial data and evidence of the transfers, will be provided to the Applicant to enable further updates to be made to their land documents.	Noted – Thank you.
		The SPR parties also explained to the Applicant at this meeting which areas of land the SPR parties are aiming to still purchase and provided an expected timeline for these. These areas of land are coloured pink on the composite land interests plan attached at Appendix 1. It is expected that the majority of this land will be purchased by the SPR parties by May 2026. It was explained at CAH2 that some land deals are dependent on others, so some cannot complete until certain ones complete as they are reliant on access etc. The abovementioned plan also shows the land currently owned by SPR parties in red and the land the SPR parties have an option agreement over to purchase land but have not yet exercised the option in green. SPR does not currently have any plans to purchase additional land at the Kiln Lane Substation other than that shown coloured pink on the abovementioned plan but this might change when construction of the EA2 onshore substation begins and when the timings for EA1N are more certain.	Noted – Thank you. The Applicant welcomes the ongoing engagement with SPR on land rights beyond the close of examination and will continue to update its records as necessary.
		The SPR parties and the Applicant have made good progress on the transfer of benefit agreement ("TOBA") and land transfer and negotiations are advanced. However, it is difficult to say whether these will complete before the close of the Examination. If they do not, it will not be long after. Once the TOBA and land transfer complete, the Applicant will acquire the land and rights over the SPR parties owned land that the Applicant requires in order to construct the Kiln Lane Substation and associated infrastructure on land owned by the SPR parties. The SPR parties are also willing to grant the Applicant the relevant rights required for the Sea Link cables over land owned by the SPR parties as part of the land transfer process but are waiting for the Applicant to provide details to enable this to be discussed further. Therefore, the SPR parties continue to object to compulsory acquisition of land and new rights being kept in the Projects' Development Consent Order ("DCO") once the TOBA and land transfer completes. This is a key issue for the SPR parties due to the potential impact that continued compulsory acquisition powers over land owned by the SPR parties could have on EA2L and EA1NL when they are required by Ofgem to transfer the transmission assets to an Offshore Transmission Owner ("OFTO"), or when the SPR parties are trying to agree mitigation measures with landowners. As mentioned in the SPR parties' Deadline 4 submission [REP4-113], it is our view that there should be a	The Applicant maintains it must have the ability to deliver the Kiln lane substation and will continue to engage with SPR to secure the necessary land rights. At this point the TOBA is not yet agreed or completed.

Reference	Matter	Point Raised	Applicant's Comments
		requirement in the Project's DCO that the compulsory acquisition powers no longer required for these works should fall out of the Project's DCO. This could be drafted on a scenario basis similar to what was granted in the Norfolk Boreas Offshore Wind Farm Order 2021. The SPR parties are continuing to work together with the Applicant to agree a set of protective provisions to be included in the Project's DCO. Should agreement not be reached on all points, the SPR parties will submit their wording for any areas outstanding at Deadline 7 as per the ExA's request at CAH2 and Action Point 31.	
	Agenda Item 4 - Sections 127 and 138 of the PA2008 and Schedule 15 of the dDCO – Protective Provisions	The SPR parties submitted draft protective provisions at Deadline 5 (Appendix 1 of [REP5-171]) which comprised of: 2.10.1 2.10.2 2.10.3 2.10.4 2.10.5 General protective provisions for SPR; General protective provisions for EA1NL; General protective provisions for EA2L; Cable crossing protective provisions for EA1NL; and Cable crossing protective provisions for EA2L. The Project's cables will cross the onshore cables for EA1NL and EA2L south east of the Kiln Lane substation (outside of land owned by the SPR parties'). This is a complicated cable crossing as the SPR parties do not know what stage of construction they will be at when NGET will be crossing the S6152.28 1022379118 8 CBW Page 3 cables, EA2L may have laid their cable as well as the ducts for EA1NL with the EA1NL cable still to be installed. Alternatively the SPR parties and the Applicant might be looking to lay cables at this location at the same time. Therefore, the situation here is a lot more complicated than a standard cable crossing. 2.12 2.13 3. The SPR parties have now received comments on their proposed protective provisions from the Applicant. The protective provisions for SPR are in agreed form. Discussions are still ongoing in relation to the EA1NL and EA2L protective provisions. The SPR parties are confident that various agreements which will deal with these matters will be agreed between them and the Applicant; however this is unlikely to happen before the close of the Examination. It is therefore imperative that protective provisions for the SPR parties are included in the DCO should development consent be granted, to ensure the SPR parties are protected in the meantime. The SPR parties agree to provide their final proposed wording for the protective provisions at Deadline 7 should agreement on these not be reached with the Applicant beforehand.	The Applicant is continuing to discuss the Protective Provisions with the SPR companies and will include provisions at the Deadline 7 where this is not possible the Applicant will continue to discuss these Protective Provisions up to the decision by the Secretary of State.
Response to ExQ3			
The Applicant has responded to East Anglia ONE North Limited, East Anglia TWO Limited and ScottishPower Renewables (UK) Limited's responses to ExQ3 in Application Document 9.150 Applicant's Comments on Responses to Third Written Questions .			

15. Applicant’s Comments on the Submission from East Suffolk Communities Energy Partnership

15.1 Introduction

15.1.1 Table 15.1 summarises the Applicant’s comments on East Suffolk Communities Energy Partnership Deadline 6 Response [REP6-156].

Table 15.1 Applicant’s Comments on the East Suffolk Communities Energy Partnership Deadline 6 Submission [REP6-156]

Reference	Matter	Point Raised	Applicant’s Comments
N/A	Traffic Issues	Traffic issues The highway network is dominated by a single major highway, the A12 between the A14 at Seven Hills and Lowestoft which, north of Wickham Market to Blythburgh is a single carriageway road with very limited laybys and 30 and 40mph limits except for a short section of 50mph at Glenham Hall and a section on the very short remnant of dual carriageway at the B1121 Benhall junction with the national speed limit only around Saxmundham and north of the A144 junction to the Blackheath (Hazel’s Lane) junction. Aside from that route all other A and B class routes from south to north to the east of the A12, the B1438, A1152, B1078, B1079, B1121, B1122 and B1125, and those to the west, are locally narrow, have underbed verges, poor sightlines at numerous junctions and pass through residential areas of villages and towns with, in many instances, houses directly onto the pavements. These roads do not fit well with increased use by modern, wider, cars, vans and HGV and any significant additional traffic on them poses considerable issues with safety and damage to both the highway, verges and drainage. For these reasons the roads are not part of the SCC official diversion routes for A12 closure or major roadworks. However, as these official diversions are generally over 50 miles long the local roads off the A12 do get used heavily by traffic avoiding the official diversion routes and this can include use of some C and unclassified roads. When delays or blockages occur on the A12 due to accidents or major roadworks the subsidiary roads carry vastly greater traffic volumes. Evidence since Sizewell C started is that this leads to severely damaged verges and blocked drainage. HGVs which do not follow the official diversions divert onto them sometimes becomes stuck as they struggle to pass other HGVs or large tractors.	The Applicant has provided responses to many of these comments previously within responses to both Suffolk County Council and East Suffolk Communities Energy Partnership, including within: - Application Document 9.134 Applicant’s Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109] - Application Document 9.91 (A) Applicant’s Comments on Change Request (CR1) Relevant and Written Representations [REP4-089] - Application Document 9.35.1 Applicant’s Comments on Local Impact Report from Suffolk County Council [REP2-026]. Nonetheless, the Applicant has provided further responses below to some of the more specific points. <u>Cumulative Assessment</u> The Applicant has previously responded to comments on the scope and findings of the cumulative traffic and transport assessment in Suffolk, including within Table 2.9 of Application Document 9.34.1 (B) Applicant’s Detailed Responses to the Relevant Representations identified by the ExA [REP2-014], Table 26.1 of Application Document 9.36 Applicant’s Comments on Other Submissions Received at Deadline 2 [REP3-064] and Table 18.2 of Application Document 9.134 Applicant’s Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109]. <u>Construction Workers</u> The Applicant acknowledges that based on the proposed working hours, construction workers may travel between 6am-7am in the morning and 7pm-8pm in the evening. However, to provide a robust weekday assessment, rather than adopting 6am-7am for staff arrivals and 7pm-8pm for staff departures, construction worker travel patterns have been based on the busier ‘shoulder’ peaks to the traditional network peak hours. Therefore, staff arrivals have been assumed to take place between 7am-8am and staff departures have been assumed to take place between 6pm-7pm (Monday to Friday). This approach was agreed with SCC Highways and informed Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] and the junction capacity modelling within

Reference	Matter	Point Raised	Applicant's Comments
		Sizewell C has recognised this issue and, where the diversion is due to Sizewell C funded highway works or closures, it is assisting SCC Highways in repairing these unofficial diversion roads despite no obligation to do so under the DCO/DoO. ESCEP seeks assurances that the ExA will ensure the Applicant for Sealink accepts a similar obligation for such repairs but also seeks means of minimising such routes being used. ESCEP also seeks the ExA to place the same restrictions as are on Sizewell C, on all Sealink HGV traffic i.e. to only use the A12 from the A14 up to the site access road and when traffic is queuing or other delays occur on the A12, to hold HGVs at a facility until the route is clear. The latter is crucial for the following reasons • Alternative classified routes alongside the A12 to/from the A14 to Woodbridge do not exist. • From Woodbridge to/from the north end of the Wickham Market bypass the only route is the B1438, A1152 and B1069 which pass through narrow villages and town streets with residences directly onto the highway or onto narrow pavements. • The single lane A12 from Wickham Market to Benhall has very limited laybys and, in the case of sudden road closure due to accidents or emergencies HGVs can become marooned and a small number can thus block the A12 to emergency services. ESCEP consider effective management of the above could be achieved by cooperation with Sizewell C in using its Freight Management Facility, the Orwell Logistics Park, on the A14 at Nacton, some 1 km from the A12/A14 Seven Hills junction. The impact of Sealink traffic and its component to the cumulative effect is influenced by the at Wickham Market. North of the Sizewell C Southern Park & Ride the most significant additional vehicle component of traffic northbound during peak Sealink commuting hours, probably 0615 - 0645 will be Sealink related workers vehicles, up to 221 as Sizewell C workers will occupy some 50 buses. Southbound, at probably 1900 1930, the most significant additional vehicle component of traffic will again be Sealink related workers vehicles (up to 221). In 2028 on the assumption made above for Lionlink worker traffic, assuming identical working hours, the combined Sealink and Lionlink related workers vehicles will be up to 450. At Saturday evening and Sundays all additional traffic will be Sealink and Lionlink. The Applicant's data in EN020026-000303 shows the A12 northbound south of the A1094 on weekdays, at 0700-0800, has a 2028 baseline 1376 vehicles (two way) but does not provide data for 0600-0700 when	Application Document 6.3.2.7.A (B) Environmental Statement Appendix 2.7.A Transport Assessment Note [REP6-039]. To confirm, the Applicant has assessed the potential impact of additional construction workers within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] and has not identified the potential for significant effects during the peak construction phase. <u>A12 MRN Scheme</u> The Applicant acknowledges the comments relating to the A12 MRN scheme and the Suffolk County SATURN strategic traffic model assessment. However, Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] and Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060] do not identify the potential for significant effects during as a result of the Proposed Project, including for the A12 within the study area during the peak construction phase. <u>Scope of Assessment (A12 and A1094)</u> Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] and Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060] include assessments of the A12 between (and including) the junctions with the A1094 Aldeburgh Road to the south and the B1122 Leiston Road to the north. In addition, these documents include assessments of the A1094 Aldeburgh Road between the A12 to the west and the B1122 Leiston Road within Aldeburgh to the east. These do not identify the potential for significant effects during as a result of the Proposed Project, including during the peak construction phase. <u>Construction Traffic Management and Travel Plan</u> The Applicant has produced Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan – Suffolk [REP6-062] which includes measures to manage construction traffic to minimise potential impacts. This has been updated several times during Examination following further consultation with SCC Highways to include additional measures where necessary.

Reference	Matter	Point Raised	Applicant's Comments
		its workforce will be travelling on it. ESCEP believe it is likely when at peak staffing the 221 worker vehicles will create a double morning peak with traffic between 06:40 – 06:50 probably being a sharp peak. The Applicant's report similarly does not cover the 19:00-20:00 period but ESCEP believe that will probably a similar peak between 19:15-19:30. Evening traffic appears to be considerable lighter with 18:00-19:00 baseline as 755 vehicles so Sealink traffic will form a very significant additional traffic flow. The substantial additional traffic at these times will have a large impact on local vehicles wishing to join the A12 from side roads as none are light controlled, sand this will particularly affect Button's Road at Glemham Hall as it sits within a 50mph zone. South of the Wickham Market Park & Ride there will be large number of Sizewell C workers vehicles travelling to/from the Park & Ride as Sizewell C increases staff numbers vastly in 2027 and 2028. The Park & Ride has the capacity to hold some 2,500 workers non-HGV vehicles and is expected to be close to fully utilised by mid to late 2027 with a very substantial proportion of workers travelling to and from the Park & Ride on the A12 to/from the A14 with small volumes seeking to use the B1068 to the A14 at Needham Market and the A1214 into Ipswich. This Sizewell C worker traffic will be supplanted by up to 221 Sealink staff vehicles and, in 2028, ESCEP anticipates that if Lion link is approved, a similar number of Lionlink staff vehicles will add to that total. Given site working hours are 07:00 to 19:00 (18:00 on Sizewell C) this level of traffic will be present outside normal peak hours both in the morning and evening, Monday to Saturday with the peak Sizewell C and other energy project leaving traffic being the early afternoon of Saturdays due to no Saturday afternoon or Sunday working on those projects. The number of vehicles on the A12, excluding any energy project HGV/HDV's will far exceeds the normal peak hourly traffic flows at existing A12 junctions from the A14 to B1068 junction at Wickham Market. Some junctions up to the A1152, and the single lane section between the B1438u and B1079, are already approaching, or exceeding, capacity with normal peak A12 traffic levels c.f. SCC Strategic traffic model for the A12 MRN project from which extracts have been added below. The primary reason for the A12 MRN scheme was the impact of traffic from already approved development works such as Sizewell C and East Anglia ONE North and East Anglia TWO Offshore Windfarms. The A12 MRN was intended to be completed by 2027 as the Suffolk County SATURN strategic traffic model assessment, in the Transport Assessment document, for the A12 MRN planning application is based on that assumption.	

Reference	Matter	Point Raised	Applicant's Comments
		A12 MRN is now stated by SCC (OFH3) to hopefully receive planning approval no earlier than this summer. Construction will be from mid 2027 (earliest) to mid-2029. The reporting on the modelling assessment in Chapter 7 does include modelling for a 2027 Do Minimum (DM) scenario which is pertinent to the early years for Sealink and Lionlink and delay details for key junctions and the single carriageway section between the B1438 and B1079 (confusingly referred to as A12 northbound and Southbound Dual Carriageway in the Figure 7-7, reproduced below, with peak hours am between 08:00-09:00 and evening 17:00 18:00. Table 7-7 illustrate the single carriageway section between the B1438 and B1069 (referenced as A12 Northbound Dual and A12 Southbound Dual in the above extracted table) forms a marked capacity constraint during peak hours and, given that the combined Sizewell C and Sealink traffic will form a second higher peak each day at earlier and later hours delays can be expected to be even more marked than illustrated in the figures. Table 10-37 shows under RFC the % of traffic capacity utilised and with Sizewell C and East Anglia ONE North and East Anglia TWO Offshore Windfarms traffic capacity is slightly exceeded. Thus, additional Sealink traffic will have a significant impact. Even in the absence of the A12 MRN construction works in early 2027 ESCEP's view is that capacity exceedance issues and associated additional delays with additional Sealink traffic this will lead to driver elective diversion along the B1438 through the centre of Woodbridge, Melton and Ufford raising traffic levels significantly. Once A12 MRN construction works commence delays will inevitably be greater due to traffic management and the works office access along that length They will be particularly severe when the B1069 roundabout junction is remodelled from two to three lane and tie ins for the new offline dual carriageway are built. Whilst ESCEP Sealink's traffic will be lower in volume than Sizewell C and East Anglia ONE North and East Anglia TWO Offshore Windfarms traffic it is 'the straw that will break the camel's back' leading to substantive volumes of traffic diverting onto the B1438. Further ESCEP consider at peak Sealink worker traffic levels it will raise impact on the B1438 from driver elective diversion to medium to large as defined in Table 7-10 of APP-054 and medium to large significance as defined in Table 7-13. ESCEP understand the impact of the additional worker traffic for Sealink, let alone Lionlink, has not modelled by the Applicant or by SCC via the SCC Strategic traffic model thus there is no assessment of the wider impact of Sealink's traffic on the local highways network remote from the	

Reference	Matter	Point Raised	Applicant's Comments
		very limited area where the Applicant has examined junction movements. It is ESCEP understand the Applicant has declined to undertake such an assessment for the A12 or other roads south of the A1094 or the A1094/B1078 junction. For all the above reasons ESCEP's view is that during Sealink's peak staffing periods the Applicant should be required to set up a temporary Park & Ride at the Martlesham Park & Ride. This has been a Sizewell C temporary solution under it recently opened an initial part of its Southern Park & Ride site.	
	AIL access route via Benhall Bridge	AIL access route via Benhall Bridge In the vicinity of the site, the Applicant appears to maintain a preference to construct and dismantle a 'mini bridge' over the Benhall rail bridge for each AIL vehicle accessing the site via access road across the River Fromus. Its sister company, National Grid Ventures, is also intending to use the same option for Lionlink. The construct/dismantling the 'mini bridge' each time will led to significant traffic diversion as the B1121 will be closed at the Benhall Bridge for a period of days each time. Traffic to/from the A12 to/from Saxmundham will primarily divert via the B1119 into/out of Saxmundham increasing traffic volumes crossing the unrestricted (60mph) A12 including HGV and buses. Additional traffic is also likely to use the A1094, and then the unclassified and narrow Sternfield Road/Church Hill, to reach Benhall and Sternfield. It is unclear whether, with the option of constructing/dismantling a 'mini bridge' for each AIL crossing of Benhall Rail Bridge Sealink HGVs will use this route to reach the River Fromus access road. ESCEP is strongly of the opinion that the Applicant should be required to strengthen the Benhall bridge to avoid repeated traffic diversions or preferably utilise the alternative northern route proposed by SCC at Deadline 4. With respect to public transportation the Applicant preferred proposal to construct and dismantle a 'mini bridge' over the Benhall rail bridge for each AIL vehicle will severely impact residents without cars as one of the principal East Suffolk bus service, the 64 from Ipswich to Aldeburgh passes along the B1121. It is likely that the bus will divert via the A12 and B1119 and there is no suitable alternative route. There would be no alternative bus stop for residents of Benhall during the periods the B1121 is closed, they would have to walk to/from Saxmundham. A bus stop on the A12 is not a viable option. Whilst ESCEP understands the Applicant has proposed free taxis for residents of Whitearch during these periods ESCEP consider such a service should also be made available to other local residents of Benhall and Sternfield. The Applicant preferred proposal to construct and dismantle a 'mini bridge' over the Benhall rail bridge for each AIL vehicle will also severely impact the East Suffolk line passenger rail service. ESCEP believe that Network Rail will require line closure for the constructing and dismantling of the 'mini bridge' and given the commitment to rail freight to Sizewell C the closures are likely to be daytime. Whilst rail replacement buses would be provided by the rail operator there would be significant delay as the rail time from Saxmundham to Ipswich is 35-40 minutes. A rail replacement bus calling at Campsea Ashe (Wickham Market station),	The Applicant has previously provided responses to these comments relating to Benhall Rail Bridge within responses to both Suffolk County Council and East Suffolk Communities Energy Partnership within: - Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109] - Application Document 9.91 (A) Applicant's Comments on Change Request (CR1) Relevant and Written Representations [REP4-089] - Application Document 9.35.1 Applicant's Comments on Local Impact Report from Suffolk County Council [REP2-026].

Reference	Matter	Point Raised	Applicant's Comments
		Melton and Woodbridge stations takes 75-90 minutes even outside peak traffic times. These impacts could be avoided if a northern AIL route is required by the DCO and be to a degree minimised if bridge strengthening was adopted for Benhall Bridge. However, the proposed continuous 28 period for those strengthening work would severely impact rail passengers particularly daily commuters.	

16. Applicant’s Comments on the Submission from Cllr Katie Graham (East Suffolk Council)

16.1 Introduction

16.1.1 Table 16.1 summarises the Applicant’s comments on Cllr Katie Graham (East Suffolk Council) Deadline 6 Response [REP6-157].

Table 16.1 Applicant’s Comments on the Cllr Katie Graham (East Suffolk Council) Deadline 6 Submission [REP6-157]

Reference	Matter	Point Raised	Applicant’s Comments
		Thank you for the opportunity to speak. I am a district councillor representing Aldeburgh &Leiston ward, which also includes the parishes of Benhall & Sternfield and Friston. I endorse this government’s acceleration of decarbonisation of our electrical grid, it is anurgent and essential priority, only further underscored by instability in the Middle East andbeyond. But following decades of inaction to prepare our country for essential energy transition, our government has inherited a system of commercially led project promoters setting the agenda of how this takes place, and I worry that it is turning communities against the change we need. Here in this part of Suffolk, despite being an area of high ecological value, we are particular beneficiaries of a lack of strategic oversight. We narrowly missed the last government’s Holistic Design Network scheme, already too little too late, and the current government’s Regional Energy Spatial Plan is welcome progress for the nation, but also postdates the tangle of development planned or in construction here. This current application for Sea Link, a grid reinforcement project with questionable origins and questionable need, is particularly symptomatic of the chaotic and careless approach of this developer-led transition. At this point I would like to pay tribute to our communities, the town and parish councillors, the tireless campaign organisers and the hundreds of residents who have given over hundreds of unpaid hours to scrutinising a succession of complex and unconnected project proposals over several years. It has been unrelenting and frequently demoralising. In the course of this, a notable thing has happened. These residents, the future inheritors of poorly planned energy transition, have stepped up to assemble their expertise, commission research and legal counsel to assess the truth of the picture as it has been presented to us by the developer, to attempt to view things in the round where this has historically been lacking from previous governments, and even to explore alternative solutions. For this, I think they deserve to be heard. There remain many areas of disagreement between East Suffolk council and the developer, and it has been frustrating, to witness the disregard NGET has shown on the future impact of its project locally, as you are aware of from our previous written responses, and as we	The concerns raised here are noted. The need case for Sea Link is set out in several application documents, primarily the Strategic Options Back Check Report [APP-320], the Planning Statement [AS-057], and the Design Development Report [APP-321] and most recently in REP5-142 and the response to 2GEN1 in REP6-106. Without revisiting these submissions there is as a matter of national policy a critical requirement for significant reinforcement of the transmission system to facilitate the connection of renewable energy sources and to transport electricity to where it is used. This representation is not specific about which cumulative impacts it is concerned with. Nevertheless, a comprehensive cumulative assessment of the impacts of Sea Link and other projects in Suffolk has been undertaken within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. They have not been ignored in any sense.

Reference	Matter	Point Raised	Applicant's Comments
		have already heard from the Cabinet member for Energy and Climate CHange. Cumulative impact seems to be ignored, with valuable opportunities for coordination with other projects wilfully missed, and a refusal to align with other developers on basic issues such as acceptable working hours. Cost has been presented as a barrier to more environmentally sensitive construction approaches that other developers seem able to afford, and as we have heard their project plans even risk – unbelievably - railroading existing and essential mitigation for a previous project. However there is a very fundamental area of disagreement which our communities and the council would welcome a more detailed discussion, and that is the needs case for Sea Link. And while I am aware that both the council and other respondents have laid out concerns already in writing, and that this is the advised position of the Examining authority, I would like to make the request, on behalf of our exhausted communities, that this discussion be allowed to take place in the more open forum of an Issue Specific Hearing. There is a history of lack of [redacted] with National Grid plc which takes great care to distance itself from the multiple strands of its parent company. Let us go back to the beginning, when they offered a connection agreement to Scottish Power at Friston which we were told was for two wind farms only. These projects were given consent with the caveat that the impacts were severe and could only just be mitigated. Despite this, there shortly followed applications for other projects under the umbrella of National Grid plc that were seemingly always lurking in the queue, which now had the connection point in place that made it expedient for them to advance . Nautilus, Sea Link, Lion Link. And then of course, just down the road, development consent was given for Sizewell C, one of the largest construction projects in Europe, against the recommendation of the planning inspectorate, who cited environmental harms as a major consideration. The impacts of this project alone as others before me have already testified, are enormous and will be long lasting. It is only right that Suffolk, as with other parts of the country, should play its part in a more resilient, greener and future-proofed energy system. But is it right that it should inherit so much, without proper masterplanning, and where the parameters are set by commercially led developers? The current need case presented by NGET as we have previously heard has changed since originally filing the DCO, and investigations by campaigners informed by research and counsel suggest there are viable alternatives that render it unnecessary, or at least not at this particular juncture. So there is again a very important question about what this grid reinforcement project is really for, if not for its initial justification. What will it open the door to, and what is the end point for energy development in this part of the country? Our communities deserve this transparency. I ask respectfully for an issue specific hearing on this item.	

17. Applicant’s Comments on the Submission from Tom Daly (East Suffolk Council)

17.1 Introduction

17.1.1 Table 17.1 summarises the Applicant’s comments on Tom Daly (East Suffolk Council) Deadline 6 Response [REP6-158].

Table 17.1 Applicant’s Comments on the Tom Daly (East Suffolk Council) Deadline 6 Submission [REP6-158]

Reference	Matter	Point Raised	Applicant’s Comments
Open Floor Hearings for Sealink		East Suffolk Council is the local planning authority and we have statutory dealings with all the NSIPs at all levels. As Cabinet Member for Energy and Climate Change with East Suffolk Council, I would like to convey to the examiner some serious concerns we have in our dealings with the applicant to date. They have an approach that is in contrast to all the other NSIPs we are dealing with; an attitude that SeaLink is the only project in the frame, it trumps all others and it will definitely be consented whatever the lack of constructive engagement with the planning authority or meaningful coordination with other projects using the same sites. For example, working hours. This is a prime example. During the process of these huge developments, there must be periods of respite for the local community. ScottishPower Renewables respect this in that they don't work Saturday afternoon, Sundays or bank holidays. NGET must be required to do the same. If ScottishPower can show that respect for the community, NGET must do the same or it becomes meaningless. Noise - another example. Operational, construction, machinery noise at the landfall site, at Friston, at the Saxmundham converter site, can be minimised and mitigated. NGET’s current attitude is not conducive to this. A crucial example is coordination. The coordination of all projects is so crucial if we're going to minimise impacts on communities and the environment. Other projects are showing willing. NGET – no. For example, the HVAC cables to be laid from Friston to the converter site at Saxmundham - NGET refuses to consider laying the ducting for LionLink so that there's just one set of impacts. This is the opposite of coordination. Similarly with master planning the converter site itself. Another prime example is the discharge of consents. This is the crucial detail of how major works can be done most effectively. NGET are demanding 35 days with deemed consent. That is, they automatically go ahead. SPR is 56 days with a very definite we'll get it right attitude. These things have to be done properly. Under these rules, NGET could dump many discharges at once, making	The Applicant has addressed concerns from local authorities as to working hours in detail in its response to ExQ 1GEN49. Concerns relating to the wellbeing effects associated with construction activities, including issues of limited respite and cumulative pressures from overlapping projects, have been noted and previously considered within Reference 128 (p58) of Application Document 9.34.1 Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]. The Applicant has carefully considered coordination as with regards ducting, but that has not proved feasible – see the Applicant’s response at p.47 of Document 9.34.5: Applicant's Response to Selected Relevant Representation Responses [REP2-022]. The Applicant acknowledges comments regarding the timescales for discharge of requirements. However, the Applicant considers that the time limits are necessary and proportionate and have been deemed acceptable by the Secretary of State on previous National Grid DCOs, including the National Grid (Bramford to Twinstead Reinforcement) Order 2024 and the National Grid (Yorkshire Green Energy Enablement Project) Development Consent Order 2024.

Reference	Matter	Point Raised	Applicant's Comments
		the process of safeguarding our communities and environments unworkable. And this is yet another example of ignoring other projects going on, and the cumulative pressures communities and ESDC officers are under. The intention of working with us to make the best of this development, seems missing with NGET. The appreciation of the other projects and the cumulative effects that have been described here today on our communities seems lacking. We must have a constructive, productive working relationship with NGET, if this project is consented, for it to be delivered in the best interests of all involved, particularly our communities most impacted by so much at this time. This is just one project amongst many. This change of attitude must start now. I appeal to the examiners to insist that there is constructive engagement, particularly on these areas of: working hours, noise, coordination, and discharge of requirements; but also across the board as indicated on that powerful document, the East Suffolk Council PADSS. The applicant must accept it is part of a much bigger picture. It must take a responsible approach and that needs to start now. Thank you.	

18. Applicant’s Comments on the Submission from East Suffolk Council

18.1 Introduction

- 18.1.1
- Table 18.1 summarises the Applicant’s comments on East Suffolk Council’s Deadline 6 Response [REP6-159] Post-CAH2 Submission.
- 18.1.2
- Table 18.2 summarises the Applicant’s comments on East Suffolk Council’s Deadline 6 Response [REP6-160] Post-ISH3 Submission.
- 18.1.3
- Table 18.3 summarises the Applicant’s comments on East Suffolk Council’s Deadline 6 Response [REP6-161] Response to ISH3 Action Points.
- 18.1.4
- The Applicant’s has responded to East Suffolk Council’s Deadline 6 Response [REP6-261] in Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions.

Table 18.1 Applicant’s Comments on East Suffolk Council Deadline 6 Submission [REP6-159]

Reference	Matter	Point Raised	Applicant’s Comments
Compulsory Acquisition Hearing 2 Post Hearing Note			
	Agenda Item 2.2: section 122 and 123 of the Planning Act 2008 (PA2008)	3. The relevant land plots are: plots 6/3 [REP5-16, p.455]; plots 6/5 [REP5-16, p.456]; and plots 6/6 [REP5-16, p.456] (and there is also plots 6/1 [REP5-16, p.453] over which ESC has the benefit of a restrictive covenant). These plots comprise highway and scrub land around the Thorpe Road in the landfall location in Suffolk. 4. The ExA asked if ESC is prepared to withdraw their objection to the CA powers over its land (based on what was said in [REP3-185, p.13]). ESC confirmed that it was not yet in a position to do so. It maintains an overarching object to the scheme, which has not yet been addressed and, so although, the objection is not per se to the CA powers, it is maintained and applies to the CA powers (unless and until a negotiated agreement is reached). However, if SoS is minded to grant DCO in face of the Council’s objection then ESC has made clear, it has no freestanding objection to the grant of CA powers over the ESC plots. 5. As to negotiations, a summary of position is provided by the Applicant in [REP5-14] Schedule of Negotiations Tracker (in respect of ESC plots (6/3, 6/4 and 6/5): “10.03.2026 – The Applicant’s Agent held a Teams meeting with the Landowner’s Agent on 9th February 2026 where they discussed ongoing queries, in particular in relation to restrictions over the Easement width at surface level. The Applicant’s Agent issued confirmation of outstanding points and emailed the Landowner’s Agent on the 18th February 2026 to arrange a further meeting. It is anticipated that the remaining outstanding matters will be addressed in the next revision of the Heads of Terms which are due to be issued imminently. It is anticipated that an agreement can be reached prior to the close of Examination.” 6. The meeting held on 9 February 2026 was constructive and the principal points raised by Bruton Knowles on behalf of ESC were either accepted by National Grid’s agent or taken back to the National Grid team for consideration. 7. ESC’s position is simple: (1) The Heads of Terms and any resulting deed should be bespoke to the rights that are actually required over the ESC land	Noted – Thank you. Noted – Thank you. The updated Heads of Term were issued on 26th March addressing the points ESC have previously raised or providing an explanation as to why some terms must remain. It is expected this will resolve the outstanding matters save for the commercial terms and would be grateful if ESC could confirm in writing this is the case.

Reference	Matter	Point Raised	Applicant's Comments
		and should not include provisions designed for surface-level or wider infrastructure projects; (2) The subsurface nature of the cable installation should be reflected throughout the documentation, including by the creation of a defined underground corridor with minimum and maximum depth parameters; (3) Provisions that are not necessary given the specific nature and location of the installation on ESC land should be removed; and (4) The commercial consideration should reflect market rates. 8. A further version of the HoT was provided to ESC on 17 March 2026. It is clear that there remains a number of points of difference which require continued discussions including: (1) ancillary rights for utilities; (2) indemnity and insurance; and (3) commercials. 9. In order to make good its points in relation to market rates and to make progress on the commercials, Bruton Knowles has prepared and submitted a schedule of comparable evidence to National Grid. 10. In summary, issues have narrowed but there remains a number of points to resolve as well as the issue of the commercial terms. The parties remain in active negotiations.	This is understood and the Applicant believes the latest version of the Heads of Term issued on 26th March addresses the points we are able concede bar the commercial terms which are still to be agreed. We are unable to remove the point in relation to ancillary rights for utilities. The level of indemnity and insurance has been confirmed to ESC as standard and deemed sufficient. The Applicant awaits suitable comparable evidence and a commercial proposal from ESC's agent to support the negotiations. The Applicant is committed to reaching a voluntary agreement with ESC on terms enabling it to deliver the proposed project.

Table 18.2 Applicant’s Comments on East Suffolk Council Deadline 6 Submission [REP6-160]

Reference	Matter	Point Raised	Applicant's Comments
3 Water Environment			
3.1	Flood risk	ESC defers to Suffolk County Council (SCC) as Lead Local Flood Authority (LLFA) and the Environment Agency (EA) on these matters.	Comment noted.
3.2	The applicant's approach to the sequential and exception tests		
3.3	Matters relating to the objectives of the Water Framework Directive		
4 Traffic and Transport			
4.1	Junction Capacity Modelling –responses and updates	ESC defers to SCC as Local Highways Authority on these matters	Comment noted.
4.2	Driver delay mitigation		
4.3	Effects of current planned highway works (such as the A12) on the proposed development construction traffic		
4.4	Benhall Railway Bridge update and abnormal load routes		

Reference	Matter	Point Raised	Applicant's Comments
4.5	Potential capping of heavy good vehicles using the local road networks		
5 Socioeconomic and Tourism			
5.1	Accommodation for workers of the proposed development	ESC noted at ISH3 that it would comment on the Applicant's Deadline 5 submissions relating to worker accommodation at Deadline 6. ESC's comments on REAC commitments SE04 and SE05, and the Applicant's responses to ExQ2 (and associated appendices) are therefore provided in Appendix A to this submission.	In reference to ESC's comments regarding commitments SE04 and SE05, the Applicant has provided detailed response within Application Document 9.153 Applicant's Response to the ExA's Rule 17 Letter (please refer to Ref 9.2 and 9.3).
5.2	Tourism impact monitoring and mitigation	ESC considers that a more specific commitment to a 'Workforce Accommodation Strategy' is required. ESC's suggested wording for a DCO Requirement is provided in response to ISH3 Action Point 1. ESC welcomes REAC commitments SE04 and SE05 in principle, but is concerned that they do not go far enough. Regarding SE04, ESC notes that both SCC and ESC are not listed as potential organisations with which the Applicant intends to engage regarding tourism, despite both councils' active involvement. ESC runs extensive tourist mitigation and development programmes for East Suffolk and the wider locality. For SE04, ESC requests that the mechanism for liaison is given due consideration, both in relation to how this commitment will be implemented in practice, and how it will be integrated into established working groups. ESC is concerned that applying another layer of engagement, on top of the sophisticated engagement that is already underway, would be required for SE04. The commitment, via REAC measure SE05, to monitor where workers are staying is welcomed by ESC in principle, but fails to address how this monitoring information will be shared with local stakeholders, particularly ESC which has private housing officers and pays close attention to tourism accommodation stock on. ESC therefore needs to be involved in this monitoring activity. The utilisation of a trigger point, which the Applicant has at this stage suggested would be 18 non-home based (NHB) workers staying in visitor accommodation, appears arbitrary and it is unclear how this figure was arrived at. A trigger point is a reactive approach to the problem, and the consideration of mitigation cannot wait until this arbitrary trigger point is reached; a proactive and forward-looking analysis of NHB workers' use of tourism accommodation is necessary. ESC considers it necessary for the use of tourism accommodation to be monitored from the offset, allowing mitigation strategies to be planned and for cumulative effects resulting from other NSIPs in the locality to be incorporated. ESC recognises the economic benefits that NHB workers can provide for East Suffolk, including through filling any spare capacity in visitor accommodation	The Applicant also confirms that in response to ESC's query, SE05 applies only to serviced accommodation. The Applicant has provided detailed response regarding its position on a tourism fund within Document 9.136: Applicant's Responses to Third Written Questions [REP6-111] (see 3SERT2).

Reference	Matter	Point Raised	Applicant's Comments
		during the off-season. However, ESC requires more information regarding how the Applicant's discussions with other local developers are progressing, particularly in relation to specialist accommodation that is being built within East Suffolk and whether they may be any spare capacity that could be utilised for workers on the Sea Link project, and regarding the use of transport facilities such as the Sizewell C park and rides. ESC also requires clarity from the Applicant regarding whether commitment SE05 relates only to serviced accommodation, only to non-serviced accommodation, or to both. ESC would welcome the opportunity to engage with the Applicant regarding the establishment of local governance and working groups to monitor and shape the delivery of the Applicant's commitment. ESC considers this would be hugely valuable given the expertise of ESC and other tourism organisations in the area. Whilst ESC welcomes the engagement it has had with the Applicant since ISH3, including a meeting on 1 April, no progress has yet been made with regard to its request for local governance and working groups. Whilst ESC is concerned by the differences between ESC's analysis of total accommodations stock and that presented by the Applicant (as highlighted in Appendix D to the Applicant's responses to ExQ2 [REP5-136]), it should be noted that total accommodation stock does not translate into availability as this will be dictated by occupancy throughout the year. ESC noted at ISH3 that occupancy was set to be about 100% over the two-week Easter holidays, and such situations would pose challenges for both visitors and NHB workers if the project were to be consented. Additionally, ESC considers the Applicant's assumption that NHB workers would want to share rooms is not necessarily true. ESC agrees with SCC that a proportionate tourism fund is appropriate and necessary. At ISH3, ESC's Sizewell C Tourism Programme Manager provided a summary of the Sizewell C Tourism Fund. This is a £12 million fund designed to maintain visitor confidence, sustain demand and strengthen the tourism offer during the Sizewell C construction period. Annual payments are received by ESC, and there are mandatory minimum spends on data and monitoring as part of that. A working group is made up of the two Councils (ESC & SCC) and other organisations including the Local Visitor Economy Partnership, the Suffolk Coast Destination Management Organisation, Suffolk and Essex Coast and Heaths National Landscapes Partnership, and Sizewell C. The board sit and approve the monitoring approach to understand what the industry is doing during this period. Work has thus far been focused on acquiring data sources and understanding baselines. As part of the programme, money is allocated towards marketing and PR to manage perceptions and keep the destination viable for tourism. Destination development strengthens the core reasons why people want to visit East Suffolk and can include grants to enable businesses to adapt and for sector development, with emphasis on the food and drink	

Reference	Matter	Point Raised	Applicant's Comments
		sector. Data and monitoring is a key aspect of the programme, with data sources including spend and footfall. During the Sizewell C Examination, that applicant acknowledged that perceptions were key in attracting visitors in terms of area appeal, and these perceptions therefore needed to be managed. Perception studies were conducted during that examination and ESC has commissioned longitudinal perception studies to understand East Suffolk's current audiences, where there are opportunities to grow these audiences, and what may be affecting these audiences in terms of motivations. During both these studies, it has been acknowledged that East Suffolk's key audiences are very sensitive to environmental changes, transport disruption etc. It is therefore important to have adequate monitoring and data so that we can really understand where we should be targeting those mitigation funds in the right way, and to get a return on investment. ESC acknowledges that it will be difficult to differentiate between the impacts that Sizewell C is having from the future Sea Link potential impacts, but ESC understands what is happening in the industry as a whole. Declines or changes in the spend or footfall data can be observed on a highly localised level; for example, ESC has observed the average food and drink transactional value decline in Leiston (the nearest town to Sizewell C) , with a shift towards more takeaway food rather than sit-down restaurant meals. This level of detail is essential to allow for a targeted response. Whilst it will be difficult to ascertain what is as a result of one project versus another, this is a natural consequence of the cumulative effects that are being experienced in East Suffolk.	
5.2	Tourism impact monitoring and mitigation	ESC has been requesting that the Applicant commits to ongoing monitoring and reporting of socioeconomic conditions and workforce projections during the construction phase of the project in order to monitor impacts on receptors, including tourism assets. ESC considers that the continued absence of any identified intention to establish long-term, continuous monitoring and assessment of potential socio-economic impacts of the Suffolk Onshore Scheme on the visitor economy constitutes a fundamental failure of the Applicant's assessment. Neither the Applicant nor ESC can predict the future with certainty, and the absence of any proposed monitoring means that it is impossible to identify any of the inevitable negative changes in the visitor economy, and to plan appropriate interventions. Accordingly, ESC urges the Applicant to commit to long-term, continuous monitoring and assessment. The Applicant's position that monitoring should be limited to worker accommodation (see Applicant's response to ExQ2 2SERT4 [REP5-135]) is fundamentally too narrow and fails to address the nature of the risk identified by ESC. The concern is not solely where workers are housed, but the broader and more complex impact on the visitor economy over time. Tourism is a dynamic and sensitive sector, influenced not only by physical availability of accommodation but also by price, perception, and overall visitor experience.	The Applicant has provided detailed response regarding tourism impact monitoring and mitigation within Document 9.136: Applicant's Responses to Third Written Questions [REP6-111] (see 3SERT2).

Reference	Matter	Point Raised	Applicant's Comments
		By restricting monitoring to worker accommodation alone, the Applicant excludes the very indicators that would reveal whether displacement, price inflation, or behavioural changes in visitor patterns are occurring in practice. In those circumstances, impacts may arise gradually and cumulatively yet remain unidentified and unmanaged. This limitation is particularly significant when considered in the context of cumulative effects. The Applicant continues to assess its impacts in isolation, whereas in reality the Suffolk accommodation market is finite and shared between multiple major infrastructure projects, including Sizewell C. The interaction of these projects is not simply additive but competitive, with each drawing from the same constrained pool of accommodation. Tourism is especially sensitive to such pressures, and even relatively small changes—whether in availability, affordability, or visitor perception—can alter how a destination is viewed and experienced. There is therefore a real risk that the combined effect of multiple projects will change the perception of Suffolk as a visitor destination, undermining its attractiveness and long-term tourism strategy. In this context, the absence of long-term, continuous monitoring of the visitor economy represents a critical gap. Without it, neither the Applicant nor the local authority can identify emerging impacts or implement timely interventions. Monitoring must extend beyond worker accommodation to include wider socio-economic indicators, including accommodation availability, pricing trends, and visitor behaviour, in order to provide a meaningful understanding of real-world effects. In terms of mitigation, a coordinated and strategic approach is required. It is not sufficient for each project to propose isolated or siloed measures. Any mitigation—particularly financial contributions—should be designed to operate collectively across projects, recognising that the impact itself is cumulative. This includes, for example, contributions toward tourism support and destination marketing, which should be aligned with and, where appropriate, added to existing initiatives such as those established in connection with Sizewell C. The objective must be to maximise effectiveness through a joined-up approach, rather than fragmenting resources across multiple uncoordinated schemes. Tourism in Suffolk is highly interconnected, both geographically and economically. Impacts in one area can have consequences across the wider region, and mitigation must reflect those interdependencies. A coordinated framework for monitoring, management, and investment is therefore essential. Without such an approach, there is a clear risk that cumulative pressures from multiple developments will erode both the capacity and the perception of Suffolk as a visitor destination, resulting in a material and lasting adverse effect on the tourism economy. The Sizewell C Tourism Fund provides a clear and demonstrably effective model of mitigation in practice. It was deliberately designed as a multifaceted framework, combining sector-wide monitoring with targeted and measurable,	

Reference	Matter	Point Raised	Applicant's Comments
		adaptable interventions. This structure ensures not only that the Fund supports the tourism industry proactively, but that it also retains the flexibility to respond to emerging or unforeseen issues as they arise. Monitoring identifies pressure points early, mitigation can then be shaped and refined to maintain the resilience of the visitor economy throughout the construction period. This Applicant for this proposed project and any future NSIPs should look to complement the approach. Tourism impacts do not arise in isolation, and neither should the response to them.	
6 Health and Wellbeing			
6.1	Core working hours	ESC has made its position explicitly clear over the course of this examination regarding the Applicant's proposed core working hours, and so will not repeat this here. With regards to specific discussions at ISH3 around the exceptions to the core working hours listed in Requirement 7 of the draft DCO, ESC is concerned that the breadth of these exceptions, together with the inclusion of start-up and close-down hours either side of the core working hours, provide the Applicant with a very broad scope to work outside of those core working hours, to the point that it undermines those core working hours. ESC is requesting further justification for each of the individual exceptions, which it considers has not yet been adequately provided by the Applicant. On the basis of the information that has been provided to date by the Applicant, ESC cannot accept the breadth of the list of exceptions in paragraphs (4) and (8) of Requirement 7, noting that the SPR EA1N and EA2 DCOs provided a much narrower list of exceptions, and ESC would expect to see a similar list in the Sea Link DCO.	The core working hours proposed (secured via requirement 7 of Document 3.2 Draft Development Consent Order) are required to facilitate the delivery of the Proposed Project, a critical nationally important electricity transmission infrastructure, by 2030. This reflects the need presented in the UK Government's Clean Power 2030 Action Plan, responding to NESO's Clean Power 2030 report. The delivery of the Proposed Project in accordance with the programme set out in the Applicant's Transmission Licence, in accordance with the NESO clean power objectives, and in a way that reduces constraints costs being passed to consumers, is fundamental to the need case for the Proposed Project. The Proposed Project requires the ability to programme its work as necessary across a seven-day week. While it is not anticipated that Sunday and bank holiday working would be undertaken across the entire onshore elements of the project every weekend, the ability to utilise weekend days as required is critical to allow an effective delivery programme to be developed. Within the core working hours themselves, there are restrictions on noisy works (namely percussive piling) and on HGV movements on weekends, with neither percussive piling nor NHGV deliveries occurring on Sundays or bank holidays at all with the exception of activities covered under requirement 7 paragraph (4). Furthermore, bank holiday weekends are excluded from the core working hours at the Suffolk converter station site and the Kent converter station and substation site, with further restrictions at Friston (Kiln Lane) substation (recognising that this is already consented via another project DCO). There are robust controls in a suite of management plans secured via requirements 5 and 6 of the dDCO that mitigate the effects of construction activity, noting for example Document 7.5.3 Outline Onshore Construction Environmental Management Plan [REP6-074], Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP6-134], and Application Document 9.83 Outline Code of Construction Practice [REP4-232]. The Applicant's position reflects that set out in its responses to ExQ 1GEN49 in Document 9.73 Applicant's Responses to First Written Question [REP3-069] and its responses to AP106 Document 9.90 (A) Applicant's Response to

Reference	Matter	Point Raised	Applicant's Comments
			Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2)ISH2 Action Point 106 [REP4-086].
6.2	Mental health impacts	Increasingly, mental health is being given due importance in its own right, separate from physical health, in consideration of impacts of NSIPs. Managing appropriate working hours is an important element of safeguarding residents' mental health and wellbeing. Saturdays, particularly Saturday afternoons, Sundays, and bank holidays are expected to be reprieves from construction working. Residents require respite from these works, especially given the number of projects in the district. Significant adverse effects on mental health and wellbeing can arise during construction periods, particularly where multiple projects are being the subject of consultation, then consented, and then constructed across the same communities. ESC noted that submissions at the OFH including from the local doctors raised this issue. This indicates real impacts on the ground now. The Applicant states, at Paragraph 11.8.1 of the Health and Wellbeing ES Chapter [APP-058] that 'the Proposed Project has been designed, as far as possible, following the mitigation hierarchy in order to, in the first instance, avoid or reduce health and wellbeing impacts and effects through the process of design development, and by embedding measures into the design of the Proposed Project'. ESC does not accept this assertion and considers that the Applicant has not 'as far as possible' avoided or reduced the mental health and wellbeing impacts of the Proposed Project. Most notably, as discussed above, the Applicant has failed to propose reasonable core working hours to provide the local community with respite from construction activity. This is an extremely important mitigation measure that the Applicant has failed to implement for the sake of its own project programme and costs. This is unacceptable to ESC. ESC cannot agree with the Applicant's findings of 'no likely significant adverse effects' on health and wellbeing as a result of the Proposed Project, and when considered cumulatively with other projects in the locality. As discussed in further detail below, East Suffolk's residents are experiencing significant disruption from other major infrastructure projects in the District, including those currently under construction, such as Sizewell C and SPR's EA1N and EA2 projects, and those at earlier stages of the consenting process, including LionLink. This is not anecdotal. A recent survey by Suffolk Mind (the details of which are provided in the LIR at [REP1-128], paras 7.5.4-7.5.5), commissioned by the Aldeburgh, Leiston and Saxmundham Community Partnership shows the increasing impact of the various proposed projects on wellbeing in the area. Sea Link is exacerbating, and will continue to exacerbate, these effects. ESC already has concerns for the mental health and wellbeing of its local communities, and therefore entirely rejects the Applicant's conclusion that the cumulative effects of Sea Link in combination with other projects in the area will not have significant adverse effects on mental health and wellbeing. It is essential that the Applicant genuinely engages with the local communities and parish and town councils. The issue of the adverse impact on wellbeing	The Applicant maintains the view that the Project will not have a significant effect on health and wellbeing, in isolation or cumulatively, and that its assessment presented in APP-058 is robust. Measures to address disruption and potential effects on mental health and wellbeing arising from construction activities are secured within Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 7 to reduce or avoid adverse human health and wellbeing related impacts during the development. A detailed response regarding the existing commitments, and further proportionate measures to demonstrate recognition of the LPA and community's concerns regarding health and wellbeing is set out in Application Document 9.136 Applicant's Responses to Third Written Questions in response to 3HW3.

Reference	Matter	Point Raised	Applicant's Comments
		will be felt across this area of the district but will be intensified in communities which have been subject to previous NSIP proposals. ESC has continually stressed its concerns for the mental health and wellbeing of communities currently subject to a number of NSIPs, including those that are operational, under construction, consented, and proposed for the future, and the spatial and temporal overlap of the construction phases of these projects can compound the effects on people's health and wellbeing. The Sea Link proposals will undoubtedly further exacerbate these existing issues. A recent survey by Suffolk Mind, commissioned by the Aldeburgh, Leiston and Saxmundham Community Partnership shows the increasing impact of the various proposed projects on wellbeing in the area. It is important to stress that increases in working hours can have significant adverse effects on people's health and wellbeing. Many areas within the Suffolk Onshore Scheme Order Limits are highly sensitive and residents are already experiencing significant disruption from other major infrastructure projects. The Applicant has stated that it 'recognises' the adverse mental health impacts of the Proposed Project and the local community's concerns, including, but not limited to, those in relation to the extensive proposed working hours. This is simply not enough. Instead, these concerns must be taken on board by the Applicant to inform its proposed works and mitigation. ESC is far from convinced that this has been the case to date. For example, the Applicant continues to justify prolonged, significant disruption (and the subsequent mental health impacts) to the local community caused by its proposed core working hours by citing the identification of the project as 'Critical National Priority'. ESC considers that the Applicant has unacceptably failed to grasp the magnitude of impact or adequately consider the health and wellbeing of the local community in formulating its proposals.	
7 Cultural Heritage			
7.1	Archaeology update and assessed impacts	ESC defers to SCC Archaeological Services.	Comment noted.
7.2	Setting of heritage assets, including cumulative impacts	ESC is content with the scope of the Applicant's assessment of above ground heritage assets, and is not seeking any further information from the Applicant in this regard. ESC's position remains as set out in Section 6.3.6 of its LIR [REP1-128], notably its disagreement with the Applicant's assessment of the impacts on Hurts Hall and Hill Farm. ESC considers it unlikely that this disagreement will be resolved between now and the end of Examination. ESC confirmed at ISH3 that this disagreement does not, in ESC's view, necessitate any change to the draft DCO. The Council does not have any concerns in relation to non-designated heritage assets. The only relevant above ground non-designated heritage asset is Wood Farmhouse, which was recently delisted and for which ESC agrees with the Applicant's assessment and approach. ESC notes that additional visualisations have been provided (Appendix A of Document 9.90: Applicant's Response to January Hearing Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2)	The disagreement on the degree of impact at Hurts Hall at Year 15 of operation and at Hill Farmhouse is a disagreement in professional judgment and it was acknowledged in ISH3 that an agreement is unlikely to be reached between the Applicant and ESC on these matters. <u>Hurts Hall</u> A representative view towards the Grade II listed Hurts Hall from the B1121 to the southwest of the asset was subject to summer and winter photography and photomontages were created to demonstrate the appearance of the view at different stages of the site development and to demonstrate different options under consideration for the bridge design. These are provided in Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 1 of 7 [APP-208] and Application Document 6.4.2.1 ES Figures Suffolk Landscape and Visual Part 2 of 7 [APP-209]. These detail the summer and winter baseline situation, the situation following removal of vegetation and introduction of the Fromus Crossing bridge (two options), and the situation at Year 15 of operation when screening planting has matured. These photomontages demonstrate that the proposed screening planting for the

Reference	Matter	Point Raised	Applicant's Comments
		– Deadline 4 [REP4-086]) which show illustrative models of the Saxmundham Converter Station within the maximum parameter blocks represented by the Rochdale Envelope. ESC has made its assessment of the impact on designated heritage assets on the basis of the maximum parameters (the worst-case scenario) of the converter station, as the visualisations are only illustrative and not definitive at this stage. If the height, footprint and layout of the converter station were definitively agreed to be as shown on the illustrative model, then we could be more certain that the visual impact on the setting of Hill Farmhouse would be lower than previously assessed.	bridge, access and Saxmundham Converter Station does not obscure this view of the asset. Further visualisations have been provided during DCO Examination [Application Document 9.48 River Fromus Visualisations Part 1 of 3 [REP1-298; REP1-299; REP1-300] that demonstrate different viewpoints in the vicinity of Hurts Hall and illustrative viewpoints of a design option for the Fromus bridge design and Saxmundham Converter Station design that show how with sensitive design and mitigation planting the impact of both features can be reduced. Cumulative visualisations towards Hurts Hall from the B1121 showing maximum extents and illustrative extents for Saxmundham Converter Station and LionLink Converter Station in combination have also been submitted at Deadline 4 in Appendix A to Application Document 9.90 Applicant's Response to January Hearing Actions Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [PRE4-086]. The reduction in the residual significance of effect reported in Section 3.11 of Application Document 6.2.2.3 (B) Part 2 Suffolk Chapter 3 Cultural Heritage [REP6-020APP-050] in relation to Hurts Hall as a result of the maturation of screening vegetation at Year 15 of Operation is mainly related to the success of mitigation screening of the Fromus crossing and permanent access which soften the visual impact of these features within the asset's setting. The continued visibility of the Converter Station, albeit improved by screening planting, is acknowledged in the residual minor adverse significance of effect assessed at Hurts Hall. Hill Farmhouse The assessment of Hill Farmhouse presented in Paragraph 3.9.117 of Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109] and the baseline significance and setting assessment presented in Paragraphs 6.1.35-6.1.38 of Application Document 6.3.2.3.A ES Appendix 2.3.A Cultural Heritage Baseline Report [APP-109] include robust consideration of the degree to which the surrounding agricultural landscape contributes to the significance of the asset and the degree to which it is sensitive to visual intrusion resulting from the Proposed Project. It highlights the enclosed nature of the asset's setting, being largely screened from view due to the boundary planting in its immediate curtilage. Views of the asset in the surrounding landscape are not a feature of its setting that contributes to significance. Viewpoint CH3 in Application Document 6.4.2.3 ES Figures Suffolk Cultural Heritage Part 2 of 2 [APP-230] is taken from the south of the asset looking north towards the proposed Saxmundham Converter Station. This demonstrates both the asset's lack of visibly and the lack of visibility of the Proposed Project which would sit behind it in the view. Cumulative illustrative visualisations at Viewpoint 5 have been produced in Appendix A of the Application Document 9.90 Applicant's Response to January Hearing Actions Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]. These illustrate the maximum parameters of the Suffolk Onshore Scheme and LionLink in the vicinity of Hill Farmhouse. 'Viewpoint 5 Heritage' also extends the view in the formal visualisation west to include the farmhouse. The visualisations also show reasonable illustrative models of both schemes in the same view, which are significantly smaller than the maximum parameters. This demonstrates how the Saxmundham Converter Station, shown illustratively in dark green, can

Reference	Matter	Point Raised	Applicant's Comments
			integrate into the view, appearing as further agricultural buildings of the same form as the existing modern units. The summer and winter photography provided also demonstrates how the farmhouse is entirely screened by vegetation in the view in the summer.
8 Cumulative effects			
8.1	Intra-project cumulative effects including the estimation of significance and need for mitigation (including how that is secured)	ESC's position is set out in its response to ExQ2 Question 2CEIntra3 [REP5-189]. In summary, ESC is in full agreement with SCC. There is a level of uncertainty in the intra-project cumulative assessment that warrants a precautionary approach, thus indicating a need to classify the effects as major rather than moderate. Whatever the final view is on the appropriate category of effect, both are significant and so the decision maker will need to put material weight behind those effects whether it is properly categorised as moderate or major on a precautionary basis.	The Applicant has addressed this issue in document 9.141 Intra Project Cumulative Effect Significance - Technical Note [REP6-117] .
8.2	Matters relating to the application of the mitigation hierarchy	ESC confirmed that it has no specific requests for further mitigation measures to be identified for intra-project cumulative effects at this stage, but notes that this is on the basis that the mitigation for individual topic areas is adequate and does operate to minimise effects as per the requirement of paragraph 3.1.2 of NPS EN-1. Before you get down to the mitigation and compensation levels of the hierarchy, one needs to avoid, and then reduce the effects. The cumulative assessment on residential receptors, for example, in the Suffolk Intra-Project Cumulative Effects ES Chapter [APP-059] identifies a significant intra-project cumulative effect arising from visual, noise and vibration, health and wellbeing, and traffic and transport effects during construction. Each of these sources of effect (except visual) may be reduced by, for example, more constrained core working hours. Those building blocks are essential to fulfil the policy requirements of reducing effects even before you get to the considerations of mitigation or compensation. Therefore, whilst ESC does not put forward any specific further mitigation measures in the context of cumulative effects, this is predicated on the Applicant proposing further mitigation, as requested by ESC, for individual topic areas.	The Applicant sets out its position regarding core working hours as a mitigation measure in response to point 16 of the ExA Rule 17 letter, document 9.153 Applicant's Response to the ExA's Rule 17 Letter .
9. Marine Physical Environment			
9.1	Update on additional sediment modelling	No comment.	N/A
9.2	Effects on the Coralline Crag and coastal processes, the need for requirements to secure a minimum depth of burial and exit location, and any other mitigation	ESC is content with the commitment to exit to the east of the Coralline Crag but agrees with the ExA's suggestion at ISH3 that the draft DCO must match that intention. ESC noted in response to ExQ2 Question 2GEN17 that a 25m burial depth would just meet the lower end of ESC's desired depth. As discussed at ISH3, ESC would welcome the Applicant reviewing the drafting of the DCO/REAC to secure this minimum depth of burial. ESC has provided wording for a DCO Requirement to secure the submission of a landfall construction method statement and landfall monitoring plan to ESC for approval post-consent in response to ExQ2 Question 2GEN17. [REP5-189]. Either an Outline Landfall Construction Method Statement, or the Requirement itself, would also secure	The Applicant cannot find valid justification of 25m to protect the cable from coastal erosion and the associated lowering of beach levels. Analysis by the Applicant's coastal processes specialists suggests erosion would result in a stable seabed level of between –6m LAT and –7m LAT. An additional allowance of 2m gives an elevation of –9m LAT for the buried cable which is therefore beneath the maximum extent of future vertical erosion. Even allowing for uncertainty in future projections, the extent of erosion required to expose cables buried below a level of –9m LAT is considered highly unlikely to occur. Additionally, the Coralline Crag formation is found at a similar elevation (-6 m LAT to –7 m LAT) which is resistant to erosion and provides an additional factor of safety limiting both horizontal retreat and vertical erosion of mobile beach material.

Reference	Matter	Point Raised	Applicant's Comments
		the depth of cable burial under the contemporary level of nearshore and foreshore to an absolute minimum of 25m, but preferably 30m due to the historical analysis of coastal process data and as a precautionary approach to managing accelerating rates of future coastal change.	Based on the analysis, at Deadline 7, the Applicant has submitted updated or additional REAC commitments, summarised as follows: - MPE06: Over the operational lifetime of the Proposed Project, monitoring of the beach profile and erosion rates will be carried out at both the Suffolk and Kent landfall sites in relation to the trenchless technique construction areas - Measure MPE04: At the Suffolk landfall, the minimum depth of the landfall will be below elevation -10.5m OD (-9m LAT) for the length installed beneath The Haven Local Nature Reserve (THLNR). For the length installed to the west of THLNR and within the RSPB North Warren Reserve, the minimum depth of the landfall will be 12m below existing ground level.
9.3	Use of pneumatic casing	ESC has no specific comments to make on the use of pneumatic casing, other than to advise that such use needs to be properly impact assessed. ESC provided comments on the use of pneumatic casing in response to ExQ2 Question 2PE1 [REP5-189].	Comment noted. Please see response to AP53 in 9.135: Applicant's Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110] where it states that casing installation using a pneumatic hammer is not proposed for the landfalls and has not been assessed as part of the Project.
9.4	River Stour channel migration and mitigation including scope of monitoring	ESC defers to Kent authorities.	Comment noted.
10. Noise and vibration			
10.1	Construction noise effects and mitigation	ESC has been requesting that the Applicant commit to the use of Section 61 Control of Pollution Act (CoPA) applications for all works. ESC set out proposed wording in this respect for inclusion in the Outline Construction Noise and Vibration Management Plan in its response to ExQ2 Question 2NV3 [REP5-189].	The Applicant agrees with this request and this has been included in 7.5.8.1 Outline Construction Noise and Vibration Management Plan - Suffolk [REP6-082] .
10.2	Operational noise emissions from converter stations and substations including, but not limited to, low frequency noise emissions and evidence to demonstrate that 5dB below background level is unachievable	In relation to operational noise, ESC requests 5dB below background, based on BS4142 which provides that below background is indicative of a low impact. ESC acknowledges the difficulties in achieving this for a project of this size in a low background sound level area. ESC does, however, require the Applicant to propose an operational noise limit The Council does however require is that an operational noise limit is proposed. 34 dB has been suggested, but ESC needs to know that this is the lowest achievable rating level that the current design can achieve, and that it accords with policy in terms of LOAEL and SOAEL. For ScottishPower Renewables' EA1N and EA2 projects, the LOAEL and SOAEL were set in line with BS4142 with greater than +5db being the LOAEL and greater than +10db being the SOAEL. Similarly, LionLink has committed to that. ESC is unsure where 34 dB sits in terms of LOAEL and SOAEL, and so, on the basis of the information provided to date, ESC cannot be satisfied that a 34 dB operational noise limit does indeed satisfy policy. ESC therefore requests that the Applicant provides additional information to justify a 34 dB operational noise limit. If 34 dB is the lowest that can be achieved, this needs to be justified, and ESC requires a commitment to go lower if possible at	The applicant notes this comment, and additional commitments covering these point have been provided at Deadline 7, following discussions with East Suffolk Council at Deadline 6.

Reference	Matter	Point Raised	Applicant's Comments
		detailed design stage, which is a commitment that has been made by other projects including EA1N and EA2.	
11 Air quality			
11.1	Traffic emissions assessment	ESC noted at ISH3 that it is possible that revised traffic modelling could affect the data used to underpin the cumulative emissions assessment or impact the conclusions of significance in relation to vehicle emissions, but it would need to review any further modelling before coming to a firmer judgement. ESC's current position is that it is comfortable with where matters lie in terms of air quality and emissions from traffic.	As summarised at ISH3, the additional work undertaken by the traffic and transport team comprises junction capacity modelling only. This modelling assesses operational performance, focusing on queuing and delay at peak periods to determine whether junctions would operate within capacity. The assessment does not alter overall daily traffic flows or traffic data used to inform the Environmental Statement. As the underlying traffic inputs remain unchanged, there is no change to the data underpinning the air quality assessment, and the conclusions on air quality effects associated with traffic emissions remain unaffected.
11.2	Operational back-up generator assessment including, but not limited to, potential for eutrophication impacts and cumulative effects with SPR proposals.	ESC notes that the Applicant is intending to clarify whether there will be back-up generators in Suffolk. If there are, ESC requests that REAC commitment AQ11 is applied to Suffolk.	The Applicant confirms that there will be back-up generators in Suffolk as part of the Proposed Project, and possibly as part of the SPR proposals. Commitment AQ16 was added to the REAC at Deadline 6. This is based on commitment AQ11, but has been adapted for the Suffolk Onshore Scheme and will ensure emissions from the back-up generators during the operational phase are not significant,
11.3	Air quality mitigation measures including enforceability and water for dust suppression in Suffolk	ESC noted that it is content with the content of the Outline Air Quality Management Plan. The Applicant has made provision for water dust suppression as a key measure for dust mitigation for the construction phase of the project. Whilst this is accepted as a standard method for controlling dust associated with construction work ESC would like the Applicant to demonstrate that they have access to sufficient water supply to provide adequate dust suppression. This is particularly key given the significant amount of earthmoving and ground disturbance required to deliver the project and the soil types present in the district which are often friable and prone to dust generation if not well controlled. The issue of how the Applicant intends to secure sufficient water supply for dust suppression is an area of concern for ESC, particularly in the context of multiple NSIPs in the area. ESC would therefore welcome further detail from the Applicant in this regard. Other projects in the district have had significant issues with water scarcity and as an example Sizewell C, albeit with different water supply requirements, has put in place multiple measures to ensure water supply from ground abstraction to storage lagoons. SZC have also employed other more novel measures such as soil stabilisation, along with more traditional planting plans for long term soil depositions and storage due to the scarcity of water. ESC would like to understand how the Applicant intends to ensure sufficient water supply to adequately control dust and ensure that not only do supplementary measures exist, but that they are available to the project and its contractors to control and suppress dust as required. Given water supply is relatively scarce in the area, ESC does not yet have confidence that the Applicant will be able to secure a sufficient supply. ESC is	Contracts for water supplies are being discussed with providers and are not currently signed at this stage of the project development. This is the expected position of a project at the examination stage of planning where consent has not yet been obtained. The Applicant has allowed for water retention for reuse along the length of the project including the reuse for dust suppression. Piped connections for water supplies to construction compound sites are being sought from utility providers where practicable. However, the applicant is aware that tankered supplies may be required to support the construction works. Water saving measures such as recycle systems on wheel washes and recycling trenchless drilling fluid shall be used and water retention and reuse are included in the Drainage Strategy in line with SuDS guidance. Trickle feed tanks can also be used to store water for use in construction, enabling a lower level of water demand to be used at any given time.

Reference	Matter	Point Raised	Applicant’s Comments
		therefore seeking further justification that they will be able to do so. From what the Applicant has said, it appears that they are not yet in a position to do that given they have not yet engaged with the supply chain in this regard. It may well be the case that they find the market to be constrained, and so it is concerning that this work has not yet begun.	
12. Ornithology			
12.1	Update on red-throated diver displacement assessment	ESC defers to Natural England.	Comment noted.
12.2	Seasonal restriction for all activities including pre-lay grapnel run		
12.3	Application of a 2km buffer for vessel displacement		
12.4	Potential derogation and compensation in respect of emergency repairs		
13. Ecology and Biodiversity			
13.1	Whether the potential disturbance effects of terrestrial unexploded ordnance have been sufficiently addressed in the applicant’s ecological assessments	ESC does not consider that the ecological assessment of terrestrial UXO impacts and the subsequent necessary mitigation measures have yet been fully addressed. As set out in its response to ExQ2 Question 2ECOL5 at Deadline 5 [REP5-189], ESC considers that there is still a risk that UXO could be encountered as part of the HDD works under the Leiston-Aldeburgh SSSI and that mitigation measures to address this need to be identified as part of the REAC. ESC understands that the Applicant is continuing to work with the RSPB and Natural England on this matter, with further information to be submitted at Deadline 6. ESC will provide further comments as any additional information is made available.	A more detailed assessment has been submitted at D6 in the HRA and in the Suffolk Ecology and Biodiversity Chapter.
13.2	Mitigation for riparian mammal activity	No ESC comment.	Noted.
13.3	Bats including, but not limited to, update on Natural England licensing team barbastelle bat discussions, use of hedgerow gaps vs HDD (including evidence of programme constraints) and mitigation for Daubenton’s bats in Pegwell Bay	<u>Created hedgerow gaps vs HDD for hedgerow crossing points</u> ESC considers that its comment on the lack of demonstration that the Applicant has considered avoiding hedgerow removal through the use of micro-siting, HDD or similar trenchless construction techniques remains. This is as set out in section 3.4 of its ISH2 post-hearing submission [REP4-117] submitted at Deadline 4. ESC welcomes the discussion on this point at ISH3 and notes that the Applicant advised that it would consider this matter further, including what additional measures can be implemented to further reduce hedgerow crossing removal widths, for Deadline 6. ESC will provide further comment on this matter following review of the additional information. In this section the Applicant also made reference to in-construction monitoring of hedgerow crossing points to ensure that they continue to be used by bats. ESC requests that this specific monitoring measure is included as part of the OLEMP, alongside the pre-construction survey methodologies and other in-	A schedule of ecological surveys, including reference to monitoring of bats using artificial crossings has been included in the oLEMP for D6 (Appendix B) and this has been slightly amended for D7. The oLEMP also includes a commitment to agree survey methodologies with the local planning authorities prior to surveys being undertaken. The Applicant notes the advice on monitoring methodologies. Regarding additional measures to be implemented to further reduce hedgerow crossing removal widths, these cannot be identified as part of the DCO but will be done by the contractor as part of detailed cable design. As a general principle, the Applicant will work with the contractor to ensure all hedgerow gaps are as small as practicable for the works required. With regard to East Suffolk Council’s views on the ability to use trenchless methods to traverse hedgerows and on the identification of hedgerows important for commuting bats, the Applicant refers to its previous responses on

Reference	Matter	Point Raised	Applicant's Comments
		construction monitoring surveys. We recommend that the use of thermal night vision aids (NVAs), along with paired static detectors and surveyor observations would be an appropriate, and relatively commonly used, methodology for surveying crossing points. NVAs used for this purpose must be of sufficient minimum specification (resolution, refresh rate and thermal sensitivity) for the survey distances involved. <u>Hedgerows Potentially Important for Foraging/Commuting Bats</u> Whilst acknowledging that the Applicant is seeking to mitigate each hedgerow crossing as though it is important, ESC remains concerned, as set out in section 3.4 of its ISH2 post-hearing submission [REP4-117], that the Applicant's survey methodology means that ESC has no way of knowing which hedgerows are actually important. This is of concern to ESC given there can be difficulties implementing those mitigations. ESC advised at ISH3 that due to the survey methodology that the Applicant has implemented (targeting surveys only on a certain number of hedgerows), it cannot be ascertained which hedgerows are actually important for foraging/commuting bats. ESC explained that further survey effort would provide a general picture of all the bat species that are using all of those hedges, thus indicating if the hedges are important for bats generally. If barbastelle are targeted for tracking and tagging, this will tell you which hedgerows are important for barbastelle. These are therefore two different techniques that will provide two slightly different outcomes. At ISH3, at the ExA's request, ESC committed to providing its consideration of hedgerows crossed by the project which may be potentially important to foraging and commuting bats. This is included in East Suffolk Council's response to Action Points arising from Issue Specific Hearing 3 (ISH3) on environmental issues held on Wednesday 25 March to Friday 27 March 2026 submitted at Deadline 6.	this matter in the Applicant's response to East Suffolk Council's Local Impact Report (Application Document 9.35.2 Applicant's Comments on Local Impact Report from East Suffolk Council), and in verbal submissions at ISH2 and ISH3 (Application Document 9.133 (A) Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 3).
13.4	Pegwell Bay and former hoverport access and disturbance	ESC defers to the Kent local authorities.	Comment noted.
13.5	Control of activities under requirements 5 and 6, including consideration of whether the outline landscape and ecological management plan should contain more specific survey methodologies (or provision to secure this detail)	ESC notes the applicant's commitment to provide additional detail on pre-commencement survey methodologies in the updated OLEMP at D6 (2ECOL3 - Applicant's Responses to Second Written Question [REP5-135]). We welcome the opportunity to provide further comment on this detail when it is available. ESC maintains that it is essential that the OLEMP includes detail of the pre-commencement survey methodologies to be implemented so that it is clear to all stakeholders what work needs to be undertaken. Including the detail of these methodologies in the OLEMP is particularly important as most, if not all, of the surveys need to be undertaken before pre-commencement site clearance works (allowed under Requirement 5) are carried out. If the detail of the necessary surveys is left to be agreed via the discharge of the LEMP under Requirement 6, then the site clearance works could have occurred before the trigger for discharging the LEMP is reached.	A schedule of ecological surveys, including reference to monitoring of bats using artificial crossings has been included in the oLEMP for D6 (Appendix B) and this has been slightly amended for D7. The oLEMP also includes an explicit commitment to agree survey methodologies with the local planning authorities prior to surveys being undertaken (and thus prior to vegetation clearance). The Applicant does not intend to include detailed survey methodologies in the oLEMP itself so that these can be agreed with the local planning authorities and be adjusted as necessary during the construction period, taking account of the fact that survey methodologies can change over time and often need adapting to specific circumstances and phases of construction, based partly on survey results from previous seasons.
13.6	Biodiversity net gain including, but not limited to, an applicant update on progress with legal	ESC remains concerned that this late in the examination process the Applicant's BNG proposals continue to lack clarity, including over the potential split between onsite and offsite BNG provision, the mechanisms through which onsite BNG will be secured and monitored, and the mechanisms through	1. As detailed in the ESC Statement of Common Ground, submitted at deadline 7, the section 106 unilateral undertaking (UU) will commit the Applicant to deliver BNG in line with its corporate commitments. This UU will have the same enforceability as a bilateral section 106 agreement and so is considered entirely

Reference	Matter	Point Raised	Applicant's Comments
	agreements and details of proposals	which offsite BNG will be secured and delivered. At ISH3, the Applicant made reference to using a Unilateral Undertaking (UU) to secure BNG delivery and to a National Grid procurement process for obtaining offsite BNG. ESC made the following points in relation to these: - Proposed UU – ESC requests a copy of the current draft of the UU Heads of Terms as soon as possible so that it can review and comment on it. Notwithstanding this, ESC considers that a UU is not the appropriate mechanism to secure the necessary BNG obligations. Instead, a S106 agreement is required to enable ESC, as the Local Planning Authority, to secure the necessary monitoring mechanisms and financial contribution for onsite BNG. These are required to enable the LPA to meet its Biodiversity Duty under section 40 of the Natural Environment and Rural Communities (NERC) Act (2006). ESC can now confirm that it did receive the draft unilateral undertaking on Friday 10th April, but evidently this provided insufficient time for ESC to be able to return comments to the Applicant ahead of Deadline 6 (Monday 13th April). - National Grid BNG procurement process – whilst in principle ESC welcomes a standardised procurement process for offsite BNG, ESC maintains reservations that it may be overly complex or bureaucratic for BNG Habitat Banks to engage with. ESC would be happy to provide the Applicant with its experience of the offsite BNG market to date, including as the only LPA in Suffolk to have signed legal agreements with landowners to create BNG Habitat Banks in the district (two at the time of this response, with a further two expected to be signed shortly). - Whilst ESC welcomes the Applicant's previous commitment to deliver all BNG related to the Suffolk part of the scheme in Suffolk, it is considered that this must form part of the legal agreement and the procurement process. Preference must be strongly weighted to delivering offsite BNG in East Suffolk, then the rest of Suffolk, in order to ensure that gains are being delivered in the same locality as the losses.	appropriate and enforceable in these circumstances. A draft of the UU Heads of Terms was shared with ESC and all other relevant LPAs for comment as was the draft UU which was submitted at Deadline 7. 2. The Procurement Act 2023 sets the value thresholds for utilities companies at £415,440 for services (VAT-inclusive) which includes provision of biodiversity units. The purchase of any biodiversity units with a value over this threshold must demonstrate compliance with procurement exercises as set out in the Procurement Act 2023. This threshold applies to utility companies conducting procurement in England, Wales, and Northern Ireland. National Grid is currently in the process of developing the questions that will be included in the Qualifying Utilities Dynamic Market (QUDM) for biodiversity gains, marine restoration and enhancement, and carbon under the Procurement Act 2023. The QUDM is a pre-vetted pool of capable suppliers and works as a dynamic framework where a utility company publishes a notice, suppliers register and qualify (proving their technical capability). Applications to enter the QUDM are anticipated to open soon and will be advertised on the Government Find a Tender Service. Initial market engagement with potential suppliers has been undertaken and has been received favourably, with market suppliers appearing keen to get onto the qualified list. The QUDM will be open to businesses of all sizes across that can supply biodiversity units. National Grid is confident that the QUDM, and subsequent tender exercise is the most suitable mechanism for the procurement of offsite BNG, at the scale the Sea Link project requires. 3. The QUDM includes strategic criteria inline with principle 8 and 9 of the Statutory Biodiversity Metric User Guide, These criteria include location, capacity and connectivity, For location, weight will be given to sites that can deliver units together, ideally in a single strategic location in each Suffolk and Kent. Greater weight will be given to proposals which are located in East Suffolk LPA (and Thanet LPA). However, a site further away from the development may provide opportunity for greater ecological benefit and value than one close by. We will seek to deliver high quality outcomes for the landscapes, habitats and communities affected by the Project by delivering biodiversity units that seek to maximise benefits for nature at a large scale. Decisions on proposals relating to the location of biodiversity units will need to balance the requirements of Principles 8 and 9, the strategic criteria, and what is available from providers to meet the Project's timescales.

Appendix A – ESC's comments on the Applicant's Deadline 4 and Deadline 5 submissions relating to socio-economics

Visitor accommodation	ESC has long-standing concerns regarding the capacity for the available serviced and non-serviced visitor accommodation and private-rented sector in East Suffolk to accommodate the non-home-based (NHB) workforce, without causing harm to residents and the local visitor economy. ESC expressed its concerns in its Local Impact Report [REP1-128] (for example, see Section 7.8.6, page 76-77), and has since expanded on these in its comments on the	The Applicant maintains its position that the Project will not give rise to significant effects on tourism or the visitor economy, and that the assessment of accommodation capacity, both in isolation and cumulatively, is robust and appropriately precautionary. This includes consideration of a reasonable worst-case scenario in which peak demands coincide.

Reference	Matter	Point Raised	Applicant's Comments
		Applicant's Visitor and Tourism Assessment Technical Note – Suffolk ([REP4-184], pages 8-16). The Applicant's assessment is predicated on the unrealistic assumption that its workforce demand can be considered in isolation. In practice, there is a single, finite accommodation market serving the needs of both the residents and tourism sector in East Suffolk. The cumulative impact of multiple projects within East Suffolk remains a chief concern, and this view is increasingly supported by the demonstrable impact of the Sizewell C development; even though it remains at an early stage of construction. The Applicants assessment of accommodation availability during the construction period remains theoretical and it is unclear how, in practice, any additional competition from NHB Workers will affect residents and visitors' ability to secure accommodation locally.	The Applicant has provided detailed analysis on cumulative worker accommodation demand and capacity within both Application Document 9.117 Applicant's Response to AP104 from Issue Specific Hearing 2, and Application Document 9.123 Applicant's Responses to Second Written Questions (please refer to 2SERT3).
1	ESC Comments: Applicants response to AP104 from ISH2 [REP4-237]	Limited resources mean that ESC has not been able to fully address and provide qualified comment on the Applicant's response to AP104 from ISH2. However, ESC urges caution and is wary of the Applicant's conclusion that 'there is likely to be capacity within the private rental accommodation sector for construction workers of cumulative schemes that require accommodation'. ESC is concerned that any over-reliance on private-rented accommodation to house NHB Workers introduces an unforeseen risk of affecting the availability and affordability of housing locally, consequently leading to the displacement of East Suffolk residents. ESC will approach its own Housing Team for comment on the methodology, assumptions and conclusions within the Applicant's response	This comment is noted.
2	ESC Comments: Applicant's Responses to Second Written Questions [REP5-135]	[2SERT1]: <i>Tourism Accommodation Figures</i> ESC appreciates the Applicant's response and has made the following observations. ESC's Deadline 4 submission [REP4-184], by necessity, had to draw on the findings of ESC's own East Suffolk Hotel & Visitor Accommodation Study. A study commissioned independently of the Proposed Project and undergoing final editorial review at the time of the Sea Link Examination. ESC acknowledges that there will be inherent differences in the design and methodology between the two studies including the 'origin point' from which the 60-minute drive-time is calculated, as well as the time of day or traffic conditions used to generate the drive-time catchment. Together these differences will affect the findings of the two studies. However, ESC remains surprised at the variance in serviced accommodation stock as illustrated by the Applicant in Appendix D [REP5- 136]. ESC is also surprised that the Applicant did not include non-serviced accommodation within their original analysis despite their stated assumption that NHB workers are likely to choose cheaper accommodation whilst working on the proposed project. ESC remains unconvinced that NHB workers have a preference to share rooms within serviced accommodation, and whether they have a preference between Serviced and Non-Serviced visitor accommodation. The Applicant has identified that a lack of inclusion of non-serviced accommodation within the ES assessment has potentially led to an underestimation of the total available tourist accommodation available within the 60-minute drive-time catchment that could be used by construction workers.	The Applicant notes ESC's comments regarding tourist accommodation figures. The Applicant maintains its position that the Project will not give rise to significant effects on tourism or the visitor economy, and that the assessment of accommodation capacity, both in isolation and cumulatively, is robust and appropriately precautionary. This includes consideration of a reasonable worst-case scenario in which peak demands coincide. On this basis, no further substantive response in regard to assessment of accommodation capacity is considered necessary beyond that already provided in Application Document 9.117 Applicant's Response to AP104 from Issue Specific Hearing 2, and Application Document 9.123 Applicant's Responses to Second Written Questions (2SERT1 and 2SERT3). This includes commentary regarding the approach towards assessment focusing on serviced accommodation and the PRS. In addition, the Applicant's proposed framework of monitoring and mitigation secured through Application Document 9.84 Register of Environmental Actions and Commitments (REAC) submitted at Deadline 7 allows for adaptive management during the construction period. This includes the ability to monitor workforce accommodation demand, engage with relevant stakeholders, and implement appropriate measures where necessary. The Applicant has provided detailed response regarding tourism impact monitoring and mitigation within Document 9.136: Applicant's Responses to Third Written Questions [REP6-111] (see 3SERT2).

Reference	Matter	Point Raised	Applicant's Comments
		The Applicant's assessment that their own accommodation study may have underestimated the total available tourist accommodation available does not help their argument. ESC maintains that irrespective of the total tourist accommodation stock, it is the availability of accommodation for use by visitors and NHB workers that is important. Both groups are likely to compete for the same accommodation, especially during the peak tourist season, leading to the potential displacement of either group, through the scarcity of supply, and price inflation.	
		<i>[2SERT2]: Affordability of Accommodation</i> When considering the affordability of accommodation, the Applicant has stated that "National Grid agree that construction workers will not be utilising the tourist accommodation in the Suffolk coastal area because it is not affordable to workers and there are far lower cost options available". This statement conflicts with the Applicant's previous analysis of Accommodation requirements for NHB Workers. Additionally, if the Applicant is confident that NHB Workers will not be using tourist accommodation in the Suffolk Coastal area, then there would be little need to have included local tourist accommodation within their analysis. If decisions relating to the choice of accommodation are influenced by its proximity to a worker's place of work and the affordability of accommodation, then ESC believes that NHB workers are likely to consider low-cost accommodation, such as non-serviced accommodation, that is close to their place of work, thereby reducing commuting time and travel costs. Logically, this might include accommodation within East Suffolk. Whilst the Applicant may be able to control the accommodation choices of their direct employees, the Applicant would have less influence over their contractors when seeking to reduce the impact of NHB Workers on tourist accommodation. ESC believes that there can be no absolute certainty or control over where NHB Workers will seek accommodation, or the type of accommodation they will choose. The reality is likely to include a broad range of locations and accommodation type throughout the construction period. Therefore, ESC recommends that appropriate working groups, whether established or newly created, are tasked to work with the Applicant to develop forward looking monitoring and mitigation programmes that help all stakeholders understand the supply, demand, and potential issues within private rental, serviced and non-serviced accommodation sector during the construction period, enabling the resolution of issues before they arise.	Please refer to the responses above.
		<i>[2SERT3]: Cumulative Worker Accommodation</i> ESC welcomes the Applicant's mapping and analysis of peak demand for worker accommodation across cumulative schemes in East Suffolk and appreciates the challenges of assembling worker information and phasing across the cumulative construction period, especially when some schemes have yet to be consented and all schemes may be subject to schedule variance where a project is delivered either ahead or behind schedule. ESC is not in a position to determine whether October 2028 represents an appropriate choice of peak cumulative demand for construction workers, whether the Applicant's assessment that peak cumulative demand is unlikely	Please refer to responses above.

Reference	Matter	Point Raised	Applicant's Comments
		to overlap, or whether the cumulative construction workforce and baseline accommodation assumptions are accurate. However, the Applicant's assessment, assuming a worst-case scenario where peak accommodation demands from cumulative schemes coincide, indicates that 'no capacity would remain within serviced visitor accommodation, and the PRS [Private Rental Sector] would be required to absorb the cumulative demand'. Admittedly, the non-serviced accommodation has the potential to alleviate demand stress on the serviced and private-rented sector, but ESC remains concerned that irrespective of the worst-case scenario assessed, there remains the possibility of limited availability of accommodation across all types during the construction phases of the cumulative schemes, especially during peak visitor periods. Additionally, the health of the private rental sector in East Suffolk has not been assessed by ESC and as previously stated, ESC is concerned that any reliance on private rented accommodation to house NHB Workers would affect the availability and affordability of housing for East Suffolk residents.	
		<i>[2SERT4]: Monitoring and Adaptive Management</i> ESC would welcome the Applicant working with local stakeholders and committing to monitoring of tourism impacts (including monitoring of worker and tourism accommodation) and potential adaptive management during the construction phase, both for the proposed development and cumulatively with other projects. A key concern for ESC remains the potential cumulative negative impacts of multiple schemes on the availability of tourist accommodation and the consequent effect on the visitor economy. However, it is not only the impacts on tourist accommodation that are a concern. ESC has previously demonstrated that the visitor economy is a complex system and that its success is a product of multiple factors which contribute to the visitor experience. These can include, for example, environmental factors such as landscape and visual, traffic and transport, noise and vibration and cultural heritage. All of which are within scope of the Applicant's Environmental Statement but fall out of scope for the purposes of the socio-economics and tourism assessment. Monitoring of the visitor economy falls to ESC and local stakeholders, and whilst local monitoring systems are becoming increasingly sophisticated, they remain limited. The tourism sector is still exposed to the unforeseen or unexpected events such as those potential cumulative inter-project effects expected in East Suffolk over the next decade. Importantly, the mechanisms by which ESC and local stakeholders can engage with developers during the construction period need to be developed. It is only through the establishment of effective feedback loops informing all stakeholders that appropriate mitigation activities including adaptive management can be developed and executed. ESC has welcomed the SE05 commitment within the REAC [REP5-115] but requests that further consideration be given to the mechanism for liaising with local stakeholders and that the Applicant works with local stakeholders to develop the detail behind the commitment.	The Applicant has provided detailed response regarding tourism impact monitoring and mitigation within Document 9.136: Applicant's Responses to Third Written Questions [REP6-111] (see 3SERT2).

Reference	Matter	Point Raised	Applicant's Comments
		ESC, SCC, and local industry representatives met with the Applicant on the 1st of April to discuss a revised commitment which the Applicant intends to submit by Deadline 6.	
		<i>[2SERT5]: Skills and Employment Plan</i> ESC and SCC received a draft copy of the Sea Link Skills, Supply Chain, and Employment Plan from the Applicant on 19 March. This was followed by a meeting with the Applicant on 23 March where the content was discussed. ESC and SCC provided feedback on 8 April. The Applicant will submit a revised plan by Deadline 6.	The Applicant has submitted Application Document 9.120 Detailed Skills, Supply Change and Employment Plan at Deadline 6 to accompany the Application for a Development Consent Order (DCO) for the Sea Link project.
3	ESC Comments: Applicant's Responses to Second Written Questions – Appendices [REP5-136]	<i>Appendix D: Tourist Accommodation Stock by type as presented by ESC and for the Suffolk Onshore Scheme</i> ESC has commented on the Applicant's response to ExQ2 2SERT1 above. However, it is worth re-iterating that design difference between the ESC and Applicant accommodation studies can, to a certain extent, explain the variance in findings of serviced accommodation count within the two studies.	This comment is noted.
		<i>Appendix E: Suffolk Coastal Accommodation Analysis to Support REAC Commitment SE05 and Response to Written Question 2SERT4</i> ESC welcomes the Applicants initial commitment and together with SCC met with the Applicant on 1 April to discuss the Applicant's SE05 REAC Commitment [REP5-115]. All parties agreed that there is value in a collaborative approach to monitoring the potential tourism impacts, of the proposed project and discussed how this could work in practice. The Applicant agreed to review their SE05 REAC Commitment and submit the revised document by Deadline 6.	The Applicant has provided detailed response regarding tourism impact monitoring and mitigation within Document 9.136: Applicant's Responses to Third Written Questions [REP6-111] (see 3SERT2).
4	ESC Comments: Register of Environmental Actions and Commitments (REAC) [REP5-115]	ESC appreciates that following a meeting with the Applicant on 1 April, the Applicant has agreed to review the content and consider the mechanism by which the commitment can be delivered. ESC refers to this within this ISH3 Post-Hearing Submission. Therefore, the following abridged comments reflect the earlier ESC position at ISH3: • Monitoring of worker accommodation needs to be shared with those previously mentioned stakeholders and inform supply/demand/occupancy forecasts that contribute to mitigation planning. • ESC believes that the wording of the commitment needs more firm commitments rather than “will consider” or “could include”. • ESC considers the utilisation of a trigger point, irrespective of its value, is only part of the solution. It can also be interpreted as a reactive or retrospective approach to the problem. • ESC recognises the economic benefits that NHB Workers bring to East Suffolk and that during the ‘low season’ accommodation providers would welcome the opportunity to fill any spare capacity. It is a matter of balance. • ESC would welcome a more joined up approach and would strongly support discussions with other local developers and whether the use of specialist accommodation, park and ride, or	A response to this matter is provided above in Table 1.1 Applicant's Comments on the East Suffolk Council Deadline 6 Post ISH3 Submission [REP6-160] . See reference 5.1 and 5.2.

Reference	Matter	Point Raised	Applicant's Comments
		transport facilities could be forthcoming to collectively resolve the cumulative impact. • ESC would welcome the opportunity to establish local Governance and Working Groups to monitor and shape delivery of the Applicant's commitment. • ESC is of the opinion the Applicant has not provided any specific mitigation for example they have not explained transparently 'how' they expect to manage worker demand, whilst protecting tourist accommodation. In essence, the measure does not prevent displacement; it merely observes it and leaves any response optional. This falls materially short of what is required to provide confidence that tourism impacts will be avoided. The Applicant assumes that workers will avoid tourist accommodation due to cost. However, it accepts that some workers will use booking systems to secure hotel rooms, and acknowledges challenges in securing workforce, which increases pressure to provide convenient accommodation. In practice, workers, particularly higher-paid or specialist staff, are likely to prioritise proximity to site, contractors are incentivised to secure accommodation close to site, and market behaviour, not policy assumptions, will determine outcomes. This is already being seen in relation to Sizewell C, where contractors have block booked accommodation, paying above agreed subsidy rates and securing rooms in competition with tourists. Accordingly, there is a clear and realistic risk that contractors will secure and prioritise local accommodation, including visitor accommodation, irrespective of the Applicant's assumptions. The Applicant has indicated that, for security reasons, it will not disclose where workers are located. This raises a critical issue in that if workforce accommodation locations are not disclosed, there is no way to independently verify whether tourism accommodation is being used, undermining the credibility of monitoring, and any confidence in compliance with mitigation measures. In summary, the Applicant's case on visitor accommodation is not robust. It is characterised by a reliance on partial and inconsistent data, assumptions about worker behaviour, a lack of a defined or secured accommodation strategy, no effective control over contractors, reactive and non-binding mitigation, and limited transparency preventing verification. Accordingly, there is no reliable or enforceable basis on which the decision-maker can be satisfied that the development will not result in displacement of tourists or harm to the local tourism economy. In the absence of a clear and secured strategy, this matter should be treated as giving rise to a likely significant adverse effect, to be weighed accordingly in the planning balance.	

Table 18.3 Applicant's Comments on East Suffolk Council Deadline 6 Submission [REP6-161]

Reference	Matter	Point Raised	Applicant's Comments
General			

Reference	Matter	Point Raised	Applicant's Comments
1	Submit any suggested drafting (whether relating to matters raised in ExQ3 or not) which you consider should be included in the draft Development Consent Order (dDCO), with reasons why you consider it is necessary.	ESC provided a set of detailed comments on the draft DCO in Annex 1 to its comments on the Applicant's Deadline 4 submissions [REP5-172], and these comments still apply. More substantive comments where ESC has provided suggested drafting changes over the course of the Examination are provided below. ESC has also provided its suggested amendments to the REAC in Appendix 2 to this submission.	The Applicant set out a detailed response within Document 9.136 Applicant's Responses to Third Written Questions and Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109] .
	Article 2	ESC suggests that advanced mitigation planting is added to the list of pre commencement operations in Article 2 of the draft DCO. ESC also noted in Annex 1 to its comments on the Applicant's Deadline 4 submissions [REP5-172] that it considers the current definition of "maintain" to be too broad. ESC has therefore provided suggested amended wording in response to ExQ3 Question 3GEN14, and has reproduced this wording below for expediency (amendments shown in red: "maintain" includes inspect, upkeep, repair, adjust, alter, dismantle, ~~remove~~, clear, refurbish, ~~paint~~, surface treat, decommission, improve, reconstruct or replace (but only in relation to any of the ancillary works in Part 2 of Schedule 1 (ancillary works) to the extent assessed in the environmental statement) and "maintenance" must be construed accordingly; ~~any part, but not remove, reconstruct or replace the whole of the authorised project including through the use of robots, helicopters, drones, gadgets or similar devices either remote controlled or autonomous, provided such works do not give rise to any materially 3 new or materially different environmental effects to those identified in the Environmental Statement, and any derivative of "maintain" must be construed accordingly;~~	The Applicant does not agree that the definition of 'maintain' is too broad or that it should be restricted to ancillary works. The definition is well-precedented across other nationally significant infrastructure projects and takes into account the range of works that the Applicant may reasonably need to carry out over the lifetime of the authorised development to ensure a safe and efficient connection. It is essential that the maintenance power applies to the whole of the authorised development to ensure the safety of the electricity transmission network. Such an approach is a standard approach taken to nationally significant infrastructure projects. The definition enables National Grid to use technology, such as drones, in its maintenance activities. This is appropriate to ensure that National Grid can maintain the authorised development using the most efficient and least disruptive methods available to it and it is essential that these are retained. Activities such as painting form part of regular maintenance and it is unclear how it is justified to be excluded.
	Article 4 (Maintenance of authorised project)	ESC also requested in Annex 1 to its comments on the Applicant's Deadline 4 submissions [REP5-172] that the Applicant is required to serve written notice on the relevant planning authority prior to the commencement any "material" maintenance works. 4.—(1) The undertaker may at any time maintain the authorised project, except to the extent that this Order, or an agreement made under this Order, provides otherwise. (2) The power to maintain conferred under paragraph (1) does not relieve the undertaker of any requirement to obtain any further licence under Part 4 of the 2009 Act (marine licensing) for offshore works not covered by the deemed marine licence. (3) The undertaker must give 28 days' notice in writing to the relevant planning authority prior to the commencement of any maintenance works which may give rise to effects or impacts not assessed in the Environmental Statement and those works must not be undertaken unless the relevant planning authority has confirmed in writing that it has no objection to such works.	The Applicant does not agree that it is necessary to serve notice on the local planning authority prior to the commencement of maintenance works as previously explained in Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109].
	Article 7	ESC suggests that a new paragraph (6) is inserted in Article 7 as follows – (6) The undertaker must give the relevant planning authority not less than 56 days' notice of its intention to transfer or grant to another person any or all of the benefit of the provisions of the Order.	The Applicant has already explained its position regarding the transfer of the Order, as set out in Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109].

Reference	Matter	Point Raised	Applicant's Comments
	Article 10	ESC has liaised with SCC to agree wording for Article 10 and understands that SCC has submitted this proposed wording into the Examination at Deadline 6.	The Applicant has provided its comments in respect of this article within Document 9.153 Applicant's Response to Rule 17 Letter submitted at Deadline 7.
	Article 49	ESC requested, in response to ExQ2 Question 2GEN13 [REP5-189], that Article 49(1)(b)(i) be amended to refer to an operational noise limit DCO Requirement (see request for a new Requirement relating to operational noise below), rather than the Construction Noise and Vibration Management Plan, as this contains no operational noise controls and so is not relevant to the use of the authorised development. Despite the ExA querying this in its ExQ2 Question 2GEN13, ESC notes that no amendments were made to Article 49 at Deadline 5. The Applicant must propose an operational noise limit DCO Requirement (see above), and then make reference to this in Article 49. ESC also requested, in Annex 1 to its comments on the Applicant's Deadline 4 submissions [REP5-172], that Art 49(1)(a)(iii), 49(1)(a)(iv) and 49(1)(b)(ii) are amended to provide that the demonstration that the nuisance cannot 'reasonably be avoided' be demonstrated to '<i>the relevant planning authority's reasonable satisfaction</i>'. ESC suggests the following wording (amendments to current draft DCO wording shown in red): 'Defence to proceedings in respect of statutory nuisance 49.—(1) Where proceedings are brought under section 82(1) (summary proceedings by persons aggrieved by statutory nuisance) of the Environmental Protection Act 1990(b) in relation to a nuisance falling within paragraphs (g) (noise emitted from premises so as to be prejudicial to health or a nuisance) and (ga) (noise from vehicles, machinery or equipment in a street) of section 79(1) of that Act no order must be made, and no fine must be imposed, under section 82(2) of that Act if— (a) the defendant shows that the nuisance— (i) relates to premises used by the undertaker for the purposes of or in connection with the construction or maintenance of the authorised project and that the nuisance is attributable to the carrying out of the authorised project in accordance with a notice served under section 60 (control of noise on construction sites) or a consent given under section 61 (prior consent for work on construction sites) of the Control of Pollution Act 1974(a); or (ii) relates to premises used by the undertaker for the purposes of or in connection with the construction of the authorised project and that the nuisance is attributable to the carrying out of the authorised project in accordance with the controls and measures relating to noise as described in the relevant Onshore Construction Environmental Management Plan or the relevant Construction Noise and Vibration Management Plan; or (iii) is a consequence of the construction or maintenance of the authorised project and it is demonstrated to the relevant planning authority's reasonable satisfaction that it cannot reasonably be avoided; or (iv) is a consequence of complying with a requirement of this Order and it is demonstrated to the relevant planning authority's reasonable satisfaction that it cannot reasonably be avoided; or (b) the defendant shows that the nuisance—	The Applicant explained why the proposed amendments to Article 49 are inappropriate in Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109] .

Reference	Matter	Point Raised	Applicant's Comments
		(i) relates to premises used by the undertaker for the purposes of or in connection with the use of the authorised project and that the nuisance is attributable to the use of the authorised project which is being used in ~~accordance with the Construction Noise and Vibration Management Plan~~ compliance with Requirement X (Control of noise during operational phase); or (ii) is a consequence of the use of the authorised project and it is demonstrated to the relevant planning authority's reasonable satisfaction that it cannot reasonably be avoided. (2) For the purposes of paragraph (1) above, compliance with Requirement X (Control of noise during operational phase), and the controls and measures relating to noise described in the relevant code of construction practice, the CEMP and the Construction Noise and Vibration Management Plan will be sufficient, but not necessary, to show that an alleged nuisance could not reasonably be avoided. (3) Where a relevant planning authority is acting in accordance with section 60(4) and section 61(4) of the Control of Pollution Act 1974 in relation to the construction of the authorised project then the local authority must also have regard to the controls and measures relating to noise referred to in the relevant code of construction practice, the CEMP or the Construction Noise and Vibration Management Plan approved under Schedule 3 (Requirements). 4) Section 61(9) (prior consent for work on construction site to include statement that it does not of itself constitute a defence to proceedings under section 82 of the Environmental Protection Act 1990) of the Control of Pollution Act 1974 does not apply where the consent relates to the use of premises by the undertaker for the purposes of or in connection with the construction or maintenance of the authorised project. (5) In this article "premises" has the same meaning as in section 79 of the Environmental Protection Act 1990(b).	
	Requirement 3 (Detailed Design)	ESC provided its suggested wording for Requirement 3 in its response to ISH2 Action Point 131 [REP4-119]. After liaising with Suffolk County Council, ESC and SCC have made amendments to this proposed wording, including incorporating a post-consent independent design review of the converter stations, Kent substation, and the River Fromus bridge: 3. Detailed design parameters onshore — 1) No stage of development of the above ground elements of the authorised development comprised in Work No. 3B (Suffolk Converter Station) may commence until details of the layout, scale and external appearance of that work have been submitted to and approved by the relevant planning authority in consultation with Suffolk County Council. The submitted details must be in accordance with the Converter Station Design Principles and the Design Engagement Strategy found in Document 7.12.1 Design Principles – Suffolk. Approval of the submitted details may not be withheld where doing so would contravene a Critical Design Constraint. Work No. 3B must be carried out in accordance with the approved details. (2) Suffolk Substation (Friston) (a) Unless otherwise approved by the relevant planning authority, the Suffolk Substation (Work No 1B) will be constructed in accordance with the details within the documents submitted for the discharge of Requirement 12 of part 3	The Applicant's position is set out in the updated draft DCO submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		of schedule 1 to SI 2022/433 (insofar as those details relate to the design, scale and layout of Work No. 1B) (b) Insofar as the details approved pursuant to Requirement 12 of SI 2022/433 are amended or if the East Anglia TWO or East Anglia ONE North projects do not progress as currently planned, then the relevant planning authority shall have regard to such circumstances when considering whether to approve otherwise pursuant to paragraph (a). (3) Bridge over the River Fromus (a) Development of the bridge crossing of the River Fromus (part of Work No. 3A) must not commence until details of the design, layout and scale of the bridge have been submitted to and approved by the relevant planning authority, following consultation with Suffolk County Council, in accordance with the Design Engagement Strategy, and the relevant local planning authority has confirmed, following consultation with the Environment Agency, that the parameters set out in (3) (b) have been met. (b) The bridge over the River Fromus should be designed in accordance with the following parameters: (i) the bridge shall not have a soffit height lower than 10.49 m Above Ordnance Datum (approximately 4m above the Q95 flow level); (ii) abutments for the bridge shall be set back no less than 8m from the top of the bank; and (iii) the bridge shall not have a deck width greater than 6m. (c) The details of the design, layout and scale submitted under (a) must be accompanied by a technical statement demonstrating how, recognising the minimum size parameters in (b)(i) and (ii), the Applicant has sought to reduce the scale of the bridge and achieve good design in accordance with national policy, having regard to the relationship with the landscape mitigation proposals, the articulation of the spanning structure, the design of the abutment walls, external colour, surface finish, materials, separation of pedestrian and vehicular traffic and the design of the parapet railings. The technical statement will include a plan, elevation and section drawings, and 3D renders of the bridge design in key view VP02 and CH02. (d) No part of the finished external treatment of the bridge crossing of the River Fromus comprised in Work No. 3A(a) (part of the authorised development comprising the access road to the Suffolk Converter Station) must be implemented until details of the external colour and surface finish (in line with the process established in Design Principle ID.3) have been submitted to and approved by the relevant planning authority. (e) Should the bridge design comprise a soffit height of less 12.49 m Above Ordnance Datum (approximately 6m above the Q95 flow level), then development of the bridge must not commence until a macro invertebrate monitoring and contingency plan has been submitted to and approved by East Suffolk Council, following consultation with the Environment Agency. The invertebrate monitoring and contingency plan must include: (i) The requirement to carry out Water Framework Directive compliant surveys twice yearly (spring and autumn), upstream and downstream of the Fromus crossing for a period of five years following completion of the construction of the Fromus crossing.	

Reference	Matter	Point Raised	Applicant's Comments
		(ii) Principles of the contingency monetary fund set out in (f) and criteria for when provision of the fund would be triggered. (f) Following receipt and review of the monitoring results under (e)(i), should the criteria in (e)(ii) be exceeded, then a contingency fund would be provided to fund measures to encourage the passage of macro invertebrates around the Fromus crossing and/or enhancement of Water Framework Directive invertebrate habitat upstream of the Fromus crossing. This would be secured via an appropriate legal agreement. (4) No stage of development of the above ground elements of the authorised development comprised in Work No. 9B (Kent Converter Station) may commence until details of the layout, scale and external appearance of that work have been submitted to and approved by the relevant planning authority in consultation with Kent County Council and Historic England. The submitted details must be in accordance with the design details and the Converter Station Design Principles and the Design Engagement Strategy found in Document 7.12.2 Design Principles – Kent. Approval of the submitted details may not be withheld where doing so would contravene a Critical Design Constraint. Work No. 9B must be carried out in accordance with the approved details. (5) No stage of development of the above ground elements of the authorised development comprised in Work No. 11 (new Kent Substation) may commence until details of the layout, scale and external appearance of that work have been submitted to and approved by the relevant planning authority in consultation with Kent County Council and Historic England. The submitted details must be in accordance with the Substation Design Principles and the Design Engagement Strategy found in Document 7.12.2 Design Principles – Kent. Approval of the submitted details may not be withheld where doing so would contravene a Critical Design Constraint. Work No. 11 must be carried out in accordance with the approved details. (6) The details of layout, scale and external appearance of Work Nos. 3B, 3A, 9B, and 11 submitted under sub-paragraphs (1), (3), (4), and (5) above must be accompanied by a technical statement demonstrating how these details have been informed by feedback received during the implementation of the relevant Design Engagement Strategy from relevant stakeholders and from an independent review of the detailed design. The Councils expect the Design Principles – Kent and Design Principles – Suffolk documents to contain a section providing details of the independent design review process ('the Design Engagement Strategy'), which the proposed wording above makes reference to. SCC has included detail of this strategy as part of its Deadline 6 submissions.	
	Requirement 6 (Management Plans to be Approved)	As noted in ESC's response to ExQ2 Question 2LVIA8 [REP5-189] and to ExQ3 Question 3LVIA3, ESC considers that the relevant planning authorities must have the ability to regulate and control details of operational lighting. Detailed justification is provided in response to the ExA's questions referenced above, but in summary, ESC does not consider that the controls over operational lighting currently suggested in Requirement 3 provide sufficient protection for the local community and requests that the Applicant prepares an outline lighting management plan covering the operational lighting for both the converter station and substation sites, with a more detailed Lighting	The Applicant included a requirement for an Operational Lighting Management Plan within 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134] submitted at Deadline 6.

Reference	Matter	Point Raised	Applicant's Comments
		Management Plan to be submitted to the relevant planning authority for approval through a discharge of Requirement 6 of the draft DCO. With regards to specific wording, ESC suggests that Paragraph (1) of Requirement 6 is amended as follows (amendments to current draft DCO wording shown in red): ‘(1) ... (q) Flood Management Plan (FMP); ~~and~~ (r) Code of Construction Practice (which must be substantially in accordance with the outline Code of Construction Practice).; (s) Lighting Management Plan – Suffolk (which must be substantially in accordance with the Outline Lighting Management Plan – Suffolk); and (t) Lighting Management Plan – Kent (which must be substantially in accordance with the Outline Lighting Management Plan – Kent).’ ... Alternatively, if the ExA does not consider it appropriate for outline lighting management plans to be submitted at this stage of the Examination, the following wording could be included as an additional DCO Requirement, which ESC has prepared based on the wording of Requirement 25 in the EA1N and EA2 DCOs: Control of artificial light emissions during operational phase (3) Work Nos. 1B, 3B, 9B and 11 must not begin operation until an operational artificial light emissions management plan for that Work providing details of artificial light emissions during the operation of that Work, including measures to minimise lighting pollution and the hours of lighting, has been submitted to and approved by the relevant planning authority. (4) The approved operational artificial light emissions management plans for Work Nos. 1B, 3B, 9B and 11 must be implemented upon, and maintained during, the operation of the relevant Works.’	
	Requirement 7 (Construction hours)	ESC has liaised with the other Councils and suggests the following wording for Requirement 7 (amendments to current draft DCO wording shown in red). It is important to note, as raised by ESC at ISH3, ESC is concerned that the breadth of the exceptions listed in paragraphs (4) and (7) (previously (8)) of Requirement 7, together with the inclusion of start-up and close-down hours either side of the core working hours, provide the Applicant with a very broad scope to work outside of those core working hours, to the point that it undermines those core working hours. ESC is requesting further justification for each of the individual exceptions, which it considers has not yet been adequately provided by the Applicant. Therefore, whilst the list of exceptions proposed by the Applicant has been retained in ESC’s below Requirement wording, ESC will require justification for the extent of these exceptions, and ESC reserves the right to amend its suggested wording in light of provision of this justification. Construction hours 7.—(1) Subject to sub-paragraphs ~~7~~(2), ~~7~~(3), ~~and 7~~(4) ~~and 7~~(7) onshore construction work may only take place between 0700 and 1900 Monday to Friday and between 0700 and ~~1700~~ 1300 on Saturdays, ~~Sundays and Bank Holidays~~ (the core working hours), unless otherwise approved by the relevant planning authority. ~~There will be no working on Bank Holidays in respect of Work No. 3B, Work No. 9B, and Work No. 11, except for the operations~~	The Applicant’s position is set out in the updated draft DCO submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		~~described in paragraph (4) below or with the prior agreement of the local planning authority. In respect of those works, for Bank Holiday Mondays (meaning Easter Monday, the early May bank holiday, the Spring bank holiday, and the summer bank holiday) there will also be no working on the preceding Saturday or Sunday in each case.~~ (2) No ~~P~~percussive piling works ~~may take place outside the core working hours are limited to 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays and may not occur on Sundays or Bank Holidays,~~ unless otherwise approved by the relevant planning authority. (3) ~~Subject to sub-paragraph (4),~~ No HGV deliveries ~~may be made outside the core working hours are limited to 0700 to 1900 Monday to Friday and 0700 to 1700 on Saturdays and may not occur on Sundays or Bank Holidays,~~ unless otherwise approved by the relevant highway authority. (4) ~~Only t~~The following operations may take place outside the core working hours referred to in sub paragraph (1)— (a) trenchless crossing operations including at landfalls and beneath highways, railway lines, woodlands, nature reserves, Sites of Special Scientific Interest or watercourses; (b) the installation and removal of conductors, pilot wires and associated protective netting across highways, railway lines or watercourses; (c) the jointing of underground cables; (d) the continuation of any work activity commenced during the core working hours to a point where they can securely and or safely be paused; (e) delivery to the transmission works of abnormal loads and any highway works ~~provided they have been~~ requested by the highway authority to be undertaken outside the core working hours; (f) the testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities; g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities ~~where not doing so would lead to a disproportionate delay to the construction programme or a disproportionate increase in adverse effects. In such cases, the undertaker must, as soon as practicable, inform the relevant planning authority in writing of the disruption or interruption and explain why that work could not be completed within the core working hours referred to in sub-paragraph (1);~~ (h) activity necessary in the instance of an emergency where there is a risk to persons or property; (i) marine works (all works below the mean high water springs line); (j) security monitoring; (k) intrusive and non-intrusive surveys; (l) mechanical and electrical installation works within buildings once erected and enclosed; (m) any highway works requested by the highway authority to be undertaken outside the core working hours; and (n) any railway works to be undertaken as part of the project on a Saturday, Sunday, Bank Holiday or outside the core working hours.	

Reference	Matter	Point Raised	Applicant's Comments
		(5) The core working hours referred to in sub-paragraph (1) exclude start-up and close down activities up to 1 hour either side of the core working hours. Start up and close down activities will be inaudible at the nearest noise sensitive receptor during these times. Where this cannot be reasonably met, justification must be provided to the relevant local planning authority, and as a fall back in accordance with the relevant BS5228-1 Category Threshold (Table E.1), a 50dBA noise limit (where Category B) and a 45dBA noise limit (where Category A) will apply at the nearest noise-sensitive receptors for start-up and close down activities up to one hour either side of the core working hours. (6) The severe weather conditions referred to in sub-paragraph (4)(g) means any weather which prevents work from taking place during the core working hours referred to in sub-paragraph (1) and, as the case may be, the hours referred to in sub-paragraph (3) by reason of physical incapacity (whether for reasons of visibility, ground conditions, power availability, site access, wind or otherwise) or being contrary to safe working practices. ~~(7) In respect of Work No. 1A and Work No. 1B, and all other elements of the authorised development, including associated development, located within the area defined in Sheets 2 and 3 of the Works Plans – Suffolk, construction work may only take place between 0700 hours and 1900 hours Monday to Friday and 0700 hours 16 and 1300 hours on Saturdays, with no activity on Sundays or bank holidays, except as specified in sub-paragraph (8).~~ ~~(78)~~ Outside the hours specified in sub-paragraph ~~(17)~~, construction work in respect of Work No. 1A, Work No. 1B, and all other elements of the authorised development, including associated development, located within the area defined in Sheets 2 and 3 of the Works Plans – Suffolk, may be undertaken for essential activities including but not limited to— (a) continuous periods of operation that are required as assessed in the environmental statement, such as concrete pouring and the installation and removal of conductors, pilot wires and associated protective netting across highways or public footpaths; (b) internal fitting out works associated with the substation; (c) the completion of construction activities commenced during the approved working hours which cannot safely be stopped; (d) the testing or commissioning of any electrical plant installed as part of the authorised development; and (e) activity necessary in the instance of an emergency where there is a risk to persons or property ~~(89)~~ With the exception of activities undertaken in accordance with sub-paragraph ~~(87)~~(e), the timing and duration of construction work undertaken in accordance with sub-paragraph ~~(87)~~ and, where works do not fall within sub-paragraphs ~~(87)~~(a) to ~~(87)~~(e), whether such works are essential, must be approved by the relevant planning authority in writing in advance, and must be carried out within the approved time.	
	New Requirement akin to Requirement 44 of the EA1N/EA2 DCOs	ESC has requested, in Annex 1 to its comments on the Applicant's Deadline 4 submissions [REP5-172], that a requirement comparable to Requirement 44 (Control of development during operational phase) of the EA1N and EA2 DCOs be added to the Sea Link draft DCO. This would ensure that Permitted Development rights are not used by the Applicant in a way that would	The Applicant set out a detailed response to this suggested requirement in Document 9.136 Applicant's Responses to Third Written Questions and Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109] . The Applicant remains of the view that there is no justification for a requirement based on Requirement 44

Reference	Matter	Point Raised	Applicant's Comments
		undermine consented landscape and drainage mitigation. ESC is proposing the following wording: “Control of development during operational phase (1) During the operation of and within operational land related to Work Nos. 1B, 2, and 3B in the District of East Suffolk and Work Nos. 9A, 9B, 10 and 11 in the District of Thanet and Dover, any development in addition to that authorised in this Order that is permitted under Schedule 2 Part 15 Class B (d), (e), or (f) of the General Permitted Development Order 2015 (“electricity undertakings permitted development) or any equivalent successor provision is subject to the following conditions – (2) In respect of operational drainage – (a) No electricity undertakings permitted development may commence until an amendment to the Drainage Management Plan approved pursuant to requirement 6 (o) in relation to Suffolk and requirement 6 (p) in relation to Kent that includes provision for the replacement of any existing drainage measures to be removed and maintenance of any new drainage measures to be provided as part of the permitted development, has been submitted to and approved by the relevant lead local flood authority, in consultation with the relevant planning authority and the Environment Agency; (b) The measures in the amendment to the operational drainage management plan in respect of the permitted development must be implemented as approved. (3) In respect of the provision, implementation and maintenance of landscaping – a) No electricity undertakings permitted development may commence until an amendment to the written Landscape and Ecological Management Plan and associated work programme approved pursuant to requirement 6 (f) in relation to Suffolk and requirement 6 (g) in relation to Kent that includes provision for the replacement of any existing landscape measures to be removed and maintenance of any landscape measures to be provided as part of the permitted development, has been submitted to and approved by the relevant planning authority; and (b) The measures in the amendment to the written landscape management plan and associated work programme plan in respect of the permitted development must be implemented as approved.”	of EA1N and EA2 to be included in the Sea Link DCO that would interfere with National Grid’s permitted development rights.
	New Requirement relating to fencing	ESC requested, in response to ExQ2 Question 2LVIA8 [REP5-189], a DCO Requirement to provide relevant planning authorities with control over fencing, for protection of trees and hedgerows, and of ecological receptors, and to ensure the safety of Public Rights of Way users. ESC suggests the following wording, which is based on the wording of Requirement 17 of the EA1N and EA2 DCOs: ‘Fencing and other means of enclosure (1) No stage of the onshore works may commence until for that stage written details of all proposed permanent and temporary fences, walls or other means of enclosure of the onshore works have been submitted to and approved by the relevant planning authority. (2) All fencing and other means of enclosure of the onshore works must be in accordance with the approved details.	The Applicant’s position is set out in the updated draft DCO submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		(3) Any temporary fencing must be removed on completion of the relevant stage of the onshore works unless otherwise approved by the relevant planning authority. (4) Any approved permanent fencing in relation to Work Nos. 1B, 3B, 9B and 11 must be completed before that Work is brought into use and must be maintained for the operational lifetime of the Work to which it relates.'	
	New Requirement relating to operational noise	ESC has been continually requesting an operational noise DCO Requirement, which has not yet been forthcoming. ESC met with the Applicant and Thanet District Council on 9th April and understands that the Applicant intends to submit such a Requirement into the Examination in due course. In the meantime, ESC suggests the following wording, which it proposed in response to ExQ2 2NV1 [REP5-189]: Control of noise during operational phase (1) The noise rating level for Work No. 3B and Work No. 9B must not exceed [34] dB Lar,T at any noise sensitive receptor in accordance with the principles set out in BS 4142:2014+A1:2019. (2) Work No. 3B and No. 9B must not operate until Monitoring Schemes for monitoring compliance with the noise rating level or levels set out in paragraph (1) above have been submitted to and approved by the relevant planning authority. The scheme must be based on principles set out in BS 4142:2014+A1:2019. The reference method set out in Annex D to BS 4142:2014+A1:2019 shall be used in the assessment of whether tonal penalties apply. (3) The noise rating level for Work No. 1B must be at least 5 dB below background noise level at any noise sensitive receptor in accordance with the principles set out in BS 4142:2014+A1:2019. (4) Work No. 1B must not commence operation until a Monitoring Scheme for monitoring compliance with the noise rating level or levels set out in paragraph (3) above has been submitted to and approved by the relevant planning authority.. The reference method set out in Annex D to BS 4142:2014+A1:2019 shall be used in the assessment of whether tonal penalties apply. (5) In order to demonstrate that the noise levels have been achieved, the Monitoring Schemes referenced in paragraphs (2) and (4) above must identify– (a) the required meteorological and other conditions under which the measurements will be taken, acknowledging that data obtained during emergency operation or testing of certain plant and equipment is not to be taken into account; (b) suitable monitoring locations (and alternative surrogate locations if appropriate); (c) times when the monitoring is to take place; and (d) when it has taken place. (6) In the event that Work No. 1B (the new Substation at Grove Wood, Friston) is not delivered under this Order, in order to ensure that the work to be delivered under Work No. 2 of this Order does not result in exceedances of the operational noise rating levels at the substation site at Grove Wood, Friston, Work No. 2 must not operate until a scheme for	The Applicant's position is set out in the updated draft DCO submitted at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		monitoring compliance with the noise rating levels set out in Requirement 27 of the East Anglia TWO DCO (SI 2022/433) has been submitted to and approved by the relevant planning authority. (7) In order to demonstrate that the lowest reasonably practical operational noise levels have been achieved, the schemes referenced in paragraphs (2) and (4) above must also provide an assessment to demonstrate, to the relevant planning authority's satisfaction, whether it is possible to achieve lower noise rating levels than those identified in paragraphs (1) and (3) above and for the sites during their operational life. (8) The schemes must be implemented as approved, and the Monitoring Reports must be submitted to the relevant planning authority, three months and then six months after operation and thereafter on an annual basis commencing on the anniversary of the six month submission.	
	New Requirement relating to trenchless landfall	ESC provided, in response to ExQ2 Question 2GEN17 [REP5-189], suggested wording for a trenchless landfall requirement. ESC's preference would be for the Applicant to prepare an outline landfall construction method statement, and an outline landfall monitoring plan during this Examination, as was the case for EA1N and EA2. ESC therefore suggests the following Requirement wording: (1) No part of Work No. 6 may commence until the following have been submitted to and approved by the relevant planning authority in consultation with the relevant statutory nature conservation body and, in respect of sub-paragraph (a) and to the extent that it relates to works seaward of mean high water springs, the marine management organisation— (a) a landfall construction method statement for the construction of that part of Work No. 6 (which accords with the outline landfall construction method statement); and (b) a landfall monitoring plan (which accords with the outline landfall monitoring plan). (2) The landfall construction method statement and the landfall monitoring plan must be implemented as approved. (3) In the event that inspections carried out in accordance with the landfall monitoring plan indicate that, as a result of the rate and extent of landfall erosion, Work No. 6 could become exposed during the operation of the authorised project the undertaker must, as soon as practicable, submit proposals in writing for remedial works or mitigation measures to protect Work No. 6 from coastal retreat, together with a timetable for their implementation, to the relevant planning authority for approval in consultation with the relevant statutory nature conservation body, and the remedial works or mitigation measures must be implemented as approved.' Alternatively, if the ExA considers it not appropriate for the Applicant to produce an outline landfall monitoring plan at this stage, Paragraph (1) of the requirement could be replaced with the following: '(1) No part of Work No. 6 may commence until the following have been submitted to and approved by the relevant planning authority in consultation with the relevant statutory nature conservation body and, in respect of sub-paragraph (a) and to the extent that it relates to works	Condition 4 of the deemed marine licence requires a landfall method statement and an In-Principle Monitoring plan to be submitted and approved by the MMO as per the draft DCO which was submitted at Deadline 6. Therefore, the Applicant does not consider that any amendment to the requirement is necessary.

Reference	Matter	Point Raised	Applicant's Comments
		seaward of mean high water springs, the marine management organisation— (a) a landfall construction method statement for the construction of that part of Work No. 6. This must secure use of a trenchless landfall technique and include the final proposed profiles for the trenchless cable burial, demonstrating a minimum cable burial depth of 25m below the contemporary nearshore and foreshore level; and (b) a landfall monitoring plan which commits to coastal geomorphology impact assessments and comparison of collected data to baseline topographic surveys to ascertain whether any coastal change is taking place that could risk cable exposure if unmitigated.'	
	New Requirement relating to advanced planting	Advanced planting (1) No pre-commencement operations may commence until details of advanced planting have been submitted to and approved by the relevant planning authority, including a timetable for their implementation.	The Applicant has already responded to this matter in response to 3LVIA1 in Application Document 9.136 Applicant's Response to Third Written Questions submitted at Deadline 6.
	New Requirement relating to Workforce Accommodation Strategy	The Applicant's assessment fails to address the fundamental issue that accommodation in East Suffolk operates as a single, finite market, which is already under significant pressure from Sizewell C and other NSIPs. In these circumstances, it is not sufficient for each project to assess its impacts in isolation. Without coordination, multiple NSIPs will compete for the same limited accommodation supply, creating a cumulative effect that is materially greater than the sum of its parts. In order to avoid this outcome, a coordinated accommodation strategy is required whereby the Applicant works jointly with other major projects, including Sizewell C, to plan, manage and, where necessary, provide appropriate worker accommodation. Without such a mechanism, there is a clear risk of unregulated competition, block booking, and price inflation, all of which would adversely affect the availability of accommodation for visitors. This issue must also be considered in the context of established tourism policy and strategy at both local and regional level. A consistent objective of those strategies is to convert high volumes of day visitors into overnight stays, thereby increasing economic value. The 2024 Cambridge economic model demonstrates that overnight visitors contribute significantly more per head than day visitors, both in terms of direct spend and wider economic impact. The availability of accommodation is therefore a critical enabler of this strategy. If that accommodation is instead occupied by construction workers, particularly over extended periods, the ability to grow higher-value overnight tourism is fundamentally constrained. ESC therefore requires a coordinated, enforceable accommodation strategy secured through a DCO Requirement. Without this, there is no mechanism to prevent cumulative harm to the tourism economy. ESC suggests the following wording for a new DCO Requirement: (1) No part of the authorised development may commence until a Workforce Accommodation Strategy has been submitted to and approved in writing by the relevant planning authority. (2) The Workforce Accommodation Strategy must include: (a) a coordinated accommodation plan demonstrating how the undertaker will work jointly with the undertakers of other nationally significant infrastructure projects and major development proposals in	The Applicant has responded to this point in 9.153 Applicant's Response to the Rule 17 Letter.

Reference	Matter	Point Raised	Applicant's Comments
		the locality, as approved by the relevant planning authority, to manage cumulative workforce accommodation demand; (b) an assessment of cumulative accommodation demand and supply, taking into account all known and committed projects within the relevant travel-to work and accommodation catchment; and arrangements to prevent displacement of visitor accommodation; (c) Identification of accommodation types to be used (including serviced and non-serviced accommodation), and the proportion of workforce expected to occupy each; (d) details of secured accommodation provision, including evidence of availability and arrangements to prevent displacement of visitor accommodation; (e) measures to avoid the use of tourist accommodation, including enforceable controls on contractors and subcontractors; (f) Mechanisms to prevent block booking of visitor accommodation, particularly within identified tourism-sensitive areas; (g) a monitoring and reporting framework, including provision of sufficient data to enable independent verification by the relevant planning authority; (h) a mitigation and intervention strategy, including clear and enforceable action to be taken in advance of, and not after, any identified impact on visitor accommodation; and (i) a procedure to report the results of the implementation of the Workforce Accommodation Strategy to East Suffolk Council, Suffolk County Council, the Local Visitor Economy Partnership, and the Destination Management Organisation on a regular basis, including a mechanism for adapting the Strategy based on the reported results. (3) The approved Workforce Accommodation Strategy must be implemented as approved for the duration of the construction period. (4) No variation to the approved strategy shall be made without the prior written approval of the relevant planning authority. (5) In Suffolk, the results of the implementation of the Workforce Accommodation Strategy must be reported to East Suffolk Council, Suffolk County Council, the Local Visitor Economy Partnership, and the Destination Management Organisation.	
Traffic and Transport			
13	The Construction Traffic Management Plan says the applicant has a preference for Option 1 (repairing or strengthening the existing bridge). Is this a strong enough form of wording? Should it be that if Option 1 is fully available then the applicant commits	ESC defers to SCC as the relevant Highways Authority, noting that the Benhall Bridge is an SCC asset.	Comment noted

Reference	Matter	Point Raised	Applicant's Comments
	to taking this option ahead of the other options? SCC, East Suffolk Council (ESC), Applicant / DL6		
18	If there are traffic delays due to proposed development construction traffic, either alone or in combination with other developments, is it likely that alternative routes would be taken by the public in their vehicles, potentially having an impact on more minor highways? If so, has this been assessed and is there actions needed to avoid this?	ESC defers to SCC as the relevant Highways Authority.	Comment noted
Socio-economics and tourism			
25	The ExA require that the Councils work together and provide wording for a requirement within the DCO, if the Councils considered it necessary, for the monitoring and possible adaptive management in regards to tourism impacts. All Councils / DL6	ESC notes that the wording of this ISH3 Action Point 25 is the same as ExQ3 Question 3SERT2. To avoid duplication, ESC has provided a response to Action Point 25 in its response to ExQ3 3SERT2.	The Applicant has provided response within Application Document 9.150 Applicant's Comments on Responses to Third Written Questions .
27	If there was to be a Skills and Employment Plan submitted by the applicant which would be considered acceptable by the Councils, would this be sufficient to overcome any remaining concerns relating to economic impacts? All Councils / DL6	ESC and SCC received a draft copy of the Sea Link Skills, Supply Chain, and Employment Plan from the Applicant on 19 March. This was followed by a meeting with the Applicant on 23 March where the content was discussed, and ESC and SCC provided joint feedback to the Applicant on 8 April. The Applicant will submit a revised plan by Deadline 6. ESC welcomes the Applicant's commitment to a Skills and Employment Plan, provided that the revised version is acceptable to the Councils. However, ESC considers that the purpose of the Skills and Employment Plan is to maximise the economic benefits of the proposed project across the thematic areas of Skills, Supply Chain, and Employment. It is not a mitigation strategy. ESC considers the plan to be insufficient to overcome the many serious remaining concerns relating to the economic impacts of the proposed project. On its own, it is only part of the solution and needs to be recognised within the context of a suite of required mitigation planning that includes:	As set out within Application Document 9.136 Applicants Responses to Third Written Questions [REP6-111] (please refer to 3SERT1), the Applicant does not agree that Application Document 9.120 Detailed Skills, Supply Chain and Employment Plan (SSCEP) [REP6-101] is insufficient or that there remain "serious" unresolved concerns relating to economic impacts. The SSCEP [REP6-101] does not represent mitigation of any socio-economic, recreation or tourism effects, but rather a plan to help maximise the positive gain for the local community. The Environmental Statement (Application Document 6.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism) concludes that the Proposed Project would result in no significant adverse socio-economic, recreation or tourism effects, with construction-phase employment and GVA impacts assessed as temporary minor beneficial. In this context, the SSCEP [REP6-101] has been prepared to be proportionate to the scale of effects identified and compliant with NPS EN-1 and the NPPF. The Applicant therefore considers the SSCEP [REP6-101] to be policy-compliant.

Reference	Matter	Point Raised	Applicant's Comments
		1. A commitment to delivering the Sea Link Skills, Supply Chain, and Employment Plan that is integrated into, and supportive, of existing programming being delivered locally. 2. A commitment to monitor the impacts of the proposed project on tourism accommodation throughout the construction period as provisionally described within section SE05 of the REAC [REP5-115]. 3. A commitment to work with local tourism stakeholders through a tourism sub group and shape jointly agreed and appropriate mechanisms for collecting, analysing, and acting on data that is appropriate and supportive of the tourism sector The Councils (ESC and SCC) suggest that, given the stage reached in the Examination, it is unlikely that the Applicant and the Councils will reach a point of agreement on the content of the Skills, Supply Chain, and Employment Plan (SSCEP) prior to the close of Examination. This includes the Councils' request for cumulative workforce modelling, detailed assessments, and supply chain analysis, which the Councils consider necessary and which are currently absent from the Plan. The Councils therefore consider that the SSCEP to be submitted into the Examination at Deadline 6 should be considered an outline version, with a detailed version to be submitted to, and approved by, the relevant planning authority post consent, in consultation with Suffolk County Council, through a discharge of Requirement 6 of the draft DCO. Where the Applicant is unable to provide the details requested by the Councils prior to the end of the examination, appropriate commitments should be made in the outline SSCEP to provide these details in the detailed SSCEP to be approved post-consent. Further engagement would be appreciated to agree appropriate wording for these commitments.	The Applicant has provided comment in response to ESC's points: 1. Integration of SSCEP into existing local programmes The Applicant agrees in principle with integration with existing local programming and notes that this is already explicitly set out in the SSCEP [REP6-101]. The Plan is deliberately structured to integrate with existing programmes rather than create new standalone initiatives. Delivery of the SSCEP [REP6-101] is aligned with existing Suffolk arrangements, including the Regional Skills Coordination Function (RSCF), Local Skills Improvement Plans (LSIPs), Further Education and apprenticeship provision, job-matching services and Chambers of Commerce. 2. Cumulative workforce modelling The Applicant does not agree that the SSCEP [REP6-101] lacks consideration of cumulative effects, nor that additional modelling is required. The SSCEP [REP6-101] recognises the cumulative demand on skills created by multiple NSIPs progressing across Suffolk. This is addressed through reference to relevant NSIPs, Department for Education labour-market and replacement-demand projections, and recognition of competition for specialist roles. As stated within Application Document 9.136 Applicants Responses to Third Written Questions [REP6-111] (3SERT1), project-specific cumulative workforce modelling would be highly speculative and not proportionate to the scale of employment associated with the Proposed Project. Such modelling would not provide reliable or meaningful outputs given uncertainty in third-party project programmes. 3. Outline Document The Applicant does not agree that the SSCEP [REP6-101] should be treated as an outline document. As submitted, the SSCEP [REP6-101] sets out clear actions, delivery arrangements and timelines capable of being implemented post-consent. While contractor-specific detail will continue to evolve, this is normal for NSIPs at this stage and is already accommodated by existing DCO mechanisms allowing for adaptive delivery and proportionate engagement. Requiring approval of a further detailed SSCEP [REP6-101] post-consent would risk delaying delivery without improving outcomes. Additionally, the SSCEP [REP6-101] confirms that activities will be refined by the Applicant and its contractors as subcontractors and supply chains are confirmed and mobilised (Section 2.5.2–2.5.3). This reflects standard NSIP practice and ensures flexibility while remaining aligned with agreed principles, actions and policy objectives. The Applicant does not consider that additional post-consent approval mechanisms are required. In response to ESC's comments regarding tourism monitoring and engagement with tourism working groups, the Applicant has provided detailed response within Application Document 9.153 Applicant's Response to the ExA's Rule 17 Letter (please refer to Ref 9.2 and 9.3).

Reference	Matter	Point Raised	Applicant's Comments
30	Respond to the proposed permissive paths and whether they should be proposed as public rights of way?	ESC defers comment on the Applicant's specific proposed permissive paths to SCC as the Local Highway Authority. However, as a general point, ESC notes that permissive paths cannot be regarded as permanent public access. An agreement can be made between the landowner and the highway authority that can specify the time in which the path can be made available to the public, but without such an agreement in place, the landowner can revoke permission at any time. If it is considered by SCC that the proposed permissive paths would add value to the network (convenience and/or enjoyment to a substantial section of the public), there may be a strong case for the permissive paths to instead be proposed as public rights of way.	The Applicant has set out its reasoning in proposing permissive paths in Application Document 9.153 Applicant's Response to the ExA's Rule 17 Letter (please refer to point 7.1).
Health and Wellbeing			
32	With regard to the proposed exceptions included in requirement 7, are there any that the Council considers as should be omitted or amended? All Councils / DL6	Refer to Action Point 1 for Requirement 7 redrafted text.	See comment above
34	All councils to work together to submit alternative wording with respect to core working hours including any restrictions and exceptions required, if the councils consider this necessary. All Councils / DL6	Refer to Action Point 1 for Requirement 7 redrafted text.	See comment above
Cultural Heritage			
39	Does there need to be any changes to the draft DCO or the support documents submitted by the applicant in relation to cultural heritage? If so, please set this out with alternative or additional wording. All Councils, Historic England / DL6	ESC does not require any changes to the draft DCO or support documents in relation to cultural heritage.	Comment noted.
Cumulative Effects			
44	The applicant and the Councils to work together and provide a document which provides the reasonings of the parties	SCC, on behalf of the Councils, contacted the Applicant on 2 April to query how the Applicant was intending to progress discussions for actions and ExQ3 questions requesting a joint position between the Councils and the Applicant. The Councils received no reply, and SCC and ESC were informed at their regular catch-up meeting with the Applicant on 9 April that the Applicant had	The email from SCC was received on the Thursday before Good Friday and the Applicant responded to the council suggesting that the monthly meeting on 9 April be used to pick up these points when relevant members of the team had returned from statutory holiday and annual leave. It is highly unlikely, given the easter break and the number of potential attendees, that a suitable time would

Reference	Matter	Point Raised	Applicant's Comments
	and DCO (and/or if appropriate REAC) wording to secure the measures identified in responding to 2WQ 2CEIntra3 should the Secretary of State deem this to be necessary.	been progressing responses to these actions/questions independently from the Councils. No meeting was therefore arranged to discuss the issue of mitigation measures for intra-project cumulative effects. ESC notes that it did not suggest any measures in response to ExQ2 2CEIntra3, with only SCC suggesting a measure (reduced core working hours). As ESC has made clear throughout the Examination, ESC strongly objects to the proposed core working hours and supports SCC's request and has provided its suggested amended Requirement 7 wording in response to Action Point 1.	have been available prior to the already planned call. The Applicant was working on a response not independently, but to gather the most recent positions of the councils and applicant to help inform discussions on the 9 April. The Applicant then provided a link to a response document to action points 44, 48 and 49 on 10 April, requesting a response from the councils the following week, however no responses were entered into this shared document by the councils. As such the Applicant provided its position and stated that <i>"The Applicant has been discussing this action point with the Council's however due to annual leave and statutory holidays we have not been able to finalise each Council's position. As such the Applicant has provided a position on each of the measures identified in responding to 2WQ 2CEIntra3, however the Council positions will need to be provided in the final Statement of Common Ground to be submitted at deadline 7."</i> The applicant is disappointed that the response from ESC misrepresents the sequence of events to the degree it does.
48	Applicant and local authorities to develop a joint position statement with regard to the unmitigated significant residual landscape and visual effects to see if there are further mitigation measures that can be included or compensation measures to offset any residual significant effects, if the Secretary of State considers that to be necessary. Applicant, ESC, SCC, TDC, KCC / DL6	SCC, on behalf of the Councils, contacted the Applicant on 2 April to query how the Applicant was intending to progress discussions for actions and ExQ3 questions requesting a joint position between the Councils and the Applicant. The Councils received no reply, and SCC and ESC were informed at their regular catch-up meeting with the Applicant on 9 April that the Applicant had been progressing responses to these actions/questions independently from the Councils. No meeting was therefore arranged to discuss the issue of unmitigated significant residual landscape and visual effects. ESC understands that the Applicant intends to provide a joint position statement at Deadline 7, which ESC will feed into.	The email from SCC was received on the Thursday before Good Friday and the Applicant responded to the council suggesting that the monthly meeting on 9 April be used to pick up these points when relevant members of the team had returned from statutory holiday and annual leave. It is highly unlikely, given the easter break and the number of potential attendees, that a suitable time would have been available prior to the already planned call. The Applicant was working on a response not independently, but to gather the most recent positions of the councils and applicant to help inform discussions on the 9 April. The Applicant then provided a link to a response document to action points 44, 48 and 49 on 10 April, requesting a response from the councils the following week, however no responses were entered into this shared document by the councils. As such the Applicant provided its position and stated that <i>"The Applicant has been discussing this action point with the Council's however due to annual leave and statutory holidays we have not been able to finalise each Council's position. As such the Applicant has provided a position on each of the measures identified in responding to 2WQ 2CEIntra3, however the Council positions will need to be provided in the final Statement of Common Ground to be submitted at deadline 7."</i> The applicant is disappointed that the response from ESC misrepresents the sequence of events to the degree it does.
49	Continue discussions with the councils to seek to identify appropriate mitigation, including measures to compensate and offset significant effects. Provide a position statement at DL6, which includes reasoning as to why the parties consider these measures to be necessary, or not, and wording that can secure such measures should the Secretary of State deem	SCC, on behalf of the Councils, contacted the Applicant on 2 April to query how the Applicant was intending to progress discussions for actions and ExQ3 questions requesting a joint position between the Councils and the Applicant. The Councils received no reply, and SCC and ESC were informed at their regular catch-up meeting with the Applicant on 9 April that the Applicant had been progressing responses to these actions/questions independently from the Councils. No meeting was therefore arranged to discuss the issue of the mitigation hierarchy and the Critical National Priority test, but ESC has provided its comments in this regard in response to ExQ3 3GEN2.	The email from SCC was received on the Thursday before Good Friday and the Applicant responded to the council suggesting that the monthly meeting on 9 April be used to pick up these points when relevant members of the team had returned from statutory holiday and annual leave. It is highly unlikely, given the easter break and the number of potential attendees, that a suitable time would have been available prior to the already planned call. The Applicant was working on a response not independently, but to gather the most recent positions of the councils and applicant to help inform discussions on the 9 April. The Applicant then provided a link to a response document to action points 44, 48 and 49 on 10 April, requesting a response from the councils the following week, however no responses were entered into this shared document by the councils. As such the Applicant provided its position and stated that <i>"The Applicant has been discussing this action point with the Council's however due to annual leave and statutory holidays we have not been able to finalise each Council's position. As such the Applicant has provided a position on each of the</i>

Reference	Matter	Point Raised	Applicant's Comments
	them necessary. All parties to clearly identify any deemed conflicts they consider remain with the applicant's ability to meet the requirements of the Critical National Priority test. Applicant, ESC, SCC, TDC, KCC / DL6		<i>measures identified in responding to 2WQ 2CEIntra3, however the Council positions will need to be provided in the final Statement of Common Ground to be submitted at deadline 7.</i> The applicant is disappointed that the response from ESC misrepresents the sequence of events to the degree it does.
Noise and Vibration			
58	. Respond to the applicant's points relating to noise during start up and close down periods. ESC / DL6	ESC provides its suggested wording in relation to Requirement 7 within Action Point 1.	See comment above.
Air Quality			
64	Confirm whether diversion of construction traffic through Saxmundham would have any implications for the impact assessment.	The ExA requested at ISH3 that ESC consider if it had any air quality concerns in relation to Saxmundham arising out of the diversion of light construction traffic through Saxmundham. ESC does not have any specific concerns but supports SCC as highways authority in its requirements to reduce congestion where possible by implementing controls where necessary. Any congested area of traffic will have an effect on the local air quality, even if this is at a low level and ESC would seek to avoid this where possible. SCC, in ensuring optimal traffic flow through suitable diversion routes, will also reduce the impact on air quality.	The Applicant has confirmed in the Outline Construction Traffic Management and Travel Plan (Application Document 7.5.1.1 (E) Outline Construction Traffic Management and Travel Plan [REP6-062]) that no HGV construction traffic would be routed through Saxmundham during any closure of the B1121, and that LGV use during the Benhall Rail Bridge closure would be minimal (up to 60 LGVs per day). Any diversion routes and mitigation measures will be agreed under SCC's permitting scheme, with liaison to minimise impacts as far as practicable, thereby also limiting any potential effects on local air quality.
Ecology and Biodiversity			
78	Provide a list of hedgerows of particular concern for bats, where the council considers that use of horizontal directional drilling (HDD) might be justified.	ESC understands that the Applicant's position is that the bat activity survey work carried out for the project is intended to describe the bat assemblage present within the Order Limits, not to inform detailed mitigation measures for each hedgerow crossing. The project intends to utilise the same construction mitigation measures for each hedgerow crossing, as though they were all important for bat commuting. It should be noted that the project's proposed construction mitigation will only be in relation to commuting bats, not foraging bats, as the temporary Heras fencing will not generate any insect biomass for bats to feed on. ESC has maintained its concern with the practical deliverability of this approach throughout the construction of the project (ESC LIR paragraph 7.2.5.5 [REP1-128], section 3.4 of ESC ISH2 Written post hearing submissions including Written summaries of oral cases made at hearings the w/c 26 January 2026 - Issue Specific Hearing 2 [REP4-117]), particularly as it is unclear exactly which hedgerows are likely to provide important connectivity for bats. ESC also maintains the concern set out in its LIR (paragraphs 7.2.5.3 and 7.2.5.4 [REP1-128]) regarding the static bat detector failure rate that the project has experienced and the limitations that this has created in understanding seasonal bat activity across the order limits. In particular, there were significant failures in August 2023 (four of nine detectors recorded for less than the minimum 5 nights in the month) and August 2024 (five of nine detectors recorded for less than the minimum 5 nights in the month). August is a key month at the end of the maternity season where young bats may still be	See Applicant's response to comment 13.3 above.

Reference	Matter	Point Raised	Applicant's Comments
		being suckled (and therefore females are still undertaking extra foraging to produce milk) or are just starting to be free flying. At ISH3 the ExA requested that ESC provides its consideration of hedgerows crossed by the project which may be important for foraging/commuting bats. This is provided below and on the accompanying annotated drawings. It is caveated that this consideration is provided based on the bat survey work submitted as part of this DCO application, publicly available biological records, consideration of the wider landscape around the project corridor and professional opinion; no additional field surveys have been undertaken. ESC believes that the following criteria are relevant to considering a hedgerow's likely importance for foraging/commuting bats: • bat species recorded at or near the hedgerow during project survey work (where sufficient coverage is available); • other available bat records at or near the hedgerow; • and connectivity provided by the hedgerow to onsite or offsite potential foraging or roosting areas. These are in accordance with the more extensive list provided in paragraph 3.4.22 of the UK Bat Mitigation Guidelines (Reason, P.F. and Wray, S. (2025). UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats. Version 1.2. Chartered Institute of Ecology and Environmental Management, Ampfield). Appendix A to this response provides plans of the hedgerows to be removed by the project (as per Sheets 1 to 5 of 2.12 Trees and Important Hedgerows to be Removed or Managed Plans (Version 2, change request) [CR1-023]), with hedgerow numbers added by ESC. Appendix A also provides ESC commentary on each hedgerow. The identification of these hedgerows does not mean that ESC considers that the Applicant should downgrade their committed mitigation proposals on hedgerows which are not listed. The commentary is provided at the request of the ExA to assist their consideration of the proposal, to highlight the number of likely important hedgerows that the project will cross, and to seek consideration of whether they could be crossed using trenchless construction measures such as HDD or similar.	
81	Respond to the applicant's comments regarding hedgerow gaps.	ESC understands that this point relates to the Applicant's comments at ISH3 that it may be possible to narrow hedgerow removal gaps further than currently identified in some locations. ESC would welcome the Applicant's consideration of this in situations where the only effective construction option is hedgerow removal, as it will reduce the width of gaps that need to be temporarily spanned for commuting bats using Heras fencing or similar and will therefore make this mitigation measure easier to deploy and maintain during construction.	See Applicant's response to 13.3 above
Appendix B – ESC comments on draft Register of Environmental Actions and Commitments (REAC)			
		ESC is concerned that the wording employed by the Applicant in the draft REAC is in places vague, ambiguous and on occasion, meaningless. <i>Requirement 5 "Management Plans and Commitments" in the draft DCO provides that – (1) All works forming part of the authorised development must</i>	The applicant has responded to each suggested change below

Reference	Matter	Point Raised	Applicant's Comments
		be carried out in accordance with the management plans, schemes and strategies listed in sub-paragraph (2) below unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan, scheme or strategy concerned. (2) The plans, schemes and strategies referred to in paragraph (1) above comprise the following – (a) (b) (c) Register of Environmental Actions and Commitments Section 1 (contained within Chapter 2 of the Register of Environmental Actions and Commitments. The practical reality, however, is that the obligation in Requirement 5 is meaningless insofar as the REAC is concerned if the wording contained in the REAC is so drafted that the performance and interpretation of any given commitment is entirely at the subjective discretion of the Applicant – which ESC believes to be the case in a large number of the proposed actions and commitments. Paragraph 1.1.4 claims that the REAC “has been developed to provide firm, precise commitments for measures that are not subject to amendment”. It continues that section 1 of the REAC “provides reassurance to Interested Parties, the Examining Authority and the Secretary of State that these measures will apply as written”. The Applicant has asserted that it is bound by the REAC. ESC, however, does not believe that to be an accurate portrayal of the actual effect of document – rather it seems to be a “get out of jail free” card for the Applicant. We have referenced first the ID number (Column 1), the Potential Changes (Column 3) followed by our proposed amendments to the Mitigation Commitment (Column 4). Proposed additions to the text of the commitments are highlighted in red, while deleted text is shown as struck out.	
General Onshore Scheme - Table 2.1 – REAC - Onshore mitigation			
	Ecology and Biodiversity	B11 - <u>To reduce ecological impact:</u> <i>Between the Saxmundham Converter Station and Friston Substation the HVAC and HVDC cables will both be in trench, so the width will be greater. In this area, the width would be minimised to 39m. ~~where possible~~</i>”.	The Applicant has updated B11 in Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) to be submitted at Deadline 7, to remove ‘where possible’. The wording has been further amended to clarify that ‘the width’ refers to any single break in the hedge, and that this will not exceed 39m.
		B64 – <u>Impact on ponds:</u> <i>Where there are existing ponds (~~as shown on Ordnance Survey mapping~~) within the Order limits, these will not be removed as part of the works. ~~This measure does not apply to any new ponds created since submission of the application.~~</i>	The Applicant rejects this amendment on the basis that the ponds must be defined to allow for the Applicant to commit to retaining them. The OS Mapping system serves as the most applicable method of defining existing ponds.
	Geology and Hydrogeology	GH12 – <u>Impacts on sensitive groundwater features:</u> <i>Sensitive routeing and siting of infrastructure and temporary works will be adopted as to avoid sensitive features such as groundwater Source Protection Zone (SPZ) 1. ~~where possible~~ A risk assessment, to be approved by the relevant planning authority, will be undertaken if the most vulnerable areas cannot be avoided.”</i>	The Applicant has updated GH12 in Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 7 with some of these proposed amendments. However, the Applicant does not agree with the requirement for the relevant planning authority to approve the risk assessment, as this is the responsibility of the Environment Agency who have oversight of controlled waters. On this basis, the commitment has been updated to require the risk assessment to be agreed with the Environment Agency, and to be shared with the relevant local planning authority for information only.

Reference	Matter	Point Raised	Applicant's Comments
		GH13 – <u>Impact from geotechnical hazards</u> : <i>The Proposed Project ~~incorporates suitable-will incorporate~~ consideration of in accordance with best practice and in consultation with the relevant planning authority.</i>	The Applicant has updated GH13 in Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) to be submitted at Deadline 7, to incorporate these amendments.
	Agriculture and soils	AS10 – <u>Permanent landtake from agricultural land</u> : <i>During construction, the design will be developed to minimise permanent land take requirements from agricultural land. ~~where possible.~~</i>	The Applicant has updated AS10 in Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) to be submitted at Deadline 7, to incorporate these amendments.
	Noise and Vibration	NV04 – <u>Impacts on noise sensitive receptors</u> : <i>For ~~both~~ routine and more substantial maintenance activities, the contractor will conduct ~~an-a proportionate a comprehensive~~ assessment of potential noise and vibration impacts, ~~as may be required.~~ Where applicable and in consultation with the relevant planning authority mitigation measures will be incorporated into the works to reduce the effects from noise and vibration to an acceptable level.</i> ESC notes that “routine and more substantial” are not defined and requests clarity in this regard.	The Applicant cannot agree to this rewording in full because for routine maintenance it would be disproportionate to undertake a ‘comprehensive assessment of potential noise and vibration impacts’ and to also have to do this ‘in consultation with the relevant planning authority’. However the Applicant has updated NV04 in Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) , to be submitted at Deadline 7, to incorporate some of these amendments.
		NV05 – <u>Impacts on noise sensitive receptors</u> : <i>For decommissioning activities, the contractor will conduct ~~a comprehensive a proportionate~~ an assessment of potential noise and vibration impacts. ~~as may be required.~~ In consultation with the relevant planning authority, mitigation measures will be incorporated into the works to reduce the effects from noise and vibration to an acceptable level</i>	The Applicant has updated NV05 in Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) , to be submitted at Deadline 7, to incorporate these amendments.
	Air Quality	AQ15 – <u>Impact on air quality sensitive receptors</u> : Where ~~substantial~~ maintenance activities are required during the operational phase and have the potential to generate dust or emissions, ~~proportionate~~ dust and emissions management measures consistent with those committed to for the construction phase shall be implemented, ~~as appropriate~~ , to minimise	The Applicant has updated AQ15 in Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) , to be submitted at Deadline 7, to incorporate these amendments. However, the Applicant has retained the term ‘proportionate’ to ensure these are commensurate with the level of dust and emissions generated by maintenance activities,...
	Climate Change	CC03 – <u>Operational carbon as a result of the Proposed Development</u> : <i>At the detailed design stage, the Contractor shall review all switchgear and substation equipment to determine whether the proposed Project can be designed to avoid the use of SF6 reliant assets. Where SF6 free alternatives are not technically feasible or are grossly disproportionate in cost, the contractor shall document the alternatives considered and the justification for the continued use of SF6 reliant equipment and implement an emissions monitoring and control plan that is fully compliant with the Fluorinated Gas (F gas) Regulation and any successor legislation. ~~The written review, written document and all related information will be forwarded to the relevant planning authorities for their consideration prior to implementation.~~ The contractor shall ensure that any SF6 reliant assets installed are subject to ~~non low~~ leakage specifications. Where SF6 reliant equipment is required, the design shall, ~~wherever practicable~~ accommodate the potential for future replacement with SF6 free alternatives.</i>	The Applicant rejects this amendment on the basis that SF6 use is regulated by Ofgem and F gas regulations, and it is therefore not necessary to involve local planning authorities.
		CC04 – <u>Embodied carbon as a result of the Proposed Development</u> : <i>Low carbon construction techniques, including low carbon plant, vehicles and equipment, will be used. , ~~where appropriate, in line with National Grid policy.~~</i>	The Applicant rejects this amendment on the basis that the works must be carried out in line with National Grid policy.

Table 2.2 – REAC - Suffolk Onshore Scheme

General Project Commitments	GG41 – <u>Radiation emergency event</u> : <i>The Applicant will prepare and will be submitted to Suffolk County Council for review and approval prior to commencement.</i>	The Applicant rejects this amendment on the basis that this will be submitted to SCC with plenty of time to review it.

Reference	Matter	Point Raised	Applicant's Comments
	Ecology and Biodiversity	B19 – Impacts from polarised light pollution on the River Fromus: <i>In consultation with the relevant planning authority a light-coloured.....</i>	The Applicant has updated B19 in Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) , to be submitted at Deadline 7, to incorporate these amendments.
		B21 - <u>Impacts on Sandlings SPA or Leiston-Aldeburgh SSSI: HVDC cables</u> <i>will ~~would~~ be installed</i>	The Applicant has updated B21 in Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) , to be submitted at Deadline 7, to incorporate these amendments.
		B29 - <u>Impacts on the orchid population: During works</u> <i>micro-sited to avoid the orchid population ~~wherever possible~~</i>	The Applicant rejects this amendment.
	Agriculture and Soils	AS13 - <u>Impact on graziers: The Applicant will not restrict the ability of graziers and their animals to freely move about the RSPB North Warren Reserve without</u> <i>first notifying the RSPB and securing the RSPB's approval in writing. prior notification to RSPB</i>	The Applicant rejects this amendment as the current wording of AS13 has been agreed with RSPB.
	Noise and vibration	NV07 – <u>Impacts on noise sensitive receptors: Saxmundham Converter Station will include appropriate noise mitigation measures in the design</u> <i>to be approved by the relevant planning authority. Proposed substations Additionally, ~~where practicable~~, the substation and converter station will be designed so as to operate at designs will seek to achieve noise levels which measured at nearby noise sensitive receptors will be as low as reasonably practicable. possible.</i>	The Applicant has submitted alternative wording in Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 7.

19. Applicant’s Comments on the Submission from Environment Agency

19.1 Introduction

19.1.1 Table 19.1 summarises the Applicant’s comments on Environment Agency Deadline 6 Response [REP6-162].

Table 19.1 Applicant’s Comments on the Environment Agency Deadline 6 Submission [REP6-162]

Reference	Matter	Point Raised	Applicant’s Comments
Written post hearing submissions including written summaries of oral cases made at hearings the w/c 23 March 2026			
	Introduction	Thank you for inviting the Environment Agency to the Issue Specific Hearing 3 (ISH3) for Sea link. During this time, we received the following actions/ questions. Please see annex A-C for a detailed response. Please note our formal position outlined in Deadline 5 remains unchanged until a formal submission has been made by the applicant. In addition, we have remaining issues other than flood risk which need to be resolved 1. Submit any suggested drafting (whether relating to matters raised in ExQ3 or not) which you consider should be included in the draft Development Consent Order (dDCO), with reasons why you consider it is necessary (Annex1). 2. Provide a summary of the current position regarding outstanding issues raised at DL5, set out any live flood risk issues that the ExA needs to be aware of, and draft any additional commitments/requirements necessary tomitigate the effects of flood risk (Annex 2). In addition, during the inquiry questions was raised about the sequential test. We have provided additional information (annex 2b) to avoid any confusion as to the EAS role. 3. Suffolk County Council (SCC), EA and applicant to pull together a position statement regarding the need, or otherwise, to locate the temporary drainage pond out of fluvial flood zone 3 in Suffolk (annex 3). 4. Joint position statement with respect to all matters relating to the proposed development meeting the objectives of the WFD. In answering confirm position with respect to 5 outstanding matters identified at DL4 – EA040, EA041, EA043, EA045 and EA046 (annex 4).	Noted

Annex 1: Draft DCO requirements

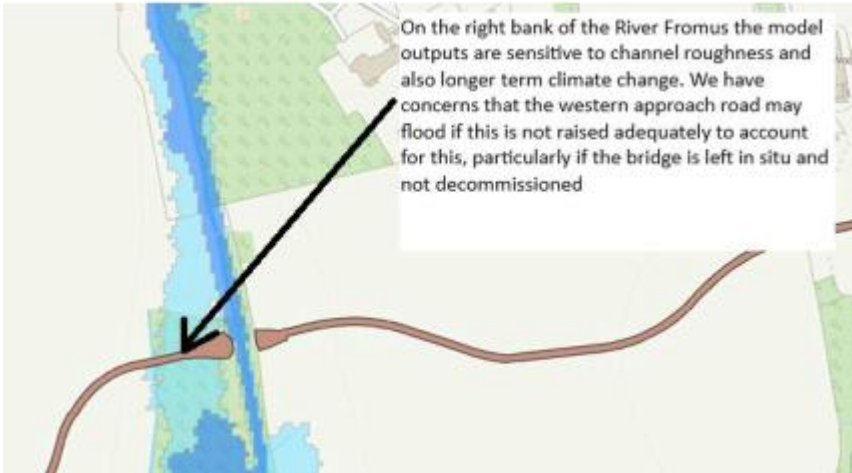
Reference	Matter	Point Raised	Applicant's Comments
		We have spoken to the applicant who have assured us that they will be addressing our previous comments in the next round of technical submission. If that is the case the need for additional requirements is limited. We would like to reserve the right to suggest further ones/ alter the current suggested ones after the next written submission by National Grid should some of our points not be addressed. At this time, we would like the addition of the following:	Noted
	River Stour Channel	This requirement is necessary as it manages the risks of erosion in the area and the secondary risk of harm to habitat and protected species. No installation of the cables in Pegwell Bay may commence until a monitoring and contingency plan has been submitted to and approved by the Marine Management Organisation in consultation with the relevant planning authority and the Environment Agency. <i>The monitoring and contingency plan will:</i> • <i>Set out monitoring proposals for the River Stour Channel within Pegwell Bay throughout the operational life of the cables. Monitoring will be undertaken annually for the first five years following installation of the cables, after which the frequency and scope of monitoring will be reviewed in consultation with the Environment Agency.</i> • <i>Set out actions that will be undertaken if monitoring demonstrates that the River Stour channel is migrating to within 50m of the installed cables. Cable lowering would be the primary mitigation method. No mitigation would be proposed involving the use of sheet piling or dredging.</i> • <i>Mitigation/ contingency measures will be agreed with and approved by the Environment Agency prior to the undertaking of any remedial works.</i>	The Applicant has proposed an update to this requirement text, and this was included in the dDCO submitted at deadline 6.
	Fromus	This requirement includes a provision that specifies that if the bridge height is less than 6m, NGET will develop a monitoring and contingency plan to assess the impact of the bridge on macroinvertebrates and should an adverse effect be present, release funds from a contingency fund to fund measures to encourage as passage of macroinvertebrates along the waterbody. Detrimental harm to these species may undermine the WFD status thus adequate protection measures need to be put in place. This agreement enables NGET to further consider a lower height bridge, as requested by ESC to minimise landscape and heritage impacts. <i>Bridge over the River Fromus</i>	The applicant notes that the proposed wording is the wording previously agreed between the EA and the Applicant.

Reference	Matter	Point Raised	Applicant's Comments
		(a) Development of the bridge crossing of the River Fromus (part of Work No. 3a) must not commence until details of the layout and scale of the bridge have been submitted to the relevant planning authority, and the relevant local planning authority has confirmed, following consultation with the Environment Agency, that the parameters set out in (4)(b) have been met. (b) The bridge over the River Fromus should be designed in accordance with the following parameters: (i) the bridge shall not have a soffit height lower than 10.49 m Above Ordnance Datum (approximately 4m above the Q95 flow level); (ii) abutments for the bridge shall be set back no less than 8m from the top of the bank; and (iii) the bridge shall not have a deck width greater than 6m. (c) Should the bridge design comprise a soffit height of less 12.49 m Above Ordnance Datum (approximately 6 m above the Q95 flow level), then development of the bridge must not commence until a macro invertebrate monitoring and contingency plan has been submitted to and approved by East Suffolk Council, following consultation with the Environment Agency. The invertebrate monitoring and contingency plan must include: (i) The requirement to carry out Water Framework Directive compliant surveys twice yearly (spring and autumn), upstream and downstream of the Fromus crossing for a period of five years following completion of the construction of the Fromus crossing. (ii) Principles of the contingency monetary fund set out in (f) and criteria for when provision of the fund would be triggered. (f) Following receipt and review of the monitoring results under (c), should the criteria in (c)(ii) be exceeded, then a contingency fund would be provided to fund measures to encourage the passage of macro invertebrates around the Fromus crossing and/or enhancement of Water Framework Directive invertebrate habitat upstream of the Fromus crossing. This would be secured via an appropriate legal agreement.	
Annex 2: Flood risk issues update			
		Since The EAs response on deadline 5 (dated 10th of March) we have several meetings with the applicant to agree a way forward. As requested during the inquiry this document provides an update on these conversations.	Noted
EA064	Temporary bridge over River Stour showing level in mAOD	Following our meeting on 19/03/26: The applicant will provide drawings.	The Applicant has provided drawings of both the permanent Fromus Bridge and the temporary Stour Bridge as Appendix E to Application Document 6.8 (B) Flood Risk Assessment [REP6-052].

Reference	Matter	Point Raised	Applicant's Comments
EA065	Sequential approach to FZ3b	This relates to a sequential approach, part b of the ET, and stipulations following passing of the Exception Test – <u>see Notes to Table 2 PPG Paragraph: 079</u> <i>Notes to Table 2:</i> <i>In Flood Zone 3b (functional floodplain) essential infrastructure that has passed the Exception Test, and water-compatible uses, should be designed and constructed to:</i> • <i>remain operational and safe for users in times of flood;</i> • <i>result in no net loss of floodplain storage;</i> • <i>not impede water flows and not increase flood risk elsewhere.</i> Following our meeting on 19/03/26: The applicant presented information relating to this but did not include anything within the post-meeting summary of actions. They are looking to split this assessment up into Suffolk and Kent. Suffolk – only matter of potential concern is the temporary attenuation pond (coords: 640430, 262030). The applicant has suggested that this is outside of Flood Zone 3b and that using professional judgement it will not inhibit flood flow routes. We would anticipate this information to be included within the FRA for our consideration. Kent- the applicant has suggested that raising of the ground is not proposed as part of the haul roads which we would seek to be secured through appropriate control documents. In relation to the temporary bridge within FZ3b we are waiting on an outline method statement, and outline design, which could be secured through appropriate control documents. We would seek for the summary presented in our meeting to be included within the FRA. <i>Note::</i> - <i>They need to demonstrate a sequential approach to avoiding FZ3b.</i> - <i>The development will be safe for its lifetime without increasing flood risk elsewhere.</i> - o <i>Floodplain storage</i> - o <i>Flood flow routes</i>	The Applicant has updated W06 in Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134] and split the measure between Suffolk and Kent.
EA066	Ex1.3.2 of the FRA [APP292] suggested local increases in flood risk which was of a concern and for which we were seeking clarity.	This relates to part b of the Exception Test. Following our meeting on 19/03/26: This is a miscommunication, and the applicant will update the FRA to better represent their intended meaning.	The last sentence of Ex1.3.2 in Application Document 6.8 (B) Flood Risk Assessment [REP6-052] has been updated to better convey the intended meaning.
EA068	Stockpile location (setback and flood zone) commitment W06.	Following our meeting on 19/03/26: • Update wording to W06 for storing stockpiles / materials in FZ3b. • Splitting out into Kent and Suffolk as more challenging for Kent due to large area of FZ3b. • Suffolk - Achievable to not store stockpiles / materials in FZ3b → will be stored in FZ1.	The Applicant has updated W06 in Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134] and split the measure between Suffolk and Kent.

Reference	Matter	Point Raised	Applicant's Comments
		• Kent - The applicant will suggest some wording on this matter for our consideration – we will await this and provide comment. Notes: • The applicant should prepare a Flood Emergency Plan for the temporary construction compound located within Flood Zone 3a. This plan should set out the procedures that will be followed to manage flood risk to site personnel, materials and equipment during the construction phase. • Where materials and equipment cannot be stored outside Flood Zone 3a, these should be capable of being removed from the floodplain prior to a flood event. The Flood Emergency Plan should therefore include a flood response procedure, identifying appropriate triggers (e.g., the receipt of a flood alert or flood warning) and the actions required to remove materials and equipment from the floodplain where practicable. • The plan should also demonstrate that safe access and egress arrangements for site personnel are available during a flood event, noting that it is for the LPA's Emergency Planning team to provide bespoke advice on this matter. • Temporary construction compounds should be designed and managed so that flood flows are not impeded. For example, where appropriate, compounds could be raised or supported on structures such as stilts to allow flood water to pass beneath them. Any such structures should be regularly inspected and maintained, including the removal of debris that could accumulate and obstruct flows. • These measures could be secured through the Construction Environmental Management Plan (CEMP).	
EA069	Commitment to reinstate land	Following our meeting on 19/03/26: W06 to be updated to include temporary works. We await updated wording and will then provide comment.	The Applicant has updated W06 in Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134] to include temporary works.
EA070	FSC and attenuation ponds	This relates to part b of the Exception Test. Following our meeting on 19/03/26: Applicant to update FRA with information requested. We will take a view on whether their proposal is compliant with policy and whether a commitment is needed.	In Application Document 6.8 (B) Flood Risk Assessment [REP6-052] the Applicant has added Table 4.3 and paragraphs 4.3.12 and 4.3.13 for Suffolk and Table 4.4 and paragraphs 4.3.26 for Kent to include the information requested
EA075	No loss of flood storage, or impedance of flood flow because of haul roads – relates to W06.	This relates to part b of the Exception Test. (Note that W06 is about removal post-construction) Following our meeting on 19/03/26: Applicant proposing to update W06 (or other commitment) in relation to loss of flood storage relating to haul roads – a commitment to not do so.	The Applicant has updated W06 in Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134] to include a commitment to no loss of flood storage as a result of haul roads.

Reference	Matter	Point Raised	Applicant's Comments
EA076	16m setback for tidal watercourses (wording within mitigation commitments GG14 and W02 reflects activities occurring 15m from watercourse.)	Applicant updated W02 (but not GG14). We requested other activities to also be included within the definition. In a response dated 10/03/2026 we requested a commitment concerning margins for compound areas, heavy machinery, etc. Waiting on a response to this request.	Measure W02 has been updated in Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134]
EA079	Commitment MPE06 on monitoring of foreshore / landfall and appropriate remediation	Following our meeting on 19/03/26: Update the FRA to include more evidence base for impacts of coastal erosion and flood risk over the Project lifetime, using information from the Marine Physical Processes ES assessment. Consideration of update to MPE06 with proportionate commitment to monitoring and remediation to prevent cable exposure.	In Application Document 6.8 (B) Flood Risk Assessment [REP6-052] the Applicant has made updates to section 4.3 (Operational Risk Assessments for Suffolk and Kent)
EA081	Fromus Bridge decommissioning	This relates to part b of the Exception Test. Following our meeting on 19/03/26: Update the FRA to include the additional information presented characterising flood risk to the western approach road to the Fromus bridge. Potential raising of road to ensure site remains operational. Assured that applicant will maintain maintenance of crossing. Applicant looking to retain crossing so further deliberation of appropriate design flood level related to proposed design life – suggested it could be in perpetuity. <i>This issue relates to the proposed crossing over the River Fromus in Suffolk (see map in figure 1 below). The concern relates to the western approach road. We want to confirm that this road would be raised noting that it is modelled at existing ground levels within the hydraulic model. The reason for this is that the model outputs show the design flood extent in this location is sensitive to mannings roughness values. The flood extent is also sensitive to the climate change applied. With increased roughness and/or upper climate change allowances (which may materialise if the bridge is left in place indefinitely) the western access route could be affected by flooding. This should be raised to ensure it doesn't flood.</i> <i>Figure 1: Location of the Fromus crossing and the potential flood risk to the western approach road</i>	In Application Document 6.8 (B) Flood Risk Assessment [REP6-052] the Applicant has made updates in relation to the Fromus Bridge approach road. These include including adding Plate 4.1 and paragraph 4.3.40.

Reference	Matter	Point Raised	Applicant's Comments
			
EA083	Bridge construction method statement and outline design	Following our meeting on 19/03/26: The Applicant has prepared the requested high level method statement to share with the EA. The Applicant wishes to emphasise that the bridge would be constructed offline and lifted into place, so there would be no construction work over the river channel. We will take a view based off this.	A Method Statement has been included as Appendix E to the updated Application Document 6.8 (B) Flood Risk Assessment [REP6-052]
EA088	Details omitted relating to HDD exit pits and use of rock bags/concrete mattresses.	Following our meeting on 19/03/26: Applicant clarified that the features discussed are outside of the 16m bylaw margin. Confirmation needed in DCO submission – if so issue is resolved. <i>Applicant highlighted the following:</i> Extract from document 9.13:Pegwell Bay Construction Method Technical Note [REP4-229] - After construction of the trenchless crossing (HDD), [temporary] rock bags/concrete mattresses may be placed over the HDD ducts to provide sufficient protection of the ducts until cable installation can commence. - [In the permanent case] post-installation protection such as rock bags/concrete mattresses maybe added to stabilize the HDD exits, replacing the existing temporary protection. This protection would be buried. The top of the duct would be approximately 1.1 m below the seabed and the top of the rock bags/mattresses laid on top approximately 0.5 m below the seabed. Distances from main river as per earlier responses on cofferdam: - At the Kent landfall, rock bags/concrete used at the HDD exit (in the temporary and permanent case) will not be located within 16m of the River Stour (tidal element) or the coastal flood defences. - HDD exits will be located within the temporary coffer dams at the landfall, which are located	This is addressed by measure W30 in section 1 of Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134] .
EA089	Omission of details regarding mitigation for storage of materials within the River Stour floodplain.	Following our meeting on 19/03/26: Applicant suggested some wording which we review on submission.	This is addressed by measure W35 in Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134]

Reference	Matter	Point Raised	Applicant's Comments
		The following wording is proposed: For events up to and including the 1% Annual Exceedance Probability flood events plus climate change, where pylons and a temporary drainage pond would be located within the fluvial floodplains of watercourses as part of the Kent Onshore Scheme, compensatory storage within the Order Limits will be provided for loss of floodplain storage, in accordance with a Floodplain Compensation Strategy to be agreed with the Environment Agency. Its yet to be determined if this is going to be a requirement or if this can be resolved via other mechanisms.	

EA091	P ositioning of temporary ponds	This relates to part b of the Exception Test. This issue relates to a temporary attenuation point in the floodplain in Suffolk (grid reference 640430, 262030 also see the map in figure 2 below). The applicant has confirmed that this would be in place for 2 years and that it is not possible to move it outside of the Flood Zones (noting since the inquiry this may have changed). The key things we were looking for from the applicant with respect to the temporary attenuation pond are as follows: 1. Clarity on the loss of storage and flood risk impacts from the attenuation pond. If the attenuation pond lies within Flood Zone 3b, the applicant should be mindful of the requirements of the Exception Test 2. Confirmation that the crest level of the attenuation pond would be above the 1 in 100-year flood level Figure 2: Location of the temporary attenuation pond which falls within Flood Zone 3. Pond is in Suffolk at grid reference 640430, 262030	TC-40-ATPN has been removed from the drainage plans in the updated to Application Document 9.17.1 Suffolk Drainage Strategy. A copy of this revised document was issued to the EA and will subsequently be submitted into examination at deadline 7.



Reference	Matter	Point Raised	Applicant's Comments
Annex 2b : Sequential Test		Further guidance on how to apply the sequential test to site specific applications can be found in the planning practice guidance here. • Is about site selection not design. • It requires consideration of reasonably available alternatives. • The aim is to avoid flood risk where possible, rather than manage it. We can advise on the relative flood risk between the proposed site and any alternative sites identified. It is not appropriate for the EA to advise on whether alternative sites are reasonably available or whether they would be suitable for the proposed development. We also won't advise on whether there are sustainable development objectives that mean steering the development to any alternative sites would be inappropriate. It is not the EAs remit to determine whether the sequential test has been passed this is for the decision maker. The Exception Test is in two parts described in the National Policy Statement for Energy NP1 and the National Planning Policy Framework. For the Exception Test to be past it to be passed it must be demonstrated that a) The development would provide wider sustainable benefits to the community that outweigh flood risk and b) The development will be safe for its lifetime taking account of the vulnerability of its users without increasing flood risk elsewhere and where possible will reduce flood risk overall The Environment Agency provide advice on the second part of the test (part b) but it's for the decision maker to consider the first part of the test and determine whether the test overall has been satisfied.	
Annex 3: Suffolk County Council (SCC), EA and applicant to pull together a position statement regarding the need, or otherwise, to locate the temporary drainage pond out of fluvial flood zone 3 in Suffolk.		Please note since these conversations have occurred the position on the drainage pond in temporary fluvial flood zone 3 has been superseded. National Grid have now, recently proposed a linear drainage feature. Conversations have occurred and we are awaiting additional information. Once received we are intending to meet to provide a joint position on the need to locate the temp drainage pond our of fluvial flood zone 3 and the linier structure.	Noted.
Annex 4: Joint position statement with respect to all matters relating to the proposed development meeting the objectives of the WFD. In answering confirm position with respect to 5 outstanding matters identified at DL4 – EA040, EA041, EA043, EA045 and EA046.			

Reference	Matter	Point Raised	Applicant's Comments
		In order to reach a comment ground, we need to review the updated documents relating to these matters. These have yet to be received – Please see our comments raised in our deadline 5.	Noted

20. Applicant’s Comments on the Submission from Friston Parish Council and Substation Action Save East Suffolk (SASES)

20.1 Introduction

- 20.1.1
- Table 20.1 summarises the Applicant’s comments on Friston Parish Council & Substation Action Save East Suffolk (SASES) Deadline 6 Response [REP6-163 & REP6-180].
- 20.1.2
- Table 20.2 summarises the Applicant’s comments on Friston Parish Council & Substation Action Save East Suffolk (SASES) Deadline 6 Response [REP6-164 & REP6-179].
- 20.1.3
- Table 20.3 summarises the Applicant’s comments on Friston Parish Council & Substation Action Save East Suffolk (SASES) Deadline 6 Response [REP6-165 & REP6-178].
- 20.1.4
- The Applicanthas responded to Friston Parish Council & Substation Action Save East Suffolk (SASES) Deadline 6 Response [REP6-262 & REP6-273] in **Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions.**

Table 20.1 Applicant’s Comments on the Friston Parish Council & Substation Action Save East Suffolk (SASES) Deadline 6 Submission [REP6-163 & REP6-180]

Reference	Matter	Point Raised	Applicant’s Comments
ISH3 - WRITTEN POST HEARING SUBMISSION			
		Findings of the Examining Authorities for the EA2, EA1N and National Grid Connection Hub <i>“28.4.4 The local harm that the ExA has identified is substantial and should not be underestimated in effect. Its mitigation has in certain key respects been found to be only just sufficient on balance.” (emphasis added)</i> <i>“28.4.5 the ExA observes that the effects of the cumulative delivery of the proposed development with other East Anglia development on the transmission connection site near Friston are so substantially adverse that utmost care will be required in the consideration of any amendments or additions to those elements of the proposed development in this location” (emphasis added)”</i> FPC having reviewed its comments at ISH3 has addressed its most material issues in its other Deadline 6 submissions. Accordingly for efficiency and due to resource constraints it is not proposing to make a separate ISH3 submission.	This is noted.

Table 20.2 Applicant’s Comments on the Friston Parish Council & Substation Action Save East Suffolk (SASES) Deadline 6 Submission [REP6-164 & REP6-179]

Reference	Matter	Point Raised	Applicant’s Comments
RESPONSES TO ISH3 ACTION POINTS			
AP1	Submit any suggested drafting (whether relating to matters raised in ExQ3 or not) which you consider should be included in the	1. See responses to ExQ3. 2. At OFH3 FPC made a number of suggestions (with reasons) in terms of reinstating and reinforcing the requirements in the EA2 and EA1N DCOs in relation to the GIS National Grid substation in the draft Sealink DCO as follows.	The Applicant has agreed to secure the footprint of the substation. Under Article 5(4) of the draft DCO, the 16,800m² area limit to the operational fenced compound is secured (reflecting the same footprint secured in Requirement 12 of the SPR DCOs).

Reference	Matter	Point Raised	Applicant's Comments
	draft Development Consent Order (dDCO), with reasons why you consider it is necessary.	“First, the maximum footprint of the GIS substation should be limited as it is on the face of the EA2 DCO. Second, there should be a definition of a GIS substation i.e. the use of gas insulated switchgear – incidentally the continued use of SF6 should be addressed namely it should be avoided wherever possible and the fact that an alternative to SF6 might be more expensive is not a legitimate reason for National Grid not to use it. Third, the newly introduced exclusion of roof mounted equipment in the height requirement should be removed. Fourth the requirement to protect against uncontrolled permitted development, requirement 44 in the Scottish Power DCO, should be reinstated. In that context it was telling that National Grid produced no visualisation of the expansion of the National Grid substation for the Lionlink project. No doubt because they felt that they were free to expand the National Grid substation without reference to any planning authority.” The fourth item has already been addressed in FPC's responses to ExQ3. In relation to the first two items a new requirement should be included as follows. Please note this wording is derived from the EA2 DCO. [X] Additional requirements in respect of work number 1B (1) The fenced compound area (excluding its accesses) for the national grid substation forming part of Work No.1B must not exceed 16,800 m2. (2) External electrical equipment comprised within Work No.1B must not exceed a height of 16 metres above finished ground level. (3) The width of the new permanent access road comprised within Work No. 1B must not exceed 7 metres. (4) The national grid substation forming part of Work No.1B shall only use gas insulated switchgear (GIS) and no air insulated switchgear (AIS) shall be used. (5) SF6 gas or other greenhouse gases shall not be used in the national grid substation forming part of Work No.1B where there is an alternative gas even when the alternative gas results in increased costs. In relation to the third item the text in the table of parameters in clause 5 (as set out below) should be amended by deleting the the words “(not including roof mounted equipment)”. There was no such exclusion in the EA2 or EA1N DCOs. 16m above finished ground level of 18.5m AOD (not including roof mounted equipment) Further National Grid should explain how a finished ground level of 18.5 m AOD has been determined.	The Applicant has propped wording within the DCO to restrict the footprint of the GIS substation to match that of the made EA2 DCO The Applicant has been clear throughout the submission and the examination that it is using Gas Insulated Switchgear (GIS) at the Friston Substation and this will be SF6 free therefore there is no requirement to secure this within the DCO The Applicant is restricted by its licence conditions from OFGEM on the use of SF6 gas therefore it does not require a condition in the DCO to restrict this. The Land to be Owned by the Applicant which on the making of the DCO will become operation land will be the land that is required for the construction of the Friston Substaiton only, along with associated OHL works, access and Mitigation, therefore it would not be able to extend the subsation under Permitted developemtn therefore there is no requirement to match Requirement 44 of the SPR DCO. The Applicant does not consider it necessary to restrict the height of roof-mounted equipment. Article 5 of the draft DCO already limits the Friston (Kiln Lane) substation to a height of 16m above finished ground level. The Finished Ground Level is that as included in the SPR EA2 DCO In relation to the requested change to wording the Table of Parameters relating to Works No. 9B and 11, the Applicant does not consider it appropriate for the 28m height limit to apply to roof mounted equipment.
		3. In terms of preserving the all the design, and not just part, of the National Grid substation which has already been approved under the discharge of requirements process for EA2 additional wording is required at the end of paragraph 3(2)(a) <i>“and generally in accordance with all conditions, requirements et cetera set out in such documents and the EA2 DCO insofar as they relate to Work No.1B.”</i>	The Applicant is committed to align the Proposed Project to the SPR consents given the overlap at the Friston (Kiln Lane) substation. Nevertheless, it does not agree that the additional wording requested is necessary, since the existing plans and requirements of the SPR consents will continue to have effect. It is not possible for those controls to be circumvented by virtue of this Proposed Project.

Reference	Matter	Point Raised	Applicant's Comments
		4. Whilst there has been some restoration of the working hours requirements currently in place at the substations site at Friston under the EA2 DCO, the amendments made to the draft Sealink DCO still fall short of full restoration because there are other works in addition to Work Nos 1A and 1B which take place on the substations site at Friston. In order to ensure a full restoration across the substations site the wording highlighted in blue below should be added to paragraph 7 (7) in Schedule 3. (7) In respect of Work No.1A and Work No. 1B, and in respect of any other Work Nos where there will be construction activity on the substations site at Friston (as delineated by the order limits for EA2) construction work may only take place between 0700 hours and 1900 hours Monday to Friday and 0700 hours and 1300 hours on Saturdays, with no activity on Sundays or bank holidays, except as specified in sub-paragraph (8).	This is not agreed. This point appears to reference ‘other works’ that form part of EA2. It is not appropriate to use this DCO to control works that properly fall under the SPR consents.
		5. At ISH3 in relation to mental health and well-being there was a debate about monitoring the health and well-being of residents. National Grid considered this would not be possible due to being unable to screen out the impacts of Sizewell C on mental health and well-being. However that is to miss the point. For the residents of Friston (and probably those of Saxmundham but it is not for FPC to comment on that subject) the past, current and future damage to their mental health and well-being is almost entirely the result of being forced to live next to a major piece of energy infrastructure (which is a strategic connection point for a multitude of energy projects) and the destruction of Friston’s tranquillity, which is never to return. This damage to Friston residents dwarfs any damage arising from Sizewell C. Therefore it is suggested that there is a monitoring requirement, but this is limited to those who live within a specified radius of the substations site, such radius to be of such a size to include at the very least the entirety of the village of Friston and neighbouring residential properties. Accordingly there should be an additional requirement as follows. [X] Monitoring of mental health and well-being Every six months, starting with the date this DCO is made, the undertaker shall engage and fund an independent expert mental health organisation (“MHO”) to conduct a survey of residents living within [x] kilometres of Work No. 1B to assess their mental health and well-being and the extent to which it is being impacted by the construction and operation of Work No.1B (as defined in this DCO) and Work No. 41 (as defined in the EA2 and EA1N DCOs) and developments which connect to Work No.1B (as defined in this DCO) and Work No. 41 (as defined in the EA2 and EA1N DCOs). The content of the survey shall be independently determined by the MHO after consultation with the undertaker, Suffolk County Council, East Suffolk Council and Friston Parish Council. The results of such survey shall be published by the MHO without prior reference to the undertaker. Following such survey the undertaker will take such steps as the MHO recommends to mitigate the damage being caused to the mental health and well-being of the residents surveyed.	The Applicant disagrees with the necessity for such a requirement and its position remains that as explained at Issue Specific Hearing 3. Despite the assertions made by FPC, it remains the case that a complete assessment of potential effects on mental health and wellbeing has been undertaken in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058]. The assessment concludes that no significant adverse effects on mental health are anticipated, either from the Proposed Project itself or cumulatively with other projects.
		6. In relation to noise and NV12 and NV07 of the REAC it is unclear how these relate to each other and how NV12 replicates the requirements in requirement 27 of the EA2 DCO. FPC does not have the expertise to assess	The Applicant does not consider such an additional requirement to be necessary. The Applicant acknowledges the overlaps and common issues with the SPR projects, and has sought to align its approach accordingly

Reference	Matter	Point Raised	Applicant's Comments
		this issue. It would however point out that noise was one of the most contentious issues in the EA2 and EA1N examinations with a number of issue specific hearings on this subject which resulted in the detailed wording of requirement 27. The requirements in relation to noise under the draft Sealink DCO in relation to the National Grid substation must provide the same level of protection as the existing requirement 27 and must not undermine that protection. The following additional requirement should be included in the draft Sealink DCO. [X] Operational Noise at the Substations Site If the obligations and requirements of this DCO in relation to operational noise at the substations site at Friston result in a breach of requirement 27 in the EA2 and EA1N DCOs, then the design and operation of Work number 1B shall be modified so that full compliance with requirement 27 is achieved.	where possible. Nevertheless, it does not follow from any consent for the Proposed Project that requirement 27 of the EA2 DCO would fail to bite. As such, this existing commitment within the EA2 DCO is sufficient in securing the relevant limits on operational noise without further replication by the Proposed Project.
		7. More generally as the ExA is aware FPC is concerned to maintain the existing requirements and mitigation which it already has under the EA2 and EA1N DCOs in respect of the substations site at Friston. However as repeatedly indicated, it is an impractical and unnecessary task for a Parish Council, with very limited resources and expertise, to propose amendments to the draft Sealink DCO so that such existing requirements and mitigation are preserved, in circumstances where National Grid chose to ignore the existing EA2 and EA1N DCOs in respect of the substation site at Friston, despite FPC raising this issue with National Grid during the consultation process and also with the Planning Inspectorate in 2023. This is completely the wrong approach. National Grid should be expected to comply with existing requirements and mitigation, as currently worded in the EA2 and EA1N DCOs. If changes to that wording is required National Grid should be expected to set out in detail what the changes are and why they are necessary. 8. Fundamentally the burden should not be on a poorly resourced Parish Council to preserve existing requirements, controls and mitigation, and thereby distracting it from other issues. The obligation should be on National Grid to maintain the existing requirements and mitigation and draft a form of DCO, so that it is clear on the face of the draft DCO that such existing requirements and mitigation have been preserved.	The Applicant confirms it has no intention to (nor would it be able to) depart from the requirements as consented under the SPR consents.
AP8	Provide details on how larger vehicles would manage to turn safely at the junction of the A1094 onto B1121 south of Friston. This should include diagrams to show swept paths of larger vehicles including HGVs.	FPC is concerned as to what these “larger vehicles” would be if not HGVs. The B1121 is meant to have only very limited use for the pylon upgrade works and for no other purpose. Turning left off the A1094 eastbound is very difficult and unsafe because of the geometry. Further turning right westbound across the eastbound carriageway is not without problems, given the blind bend and rise on the eastbound carriageway, the 60mph speed limit and speeding drivers/motorcyclists. Some Friston residents have had “near misses” there.	Refer to Applicant's response to AP8 in Application Document 9.135 Applicant's Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110], where it is explained in particular that both (i) left turns off the A1094 onto the B1121 and (ii) right turns off the B1121 onto the A1094 will be banned. The Applicant is aware of the minimum visibility at the B1121/A1094 junction and is aware that a speed reduction project is planned to be implemented by SCC prior to the commencement of works for this project. Currently the visibility at the junction is approximately 120m, limited by horizontal and vertical geometry to the west of the junction along the A1094. This will meet the desired minimum for the proposed 40mph restriction proposed by SCC.

Reference	Matter	Point Raised	Applicant's Comments
			The applicant recognises that speed restrictions may not in themselves reduce the actual speeds at the junction and therefore, all drivers using this junction will be briefed on the hazards of this route prior to use.
AP11	The ExA requires the applicant to work with the County Councils (as Highway Authorities) to consider how any caps to HGV movements could be secured with wording also submitted, should the Secretary of State deem that capping is necessary. Please confirm whether this should be a requirement or part of a control document for securing the caps. This should also include which road links and junctions capping should be set and how the numbers of HGVs would be derived at to set the cap.	At the very least and as indicated above there should be a cap on the B1121 through Friston and Sternfield not just in terms of numbers but also duration.	Refer to Applicant's response to AP11 in Application Document 9.135 Applicant's Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110]. Whilst the Applicant has been able to produce construction vehicle forecasts based on anticipated construction programme, it is not possible for the Applicant to commit to caps on duration as this would remove flexibility for construction period that may later become necessary. As explained in Application Document 7.5.1.1 (E) Construction Traffic Management and Travel Plan Suffolk [REP6-062], the Applicant has however included a commitment such that the section of the B1121 in question will be limited to access to existing overhead line towers and pylon works. This route will otherwise not be used by HGVs associated with the Proposed Project.
AP14	Applicant and SCC to consider whether there should be a restriction on any HGV movements (other than in relation to the bridge works) if and when Benhall Railway Bridge is closed to public traffic. If so, explain how this should be secured and provide wording.	FPC would not want the B1121 to be used by any HGV traffic or other construction traffic diverted because of the closure of the Benhall Bridge. Construction traffic should be limited for the pylon upgrade works alone.	Refer to Applicant's response to AP14 in Application Document 9.135 Applicant's Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110] . The Applicant has committed to a restriction preventing all HGV construction traffic associated with the Proposed Project from using diversion routes through Saxmundham during any road closures of the B1121, which is reflected in Application Document 7.5.1.1 (E) Construction Traffic Management and Travel Plan Suffolk [REP6-062] .
AP18	If there are traffic delays due to proposed development construction traffic, either alone or in combination with other developments, <u>is it likely that alternative routes would be taken by the public in their vehicles, potentially having an impact on more minor highways?</u> If so, has this been assessed and is there actions needed to avoid this? (emphasis added)	Not only is it likely, but it is already the case that the B1121 through Friston and Sternfield is being used as an alternative route which is having a severe impact. Although categorised as a B road the B1121 is narrow and the verges are already being seriously eroded with damage to culverts etc as vehicles try to pass each other. In parts a 60mph limit is applied but this is far too fast and dangerous given the narrowness and bends. Friston residents have witnessed a significant increase in traffic some of which is going far too fast and having difficulty staying on the correct side of the road particularly on bends. Pedestrians/runners use this road despite there being no pavements, as do cyclists and horse riders.	Refer to Applicant's response to AP18 in Application Document 9.135 Applicant's Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110] . Based on its assessment within the Environmental Statement and the most updated modelling outputs submitted at Deadline 6 [REP6-039] , the Applicant has concluded that any localised levels of congestion or delays are mainly attributed to baseline traffic and/or additional traffic associated with cumulative schemes, rather than construction traffic associated with the Proposed Project.

Reference	Matter	Point Raised	Applicant's Comments
AP61	Check and confirm in writing whether discharge of backup generators within the SPR consents relates to the National Grid substation or the SPR substations. If the latter, provide an assessment of the implications for cumulative noise and air quality from generators.	At ISH3 FPC raised the issue of the presence of generators in the EA2 and EA1N substations when National Grid stated that the substations did not contain generators. FPC subsequently checked this issue with Scottish Power who stated there were back up generators in their substations. Please see the exchange of emails with Scottish Power at Appendix 1. Further in Chapter 6 – Project Description in paragraph 428 on page 91 there is a description of the Scottish Power substations which includes “backup generators”. A screenshot of page 91 is attached at Appendix 2.	The Applicant stated that back-up generators were not included in the SPR East Anglia One North and East Anglia Two applications. However, SPR has indicated that there is an intention to use back-up generators within their EA2 Substation and likely within the EA1N substation, although the exact design of this has yet to be completed. As such, cumulative air quality effects in relation to the SPR East Anglia One North and East Anglia Two sites have been assessed on the basis that back-up generators would be provided. This assessment is presented in Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendix B [REP6-102]. The assessment concludes that cumulative air quality effects arising from operational generator emissions would not be significant. While there is AIS equipment within the substation, this equipment is effectively silent and does not contribute materially to operational noise. The noise assessment is driven by transformer noise, which has already been assessed as part of the SPR operational noise discharge process.

Table 20.3 Applicant’s Comments on the Friston Parish Council & Substation Action Save East Suffolk (SASES) Deadline 6 Submission [REP6-165 & REP6-178]

Reference	Matter	Point Raised	Applicant's Comments
OFH3 SUBMISSION			
	SUBMISSION	5. FPC’s comments are primarily directed to change 2 in the change request relating to the location and limits of deviation of the National Grid connection hub, and the context in which that change is being sought. Whilst we have concerns with change 3, given FPC’s resources FPC has left that to the local authorities and has chosen to focus on change 2. 6. Because National Grid is refusing to honour the existing requirements for the substations site in the draft Sealink DCO this has created an environment of zero trust. Therefore whatever National Grid may say in relation to change 2 is not meaningful. FPC’s concern is making sure that requirements and mitigation are clearly secured on the face of the DCO and that the Friston community has the benefit of the mitigation and requirements which it already has under the Scottish Power DCOs. 7. FPC would not want there to be any assumption that its community is happy with the terms of the Scottish Power DCOs. It is not. However they have been granted and therefore we have to live with them. 8. In contrast National Grid seems to think that it can effectively relitigate the requirements and mitigation at the substations site. Generally legal processes do not permit the relitigation of issues which have already been determined. 9. Quite frankly the situation is ridiculous and represents a huge failure by the Planning Inspectorate to ensure the efficient running of the planning process. As you may recall FPC wrote to the Planning Inspectorate in 2023 because FPC was concerned that National Grid was seeking to reopen the Scottish Power DCOs. Consistent with the general approach to community consultation FPC’s concerns were ignored. This has led to a huge amount of	The Applicant notes these concerns. The Applicant has explained previously the purpose of Requirement 15 within Schedule 3, which is to prevent an unacceptable risk to the delivery of the Proposed Project in circumstances where SPR commence works on site but the construction of the Friston (Kiln Lane) Substation is not completed for any reason. Requirement 15 as currently worded is needed to enable the Applicant to construct this essential part of the Proposed Project.

Reference	Matter	Point Raised	Applicant's Comments
		unnecessary work and stress. FPC would remind everybody in this room that they are all paid to do this work and to be here today. We are not. We have to give up our free time and use such expertise as we have to support the Friston community without any form of compensation. 10. The need for the additional consent for the National Grid substation in the draft DCO was on the original premise that there was a risk that the Scottish Power projects would not go ahead. That risk no longer exists as there is no doubt that EA2 is going ahead and National Grid has the rights it needs in the EA2 DCO which are in the course of being transferred to it. 11. FPC's concern is that National Grid's true objective is, and has always been, to ensure that the National Grid substation and the substations site falls under the Sealink DCO regardless, and in doing so to water down the requirements and mitigation provided by the EA2 and EA1N DCOs This was never really about addressing the risk that neither of the Scottish Power projects would go ahead. 12. This objective is clear from the wording of Paragraph 15 of Schedule 3 of the draft DCO. Where any part of Work No.1B has been completed pursuant to another development consent order, those works must not be constructed under this Order, save where amendments to those works are required for the purposes of the Authorised Project 13. The effect of this paragraph is that National Grid can start works under the EA2 DCO and then unilaterally decide to "complete" them under the Sealink DCO, thereby ensuring that the substations site will be governed by the Sealink DCO with its reduced mitigation and requirements. Why should National Grid escape its existing obligations simply by saying it completed the substation under the Sealink DCO? Is this reasonable? 14. The terms of the Scottish Power DCOs were not arrived at without due consideration – a ninemonth examination and 17 issue specific hearings. Is it really open for National Grid to ignore the result of that examination particularly when it was involved with it? 15. Of course none of this would have been an issue had National Grid respected the terms of the existing consents and replicated them in the draft DCO thereby saving a great deal of time, trouble and money.	
	Change 2 of the change request	16. Ironically the need for Change 2 has arisen because National Grid has not respected the existing consent. In essence it wants to make sure that the limits of deviation for the National Grid substation are the same as they are in the Scottish Power consents. 17. Even more ironically part of the justification for the change is how in effect the different DCOs are making it challenging for National Grid to develop consistent plans. Well there is an easy solution to that. Adopt the same DCO terms as already exist in the Scottish Power DCOs in the Sealink DCO. 18. FPC's concern is that the development of the substation both now and in the future will not be sufficiently controlled in the manner which it currently is under the EA2 DCO. In other words could National Grid expand a GIS substation 16m high to cover the footprint of an AIS substation which is 6m high? The footprint which is secured in the Scottish power DCOs is 16,800 m² for a GIS substation and 44,950 m² for an AIS substation. 19. FPC reminds the examining authority that despite FPC's invitation National Grid refused to engage with it on this issue.	The response to FPC's previous representation raising substantially the same issues [REP4-200] can be found at the Applicant's comments under section 1GEN11 of Application Document 9.119 Applicant's Comments on Late Responses to ExA First Written Questions [REP5-131]. It is wrong for FPC to suggest that the "<i>easy solution</i>" is for the Proposed Project to replicate the same terms as those in the SPR consents. They are separate projects with very different needs cases, infrastructure and programmes. The projects are also subject to different national policy statements. Friston (Kiln Lane) Substation, where the three projects overlap, is a very small element of all three projects and even at Friston the works for the three projects are different. Similarly, the mitigation works are not identical and do not need to be given they are mitigating the effect of different works.

Reference	Matter	Point Raised	Applicant's Comments
		20. National Grid did comment at deadline 4 on these concerns and whilst there is a lot of warm words those words do not provide any comfort, as FPC's issues are not addressed or secured on the face of the DCO as they are in the Scottish Power DCOs. 21. In essence National Grid wants to have its cake and eat it. It wants the flexibility of the EA2 DCO but not the requirements that come with it. 22. FPC's concerns can be easily addressed. First, the maximum footprint of the GIS substation should be limited as it is on the face of the EA2 DCO. Second, there should be a definition of a GIS substation i.e. the use of gas insulated switchgear – incidentally the continued use of SF6 should be addressed namely it should be avoided wherever possible and the fact that an alternative to SF6 might be more expensive is not a legitimate reason for National Grid not to use it. Third, the newly introduced exclusion of roof mounted equipment in the height requirement should be removed. Fourth the requirement to protect against uncontrolled permitted development, requirement 44 in the Scottish Power DCOs, should be reinstated. In that context it was telling that National Grid produced no visualisation of the expansion of the National Grid substation for the Lionlink project. No doubt because they felt that they were free to expand the National Grid substation without reference to any planning authority. 23. Fundamentally though National Grid does not need Change 2. What is required is either for National Grid finally to accept the reality that EA2 is going ahead or do what they should have done at the outset which is to have a separate part of the draft DCO for the National Grid substation on the substations site which replicates the existing DCOs. So, regardless of which DCO the National Grid substation is built under, the mitigation would be the same. 24. Otherwise the Friston community will have significantly reduced mitigation across the substations site simply by National Grid unilaterally deciding that it completed its substation under the Sealink DCO. Examples of that reduced mitigation include (without limitation): • there will no longer be a 10 year landscape/replacement period as secured on the face of the EA2 DCO - still only 5 years is being offered • seven day a week working hours on the substations site with the exception of the substation itself • the exclusion of undefined roof mounted equipment above the height of 16m. In the EA2 DCO external electrical equipment is also limited to 16m above finished ground level • the footprint of the GIS substation will no longer be secured • the design of the GIS substation versus an AIS substation will not be secured • there will no longer be protection against uncontrolled permitted development • there will no longer be approval of lighting design either during construction or operation 25. FPC made a complex submission at Deadline 4 REP4-200 on how National Grid has failed to replicate the mitigation and requirements in the Scottish Power DCOs in the draft Sealink DCO. The relevant part of the submission is set out in paragraphs 15-25 and Appendix 1.	The Applicant notes Article 5 of the draft DCO secures the maximum footprint to 16,800m² matching that secured in Requirement 12 of the SPR DCOs. The Applicant has selected equipment at Friston which is SF₆ free GIS Switchgear.

Reference	Matter	Point Raised	Applicant's Comments
		26. The Friston community feels that it has already been “thrown under the bus” in the national interest, but what National Grid is doing is turning the bus around and running over Friston all over again. 27. In this context FPC does wonder how National Grid instructed its lawyers to draft the development consent order. • Did it tell them that was no existing consent at the substations site? • Were its lawyers unaware there was an existing consent for the substations site? • Did National Grid tell its lawyers to ignore the existing consent? 28. FPC does not think any scenario paints National Grid or its lawyers in a very attractive light. 29. The senior management in National Grid need to reflect upon the way the company is conducting itself. It is not ethical or corporately responsible to ignore requirements and mitigation which already exist because it is not convenient, particularly when a community, which is already paying a very high price, is being deprived of the protection and mitigation which has already been determined. It smacks of an ethical approach which is anything goes as long as you can get away with it. Is that appropriate behaviour for a major public company which is responsible for a key piece of national infrastructure?	

21. Applicant’s Comments on the Submission from Historic England

21.1 Introduction

- 21.1.1
- Table 21.1 summarises the Applicant’s comments on Historic England Deadline 6 Response [REP6-166] Action Points arising from Issue Specific Hearing 3 (ISH3) on environmental issues, held on Wednesday 25 March to Friday 27 March 2026.
- 21.1.2
- The Applicant’s has responded to Historic England Deadline 6 Response [REP6-263] in **Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions**.

Table 21.1 Applicant’s Comments on the Historic England Deadline 6 Submission [REP6-166]

Reference	Matter	Point Raised	Applicant’s Comments
<i>Action Points arising from Issue Specific Hearing 3 (ISH3) on environmental issues, held on Wednesday 25 March to Friday 27 March 2026.</i>			
1	For All parties. Action: Submit any suggested drafting (whether relating to matters raised in ExQ3 or not) which you consider should be included in the draft Development Consent Order (dDCO), with reasons why you consider it is necessary.	Historic England does not have any additional comments or suggestions in regard to the wording of draft DCO.	Comment noted.
37	For Historic England. Action: Considering the latest information submitted by the applicant in relation to listed buildings, conservation areas and scheduled ancient monuments, is Historic England content with the level of detail and assessment submitted for this examination?	Historic England can confirm that the information on historic environment submitted by the applicant and the level of assessment presented as part of this application is proportionate and sufficient for the purposes of this examination.	
39	For Historic England: Action: Does there need to be any changes to the draft DCO or the support documents submitted by the applicant in relation to cultural heritage? If so, please set this out with alternative or additional wording.	Historic England is satisfied with the current wording of draft DCO. We consider that the wording in the document [REP5-005] is appropriate in the context of Cultural Heritage.	
40	For Historic England: Action: Is Historic England satisfied with the current level of information and the approach the applicant has set out in regards to the D-shaped enclosure in Suffolk?	The information related to enclosure identified in Suffolk (Fields F25.1 and F25.2) has been presented by the applicant in the following documents: - Suffolk Section Phase 2B Archaeological Evaluation Report [AS-136] - Change Request Appendix B Geophysical Survey Report [CR1-057]	

Reference	Matter	Point Raised	Applicant's Comments
		- Suffolk Phase 3 Archaeological Evaluation Final Report [REP5-140] Historic England is satisfied with the level of information and assessment provided by the applicant in respect to this non-designated archaeological site. We consider that the enclosure is likely of regional importance, as assessed in an Addendum to Volume 6 Environmental Statement [CR1-055]. Addendum to Volume 6 Environmental Statement [CR1-055] outlines that two options for mitigation of the enclosure area which are being considered: re-routing of the cable and haul road corridor to the east to avoid impact on the enclosure; and archaeological excavation of the entirety of the enclosure to allow for the original route of the cable and haul road. The applicant confirmed during the ISH3 that the currently preferred mitigation measure is avoidance of the enclosure and re-routing of the works corridor to the east (Transcript of Issue Specific Hearing 3 (ISH3) - Day 2 - Part 2 – 26 March 2026), as no significant archaeological remains have been identified in that area during most recent phase of trial trench evaluation [REP5-140]. We understand that both options for proposed mitigation measures have been agreed with Suffolk County Council Archaeological Services. They are the appropriate authority for the provision of advice on the mitigation measures for non-designated heritage assets. We support outlined approach to mitigation and have no further comments to make.	
41	For Historic England: Action: With regards to Richborough Saxon Shore Fort, Roman Port, and Associated Remains in Kent, based on the applicant's submitted details and information, how would Historic England consider the potential impact to the setting and significance of these heritage assets?	Historic England continues to maintain that the proposed development would result in a higher level of harm to Richborough Roman Fort than has been assessed by the 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 maintenance) to be 'Negligible' with a resultant 'Minor Adverse' significance of effect ([APP-063] Table 3.14, pg. 65). On the assumption that appropriate design mitigation will be implemented, utilising the least intrusive of the design principles put forward (as described in Design Approach Document – Kent [APP-365] and Design Principles – Kent [APP-367]), Historic England assess the magnitude of harm to be 'Small' (as per [APP-63] 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'. Despite our disagreement regarding the specific magnitude of harm, the resultant significance of the effect does therefore broadly align with the applicant's assessment. It should be noted that this is subject to ensuring that the detailed design of the converter station meets the aims set out within the	It is considered that the disagreement between the Applicant and HE in relation to the specific magnitude of impact on the setting of Richborough Fort is a matter of professional opinion and, in this instance, non-material given both parties have agreed that the resultant significance of effect would be minor and therefore 'not significant' in the SoCG (Application Document 7.4.3 Statement of Common Ground Historic England).

Reference	Matter	Point Raised	Applicant's Comments
		design parameters as currently set out. However, 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' in EIA terms.	
42	For Historic England: Action: With regards to the Ebbsfleet Peninsula Multi-Period Complex, based on the applicant's submitted details and information, how would Historic England consider the potential impact to the setting and significance of this heritage asset?	HE considers that the development is 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. The potential for harm is recognised in the ES. We acknowledge 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 believe 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. We, 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, we agree that the risk of harm to significant remains associated with this complex is reduced. Therefore, because steps are being taken to retain rather than remove archaeological remains, we agree that the residual effect for construction may be considered 'Minor Adverse' and 'Not Significant'. Regarding the setting of the Ebbsfleet complex, we agree with the Kent County Council archaeological advisor's assessment that the proposed development will permanently change the setting of the heritage asset causing a degree of harm. The level of impact would be 'small' using the criteria set out in the ES and the resulting effect would be 'Moderate Adverse' in EIA terms.	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. The Applicant has consulted further with HE and KCC to discuss feasible design mitigation options and has worked with its contractors to look to reduce the footprint of compounds where practicable during the detailed design process. Ongoing development of the design, as well as consultation with KCC, has also aimed to avoid areas considered to be of greatest sensitivity. This includes areas of Bronze Age barrows and associated enclosures, as well as the large Iron Age enclosure, where a 'preservation in situ' strategy is being developed as part of the ongoing mitigation plan so that all physical impacts on them will be avoided. This was detailed in the updated Kent OWSI submitted at Deadline 5 [REP5-072] as well as an updated OWSI submitted at Deadline 7 Application Document 7.5.4.2 Kent Overarching Written Scheme of Investigation). As a result, the residual effects on the Ebbsfleet Peninsula Complex would be not-significant. HE have agreed this point in Responses to ExQ3 (if required) [REP6-263], where they have stated "<i>Therefore, in this case, because steps are being taken to retain rather than remove archaeological remains, ... we agree that the residual effect for construction may be considered 'Minor Adverse' and 'Not Significant' as set out in table 3.13</i>"
43	For Historic England. Action: Other than the Ebbsfleet Peninsula Multi-Period Complex, does Historic England disagree with the applicant's assessment of impacts to any of the other non-designated heritage assets?	Historic England has provided comments on the impact of the development on the Ebbsfleet Peninsula Multi-Period Complex as we consider that this particular non-designated archaeological site is likely of equivalent significance to a designated heritage asset. In relation to other non-designated heritage assets, we defer to the advice provided by the specialists of the relevant Local Authorities. They are best placed to judge if the conclusions of the assessment presented by the applicant in relation to these assets are acceptable.	Comment noted.

22. Applicant’s Comments on the Submission from Kelsale & Yoxford Ward, East Suffolk Council

22.1 Introduction

22.1.1 Table 22.1 summarises the Applicant’s comments on Kelsale & Yoxford Ward, East Suffolk Council Deadline 6 Response [REP6-167].

Table 22.1 Applicant’s Comments on the Kelsale & Yoxford Ward, East Suffolk Council Deadline 6 Submission [REP6-167]

Reference	Matter	Point Raised	Applicant’s Comments
		As a district councillor representing a ward directly affected by Sea Link, I am entrusted with an important responsibility to speak with you today - at a time when a dense part of East Suffolk is being subject to unprecedented infrastructure pressure. I speak on behalf of so many of residents whose lives are already being reshaped. Their voices must not be diminished by process or treated as an administrative inconvenience. Our once glorious landscape has swiftly become dystopian in look and painful in feel because Multiple major energy schemes have been allowed and indeed permissioned to take place and so doing are being concentrated into one small area by organisations who neither live here, nor experience the daily disruption, and for sure will not face the long-term consequences of the choices being made. The Inspectorate will be aware has previously heard my submissions as a local councillor who consistently seeks any potential benefit for my community. Yet despite raising these points with goodwill and in good faith, there is little to no indication that the applicant has listened or taken any suggestions on board — there still remain no meaningful benefits to counterbalance the intrusion. This is neither fair nor acceptable. The Development Consent Order process was created under the Planning Act 2008 to deliver a clear and transparent system for nationally significant infrastructure — not as a mechanism to bypass democratic accountability, community input or rigorous scrutiny. When transparency weakens, trust collapses. We have seen this recently. Sizewell C showed what happens when detail is not properly worked through into tru-isms. There have been too many assumptions, with risks being missed, cumulative impacts are underestimated, and communities disengaged due to lack of confidence. They have shown that applicants who avoid detail, then harm follows. Transparency is a choice — and the right choice is to reveal, not obscure.	The Applicant notes this observation. The Applicant has had careful regard to the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning to impact local tourism in the Environmental Statement, in particular at 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005]. The criticisms as to alternatives are made at a high level and are therefore difficult to respond to granularly. Generally, however, the Applicant has thoroughly assessed alternatives as to sites and routing. The route selection and site selection and including the need for land acquisition, have been fully assessed. The reasoning for the arrangement of the Proposed Project is contained in Application Document 6.2.1.3: ES Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044], Application Document 8.1: Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368], Application Document 8.2: Options Selection and Design Evolution Report (October 2023) [APP-369], Application Document 8.3: Strategic Options Report (October 2023) [APP-370], and Application Document 7.2: Strategic Options Back Check Report [APP-320]

Reference	Matter	Point Raised	Applicant’s Comments
		Yet in this application, too many crucial questions remain unanswered: technical queries, environmental effects, operational risks, access arrangements, and the combined burden of multiple simultaneous projects. Remarkable the Examination progresses. For a scheme of this scale, that is deeply concerning and I can only assume that once the course is set, both the counties of Kent and Suffolk have to run it until it is rejected. As [redacted] has highlighted, mental health pressures are already emerging — not hypothetical future risks, but daily and worsening realities. And I reiterate I am dealing with those myriad of nsip induced challenges that impact residents on a daily basis. No property search in the past twenty years warned residents: “From 2026, expect fifteen years of daily disruption.” Yet this is the situation communities now face. [redacted] of Snape was right to challenge National Grid’s failings within the lack of detail currently submitted. The truth is none of us would be consider submitting proposals of such poor quality and detail as with such inconsistencies they would never reach the committee table. And given that National Grid has declined to engage meaningfully, small wonder my colleague Portfolio lead for energy project Councillor Tom Daly has stressed publicly here today National Grid take seriously a need for responsible behaviour and it must start now. As the inspectorate you will be aware that Under National Policy Statement EN-1, applicants must show that reasonable alternatives have been rigorously assessed. There still remains no convincing evidence that potential brownfield or alternative sites have been examined transparently or seriously. As [redacted] of SEAS has made clear: alternatives must be tested, not acknowledged and dismissed for convenience. Are NGEt waiting for the county council to oblige in this regard just at they have proposed, using public funds a practical, deliverable integrated access solution linking Sea Link, LionLink and Sizewell C — reducing community impact, removing reliance on the unsafe Benhall Railway Bridge, and avoiding unnecessary environmental and heritage damage. It is coherent, workable and evidence-based. How can the applicant, with a hearty solution on the infrastructure plate - cry too costly, and too long a journey when neither issue will impact them greatly? Plus given all the conversations in Westminster for a need for the NSIP applications to work together to deliver an integrated access solution this should be taken into account. Finally and importantly I too wish to recognise the work of Mr Michael Mohoney — he was Speaker 21 this morning. His contribution was sublime and exposed in granular detail where these complex documents were heading and I wish you to go back over his every word. He unpacked it and pointed the clever Nget escape route out. His exposure of mitigation being quietly reduced was incisive and necessary, and his questioning of Ngets	

Reference	Matter	Point Raised	Applicant's Comments
		legal instructions to their lawyers, and his rigorous questions as to where the applicant really stands with respect to governance and ethics deserves serious scrutiny. I don't see any great solutions or investment. No new roads or access roads to help Saxmundham develop. These are asset failures. 2 I therefore urge the Planning Inspectorate to uphold the principles on which the DCO system was founded: transparency, rigour, fairness and accountability and without detailed submissions from the applicant this is not currently possible. Our community deserves nothing less. Thank you.	

23. Applicant’s Comments on the Submission from Kent County Council

23.1 Introduction

- 23.1.1
- Table 23.1 summarises the Applicant’s comments on Kent County Council Deadline 6 Response [REP6-168].
- 23.1.2
- The Applicant has responded to Kent County Council Deadline 6 Response [REP6-265] in **Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions**.

Table 23.1 Applicant’s Comments on Kent County Council Deadline 6 Submission [REP6-168]

Reference	Matter	Point Raised	Applicant’s Comments
ISH3 ExA’s Action Points			
Traffic and Transport			
11	The ExA requires the applicant to work with the County Councils (as Highway Authorities) to consider how any caps to HGV movements could be secured with wording also submitted, should the Secretary of State deem that capping is necessary. Please confirm whether this should be a requirement or part of a control document for securing the caps. This should also include which road links and junctions capping should be set and how the numbers of HGVs would be derived at to set the cap.	Any HGV caps should apply to the A256 and A299, and fall under the Construction Traffic Management and Travel Plan.	The Applicant agrees that localised HGV caps, where the Applicant has already incorporated limited movements through sensitive locations, can provide reassurance to the communities affected. Several daily localised HGV caps are therefore included within Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-065] where these caps are secured. Otherwise, the Applicant considers that periodic monitoring and adaptive management, working collaboratively with KCC and other developers in the region, is the best approach to dealing with traffic issues that may arise during the delivery of the project. Traffic management and monitoring is covered within the Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-065] paragraphs 7.4.9 to 7.4.12 and coordination will be undertaken by the Transport Co-ordinator as outlined in paragraph 7.6.5. The Applicant does not consider any additional HGV caps to be necessary to those set out above, nor has the potential requirement to include additional HGV caps on the A259 or the A299 been previously discussed, including during the meeting held with KCC Highways on 31 March 2026.
15	Does KCC have any remaining concerns that need to be addressed during this examination in relation to Abnormal Indivisible Loads (AIL) access and the routes proposed? If so, explain how these issues could be resolved and how this should be secured.	KCC needs confirmation that the AILs will have rear-wheel steering – the applicant has confirmed this information is to come once contractor is appointed.	This matter was discussed during a meeting with KCC Highways on 31 March 2026. The Applicant confirmed that whilst AIL rear-wheel steering is typically standard, this will ultimately be subject to the haulage supplier. The Applicant’s position remains unchanged.
19	If there is anything else the Councils consider is necessary to include within the DCO with regards to traffic and transport matters, include this in your DL6 submission.	We are currently seeking legal advice in relation to the protected provisions for highway works, which we feel are significantly more favourable to the body carrying out the highway works than our 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 hasn’t confirmed approval or refusal beforehand, it also	The Applicant acknowledges KCC’s current position with respect to highway works and that legal advice is currently being sought. In terms of the measures (as listed), a meeting was held with KCC Highways on 31 March 2026 to review these and Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent

Reference	Matter	Point Raised	Applicant's Comments
		does not provide for commuted sums, or dedication of new highway, which are key elements of our s278 agreements. Furthermore, we have outlined the following additional measures we consider should be included in any DCO: • A 30 HGV cap on Sundays and Bank Holidays, even with Highway Authority approval for the Bank Holidays. This would need to be given on a case-by-case basis, and not as a blanket approval for Bank Holiday working. • A full Travel Plan monitoring scheme with the Highway Authority, the costs of which to be borne by the applicant. • The applicant has offered to limit HGV movements using K-BM04 and K-BM05 to 10 HGVs per day, with no 2-way movements within the village and movements to be outside of school peaks. • Provision of passing places on Ebbsfleet Lane North where required. • The proposed Delivery Management System and Traffic Management and Monitoring System should also be responsive in real-time to network conditions, and adjust the movement of HGVs as required.	[REP6-064] was subsequently updated and submitted at Deadline 6 to reflect these discussions.
21	The ExA requires that the applicant and the highway authorities at SCC and KCC meet to discuss remaining matters of disagreement and try to find a way to progress on these matters as soon as possible. Provide an update at deadline 6.	A meeting was held on 31st March and a HGV cap was agreed.	This is agreed. The following daily HGV caps are included within Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-064] where these caps are secured: • A daily cap of ten HGV movements on Marsh Farm Road, to minimise potential impacts of construction traffic through access point K-BM04. Construction traffic HGVs through Minster will also be controlled, such that construction HGVs will not pass each other (two-way) at the same time. • A daily cap of ten HGV movements on Whitehouse Drove, to minimise potential impacts of construction traffic through access point K-BM05. Construction traffic HGVs along Richborough Road will also be controlled, such that construction HGVs will not pass each other (two-way) at the same time. • A daily cap of ten HGV movements will be imposed on Ebbsfleet Lane North, to minimise potential impacts of construction traffic through access point K-AP-6 (K-BM06). Further to the above, Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-064] includes a commitment that no HGVs will arrive or depart site on Sundays or public holidays, other than for specified exception activities when required (as listed), when they will be limited to a maximum of 30 HGVs permitted per day on Sundays and public holidays.
22	With the submission of the junction modelling and the other information submitted by the applicant through this examination, do the Councils now consider that there is a	Yes, we are of the view that there is sufficient evidence now submitted to demonstrate the specific and cumulative impacts of the proposed development's construction phase.	This Applicant both welcomes and confirms this as the agreed position.

Reference	Matter	Point Raised	Applicant's Comments
	sufficiently robust assessment of traffic and highways issues, both for the proposed development alone and also when considered cumulatively? If not, explain why.		
23	At this point in the examination, do the Councils consider that there would be any impacts to traffic and transport, particularly driver delay, which would be assessed as significant in your view? If considered that significant adverse impacts would remain after mitigation, is there further mitigation which should be secured? If so, how would this be secured and with what wording?	As confirmed in the ISH3 session, the modelled junctions were agreed between KCC and the applicant, as these represented the junctions where the level of cumulative impact was considered to be the greatest and most indicative. The modelling showed that the junctions are already expected to be over capacity in 2030 during peak hours, whether or not the proposed development goes ahead. Similar modelling for the Manston Airport DCO also showed the junction would be over capacity in 2039. Because the junctions are already congested, the additional construction traffic from the proposed development is not expected to lead to noticeable additional queuing or make conditions noticeably worse—especially since typical construction traffic will be around 46% lower than the busiest-day levels used in the modelling. To illustrate, the A299 Average Annual Daily Flow for 2024 was 23,965 vehicles, whereas Busiest Day development flows add 410 vehicle movements - a 1.7% increase. As the applicant discussed in ISH3, a full driver delay assessment at route level would be a lengthy exercise and in our view, would add little to what we already know about where the focus for mitigation needs to be. Furthermore, the results in our view do not warrant specific concerns for highway safety.	This Applicant confirms this as the agreed position.
	Would a requirement for the applicant to monitor and if necessary provide adaptive management/remediation mitigation be sufficient to overcome any concerns that the traffic and transport impacts would be significant? If so, please provide wording and explain how this could be secured.	As suggested in our previous response, 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 CCTV systems and integrating their use within the proposed DMS and TMMS measures, which has been discussed with the applicant and they are investigating.	The Applicants position is that the mitigation measure TT02 identified within the Application Document 7.5.3 Outline Onshore Construction Environmental Management Plan , stating 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 will require discussion with the relevant highways authorities to determine whether additional measures are needed, provides sufficient constraint on vehicle routing and volumes.
24	Given the winter months the applicant undertook baseline traffic surveys, does there need to be a seasonal adjustment with the junction modelling to take into account busier summer months with tourism traffic? If so, please include with the junction modelling.	In our view, the baseline traffic surveys were conducted in a neutral timeframe, representative of the vast majority of highway conditions, including typical working patterns. Although the summer months do attract a higher total volume of leisure trips, these are generally spread out during the day and working week, correlating with lower commuting/school trips, and the impact on the peaks is less significant. The main concern is for more intensive periods of leisure traffic, notably Bank Holidays and when there are public events on. These are difficult to accurately and meaningfully reflect within the Transport Assessment as the traffic impact will vary significantly depending on weather conditions, tide times, the nature/attraction/publicisation of the event and so forth. Not to mention the short-term effect of these peaks and overlap with project traffic flows, it seems to the Highway Authority that the best	The Applicant agrees with KCC's response which reflects discussions held during a meeting with KCC Highways on 31 March 2026. Following this, Application Document 7.5.1.2 (B) Outline Construction Traffic Management and Travel Plan – Kent [REP6-064] was updated and submitted at Deadline 6 to reflect these discussions.

Reference	Matter	Point Raised	Applicant's Comments
		intervention would be effective Construction Traffic Management, as discussed before. Furthermore, any adjustment to the modelling for this factor will only further confirm what we already know about where the focus for mitigation needs to be.	
Socio-economics and tourism			
28	Are there remaining concerns with regard to the potential displacement of tourists by workers of the proposed development (or in combination with other workers of other developments in the area) in tourist accommodation?	KCC has no comment on this issue and defers to the relevant District/Borough Councils.	Noted.
Cumulative Effects			
48	Applicant and local authorities to develop a joint position statement with regard to the unmitigated significant residual landscape and visual effects to see if there are further mitigation measures that can be included or compensation measures to offset any residual significant effects, if the Secretary of State considers that to be necessary.	KCC defers to the relevant District and Borough Councils on issues related to landscape and visual effects.	Noted.

24. Applicant’s Comments on the Submission from Kent Wildlife Trust

24.1 Introduction

- 24.1.1
- Table 24.1 summarises the Applicant’s comments on Kent Wildlife Trust Deadline 6 Response [REP6-169] Written post hearing submissions including written summaries of oral cases made at hearings the w/c 23 March 2026.
- 24.1.2
- Table 24.2 summarises the Applicant’s comments on Kent Wildlife Trust Deadline 6 Response [REP6-240] Consultation Response on the Report on the Implications for European Sites (RIES).
- 24.1.3
- The Applicant's has responded to Kent Wildlife Trust Deadline 6 Response [REP6-266] in **Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions.**

Table 24.1 Applicant’s Comments on Kent Wildlife Trust Deadline 6 Submission [REP6-169]

Reference	Matter	Point Raised	Applicant’s Comments
<i>Written post hearing submissions including written summaries of oral cases made at hearings the w/c 23 March 2026 (Deadline 6) – Kent Wildlife Trust</i>			
n/a	Compulsory Acquisition Hearing 2 (“CAH2”)	During CAH2, Kent Wildlife Trust (“KWT”) were asked to provide written details of specific objections in relation to land rights for each plot and in particular plots 5/10, 5/13, 5/18 and 5/38. Below is our answer to this specific action point: KWT maintains its objection to the compulsory acquisition and use of land rights over all our land plots, including 5/10, 5/13, 5/18 and 5/38. As stated during CAH2, our position is that we object to the project as a whole and therefore do not support the use of land within our ownership to facilitate its delivery. Plots 5/10, 5/13, 5/18 and 5/38 fall within the intertidal zone and comprise priority habitat mudflats, which are highly sensitive and form part of internationally and nationally designated sites, including the Thanet Coast and Sandwich Bay SPA, Ramsar and SAC. We are particularly concerned about the construction methodologies within these areas, including the trenching works and cofferdam, which in our view carries a clear risk of adverse effects on these protected habitats and their associated ecological features. Given these sensitivities, we cannot support the use of our land for activities that may damage or degrade these habitats. In addition, there is a reputational consideration; permitting the use of our land in this way could be interpreted as facilitating a project that we have consistently opposed on environmental grounds. For these reasons, KWT objects to the inclusion and use of these plots within the Order Limits and does not consider that the Applicant has justified the need for their compulsory acquisition in this context.	The applicant notes the position of Kent Wildlife Trust in relation to the voluntary agreement. Application document 4.2.2 SOR Appendix B- Schedule of Negotiations with Land Interests sets out the status of these negotiations with Kent Wildlife Trust and the attempts the Applicant has made to try to secure voluntary agreement with this party.
n/a	Open Floor Hearing 2	The following section provides KWT’s written summary of the oral submissions delivered at the second Open Floor Hearing on 24th March 2026: “Good afternoon. My name is [...], speaking on behalf of Kent Wildlife Trust. I would like to focus on the proposed access arrangements at the hoverport – a place that, on paper, may appear to be disused hardstanding, but in reality, has become something far more valuable. Because this is not a vacant site, it is a rewilded habitat – one that has quietly, over decades, developed into a mosaic of coastal habitats supporting rare plants, protected species, and nationally scarce invertebrates. Life has returned to the	No vegetation removal (i.e. height reduction including clearance to ground level) is proposed at the former hoverport and a REAC commitment exists (B66) to ensure that a route through the hoverport is marked out and (B70) shared with key stakeholders, which avoids tracking over vegetation and particularly the foodplants of the two Schedule 5 species. A small number of vehicles (low dozens even at peak times) will traverse the hoverport for short periods in the year. An unvegetated sufficiently wide route through the hoverport has been identified to avoid vegetation removal, other than possible cutting back of lateral seasonal growth of bushes. For the first stretch this

Reference	Matter	Point Raised	Applicant's Comments
		hoverport, yet its proposed use for construction access is being advanced without a proper understanding of the ecological impacts. The Applicant is seeking flexibility to route construction traffic across the hoverport, claiming this can be done without significant ecological harm, largely on the basis that it is “existing hardstanding” and that no vegetation clearance is required. But this assumption is flawed. Because nature does not recognise the distinction between “hardstanding” and “natural habitat” in the way planning documents do. We know, through years of biological recording, that this site supports a remarkable assemblage of species. A confirmed breeding population of the Firey Clearwing moth – fully protected by law. The Sussex Emerald moth – one of the UK’s rarest species, also fully protected. Nationally scarce and priority species such as Bright Wave, Rest Harrow and Oblique Striped moths. Common lizards and rare orchids including the formerly extinct Lizard Orchid, which is not only rare in the UK, but across Europe. And a wide range of micromoths and other notable invertebrates that depend on exactly the kind of undisturbed, transitional habitats that this site provides. These species are not incidental. They rely on the very features that are most vulnerable to disturbance – root systems, substrate stability, and the continuity of undisturbed ground. Compaction, vibration, and repeated vehicle movements can destroy the ecological functionality of this site, even where no formal “vegetation clearance” takes place. Larvae within rootstock can be crushed. Overwintering species can be killed. Fragile plant communities can be lost. This is habitat damage, in every meaningful ecological and legal sense. And it’s not just protected species we need to be concerned about. The movement of heavy plant and construction vehicles across the hoverport also carries a real risk of mobilising contamination within the site. Evidence already indicates the presence of historic deposits, including coal residues. Disturbance of these materials could alter water chemistry, increasing acidity, and critically could release toxic heavy metals into the coastal, aquatic environment. The hoverport is directly connected to internationally designated sites, and the release of contaminants into these habitats has the potential to cause significant adverse effect on the integrity of these ecosystems, including the serious risk of mortality from heavy metal toxicity across multiple species – from invertebrates and fish, to birds, seals and dolphins that depend on them as prey. As well as a serious health risk to people and their dogs who enjoy Pegwell Bay. Yet these risks have not been investigated. We are faced with the same pattern: uncertainty now, with the expectation that it can be managed later. Environmental assessment is not a box-ticking exercise – it is the foundation upon which lawful decisions are made. Without a clear and complete baseline, it is simply not possible to assess likely significant effects, apply the Mitigation Hierarchy or demonstrate compliance with environmental law. And critically, it is not possible for the Examining Authority to be confident that this project can proceed without committing offences under wildlife legislation. This is not a technical concern. It is a matter of legal compliance. Case law is clear that harm to habitat, including disturbance and degradation, can be sufficient to trigger offences where protected species are affected. And it is equally clear that these matters cannot be deferred to post-consent stages. Yet that is exactly what is happening here. Flexibility is being sought first. Evidence is being considered later. You cannot design around constraints that have not yet been identified.	will be via the intact tarmac roads, after which low ground pressure vehicles will be used to traverse the open concrete of the former hoverport itself. Regarding vibration, the number of vehicles traversing the hoverport is low (a few dozen per day even at peak times) and they will be slow moving. Vibration arises when driving over uneven surfaces. Photographs submitted into the examination show that through the vegetated areas where invertebrates and reptiles are most likely to be present due to the availability of cover from predators, the access roads are flat intact tarmac with no crevices. The concrete apron is much more sparsely vegetated and therefore there is a lower likelihood of relevant species being present due to the high exposure to predators. Moreover, in this area only low-pressure vehicles will be used to move to and from the intertidal area. These produce little to no ground vibration. Regarding tracking vehicles over the former hoverport, any mobilisation of contamination will be avoided by: • The suitability and integrity of the hardstanding at the former hoverport will be assessed through a pre-construction survey (visual inspection then bearing test), a commitment to which is included in the Application Document 7.5.1.1 Construction Traffic Management and Travel Plan. • Related to this, REAC commitment W37 states that the Applicant will prepare a hoverport condition monitoring plan post consent to monitor the condition of the hoverport during construction. This will include measures for identifying and managing any potential contamination risk and will be prepared in consultation with the Environment Agency, Natural England, Kent Wildlife Trust and Thanet District Council for approval by Thanet District Council. Where any broken concrete with risk of contaminant mobilisation is identified it will be avoided so that vehicles do not track over it or repaired and trackway or other methods will be used to ensure its integrity is not damaged. The Applicant regularly uses methods to track vehicles and equipment over sensitive ground, using metal or plastic trackway, bog mats or low-pressure vehicles with rubber tracks and/or balloon tyres. On the National Grid Stalybridge to Woodhead tower replacement scheme the Applicant used plastic trackway to site 150 – 250 tonne cranes on 2m deep peat bogs without damage. The Applicants position on mobilising contamination at the Hoverport is further set out in Application Document 9.150 Applicant’s comments on responses to third written questions submitted at Deadline 7 (Question 3GEN2).

Reference	Matter	Point Raised	Applicant's Comments
		We recognise the stated intention behind this change: to avoid impacts on saltmarsh. But intention is not evidence. And aspiration is not mitigation. What is being presented here is not a robust, evidence based solution. It is a proposal built on assumptions, gaps and deferrals. And that carries significant risk. Real risk to protected species, to priority habitats, and to the integrity of this wider coastal system. Because as we all know from the impacts of the Applicant's sister company – once damage occurs in these habitats, it is not easily reversed. We have seen this before. Commitments are made. Mitigation is promised. But once consent is granted and construction begins, the reality on the ground can diverge from what was anticipated. Unexpected constraints arise. Methods change. And ecological harm follows. This is precisely why these matters cannot be left to assumptions or post-consent promises. So today our position is clear. The change request is not supported by adequate baseline data. It does not demonstrate application of the mitigation hierarchy. And it does not provide certainty, either in ecological or legal terms, that harm to protected species and habitats can be avoided. Without the surveys. Without the evidence. Without the understanding. And without the mitigation, the Applicant cannot definitively conclude there will be no long-lasting ecological harm to this important site. In closing, the hoverport may look like a forgotten place. But ecologically, it is anything but. It is a place where nature has returned, quietly, but persistently. And it deserves to be protected. Thank you."	
Issue Specific Hearing 3 ("ISH3")	Agenda Item 2. Matters arising from the Examining Authorities ("ExA") third written questions (ExQ3)	KWT supports the ExA's opening statement at ISH3 in which it was stated that <i>"currently the Examining Authority is not convinced that the Applicant has demonstrated that all residual impacts are those that cannot be avoided, reduced, or mitigated."</i> We agree with this statement as it reflects a core concern that KWT has consistently raised throughout Sea Link's DCO process, dating back to our earliest representations in 2023; namely, that the Applicant has not adequately applied the Mitigation Hierarchy. As set out in National Policy Statement EN-1, the policy presumption in favour of granting consent for Critical National Priority ("CNP") infrastructure is contingent upon the proper and effective application of the Mitigation Hierarchy. This requires impacts to be demonstrably avoided in the first instance, then reduced, then mitigated, with compensation only as a last resort. Where this process has not been robustly followed, reliance on CNP policy is not justified. KWT agrees with the ExA's current position that it has not been demonstrated that all residual impacts are genuinely unavoidable. Across a number of topic areas, the Applicant has, in our view, moved prematurely to mitigation or compensation without fully exploring opportunities for avoidance or reduction. This undermines the integrity of the Mitigation Hierarchy and, by extension, the applicability of the CNP policy. A clear example of this is the proposed use of the Hoverport. As discussed during ISH2, the existing condition of the Hoverport presents a credible risk of environmental harm, including the potential mobilisation of contaminated materials into the adjacent aquatic environment. Aside from these risks, the Applicant has not taken forward options that would either avoid the impact entirely (for example, by not utilising the Hoverport) or meaningfully reduce the risk (such as undertaking repair and remediation works to stabilise the structure and prevent further degradation). In our view, this approach is not consistent with the Mitigation Hierarchy, as reasonable opportunities to avoid or reduce harm have not been adequately pursued.	The Applicant has ensured that all significant residual effects have been subject to consideration of the mitigation hierarchy, and has provided evidence of this in response to the ExA's WQ3 3GEN1 in both 9.136 Applicant's Responses to Third Written Questions and 9.136.1 Applicant's Responses to Third Written Questions - Appendices .

Reference	Matter	Point Raised	Applicant's Comments
		We have provided further detailed evidence on this matter within our response to the Examining Authority's Third Written Questions ("ExQ3"), including the potential pathways for contamination and the associated risks to designated sites and priority habitats. Additionally, we have provided other examples within our ExQ3 response that we believe could fall within the exceptions to the presumption of consent set out in paragraph 4.2.15 of NPS EN-1. These other examples are also discussed in more detail below within this Deadline 6 submission. These examples illustrative a broader pattern within the application, where impacts have not been minimised to the fullest extent possible. As such, KWT supports the ExA's current position and considers that, unless and until the Applicant can clearly demonstrate that the Mitigation Hierarchy has been properly and exhaustively applied, the project should not be afforded the policy benefit of CNP.	
	Agenda Item 3. Water Environment	KWT remains concerned that the Applicant has not provided sufficient detail to robustly assess the impacts of the project on the water environment, particularly in relation to flood risk, floodplain function, and associated ecological effects. During ISH3 it was confirmed that materials cannot be stored within Flood Zone 3b (functional floodplain) on the Kent side. However, no clear alternative has been presented. It remains unclear whether this would necessitate the creation of raised, engineered platforms (similar to those proposed for the converter and substations), which could themselves introduce additional impacts on floodplain function and surrounding habitats. This lack of clarity raises significant concerns regarding both feasibility and environmental effects. Additionally, the Applicant has not provided adequate detail on the loss of flood attenuation capacity during the construction phase. The functional floodplain plays a critical role in storing and transferring floodwater, and any reduction in this capacity, particularly without clearly defined mitigation, could increase flood risk elsewhere and alter hydrological processes that underpin designated habitats. Whilst it was suggested by the Applicant that compensatory flood storage may be provided if required, no information has been presented on the location, scale or environmental implications of such measures. This raises several unresolved issues within the water environment assessment. There is limited clarity on potential impacts to groundwater, including changes to groundwater levels, flows and connectivity with nearby designated sites. This is particularly relevant in areas where excavation, trenching, or dewatering may be required. The absence of a clearly defined dewatering and discharge strategy also raises concerns regarding how water will be managed, treated and released without adversely affecting water quality or the hydrological function of the surrounding designated sites. Construction activities within or adjacent to sensitive habitats also present a credible risk of sediment mobilisation and increased turbidity, which could adversely affect intertidal habitats such as mudflats and saltmarsh. These risks are combined by a lack of detailed pollution prevention measures, particularly in relation to runoff, accidental spills and disturbance of potentially contaminated materials (such as coal residues and toxic heavy metals at the Hoverport). There is also insufficient evidence that the assessment has fully accounted for climate change allowances, or the resilience of temporary construction works to extreme weather events. Given the coastal and flood-prone nature of Pegwell Bay and Minster Marshes, this represents a notable gap. Similarly, there has been limited consideration of how the project may interact with coastal processes, including sediment transport and erosion, which could have longer-term implications for designated sites.	At deadline 6 the Applicant submitted an update to the Flood Risk Assessment 6.8 (B) Flood Risk Assessment [REP6-052]. The update provides additional flood risk and coastal erosion information and assessment to address and resolve all remaining flood risk matters that were under discussion with the Environment Agency. Specific to the Kent Onshore Scheme and the River Stour floodplain, commitment W06 within 7.5.3 (D) Outline Onshore Construction Environmental Management Plan [REP6-074] has been updated. This secures that, for the Kent Onshore Scheme, storage of construction materials within Flood Zone 3 will be minimised, with materials such as pylon steelwork stored for up to 30 days. Flood model outputs would inform the temporary placement of soil during construction and soil stockpiles would be aligned in the direction of flow to avoid impeding flood flow routes. In addition, the contractor would monitor weather forecasts and flood alerts/warnings, enacting protocols to remove temporary stores out of FZ3b on receipt of a warning. Where construction access routes cross Flood Zone 3 and areas at high risk of surface water flooding no land raising would be required, except for very locally, at the approaches to the temporary bridge crossing of the River Stour. Creation of raised, engineered platforms for materials storage is not proposed. Mitigation for loss of floodplain attenuation capacity is secured by commitment W35, which was also updated at Deadline 6. This states that where pylons and a temporary drainage pond would be located within the fluvial floodplain of the River Stour as part of the Kent Onshore Scheme, compensatory storage within the Order Limits will be provided for loss of floodplain storage, in accordance with a Floodplain Compensation Strategy detailed in the Drainage Management Plan that is secured under Requirement 6 of the DCO and to which the Environment Agency is a consultee. Further information on the location and scale of losses is provided in an update to 9.101 (B) Kent Onshore Scheme - Fluvial Flooding from the River Stour [REP6-092]. At Deadline 6 the Applicant also submitted further detail on the surface water and groundwater quality management and pollution control measures that would be adopted at the Minster Converter and Substation construction sites in 9.32 Minster Converter Station Ground Conditions and Water Management – Technical Note [REP6-127]. With regard to climate change, Section 3.2 of 6.8 (B) Flood Risk Assessment [REP6-052] sets out in detail the climate change allowances that have been applied in developing the surface water drainage designs and in assessing the impacts of the Projects and shaping mitigation measures. Further, commitment

Reference	Matter	Point Raised	Applicant’s Comments
		Taken together, these issues highlight a series of unresolved uncertainties and evidential gaps in relation to the water environment. At this stage in the Examination, with closure scheduled for 5 th May 2026, it is unclear how the Applicant could provide the necessary additional information and allow sufficient time for Interested Parties to review and respond. These matters cannot reasonably be deferred to the post-consent stage. In our view, this lack of clarity further demonstrates that impacts have not been fully avoided or reduced at source and therefore the Mitigation Hierarchy has not been properly applied.	W07 in 7.5.3 (D) Outline Onshore Construction Environmental Management Plan [REP6-074] describes how temporary construction work sites would be managed in the scenario of an extreme weather event.
	Agenda Item 8. Cumulative Impacts	KWT maintains that the Applicant’s approach to their Cumulative Impact Assessment (“CIA”) is fundamentally flawed and does not comply with relevant policy or guidance (see our Deadline 1 response for specific details). As set out in paragraph 3.1.2 of NPS EN-1, applicants are required to minimise adverse effects, which includes a robust and precautionary assessment of cumulative impacts with other existing, approved, and reasonably foreseeable projects. We wished to raise this at ISH3, however we were not given the opportunity, therefore we have provided our concerns in writing at this Deadline 6 submission. A key concern that KWT has been pushing since ISH2 is the Applicant’s failure to include the proposed Aberdeenshire to Richborough connection within their CIA. This omission is particularly concerning given that Sea Link itself has been justified by the Applicant on the basis that it forms part of the National Energy System Operator’s (“NESO”) Holistic Network Design (“HND”). The Applicant cannot reasonably rely on the HND to justify the need for Sea Link, whilst simultaneously excluding other projects identified within that same strategic framework from its cumulative assessment. This represents a clear inconsistency and suggests a selective application of evidence where it supports the Applicant’s case, but not where it introduces additional environmental constraints. The Aberdeenshire to Richborough project is not speculative. It has been identified through the Holistic Network Design Follow-Up Exercise (“HND FUE”), accepted by Ofgem and NESO and included within the HND Implementation Plan. As such, it clearly meets the test of being a “reasonably foreseeable” project as described in more detail within our Deadline 4 response. Given that Sea Link itself emerged from this same process, it is unclear how the Applicant can reasonably argue that another HND-derived project, which is intended to connect to the same receiving location at Richborough and is currently proposed to make landfall at Pegwell Bay, is not sufficiently foreseeable to assess. KWT met with National Grid on 2nd April 2026 to discuss this issue further. During that meeting, the Applicant sought to justify the exclusion of the Aberdeenshire to Richborough project on the basis that its design may evolve, including the possibility that Pegwell Bay may not ultimately be the landfall location. However, this position is not consistent with the development of the HND Implementation Plan or Sea Link itself. Pegwell Bay was identified as the proposed landfall location for Sea Link within NESO’s (referred to then as National Grid Electricity System Operator (“NGESO”)) Pathway to 2030 HND (July 2022) prior to the publication of the Applicant’s Sea Link Corridor and Preliminary Routeing and Siting Study (October 2022). That landfall location has remained unchanged throughout the development of the project. Likewise, landfall locations for other HND projects such as the Eastern Green Link 3 and Eastern Green Link 4 have remained unchanged. On this basis, it is reasonable to conclude that this future Aberdeenshire to Richborough project is highly unlikely to deviate materially in terms of landfall location. We emphasise that the projects set out in the HND are not speculative. They are designated as essential, strategically critical	With respect to the Aberdeenshire to Richborough project, the Applicant’s approach to identifying ‘Other Developments’ for inclusion in the inter-project cumulative effects assessment is explained in Sections 1.5.1 to 1.5.28 of Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]. In respect of the project referenced by KWT, contrary to what is suggested, the Applicant does not consider it meets the test of “development...reasonably likely to come forward” under the guidance provided by Planning Inspectorate’s ‘Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment’ (Planning Inspectorate, 2024). For this reason it was not included in Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List [APP-092]. As per Item 20 of Application Document 9.89 (A) Applicant’s Written Summaries of Oral Submissions at Issue Specific Hearing 2 [REP4-085], the Applicant confirms that there are currently no National Grid Electricity Transmission (NGET) plans for further cables at Pegwell Bay. In these circumstances, there can be no question that sufficiently reliable information to undertake a satisfactory cumulative assessment does not exist. It is difficult to see what else the Applicant can do to “evidence and justify” the position as to the lack of information as suggested by KWT. As the organisation that would be tasked with developing such a link, one might expect the Applicant to be in receipt of such information were the proposals to be at a stage for there to be a reasonable prospect of it coming forward.

Reference	Matter	Point Raised	Applicant's Comments
		components of the national transmission network, with landfall locations deliberately chosen to meet network demand requirements. Ignoring these projects, or treating their locations as uncertain, undermines the very purpose of the HND and risks compromising the integrity and coordination of the UK's energy infrastructure. This is reinforced by the HND Implementation Plan consultation, which states that: "Deviations from the recommendations may have wider implications for the transmission network and other industry processes." This clearly demonstrates that the projects identified within the HND are intended to be delivered as a coherent and inter-reliant package. Any deviation or removal of projects would require a fundamental reassessment of the wider network design. In this context, the Applicant's approach fundamentally undermines the very premise of the HND, which is to deliver a coordinated and holistic approach to network planning. By excluding a clearly foreseeable HND project, particularly one that is likely to share the same landfall location, the Applicant is reverting to a piecemeal approach to assessment. This not only conflicts with established policy and guidance on cumulative effects but also risks systematically underestimating the overall purpose and full extent of in-combination impacts arising from the HND projects. We understand the Applicant's position that the future Aberdeenshire to Richborough project is not yet at a detailed design stage, and therefore specific elements such as the precise locations of converter stations, substations, and associated infrastructure are not currently defined. However, the absence of this detail does not remove the need to robustly assess likely cumulative impacts. On the contrary, it increases the level of uncertainty and therefore strengthens the case for adopting a precautionary approach. KWT strongly urges the Applicant to assess this future project on the basis of a realistic worst-case scenario. At a minimum, this should involve treating it as broadly comparable to the Sea Link project in terms of scale, construction methodologies, landfall requirements, and associated infrastructure. This is particularly important in relation to the proposed landfall at Pegwell Bay and works within the intertidal environment, where even small variations in design or construction approach could result in significant ecological effects. Without such an assessment, there is a clear risk that cumulative impacts, especially on highly sensitive and irreplaceable habitats, are being underestimated or overlooked. This includes potential effects on designated sites, supporting habitats, and the species that rely on them. In the absence of sufficient information, the ExA or Secretary of State cannot be confident that the full extent of cumulative effects has been properly identified, assessed, or mitigated. A precautionary, scenario-based assessment is therefore essential to ensure that decision-making is based on a complete and credible understanding of environmental risk. The omission of this future HND project is not a minor gap. The failure to include a clearly foreseeable project within the CIA means that the full extent of cumulative impacts, spatially and temporally, has not been evaluated. This is particularly concerning given the ecological importance of saltmarsh and intertidal habitats at Pegwell Bay, which provide critical biodiversity value, natural flood defence, and significant carbon storage. This issue directly relates to the application of the Mitigation Hierarchy and the potential reliance on CNP policy. If the cumulative impacts of the project have not been fully identified and assessed, it cannot be concluded that impacts have been appropriately avoided or minimised. As such, any reliance on CNP to justify residual impacts would be premature and unsupported. KWT considers that the Applicant has failed to undertake a lawful and robust cumulative impact assessment by excluding	

Reference	Matter	Point Raised	Applicant's Comments
		the Aberdeenshire to Richborough project. Unless this deficiency is addressed through a precautionary and comprehensive assessment, there remains a significant risk that the true scale of cumulative effects at Pegwell Bay and the designated sites are being underestimated, with potentially irreversible consequences for internationally important habitats and species.	
	Agenda Item 9. Marine Physical Environment	KWT remains concerned that the Applicant has not adequately assessed the potential environmental impacts associated with maintenance or emergency repair scenarios for the proposed cables where they pass through sensitive habitats, including saltmarsh and intertidal environments within the Sandwich and Pegwell Bay SPA and Ramsar. Whilst the Applicant proposes to install the cables beneath the saltmarsh using Horizontal Directional Drilling (“HDD”), there remains a clear gap regarding how maintenance or emergency repairs would be undertaken should the cables fail or require intervention during the operational lifetime of the project. In such circumstances, there is a credible risk that open-cut trenching may be required in order to access and repair the infrastructure. This possibility has not been assessed within the Environmental Impact Assessment (“EIA”), despite the potentially significant environmental consequences. This issue closely mirrors the concerns raised by the ExA at the start of ISH3 regarding emergency cable repair scenarios within the Outer Thames Estuary SPA and potential disturbance to the internationally important population of red-throated diver. The ExA has already identified that the absence of information regarding emergency repair scenarios represents a clear evidential gap. KWT considers that the same principle must apply to works affecting saltmarsh and intertidal habitats within Sandwich and Pegwell Bay. In the absence of a detailed assessment of how such works would be undertaken, the Examination cannot properly understand the full range of potential impacts. KWT therefore considers that development consent should not be granted without either: • A robust assessment of potential maintenance and emergency repair scenarios, including likely construction methods and associated environmental effects; or • A clear commitment within the DCO that open-cut trenching would not be permitted for maintenance or repair works within these sensitive habitats. KWT supports the position raised by the ExA during ISH3 that a commitment to long-term monitoring is required in relation to the dynamic geomorphology of the River Stour. Channel migration and natural morphological change could alter sediment dynamics and potentially affect the integrity or exposure risk of the buried cables over time. A lifetime monitoring programme is therefore necessary to ensure that any emerging risks are identified early and managed appropriately.	The Applicant confirms that all routine operation and maintenance activities have been assessed in full within all topic chapters. The Applicant refers KWT to Natural England’s D6 response on the Outer Thames Estuary SPA [REP6-247] and Table 75.7, Item 1 of Application Documnt 9.149. The Applicant has responded to the topic of Trenchless Techniques in a number of previous submissions. The Applicant confirms that following recommended edits received from the ExA on the 17th April 2026 with regards to the DCO and DML [The Examining Authority's schedule of changes to the draft development consent order (dDCO)], these updates have been applied to Requirement 16 and also DML Condition 10 at Deadline 7. The Applicant considers this issue to be resolved.
	Agenda Item 10. Noise & Vibration	KWT shares the ExA’s concerns regarding the Applicant’s approach to their noise assessment, particularly in relation to the classification of the Hoverport as “soft land” within the noise impact assessment. This is not credible. The Hoverport is surfaced with tarmac and is therefore, by definition, hardstanding. KWT agrees with the ExA that it should be assessed as such. The Applicant’s position is undermined by their reliance on the same hardstanding classification to justify the absence of reptile surveys in this area. This represents a clear inconsistency in the use of evidence, where the baseline is selectively defined in a way that minimises predicted impacts whilst avoiding additional ecological survey requirements. Such an approach reduces	Updated plans have been provided as Appendix A to 9.153 Response to ExA’s Rule 17 Letter which are based upon the hoverport being hard ground. This remodelling has not changed any aspects of the assessment.

Reference	Matter	Point Raised	Applicant's Comments
		confidence in the robustness of the overall assessment, which KWT has been voicing since the early pre-DCO consultations.	
	Agenda Item 10. Noise & Vibration	We are also concerned by the disparity between the stated construction noise limits for the converter station and the higher noise levels associated with cable installation works. Whilst provisions appear to be in place to limit construction noise at the converter and substations to 60dB, plans presented during ISH3 indicated that noise levels in excess of 75dB are likely during cable installation due to heavy machinery. These elevated noise levels have the potential to cause disturbance to both breeding and wintering bird populations. We do not believe that this noise impact has been adequately addressed.	Noise modelling was undertaken for the Kent Ecology and Biodiversity Chapter and modelled the 60dB contour following the application of standard noise reduction techniques (including applied to cable installation). It also identified areas that fell within higher noise bands. This was fully assessed regarding (for example) ornithology in paragraphs 2.9.87 to 2.9.95 of the Kent Ecology and Biodiversity Chapter.
	Agenda Item 10. Noise & Vibration	In addition, KWT considers that the Applicant has failed to robustly assess cumulative noise impacts. During ISH3, KWT asked the Applicant whether a cumulative noise assessment has been undertaken in relation to the nearby approved planning application Weatherlees Hill Solar Farm, located to the north of the Weatherlees Wastewater Treatment Plant and in close proximity to the proposed converter station and adjacent Sandwich Bay to Hacklinge Marshes SSSI. KWT does not agree with the Applicant's assertion at ISH3 that the two developments are sufficiently separated to be considered independently. Although a tree line may provide some visual screening, in practical terms the developments are immediately adjacent. The potential for combined construction and operational noise impacts on the SSSI has not been adequately assessed, and reliance on individual mitigation measures for each project does not address the risk of in-combination effects.	A precautionary 'significant disturbance' threshold of 60dB LAmax was agreed with Natural England regarding the SSSI. Modelling undertaken for the Kent Ecology and Biodiversity Chapter identified that at the SSSI boundary these noise levels would only be exceeded during certain activities (specifically site preparation, earthworks and foundation creation). REAC measure B50 therefore restricts activities relating to construction of the Minster Converter Station and Substation, that are calculated, following detailed design, to be above 60dB LAmax at the boundary of the SSSI, to be undertaken outside the period March to June. If such works are to be undertaken during July to September, a suitably qualified ornithologist will check the area of SSSI within which the activities are forecast to be subject to noise levels above 60dBLAmax to confirm the absence of qualifying nesting bird features of the SSSI. The relevant works will only occur if no active nests of SSSI qualifying birds are identified. With these measures in place there will be no locations during the nesting season where the 60dB contour of the Sea Link project and the 60dB contour of the Weather Lees Hill Solar Project overlap.
	Agenda Item 12. Ornithology	KWT strongly supports the ExA's concerns regarding the potential impacts of the project on the Outer Thames Estuary SPA and its internationally important population of red-throated diver. In particular, we share the ExA's position on the significant evidential gap relating to emergency cable repair scenarios. In the event of a cable fault or break, the absence of clearly defined mitigation or contingency measures raises serious concern. Any such works, especially during the overwintering period, have the potential to cause significant disturbance to red-throated divers and therefore result in an adverse effect on the integrity of the SPA. KWT agrees that the Applicant must provide clear, enforceable measures setting out how emergency repairs would be undertaken and how impacts to the SPA would be avoided or mitigated.	The Applicant refers KWT to Natural England's D6 response on the Outer Thames Estuary SPA [REP6-247] and to the Applicant's Response to Natural England's Deadline 6 Submissions on this point in this document the Applicant's Comments on Other Submissions Received at Deadline 6..
	Agenda Item 12. Ornithology	KWT also supports the need for a precautionary spatial buffer, and we agree with the inclusion of a minimum 2km buffer around the Outer Thames Estuary SPA during the breeding season to minimise disturbance. However, this alone is not sufficient to address the risks associated with unplanned or emergency works, which by their nature may not adhere to seasonal restrictions.	The Applicant would like to confirm that the 2 km buffer applied to the Proposed Project's construction and routine operation and maintenance activities with regards to the Outer Thames Estuary is due to the sensitive overwintering season, and not the breeding season.
	Agenda Item 12. Ornithology	We note the ExA's clear indication that, in the absence of adequate information on emergency repair scenarios and their potential impacts, it may be necessary to recommend refusal of the DCO. KWT fully supports this position. Without this critical information, the Examination cannot conclude beyond reasonable scientific doubt that the project will not adversely affect the integrity of the SPA, and as such, the scheme should not be consented.	As set out in the response above the Applicant has agreed an approach to address risks associated with unplanned emergency events with NE, as set out in the Red-throated Diver Protocol [REP6-090] submitted at Deadline 7 and as set out in the Applicant's Response to Natural England's Deadline 6 Submissions on this point in this document the Applicant's Comments on Other Submissions Received at Deadline 6. .

Reference	Matter	Point Raised	Applicant's Comments
	Agenda Item 12. Ornithology	As set out in other KWT consultation deadline responses, we maintain that the proposed compensation site for golden plover is unsuitable: it is located adjacent to the busy Sandwich Bypass (A256) which has been identified in the Applicant's own noise assessment report as having some of the loudest noise constraints and is sandwiched between two proposed solar farms and a housing development, all of which would introduce significant disturbance. The chosen mitigation site is a field enclosed by tall hedgerows, which are unsuitable for golden plover, a species that relies on open landscapes for predator detection. Furthermore, the site is not like-for-like with the existing functional linked land, which comprises extensive open, seasonally wet marshland, whereas the proposed site is a comparatively small, enclosed and dry agricultural field. These fundamental issues are combined by comments made by senior representatives of National Grid during a Sea Link roundtable discussion on 9th April 2026, where the Deputy Project Director, Adrian Morris, and Senior Project Manager responsible for delivery of the converter and substation, Richard Wallis, appeared unaware of the ecological purpose of the mitigation land, instead describing it as compensation for loss of farmland and suggesting it would bring land back into agricultural production. This inconsistency between the Applicant's submissions and the understanding of its own project leads reinforces KWT's overarching concern that the project remains insufficiently developed, with key mitigation measures not properly defined, understood, or adequate. At this late stage in the Examination, there remain significant unanswered questions, and a lack of clarity and confidence regarding the delivery of critical ornithological mitigation. KWT is firmly of the view that the proposed mitigation land will not be suitable for golden plover and is highly unlikely to be used by the species, resulting in a permanent loss of habitat available to qualifying features of the Thanet Coast and Sandwich Bay SPA. When considered alongside the additional loss of approximately 160ha of functional linked land from other developments, it is unclear how the Applicant can robustly conclude that there would be no adverse effect on site integrity.	Refer to the Applicant's response in Application Document 9.34.5 Applicant's Responses to Selected Relevant Representation Responses [REP1-115], specifically the Relevant Representation of CPRE. The wording of the management prescriptions for the golden plover mitigation land in the Kent oLEMP has been amended for D7 to address Natural England's comments about clarity and certainty of commitments. Mr Wallis is an engineer whereas delivery of the mitigation land post-consent would be supervised by the Applicant's environmental team and specifically the Environmental Clerk of Works and Ecological Clerk of Works.
	Agenda Item 13. Biodiversity & Ecology	KWT has consistently maintained, since the earliest stages of the pre-application process in 2023, that the Applicant has not undertaken an adequate or sufficiently robust assessment of impacts to biodiversity and protected species. It is therefore deeply concerning that, at this late stage in the Examination, there remain fundamental evidential gaps and unresolved questions. This raises significant procedural concerns, particularly given the limited time remaining before the close of Examination and the likelihood that Interested Parties may not have a meaningful opportunity to review or respond to any further ecological information submitted. Under the Conservation of Habitats and Species Regulations 2017 (the "Habitats Regulations"), there is a clear legal requirement for competent authorities to ascertain, beyond reasonable scientific doubt, that a project will not adversely affect the integrity of European designated sites. This is reinforced through established case law, including People Over Wind (C-323/17) and Holohan (C-461/17), which emphasise the need for complete, precise, and definitive findings at the point of assessment. KWT's position is that this evidential threshold has not been met.	The Applicant has responded to these points in our submissions to Kent Wildlife Trust (or Suffolk Energy Action Solutions regarding trapping and tracking of barbastelles) throughout the Examination. It should be noted that barbastelle bats are not a reason for SAC designation in Kent and therefore the People Over Wind and Holohan cases are not relevant to this point as they concern HRA matters. As discussed at ISH2 and ISH3 the Applicant does not consider further survey for bats is required and none has been requested by any statutory consultees. Extensive surveys have been undertaken across both Kent and Suffolk, including a combination of remote acoustic monitoring and walked transects, and that these surveys have been sufficient to characterise bat populations and activity within the relevant areas. Bat trapping and radio-tracking require separate licensing and are themselves disturbing to bats, with no certainty that such licences would be granted. They should only be undertaken if essential. In this case, there is no necessity for such surveys, notwithstanding that they may be of academic interest. The existing survey data, together with the mitigation strategy secured through the application, provides sufficient information to protect relevant bat species and associated

Reference	Matter	Point Raised	Applicant's Comments
		This concern is particularly acute in relation to bats, and specifically barbastelle. Survey data indicates that there have been at least 15 recorded barbastelle passes in Kent across multiple months (May, June, July, and October) between 2023 and 2024. Given that barbastelle are an Annex II species, this triggers a heightened legal duty to establish a robust, evidence-based understanding of their roosting, commuting, and foraging behaviour to inform both the Habitats Regulations Assessment and appropriate mitigation design. Notably, a barbastelle roost has never previously been confirmed in Kent. The repeated recordings within the survey area are therefore highly significant and may indicate the presence of a previously unknown population. In this context, KWT considers that advanced survey techniques, including bat trapping and radio-tracking, should have been undertaken. These methods would have enabled confirmation of presence or likely absence, identification of roost locations, and mapping of key commuting and foraging routes so that these areas could be avoided from direct impacts and therefore align with the Mitigation Hierarchy. Contrary to the Applicant's assertions, radio-tracking is not an exceptional or disproportionate method in this context. The Bat Conservation Trust (BCT 2024) guidelines explicitly state that trapping, tagging, and radio-tracking should be considered for NSIPs and for developments with potential high impacts on rare or Annex II species. The guidance is clear that landscape-scale projects affecting rare bat species or SSSI features require more detailed and comprehensive datasets. Given the scale of this project and the potential presence of a rare Annex II species (including one that has never been confirmed in Kent), the absence of such survey effort represents a significant deficiency in the evidence base. The Applicant's suggestion that repeated trapping may result in the same individuals being captured and disturbed is not a sufficient justification for avoiding this level of survey effort. This concern appears inconsistent when considered alongside the acknowledged repeated disturbance to other species within the Kent and Suffolk landfall locations arising from multiple large-scale infrastructure projects, including Nemo Link, Sea Link, Lion Link, Sizewell C, and other development projects. The precautionary principle must be applied consistently, particularly where there is potential risk to a previously unknown population of an Annex II species.	features, with an assumption that all suitable habitat is treated as potentially used by bats. The Applicant further confirms that the scope of surveys undertaken was informed by the EIA scoping process and that neither the local planning authorities nor Natural England have indicated that bat trapping or radio-tracking is required. On this basis, the Applicant concluded that further invasive survey work is not necessary to inform the assessment or the proposed mitigation.
	Agenda Item 13. Biodiversity & Ecology	Further concerns arise in relation to invertebrates and their ecological interactions. Should night-time lighting be required at the Hoverport or at the cofferdam within the intertidal area, there is a clear pathway for ecological impact that has not been assessed. Artificial lighting has the potential to attract invertebrates away from their usual habitats, altering prey availability and distribution. This, in turn, may have indirect effects on bat populations that rely on these invertebrates for foraging. The absence of a detailed assessment of these interlinked impacts further reinforces KWT's position that the Applicant's ecological assessment is incomplete.	With regard to nighttime lighting at the hoverport, the Schedule 5 invertebrates (fiery clearwing moth and Sussex emerald moth) are either day-flying or fly around dusk and dawn and are only on the wing in summer when there would be a reduced need for lighting at any wheel wash. Moreover, these insects are most likely to be present in areas with some vegetation cover rather than in open exposed areas of tarmac where risk of predation by birds is high. This is relevant because any wheel wash and associated lighting would be at the southern edge of the hoverport at the boundary with the intertidal. This is the location least likely to support Schedule 5 invertebrates. Therefore, any risk of killing and injury of Schedule 5 invertebrates, or disturbance while using their places of shelter or protection, on the hoverport is considered negligible.
	Agenda Item 13. Biodiversity & Ecology	KWT also shares the ExA's concerns regarding the Applicant's conclusion of negligible disturbance to the SPA and Ramsar sites. Given the scale, duration, and cumulative nature of the proposed works, this conclusion is not supported by a sufficiently robust evidence base. The construction programme alone, encompassing prolonged offshore and onshore works, repeated vessel movements, noise, vibration, and visual disturbance, presents multiple pathways for disturbance to qualifying features. These pressures are not short-term or isolated; they are likely to occur over	Refer to Application Document 9.139 Applicant's Responses to the Questions in the Report on the Implications for European Sites (RIES) where the Applicant have responded to any concerns from the ExA. The Habitats Regulations Assessment submitted at Deadline 6 also addressed outstanding concerns from NE. Disturbance impacts on SPA birds have been quantified. For example, in the terrestrial environment a quantifiable 60 dB L_{max} threshold, agreed with Natural England, has been used to identify spatially the affected area within a given SPA

Reference	Matter	Point Raised	Applicant's Comments
		extended periods and, critically, overlap both spatially and temporally with other existing and proposed projects in the Kent and Suffolk onshore area. This includes not only sequential disturbance but the potential for sustained, near-continuous pressure on sensitive habitats and species. For designated sites of international importance, particularly those supporting non-breeding and overwintering bird assemblages, even relatively low levels of disturbance can result in displacement, reduced foraging efficiency, and increased energetic stress. The Applicant has not demonstrated with sufficient evidence that such effects would be avoided or reduced to a level that could reasonably be described as negligible, nor has there been adequate consideration of how repeated or chronic disturbance may lead to longer-term functional impacts on habitat use, particularly in the context of birds, fish and seals exhibiting high site fidelity. Within the DCO, there is limited evidence of how disturbance effects have been quantified, how uncertainty has been addressed, or how the precautionary principle has been meaningfully applied. This is particularly concerning given the well-documented ecological sensitivity of the area and its importance as a supporting habitat for internationally designated sites. Crucially, the Applicant's conclusion does not appear to fully account for in-combination effects. When considered alongside other projects and plans affecting the same ecological receptors, the potential for cumulative disturbance increases significantly. Without a comprehensive and precautionary assessment of these combined pressures, it is not possible to conclude that the overall level of disturbance would remain negligible.	or Ramsar site and measures then identified to ensure that threshold is not exceeded within any European sites from terrestrial works.
	Agenda Item 13. Biodiversity & Ecology	It is in our view, that these issues demonstrate a pattern of under-assessment and reliance on insufficient data. At this stage in the Examination, such gaps are not minor or technical; they are fundamental. In the absence of comprehensive, evidence-led assessment, the ExA and Secretary of State cannot lawfully conclude no adverse effect on site integrity, nor can they be confident that impacts to protected species have been adequately avoided or mitigated.	
	Agenda Item 13. Biodiversity & Ecology	In conclusion, KWT maintains that significant uncertainties and evidential gaps remain across multiple topic areas, particularly in relation to ecological assessment, cumulative impacts, and the application of the Mitigation Hierarchy. Despite the advanced stage of the Examination, key issues are still unresolved, and there is a clear risk that Interested Parties will not have a meaningful opportunity to review and respond to further information should it be submitted at this late stage. These matters raise serious doubt as to whether the project, in its current form, provides a robust and lawful basis for decision-making. KWT therefore urges the ExA to give full weight to these outstanding concerns, and to ensure that any recommendation reflects the need to properly safeguard internationally important habitats and species, in accordance with relevant policy and legislation.	

Table 24.2 Applicant’s Comments on Kent Wildlife Trust Deadline 6 Submission [REP6-240]

Reference	Matter	Point Raised	Applicant's Comments
<i>Consultation Response on the Report on the Implications for European Sites (RIES)</i>			
n/a	Likely Significant Effects	KWT maintains concerns regarding the identification and screening of Likely Significant Effects (“LSE”) within the Applicant’s Habitats Regulations Assessment (“HRA”), with more detailed information provided within our	The Applicant considers the Likely Significant Effects assessment is robust.

Reference	Matter	Point Raised	Applicant's Comments
		Deadline 1 submission. Tables 2.1 and 2.2 of the RIES demonstrate that a substantial number of European sites are located in close proximity to the proposed development, with multiple impact pathways identified across all project phases. This reinforces KWT's view that the Mitigation Hierarchy has not been appropriately applied, particularly with respect to the requirement to prioritise avoidance.	
n/a	Likely Significant Effects	KWT strongly disagrees with the statement made in paragraph 2.5.3 which says: <i>"The applicant confirmed (1ECOL49, [REP3-069]) that no in-combination LSEs had been identified where a LSE had not been identified for that pathway as a result of the proposed development alone."</i> This position taken by the Applicant assumes that if Sea Link on its own doesn't cause a LSE for a particular impact pathway, then combining it with other projects also won't create LSEs.	This text was added in response to a question from the ExA.
n/a	Likely Significant Effects	This approach is flawed and not consistent with the requirements of the Habitats Regulations. It fails to recognise that effects which are not significant when considered in isolation may become significant when combined with other plans and projects. For example, the Nemo Link project has already resulted in disturbance to the Thanet Coast and Sandwich Bay SPA, Ramsar and Thanet Coast SAC via open-cut trenching of intertidal mudflats and saltmarsh habitats, subsequently disturbing qualifying bird species. The proposed Sea Link project would introduce further, similar pressures in the same location, to the same European designated sites. When considered alongside a reasonably foreseeable future project, such as the Aberdeenshire to Richborough project, there is clear potential for cumulative impacts arising from repeated disturbance, extended construction periods, and additional habitat loss. In this context, it is not credible to conclude that no LSE would arise in combination. Even where individual projects may give rise to effects that are not significant alone, the combined effect of multiple projects acting on the same receptors, in the same location, and overlapping timescales clearly reach the threshold of LSE. KWT still stands by our concerns outlined in Table 2.3: Issues raised in the examination to date by the ExA and Interested Parties ("IPs") in relation to the applicant's screening of LSEs (alone and in-combination), namely ID 2.3.1 Precautionary Approach, where we consider that the Applicant's screening had failed to apply the precautionary approach by screening out effects where impacts were described as unlikely or not anticipated rather than ruled out. We considered that the screening minimised the significance of likely impacts by using temporal and qualitative descriptors such as "temporary", "localised", or "small in scale" without evidential justification. The Applicant (Table 2.6, [REP2-034]) considered this to be a point in semantics rather than a 'lower test' being applied and stated that they had quantified terms within their assessments. KWT continues to disagree with this argument.	The in-combination assessment is specifically intended to capture situations where a project may not lead to likely significant effects alone but would do so in combination with other plans or projects. There are no impact pathways for which an LSE has been dismissed for the Proposed Project but which would arise 'in combination' with other projects and plans. This is partly because the mitigation measures that have been introduced to address the Proposed Project are sufficient to entirely address the contribution of the Sea Link project (e.g. to loss of functionally linked land or noise) and partly due to temporal or spatial separation between the Proposed Project and other plans or projects and/or their impact zones (e.g. for noise). The HRA has considered in-combination effects with both the Nemo and Thanet Offshore Windfarm Extension projects, at the request of Natural England, even though they do not fit into the criteria for an in-combination development as set out in the Planning Inspectorate's Advice on Habitats Regulations Assessments. Both projects have previously installed cables in the intertidal zone of Pegwell Bay. Neither Nemo or Thanet or the Proposed Project will result in a permanent loss of mudflat habitat in the intertidal region of Pegwell Bay. Impacts to benthic infaunal communities within the mudflats at Pegwell Bay, as a result of the Proposed Project cable installation activities, will be temporary and very localised and will recover over timescales expected to be within a period of months to 1-2 years, depending on the scale of disturbance. This is evidenced by the observed recovery of benthic communities at Pegwell Bay, following cable installation for the Nemo Link project, which can be considered to be the activity resulting in the greatest mudflat disturbance, which was shown to be very rapid in the Nemo Link Interconnector Year 3 Post Construction Intertidal Technical Report (EcoMarine, 2020). The report states that 'following an initial decrease in abundance and diversity in 2018, intertidal communities have been resilient to the physical disturbance resulting from the burial of the cable in 2017. Natural tolerance coupled with fast natural recruitment has resulted in a rapid recovery of faunal communities in 2020'. Furthermore, the monitoring report also states 'Data collected during the year-one and year-three post construction surveys showed that the loss of intertidal fauna was localised and temporary, and by 2020 faunal communities and habitats present along the cable route reflect those seen during the baseline survey'. With respect to the Aberdeenshire to Richborough project, the Applicant's approach to identifying 'Other Developments' for inclusion in the inter-project cumulative effects

Reference	Matter	Point Raised	Applicant's Comments
			assessment is explained in Sections 1.5.1 to 1.5.28 of Application Document 6.3.1.5.A ES Appendix 1.5.A Cumulative Effects Assessment Methodologies [APP-091]. In respect of the project referenced by KWT, contrary to what is suggested, the Applicant does not consider it meets the test of “development...reasonably likely to come forward” under the guidance provided by Planning Inspectorate's 'Nationally Significant Infrastructure Projects: Advice on Cumulative Effects Assessment' (Planning Inspectorate, 2024). For this reason it was not included in Application Document 6.3.1.5.B ES Appendix 1.5.B Inter-Project Cumulative Effects Long List [APP-092]. As per Item 20 of Application Document 9.89 (A) Applicant's Written Summaries of Oral Submissions at Issue Specific Hearing 2 [REP4-085], the Applicant confirms that there are currently no National Grid Electricity Transmission (NGET) plans for further cables at Pegwell Bay. In these circumstances, there can be no question that sufficiently reliable information to undertake a satisfactory cumulative assessment does not exist. It is difficult to see what else the Applicant can do to “evidence and justify” the position as to the lack of information as suggested by KWT. As the organisation that would be tasked with developing such a link, one might expect the Applicant to be in receipt of such information were the proposals to be at a stage for there to be a reasonable prospect of it coming forward.
	Likely Significant Effects	We welcome and support Requirement 16 of the dDCO and Condition 10(1) of the deemed marine licence (“DML”) (Schedule 16), which secure the use of trenchless techniques for landfall installation. However, as set out in our Deadline 4 response, there are clear precedents where similar commitments have ultimately not been deliverable at the construction stage. In those cases, applicants have successfully sought post-consent changes to allow open-cut trenching, on the basis that works could not otherwise proceed. This raises a significant concern in respect of the Sea Link project. If, at construction stage, HDD and other trenchless methods are demonstrated to be unfeasible and opencut trenching across the saltmarsh is presented as the only viable alternative, there is a realistic risk that a change request could be submitted by the Applicant and approved. Such an outcome would result in irreversible damage to a highly sensitive habitat, as seen in comparable cases such as Nemo Link. KWT therefore considers that the current drafting does not provide sufficient certainty or safeguard against this risk. The requirement must be strengthened to make unequivocally clear that, under no circumstances, would open-cut trenching through saltmarsh or other irreplaceable habitats be permitted, including through post-consent change requests. In the event that trenchless techniques are demonstrated to be unfeasible, this should not give rise to alternative construction methods. Rather, it must trigger a requirement for the Applicant to return to the consideration of alternative routes and landfall locations which avoid such impacts. We request that Requirement 16 is amended to include that if no feasible alternative to trenchless installation exists at Pegwell Bay, then the Sea Link project should not proceed at the current landfall location. This approach is necessary to ensure that unacceptable impacts cannot be authorised post-consent, and to provide certainty that the integrity of designated sites and irreplaceable habitats will be fully protected in accordance with the Habitats Regulations.	The Applicant has responded to the topic of Trenchless Techniques in a number of previous submissions. The Applicant confirms that following recommended edits received from the ExA on the 17th April 2026 with regards to the DCO and DML [The Examining Authority's schedule of changes to the draft development consent order (dDCO)], these updates have been applied to Requirement 16 and also DML Condition 10 at Deadline 7. The Applicant considers that these commitments in the DCO/dML are sufficient to close out this issue.

Reference	Matter	Point Raised	Applicant's Comments
	Likely Significant Effects	Regarding ID 2.3.7 Sandwich Bay SAC – Trenchless landfall techniques, KWT disagrees with the Applicant's HRA screening conclusion, which excludes LSE arising from direct habitat loss on the basis that trenchless landfall techniques do not constitute mitigation. We agree with the ExA that trenchless techniques, such as HDD, are clearly a form of mitigation. Their inclusion is directly driven by the presence of irreplaceable saltmarsh habitat; in the absence of such constraints, the Applicant has demonstrated elsewhere in the project (e.g. through intertidal mudflats) that open-cut trenching would be the default construction method. The use of HDD is therefore not an inherent or fixed feature of the project design, but a measure introduced specifically to avoid or reduce harm to European designated sites and their qualifying features. As such, it is not appropriate for the Applicant to rely on trenchless techniques at the screening stage to exclude LSE. Established case law makes clear that mitigation measures cannot be considered when determining whether LSE may arise. This principle was confirmed in <i>People Over Wind v Coillte Teoranta</i> (Case C-323/17), where the Court of Justice of the European Union held that measures intended to avoid or reduce harmful effects cannot be considered at the screening stage of an HRA. Similarly, in <i>R (on the application of Hart District Council) v Secretary of State for Communities and Local Government</i> [2008], the Court emphasised the need for a precautionary approach, requiring that effects can only be excluded where there is no reasonable scientific doubt. More recently, domestic case law has reinforced that embedded or standard mitigation cannot be relied upon to screen out effects unless it can properly be characterised as part of the project itself rather than a measure to avoid harm. On this basis, LSE from direct habitat loss should not have been screened out. As mentioned above, there are clear precedents where similar commitments to trenchless installation have not been deliverable at the construction stage, and applicants have successfully sought post-consent amendments to allow open-cut trenching based on technical or feasibility constraints. This raises a significant and realistic risk for the Sea Link project. If trenchless methods are later demonstrated to be unfeasible, and open-cut trenching across the saltmarsh is presented as the only viable alternative, there is a credible pathway for a change request to be submitted and approved. Without our recommended amendments to Requirement 16, and without assessment of reasonable worst-case scenarios (including open-cut trenching), the conclusion that no LSE would arise from direct habitat loss is not robust. The HRA screening should therefore be revisited to properly reflect the potential for significant effects on the integrity of European designated sites.	Refer to Application Document 9.139 Applicant's Responses to the Questions in the Report on the Implications for European Sites (RIES) where the Applicant and their legal advisors have responded to this point at length.
	Likely Significant Effects	Regarding ID 2.3.11 Thanet Coast SAC and Thanet Coast and Sandwich Bay SPA and Ramsar – Changes to marine water quality from release of contaminants and debris at the Hoverport site, our position on this has been clear. In our view, this approach is not consistent with the Mitigation Hierarchy, as reasonable opportunities to avoid or reduce harm have not been adequately pursued. We have provided further detailed evidence on this matter within our response to the Examining Authority's Third Written Questions ("ExQ3") and Deadline 6 submission. Ultimately, we think this is a clear example of how the applicant has not applied the Mitigation Hierarchy, ruled out impacts to irreplaceable habitats and therefore falls under the category of exemptions to the Critical National Priority ("CNP") policy.	Refer to Application Document 9.139 Applicant's Responses to the Questions in the Report on the Implications for European Sites (RIES) where the Applicant has responded to this point regarding marine water quality being affected due to contamination from the hoverport.

Reference	Matter	Point Raised	Applicant's Comments
	Likely Significant Effects	In respect of ID 2.3.15 Stodmarsh SPA and Ramsar site – loss of functionally linked land (“FLL”) for hen harrier, KWT shares the concerns raised by the RSPB. In particular, KWT considers that species-specific surveys should have been undertaken to robustly inform the assessment. In the absence of adequate survey data and evidence, it is not possible to conclude, beyond reasonable scientific doubt, that there would be no LSE arising from the loss of FLL for hen harrier. KWT therefore does not agree with the Applicant’s conclusion that no LSE would arise in this regard.	The Applicant notes that in their D6 response to the RIES Natural England has stated that ‘On the basis of the information provided, including the wintering bird surveys, Natural England agrees with the Applicant’s conclusion of no likely significant effect for loss of functionally linked land for Stodmarsh SPA hen harrier.
	Adverse Effects on Integrity	KWT strongly disagrees with the Applicant’s conclusion as stated in paragraph 3.1.6 that the proposed project would not adversely affect the integrity of any European site, either alone or in combination with other projects or plans. We maintain concerns regarding the proposed use of the former hoverport for access. As raised by Natural England and others, there remains insufficient evidence to demonstrate that contaminants associated with historic land uses, such as colliery spoil and fuel storage, would not be mobilised through construction traffic and heavy plant movements. The Applicant’s reliance on the absence of ground disturbance does not adequately address the risk of degradation of the hardstanding and subsequent release of contaminants, including potential effects on water quality and designated site features. We also share the ExA’s concerns in respect of the Outer Thames Estuary SPA, particularly the potential for disturbance and displacement effects on qualifying features such as the red-throated diver. The current assessment does not provide sufficient certainty to conclude no adverse effect on site integrity. Critically, we are concerned that the Applicant’s in-combination assessment is incomplete. The omission of the Aberdeenshire to Richborough project from the cumulative impact assessment represents a significant gap, given the potential for overlapping spatial and temporal effects, particularly in relation to intertidal ornithological receptors. Without proper consideration of this project, the Applicant cannot robustly conclude that there would be no adverse effect on the integrity of European sites in combination with other plans and projects. For these reasons, we do not agree that the conclusions of the HRA are sound or sufficiently evidenced.	Regarding tracking vehicles over the former hoverport, any mobilisation of contamination will be avoided by: • The suitability and integrity of the hardstanding at the former hoverport will be assessed through a pre-construction survey (visual inspection then bearing test), a commitment to which is included in the Application Document 7.5.1.1 Construction Traffic Management and Travel Plan. • Related to this, REAC commitment W37 states that the Applicant will prepare a hoverport condition monitoring plan post consent to monitor the condition of the hoverport during construction. This will include measures for identifying and managing any potential contamination risk and will be prepared in consultation with the Environment Agency, Natural England, Kent Wildlife Trust and Thanet District Council for approval by Thanet District Council. Where any broken concrete with risk of contaminant mobilisation is identified it will be avoided so that vehicles do not track over it or repaired and trackway or other methods will be used to ensure its integrity is not damaged. The Applicant regularly uses methods to track vehicles and equipment over sensitive ground, using metal or plastic trackway, bog mats or low-pressure vehicles with rubber tracks and/or balloon tyres. On the National Grid Stalybridge to Woodhead tower replacement scheme the Applicant used plastic trackway to site 150 – 250 tonne cranes on 2m deep peat bogs without damage. With regards to Red Throated Diver and the Outer Thames Estuary SPA, the Applicant agrees with Natural England’s position submitted at Deadline 6 on this matter and refers to the Applicant’s Response to Natural England’s Deadline 6 Submissions on this point in this document The Applicant’s Comments on Other Submissions Received at Deadline 6..
	Adverse Effects on Integrity	In regard to ID 3.3.19 we want to emphasise Natural England’s concerns that HDD is likely to fail at Pegwell Bay. This echoes our concerns from the very start of the pre-DCO application process. KWT are not convinced that the Applicant has shown through reasonable scientific doubt that there will be no adverse effects on integrity if HDD fails and open-cut trenching is approved post-consent as it has been with numerous other NSIP projects. As stated above, we are pleased with Requirement 16, however we do not trust that the Applicant won’t seek post-consent change requests to open-cut trenching if trenchless methods fail, and as such request amendments to state that Sea Link should not proceed at the current landfall location of Pegwell Bay if HDD and other trenchless technologies fail.	During recent discussions with Natural England on the 16th April, Natural England confirms that they are content with the current DCO and DML commitments around Trenchless Techniques at Pegwell Bay. The Applicant has responded to the topic of Trenchless Techniques in a number of previous submissions. The Applicant confirms that following recommended edits received from the ExA on the 17th April 2026 with regards to the DCO and DML [The Examining Authority's schedule of changes to the draft development consent order (dDCO)], these updates have been applied to Requirement 16 and also DML Condition 10 at Deadline 7.
	Adverse Effects on Integrity	In respect of ID 3.3.22, KWT notes that commitments B67 and B70 of the REAC require consultation with Natural England and KWT regarding the identification and agreement of access routes across the hoverport and intertidal mudflats. These commitments are clearly intended to ensure that	The Applicant confirms that specific confirms routes were not presented in ISH3, just the temporary access areas, as already defined in Works and Land plans available throughout Examination.

Reference	Matter	Point Raised	Applicant's Comments
		access arrangements are developed collaboratively, informed by ecological constraints, and subject to appropriate scrutiny prior to being finalised. However, KWT notes that at Issue Specific Hearing 3 (“ISH3”) the Applicant presented plans which included illustrated access routes across these areas. This gives rise to significant concern that access routes may have already been identified and, in effect, predetermined in advance of the consultation required under the REAC commitments. Such an approach risks undermining the purpose and effectiveness of those commitments, reducing consultation to a retrospective exercise rather than a meaningful and iterative process. KWT emphasises that the identification of access routes in this location is a matter of considerable environmental sensitivity, with the potential to affect designated habitats and qualifying features. It is therefore essential that no routes are fixed or assumed prior to full and proper consultation with relevant stakeholders, including KWT and Natural England. In light of this, KWT considers that greater clarity and assurance is required that the REAC commitments will be adhered to in practice, and that access routes will remain genuinely subject to consultation and agreement, rather than being presented as effectively predetermined.	The Applicant is committed to B67 and B70. These commitments are also secured within the Outline Onshore and Offshore CEMPS which are also secured under the DCO/DML and require approval prior to construction.
	Adverse Effects on Integrity	In respect of ID 3.3.23, KWT does not agree with Natural England’s position that sufficient information has been provided to conclude that the proposed golden plover mitigation site would adequately offset the predicted impacts of the development. KWT maintains that the evidence presented to date does not demonstrate that the proposed site is suitable to function as effective mitigation for this qualifying species. KWT remains concerned that the site is subject to a range of constraints which undermine its suitability, including noise disturbance, artificial lighting, and visual disturbance. Golden plover are highly sensitive to disturbance, and the presence of these factors are liable to significantly reduce the likelihood of the site being used as intended. In KWT’s view, these issues have not been adequately addressed or resolved within the Applicant’s submissions. Furthermore, KWT considers that there remains insufficient evidence to demonstrate that the proposed mitigation would be functionally equivalent to the habitat being affected, or that it would deliver the required outcomes with a sufficient degree of certainty. This is particularly important in the context of the Habitats Regulations, which require a high level of confidence in the effectiveness of mitigation measures where they are relied upon to avoid adverse effects on site integrity. KWT therefore maintains its position, as set out in previous deadline responses, that the proposed golden plover mitigation site is not suitable, and highly unlikely to be used by the species. We stress that success should not be judged simply by whether any golden plover use the mitigation site, but by whether it supports an equivalent level of use to that recorded on the converter site, i.e. a peak count of 370 birds. If monitoring surveys demonstrate that this level of use is not achieved at the mitigation site, adaptive management measures should be triggered to implement additional suitable land areas of mitigation. All concerns previously raised by KWT in respect of this matter remain extant and have not been resolved.	Refer to the Applicant’s response in Application Document 9.34.5 Applicant’s Responses to Selected Relevant Representation Responses [REP1-115], specifically the Relevant Representation of CPRE. The wording of the management prescriptions for the golden plover mitigation land in the Kent oLEMP has been amended for D7 to address Natural England’s comments about clarity and certainty of commitments.
	Annex 1: ExA’s Understanding of	The ExA’s statement in paragraph A1.3: “<i>The ExA understands that KWT does not agree AEoI [Adverse Effect on Integrity] can be excluded for Thanet</i>	See above responses

Reference	Matter	Point Raised	Applicant's Comments
	Positions at Point of RIES Publication	<i>Coast & Sandwich Bay SPA and Ramsar site or Thanet Coast SAC</i>” is correct. KWT emphasises that our concerns raised throughout the Examination remain extant, including those relating to ecological survey effort, the application of the Mitigation Hierarchy, trenchless techniques, mitigation measures and the consideration of alternatives to avoid impacts on European sites. KWT also continues to support the concerns raised by other environmental organisations, including the RSPB and CPRE Kent. We hope that our response to the RIES and expertise will be of assistance to the Examining Authority. If you require any further information or would like to discuss our response in more detail, please do not hesitate to contact me.	

25. Applicant’s Comments on the Submission from Northumbrian Water Limited and Ward Hadaway LLP on behalf of Northumbrian Water Limited (NWL)

25.1 Introduction

25.1.1 Table 25.1 summarises the Applicant’s comments on Northumbrian Water Limited and Ward Hadaway LLP on behalf of Northumbrian Water Limited (NWL) Deadline 6 Response [REP6-170 & REP6-254]

Table 25.1 Applicant’s Comments on Northumbrian Water Limited and Ward Hadaway LLP on behalf of Northumbrian Water Limited (NWL) Deadline 6 Submission [REP6-170 & REP6-254]]

Reference	Matter	Point Raised	Applicant’s Comments
Preliminary Meeting – Written Representation (Agenda Item 4 – Draft Examination Timetable)			
		As you are aware we are instructed by Northumbrian Water Limited ("NWL") in relation to the application for a Development Consent Order (DCO) for the Sea Link Project ("Project"). We write to provide an update on the progress of negotiations concerning protective provisions ('PPs') and a legal side agreement with NWL (referred to as NWL's asset protection agreement 'APA') in advance of the further update required at Deadline 6. The parties remain in active discussions regarding the PPs and the APA. NWL is keen to continue working constructively with the Applicant to reach agreement on the terms of those documents prior to the deadline for the Secretary of State's decision. However, given the current status of these negotiations, our client's objection to the Project, as set out in the enclosed letter dated 8 October 2025 remains unchanged. To assist the Examination, we enclose NWL's preferred form of protective provisions which incorporates the Applicant's proposed amendments to the extent that they are acceptable to NWL. We respectfully request that, in the event the Secretary of State is minded to grant consent for the Project, protective provisions for the protection of NWL in the form enclosed with this letter are included in the made DCO.	The Applicant is aware of NWL’s requests and is working with them and their legal team to finalise an agreed set of Protective Provisions for Deadline 7, should this not be achieved the Applicant will continue to work with NWL to agree the Protective Provisions before the Secretary of States decision on the Proposed Project.
Preliminary Meeting – Written Representation (Agenda Item 4 – Draft Examination Timetable)			
		We are instructed by Northumbrian Water Limited (NWL) in relation to the application for a Development Consent Order (DCO) for the Sea Link Project (the Project). On 14 May 2025, we submitted the enclosed letter on behalf of NWL objecting to the proposed DCO because no protective provisions/asset protection agreement had been agreed between the Applicant and NWL, posing a potential risk to any of NWL's assets that may be seriously affected by the Project. Although we note that certain protective provision have been included in the draft DCO we would be obliged if the ExA carefully note that	Noted

Reference	Matter	Point Raised	Applicant's Comments
		these provision have not been the subject of any discussions or consultation with our client and are not agreed. To date, there has been no meaningful engagement from the Applicant to agree protective provisions/an asset protection agreement with our client because NWL has not received all of the information that it requires to carry out an assessment on the impacts of the Project on its assets. Accordingly, NWL is concerned with its ability to engage in the examination process in accordance with the timescales in the draft examination timetable and in relation to how its concerns (if any) will be adequately addressed within the prescribed period. NWL are eager to engage with the Applicant to agree any protections to its assets required of the Project and we will continue to attempt to reach an agreed position in respect of the above with the Applicant's representatives as soon as possible however, we respectfully request that this matter is also considered at Item 4 (Draft Examination Timetable) of the Preliminary Meeting.	
Letter of Objection			
		We are instructed by Northumbrian Water Limited (NWL) in relation to the application for a Development Consent Order (DCO) in respect of the Sea Link Project (the Project). NWL are landowner, statutory undertaker and a Statutory Party for the purposes of The Infrastructure Planning (Interested Parties and Miscellaneous Prescribed Provisions) Regulations 2015. For the avoidance of doubt, NWL hereby give notice that it wishes to be considered an Interested Party for the purposes of this matter pursuant to Section 89(2A)(b) of the Planning Act 2008. At present, no protective provisions and/or asset protection agreements have been agreed with NWL, and as such NWL cannot confirm that it will not suffer serious detriment to the carrying on of its undertaking as a result of the compulsory acquisition of land or as a result of the acquisition of rights over land by the Applicant. Accordingly, NWL is unable to agree the Protective Provisions set out in Schedule 15 to the Draft Order. As a result of the above, NWL must register its objection to the proposed DCO pending the agreement of suitable protective provisions and/or asset protection agreement. We will endeavour to reach agreement in respect of the above with the Applicant's representatives at the very earliest opportunity.	The Applicant is aware of NWL's requests and is working with them and their legal team to finalise an agreed set of Protective Provisions for Deadline 7, should this not be achieved the Applicant will continue to work with NWL to agree the Protective Provisions before the Secretary of States decision on the Proposed Project.
FOR THE PROTECTION OF NORTHUMBRIAN WATER LIMITED			
2.	Compulsory acquisition	2.1nThe undertaker must not without express written agreement of NWL exercise any power conferred by article 24 (compulsory acquisition of land) or article 25 (compulsory acquisition of rights) to acquire any of NWL's interests (such agreement not to be unreasonably withheld or delayed). 2.2 In the situation, where in exercise of the powers conferred by the Order, the undertaker acquires any interest in any land in which any apparatus is placed and such apparatus is to be relocated, extended, removed or altered	The Applicant notes these requests and has submitted its position in relation to Protective Provisions in a separate document at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		in any way, no alteration extension, relocation or removal shall take place until NWL has established to its reasonable satisfaction, without unnecessary delay, contingency arrangements in order to conduct its functions for the duration of the works to relocate, extend, remove or alter the apparatus. 2.3. Regardless of any provision in the Order or anything shown on any plan, the undertaker must not acquire any apparatus otherwise than by agreement, and before extinguishing any existing rights for NWL to use, keep, inspect, renew and maintain its apparatus in the Order land, the undertaker must, with the agreement of NWL, create a new right for NWL to use, keep, inspect, renew and maintain the apparatus in a manner that is reasonably convenient to NWL and which for the avoidance of doubt shall in all respects be in a no less efficient manner than has previously been afforded to NWL, such agreement not to be unreasonably withheld or delayed.	
3.	Protection Strips	3.1. The undertaker must not within the standard protection strips interfere with or build over or under any apparatus within the Order limits or execute the placing, installation, bedding, packing, removal, connection or disconnection of any apparatus, the placement of protection slabs or execute any filling around the apparatus within the standard protection strips unless otherwise agreed in writing with NWL, such agreement not to be unreasonably withheld or delayed and being subject to paragraph 3.2 below, and this provision must be brought to the attention of any contractor responsible for carrying out any part of the authorised development on behalf of the undertaker. 3.2. Where written agreement to undertake works within the standard protection strips is sought under this paragraph 3.2 NWL may request such further information as is reasonably necessary to understand the impact of the works proposed and provide approval under paragraph 3.1 PROVIDED THAT: 3.2.1. Any request for further information is made within 15 Working Days of NWL receiving notification of the proposed works; and 3.2.2. NWL must either reasonably agree to the proposed works or provide reasons for its failure to agree to the proposed works within 30 Working Days, or within 15 Working Days of receipt of all further information requested pursuant to paragraph 3.2.1 (whichever is later). 3.2.3. For the avoidance of doubt nothing in this paragraph 3.2 shall be construed as a deemed approval from NWL for works to be carried out within the standard protection strips of NWL's apparatus.	
4.	Alteration of NWL Apparatus	4.1. Without prejudice to the generality of the foregoing, the alteration, extension, removal or re-location of any apparatus shall not be implemented until: 4.1.1. any requirement for any permits under the Environmental Permitting Regulations 2016 or other replacement legislation and any other associated consents are obtained; 4.1.2. if applicable, the undertaker has made the appropriate application under sections 106 (right to communicate with public sewers), 112 (requirement that proposed drain or sewer be constructed so as to form part of the general system) or 185 (duty to move pipes, etc. in certain cases) of	

Reference	Matter	Point Raised	Applicant's Comments
		the Water Industry Act 1991 as may be required by those provisions and has provided a plan of the works proposed to NWL and NWL has given the necessary consent or approval under the relevant provision, such agreement not to be unreasonably withheld or delayed; and 4.1.3. in the event that such works are to be executed by the undertaker, they are to be executed only in accordance with the plan, section and description submitted and in accordance with such reasonable requirements as may be made by NWL for the alteration or otherwise for the protection and maintenance of the apparatus, or for securing access to it. 4.2. If in consequence of the exercise of the powers conferred by the Order the access to any apparatus is materially obstructed the undertaker shall provide such alternative means of access to such apparatus as will enable NWL to maintain or use the apparatus no less effectively than was possible before such obstruction. 4.3. The undertaker, in the case of the powers conferred by the Order for the protective work to buildings, must exercise those powers so as not to obstruct or render less convenient or efficient the access to any apparatus belonging to NWL. 4.4. Without prejudice to paragraph 2.2 hereof if, in the exercise of the powers conferred by the Order, the undertaker acquires any interest in any land in which any apparatus is placed or requires that NWL's apparatus is altered, relocated or diverted, that apparatus must not be altered, removed, and any right of NWL to maintain or access that apparatus in that land must not be extinguished, until 4.4.1. alternative apparatus has been constructed and is in operation to the reasonable satisfaction of NWL; and 4.4.2. facilities and rights have been secured for that alternative apparatus in accordance with paragraph 5.1.	
5.	Alternative apparatus	5.1. Without prejudice to the generality of the foregoing and subject always to the provisions of paragraph 4.1 hereof, if, for the purpose of executing any works in, on or under any land purchased, held, appropriated or used under the Order, the undertaker requires the removal of any of NWL's apparatus placed in that land, the undertaker must give to NWL 28 days' written notice of that requirement, together with a plan of the work proposed, and of the proposed position of the alternative apparatus to be provided or constructed and in that case (or if in consequence of the exercise of any of the powers conferred by this Order an undertaker reasonably needs to remove any of its apparatus) the undertaker must, afford to NWL the necessary facilities and rights for the construction of alternative apparatus in other land of the undertaker and subsequently for the maintenance of and emergency access to that apparatus. 5.2. Any alternative apparatus to be constructed in land of the undertaker pursuant to the terms hereof must be constructed in such manner and in such line or situation as may be agreed between NWL and the undertaker. 5.3. If NWL notifies the undertaker that it desires the undertaker to execute any work, or part of any work in connection with the construction or removal of apparatus in any land of the undertaker that work must be executed by the undertaker without unnecessary delay under the superintendence and to the reasonable satisfaction of NWL.	

Reference	Matter	Point Raised	Applicant's Comments
		5.4. Whenever alternative apparatus is to be or is being substituted for existing apparatus, the undertaker shall, before taking or requiring any further step in such substitution works, use best endeavours to comply with NWL's reasonable requests for a reasonable period of time to enable NWL to: 5.4.1. make network contingency arrangements; or 5.4.2. bring such matters as it may consider reasonably necessary to the attention of end users of the utility in question. 5.5. Where, in accordance with the terms of the Order, the undertaker affords to NWL facilities and rights for the construction, maintenance in and access to land of the undertaker of alternative apparatus in substitution for apparatus to be removed, those facilities and rights are to be granted. 5.6. If the facilities and rights to be afforded by the undertaker in respect of any alternative apparatus, and the terms and conditions subject to which those facilities and rights are to be granted, are in the opinion of NWL less favourable on the whole to NWL than the facilities and rights enjoyed by it in respect of the apparatus to be removed and the terms and conditions to which those facilities and rights are subject, the undertaker must make provision for the payment of compensation by the undertaker to NWL as is reasonable having regard to all the circumstances. 5.7. Such facilities and rights as are set out in the preceding paragraphs 5.1, 5.5 or 5.6 are deemed to include any statutory permits granted to the undertaker in respect of the apparatus in question, whether under the Environmental Permitting Regulations 2010 or other legislation.	
6.	Stopping up	6.1. Where in pursuance of the powers conferred by the Order any street is stopped up (permanent stopping up and restriction of use of streets and private means of access), where NWL has apparatus in the street or accessed by virtue of that street, it has the same powers and rights in respect of that apparatus as it enjoyed immediately before the stopping up and the undertaker must grant to NWL legal easements reasonably satisfactory to NWL in respect of such apparatus and access to it. 6.2. Regardless of the temporary stopping up or diversion of any highway under the powers conferred by the Order (temporary alteration, diversion, prohibition and restriction of the use of streets), NWL is at liberty at all times to take all necessary access across any such stopped up highway and to execute and do all such works and things in, upon or under any such highway as may be reasonably necessary or desirable to enable it to maintain any apparatus which at the time of the stopping up or diversion was in that highway subject to provision of reasonable prior notice to the undertaker (except in the case of emergency) and compliance at all times with the undertaker's reasonable site safety rules and health and safety law.	
7.	Unmapped sewers/other apparatus	7.1. Where the undertaker identifies any apparatus which may belong to or be maintainable by NWL but which does not appear on any statutory map kept for the purpose by NWL, it shall inform NWL of the existence and location of the apparatus as soon as reasonably practicable. 7.2. If in consequence of the exercise of the powers conferred by the Order, previously unmapped sewers, lateral drains or other apparatus are identified by the undertaker, notification of the location of such assets will immediately be given to NWL and afforded the same protection as other NWL assets.	

Reference	Matter	Point Raised	Applicant's Comments
8.	Expenses and Costs	8.1. Subject to the following provisions of this paragraph and save where otherwise agreed in writing between NWL and the undertaker, the undertaker must repay to NWL all costs, charges and expenses which are reasonably and properly incurred or anticipated to be incurred by NWL in connection with: 8.1.1. the inspection, removal, alteration or protection of any apparatus which may be reasonably required in consequence of any works to construct the authorised development; and/or 8.1.2. the construction of any alternative apparatus which may be required in consequence of the execution of any such works as referred to in paragraph 5 of this Schedule.	
9.	Indemnity	9.1. Subject to sub-paragraphs 9.2 and 9.3, if for any reason or in consequence of the construction of any of the works by or at the direction of the undertaker that is consequential to the terms hereof any damage is caused to any apparatus (other than apparatus the repair of which is not reasonably necessary in view of its intended removal for the purposes of those works) or property of NWL, or there is any interruption in any service provided, or in the supply of any goods, by NWL, the undertaker must indemnify and keep indemnified NWL against: 9.1.1. any cost reasonably incurred by NWL in making good any damage or restoring the supply; 9.1.2. any other expenses, loss, damages, penalty or costs reasonably incurred by NWL, by reason or in consequence of any such damage or interruption. 9.2. NWL must use its reasonable endeavours to mitigate in whole or in part and to minimise any costs, expenses, loss, demands, and penalties to which the indemnity under this paragraph applies. If requested to do so by the undertaker, NWL must provide an explanation of how the claim has been minimised or details to substantiate any cost or compensation claimed pursuant to paragraph 9.1. The undertaker shall only be liable under this paragraph for claims reasonably incurred by NWL. 9.3. Any dispute arising between the undertaker and NWL under this Part of this Schedule must be referred to and settled by arbitration under article 62 (arbitration). 9.4. The fact that any act or thing may have been done by NWL on behalf of the undertaker or in accordance with a plan approved by NWL or in accordance with any requirement of NWL or under its supervision does not, subject to paragraph 9.5 excuse the undertaker from liability under the provisions of sub-paragraph 9.1 unless NWL fails to carry out and execute the works properly with due care and attention and in a skilful and professional like manner or in a manner that does not accord with the approved plan. 9.5. Nothing in paragraph 9.1 imposes any liability on the undertaker with respect to any damage or interruption to the extent that it is attributable to the unlawful or unreasonable act, neglect or default of NWL, its officers, servants, contractors or agents. NWL must give the undertaker reasonable notice of any such claim or demand and no settlement or compromise is to be made, without having first consulted the undertaker and taken into account its representations.	

Reference	Matter	Point Raised	Applicant's Comments
10.	Duty to cooperate	10.1. Where in consequence of the proposed construction of any of the authorised development, the undertaker or NWL requires the removal protection or alteration of apparatus, the undertaker must use all reasonable endeavours to co-ordinate the execution of the works in the interests of safety and the efficient and economic execution of the authorised development and taking into account the need to ensure the safe and efficient operation of NWL's undertaking and NWL must use all reasonable endeavours to co-operate with the undertaker for that purpose.	
11.		Nothing in this Part of this Schedule affects the provisions of any enactment or agreement regulating the relations between the undertaker and NWL in respect of any apparatus laid or erected in land belonging to the undertaker on the date on which this Order is made.	

26. Applicant’s Comments on the Submission from Ramsgate Town Council

26.1 Introduction

26.1.1 Table 26.1 summarises the Applicant’s comments on Ramsgate Town Council Deadline 6 Response [REP6-171].

Table 26.1 Applicant’s Comments on Ramsgate Town Council Deadline 6 Submission [REP6-171]

Reference	Matter	Point Raised	Applicant’s Comments
24th March 2025: Open floor hearing 3 (OFH3)			
		Ramsgate Town Council accepts the principle of the Sea Link project. But we remain deeply concerned that the Kent onshore component—particularly the converter station and associated land-take around Minster Marshes and the Pegwell Bay area—falls on one of the most environmentally sensitive landscapes in our region. This is an area valued not simply for scenery, but for its ecology, floodplain function, bird migration routes, and connection to the Pegwell Bay protected site complex. For many local people, it is also one of the few remaining places that offers quiet, open natural space—something that is increasingly scarce in Thanet. We are not persuaded that the project as currently configured demonstrates that this location is the only viable option, nor that lower-impact alternatives—particularly brownfield opportunities near Richborough—have been properly tested or evidenced.	The Applicant has carefully assessed the impacts of the proposed development on tourism, in itself and with regards to cumulative impacts arising from other relevant projects. The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are currently a source of concern for local tourism. To address this concern, the Applicant has undertaken a comprehensive and robust EIA. A comprehensive cumulative assessment of the impacts of Sea Link and other projects in Kent has been undertaken within Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073].
	Concerns about cumulative pressure	Thanet is carrying the burden of multiple major development demands: offshore grid connections, transport upgrades, housebuilding, and regeneration pressures. As a coastal district with limited land and significant deprivation, our communities are already experiencing the cumulative loss of green space, marshland, biodiversity and amenity. Sea Link’s footprint in Kent would impose long-term industrialisation on an area whose environmental value is high but whose landform is fragile, low-lying, and increasingly vulnerable to climate-driven flood risk. We believe these factors have not yet been meaningfully reconciled with the land-take proposed.	
	Community impact and fairness	For local residents, particularly in Ramsgate, Minster, Cliffsend and the surrounding parishes, there is a sense that nationally significant infrastructure is repeatedly routed to areas least able to resist the loss of valued natural space. We hear regularly from residents who do support renewable energy and want the grid to be strengthened—but they ask a simple question: “Why here, when alternatives exist?” We believe that is a fair question, and one the Examination should test robustly.	The Applicant notes this request made to the ExA.

Reference	Matter	Point Raised	Applicant's Comments
	What we are asking the Examining Authority to do	We ask the Examining Authority to: a. Rigorously test whether Minster Marshes is genuinely unavoidable Require a transparent demonstration that alternative sites—especially brownfield areas around Richborough—have been fully modelled, compared and discounted for sound reasons. b. Require the Applicant to minimise land-take and permanent impacts Where temporary possession, rights-only arrangements, or rerouting can significantly reduce damage to the marshes, these should be preferred. c. Scrutinise hydrological and flood-risk implications Raising platforms, piling, haul roads and cable infrastructure cannot be allowed to worsen flood behaviour in an area already prone to groundwater and tidal interactions. d. Protect access, recreation, and cultural landscape The Way of St Augustine and the marsh routes are integral to local identity. Their loss, even temporarily, will be deeply felt. e. Require stronger community engagement and mitigation commitments Communities must not be left worse off—environmentally, socially, or visually—because of a national infrastructure scheme.	The option identification and selection process for the Kent Converter Station is set out in Application Document 7.3: Design Development Report [APP-321].
	Closing	Chair, Members, our message today is constructive and clear: We support the national need, but not the unnecessary local harm. Ramsgate Town Council asks that this Examination ensures the full range of alternatives is honestly weighed, and that the final outcome—whatever form it takes—is not simply the easiest route for the developer, but the right one for both the nation and the people who live here. Thank you for hearing our representation.	The necessity for the Proposed Project and it's compliance with relevant legislation is set out in the Applicant's Statement of Reasons [REP6-008]
25th March 2026: Compulsory Acquisition Hearing 2			
		Ramsgate Town Council supports the national need for grid reinforcement but objects to the compulsory acquisition of Minster Marshes and adjacent land, where harm is high, alternatives exist, and the statutory tests under Planning Act 2008 s.122 have not been met.	
1.	Necessity Test – s.122(2)	The Applicant has not shown why permanent acquisition is essential for several plots associated with: • Construction compounds, haul routes and temporary access; • Drainage and flood attenuation; • PRow realignments. • Request: Convert permanent CA to temporary possession or rights-only powers wherever feasible.	The test under section 122 of the Planning Act 2008 is not whether the land is “essential” but whether it is “required”, inter alia, for the development or to facilitate the development, and that there is a compelling case in the public interest for the acquisition. In any event, the justification for the use of compulsory purchase is set out in the documents relating to that, including in particular the Statement of Reasons [REP6-008].
2.	Alternatives – brownfield before marshland	Sea Link's Kent configuration—Pegwell Bay landfall, TJB, 2 km HVDC to a converter station near Minster—drives land-take on highly sensitive marshland. RTC asks the ExA to require a side-by-side alternatives matrix including Richborough brownfield options to demonstrate whether Minster Marshes acquisition is truly unavoidable.	The route selection and site selection, including the need for land acquisition, have been fully assessed. The reasoning for the arrangement of the Proposed Project is contained in: • Application Document 6.2.1.3: ES Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]

Reference	Matter	Point Raised	Applicant's Comments
			• Application Document 8.1: Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368] • Application Document 8.2: Options Selection and Design Evolution Report (October 2023) [APP-369] • Application Document 8.3: Strategic Options Report (October 2023) [APP-370] • Application Document 7.2: Strategic Options Back Check Report [APP-320]
3.	Environmental & Ecological Harm	Minster Marshes is hydrologically fragile and functionally linked to Pegwell Bay (SSSI/SPA/Ramsar/NNR/MCZ). Loss, fragmentation and disturbance to wetland ecosystems and migratory bird routes (EAF) risks irreversible damage. Request: ExA to test the Applicant's HRA and in-combination assessment rigorously.	The Applicant acknowledges this request to the ExA.
4.	Flood Risk, Hydrology & Drainage	Raising platforms, piling and extensive drainage works increase land needs and may alter groundwater pathways. Relevant evidence: Kent Drainage Strategy & Surface Water Flood Risk Technical Note lodged in the Examination. Request: Demonstrate that drainage-related land-take cannot be reduced, and provide restoration guarantees for temporarily occupied areas.	Details of the Applicant's approach to drainage are set out in Application Document 9.17.2 Kent Drainage Strategy [REP5-086].
5.	Open Space, PRow & Access	Where land meets "open space" definitions or includes PRow (e.g., Way of St Augustine), the Applicant must justify closures/diversions and provide functional exchange land if required.	The Applicant acknowledges this.
6.	Negotiations & Good Faith	Applicant should table a Schedule of Negotiations, including discussions with TDC (hoverport access), KCC, IDB, Kent Wildlife Trust, and local councils. Some acquisition appears avoidable if agreements are reached.	Details of the Status of Negotiations were set out in [REP6-012].
7.	Funding & Restoration	RTC requests confirmation that the Funding Statement covers: • Restoration of marshland after temporary possession; • Worst-case drainage/flood risk design scenarios. This is required under CA Guidance.	Details of the Funding for the project were set out in [REP4-011]

27. Applicant’s Comments on the Submission from Saxmundham Town Council

27.1 Introduction

- 27.1.1
- Table 27.1 summarises the Applicant’s comments on Saxmundham Town Council Deadline 6 Response [REP6-174].
- 27.1.2
- The Applicant’s has responded to Saxmundham Town Council Deadline 6 Response [REP6-272] in **Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions**.

Table 27.1 Applicant’s Comments on Saxmundham Town Council Deadline 6 Submission [REP6-174]

Reference	Matter	Point Raised	Applicant’s Comments
Open Floor Hearing 2 – 24 March 2026			
	Benhall Railway Bridge	We refer to the Applicant’s Benhall Railway Bridge – Crossing Feasibility Study (REP14-101). We have significant concerns regarding Option 3, which proposes “do nothing to Benhall Bridge” with Abnormal Indivisible Loads using an alternative access route. The removal of extensive construction works to Benhall Bridge would reduce impacts on the vulnerable residents of White Arch Park, eliminate disruptive road closures and diversions through Saxmundham, and prevent closure of the rail line which is vital both for passengers and for freight serving Sizewell C. Those elements are welcome. However, the alternative route proposed under Option 3 is not satisfactory. It would transfer significant traffic impacts to communities already experiencing cumulative effects from Sizewell C and the Friston Substation, particularly Middleton and Theberton until the Sizewell Relief Road is completed, and the parishes of Leiston and Knodishall. Furthermore, Option 3 does not materially alleviate existing traffic pressures within Saxmundham.	The Applicant has set out a number of options for ALL deliveries, as confirmed in the crossing feasibility study [REP4-101]. The Applicant recognises the benefits of providing remediation to the Benhall Railway Bridge and confirms this as its preferred option, as discussed with the local highway authority. Additional options have been retained as they help ensure construction access for all necessary construction traffic for the project.
	Proposed Bridge over the River Fromus	Under the Applicant’s proposals, HGVs and workforce vehicles would continue to access the site via the B1121 through Benhall and/or Saxmundham. A new road and bridge over the River Fromus would then be constructed to provide access to the converter station. Saxmundham Town Council has consistently expressed concerns regarding the proposed River Fromus bridge due to its impacts on ecology, heritage assets and landscape character. We therefore maintain our objection to this element of the scheme. However, we believe there is an alternative approach that more appropriately considers the interests of host communities.	The Applicant has carefully considered the potential impacts of the options relating to the proposed bridge – see Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055].
	Building Bridges	Saxmundham, Benhall and Sternfield are host communities for this nationally significant infrastructure. It should be incumbent upon the Applicant to work constructively with those communities to identify solutions that mitigate the impact of 21st-century traffic demands on a 20th-century road network.	The Applicant has explained in detail why it does not consider this proposal to be an appropriate alternative – see p.11 of Document 9.107: Applicant’s Response to Suffolk County Council’s Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125].

Reference	Matter	Point Raised	Applicant’s Comments
		Suffolk County Council’s proposal (REP4-149) to avoid works to Benhall Railway Bridge through the use of a permanent haul road offers such an opportunity. A haul route using the Sizewell Link Road, via the former Leiston airfield to connect with the B1119, would: • Remove construction traffic from the parishes of Benhall and Saxmundham; • Prevent cumulative traffic impacts in Leiston and Knodishall; • Avoid harm to the historic parkland setting of Hurts Hall; • Maintain the operational rail link serving Sizewell C and local communities; • Remove NGV LionLink traffic from Saxmundham; and • Increase resilience in emergency planning for Sizewell B and C. This approach would demonstrate meaningful coordination between NSIPs, both operational and at statutory consultation stage, and would represent a constructive, cooperative response to cumulative infrastructure pressures. We acknowledge that revising traffic arrangements may create delays. However, the National Energy System Operator’s “Advice on achieving clean power for Great Britain by 2030” indicated that projects such as Sea Link have delivery dates beyond 2030, and that the projects needed bringing forward to meet the clean energy target. Given the current delivery timetable, this will not be achieved. The imperative to accelerate delivery should not override the need for coherent planning, coordination and appropriate mitigation of cumulative impacts. We strongly endorse that the Applicant should review its traffic strategy, engage constructively with Suffolk County Council’s alternative proposal, and seek to build a lasting and positive metaphorical bridge with its host communities through coordinated and sustainable infrastructure planning.	

28. Applicant’s Comments on the Submission from Snape Parish Council

28.1 Introduction

- 28.1.1 Table 28.1 summarises the Applicant’s comments on Snape Parish Council Deadline 6 Response [REP6-176].
- 28.1.2 Table 28.2 summarises the Applicant’s comments on Snape Parish Council Deadline 6 Response [REP6-177].

Table 28.1 Applicant’s Comments on Snape Parish Council Deadline 6 Submission [REP6-176]

Reference	Matter	Point Raised	Applicant’s Comments
Written Summary of statement made at Open Floor Hearing 3, 24/3/2026			
1	Baseline Data	The construction of a baseline of traffic movements has been an issue since the original application documents revealed that the baseline months chosen by NGET were far from neutral and completely ignored the seasonality of tourism and agricultural traffic movements across the local network. This matter remains unresolved and disqualifies calculations based upon this faulty baseline.	The Baseline traffic flows which have informed Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] are based on an agreed survey methodology with SCC Highways and remain appropriate for the purposes of the original assessment work. The Applicant’s position on this matter remains unchanged from that previously summarised within Application Document 9.79 Applicant’s Comments on Written Representations [REP2-034] and Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]. SCC Highways has also confirmed within their Deadline 6 submission [REP6-184] that the Environmental Assessment would have been misleading had it been based on higher summer traffic flows due to reduced proportional impacts of the Proposed Project. This matter was also discussed with SCC Highways on 30 March 2026 when it was agreed that the Baseline traffic surveys were appropriate for use, given that the methodology and period of data collection was agreed with SCC in advance of the surveys. In terms of the junction capacity modelling, following a meeting with SCC Highways on 30 March 2026 it was agreed that it would be useful to include a Sensitivity Test as part of the junction modelling to account for a potentially higher Baseline at other times of the year. The Applicant has therefore carried out a Sensitivity Test by identifying and applying a robust seasonality factor to the Baseline traffic survey results to reflect busier network conditions and then carrying this through to the other scenarios. The junction modelling methodology and results are reported within Application Document 6.3.2.7.A (B) Environmental Statement Appendix 2.7.A Transport Assessment Note [REP6-039] which was updated and submitted at Deadline 6. The junction capacity assessments carried out pursuant to discussions with SCC Highways (both with and without the Sensitivity Test) demonstrate that the Proposed Project will not have a significant effect on the operation of key local junctions and that the conclusions within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] and Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060] are valid and robust.

Reference	Matter	Point Raised	Applicant's Comments
			The above Sensitivity Test has been carried out for the purposes of the junction modelling in Suffolk only, following further consultation with SCC Highways. No further traffic surveys or seasonality adjustments are required to inform Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054], as agreed with SCC.
2	Junction Modelling	The information received up to deadline 5 on traffic impacts excluded any junction modelling, and we are still after 5 months of examination waiting for any modelling of Suffolk junctions. The commitment at last made by NGET to provide this critical information excludes a number of key junctions, including from our point of view the A1094/B1069 Snape Church junction. Providing this important information only at deadline 6 reveals a startling lack of interest in their stakeholders' feedback from the applicant.	The Applicant held a further meeting with SCC and ESC on 30 March 2026, and the junction modelling outputs were subsequently shared with them on 1 April 2026. This included junction modelling for the A12/ B1121 Main Road junction (to the south of Saxmundham), the A1094 Aldeburgh Road/ B1121 Aldeburgh Road junction and the A1094 Aldeburgh Road/ B1069 Snape Road junction. The junction modelling also included a Sensitivity Test, to consider potentially higher Baseline traffic flows at other times of the year driven by tourism related traffic peaks in summer months. The junction modelling also includes scenarios with and without cumulative traffic. The junction modelling has been submitted at Deadline 6 within Application Document 6.3.2.7.A (B) Environmental Statement Appendix 2.7.A Transport Assessment Note [REP6-039] to provide a summary of the junction modelling scope, methodology and results. Notwithstanding the above, the Applicant had not previously carried out any junction modelling given that the proposed working hours are designed to minimise additional construction worker vehicle trips on the surrounding highway network at the busiest times (during the network peak hours) and that peak construction traffic levels will be short-term and temporary in duration. In addition, no potential for significant effects had been identified with respect to Driver Delay at junctions within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] based on queue length surveys carried out at these junctions during the weekday AM and PM peak periods, and peak construction traffic forecasts. Therefore, it was not considered necessary to carry out any junction modelling. Nonetheless, junction modelling has now been carried out for the 'critical junctions' on key construction traffic routes (including the A1094/ B1069 Snape Road junction) following further consultation with SCC Highways.
3	Access to the proposed Saxmundham site	The options for access to site for AILs have all been heavily criticised, and we are concerned that these options are only now being 'finalised', despite NGET's public claims of strategic forethought. Each option in CR1 has severe impacts on the road and rail networks and we therefore identify ourselves at this point with the proposals made by Suffolk County Council to explore the use of the SZC northern relief road. We agree with Suffolk County Council in [REP4-149] that NGET haven't paid enough attention to the provision of alternative access solutions, especially as regards maintenance and operational access, with the impact of consequent road closures (A12 & B1121) on the A1094 and our own local roads left out of consideration. We also consider Sea Link's arguments in [REP5 179] once again unsatisfactory and repetitious - bringing the original case back to the debate unchanged in no way respects the feedback that NGET claim to value from their stakeholders. to do). The environmental impacts set out in [APP-044] 3.811-3.816 that NGET take to disqualify the Relief Road proposal contain nothing at all that is not brushed aside in other contexts.	The Applicant has provided a response to SCC's Deadline 4 submission [REP4-149] within Application Document 9.134 Applicant's Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109]. The Applicant has also previously provided responses relating to the Change Request (CR1) within Application Document 9.91 (A) Applicant's Comments on Change Request (CR1) Relevant and Written Representations [REP4-089]. This includes the Applicant's responses to SCC's Deadline 3A submission [REP3A-031] within Table 2.2. The Applicant cannot comment on the point relating to [REP5-179] as this represents a submission from Suffolk County Council, not the Applicant.

Reference	Matter	Point Raised	Applicant's Comments
4	Rat Running	We have previously asked for more detailed attention to be paid to the second-order impacts of heavy traffic on major roads, and we make this request once more. Those responsible for the cumulative impact of traffic diversion into unsafe and fragile rural roads and quiet lanes should be paying for TROs to reduce speed limits, and effective signage to protect smaller roads from the pandemonium and verge destruction that we have already seen with only one project in place, and which will be repeated over the next decade unless action is pre-emptively taken through DCO obligations.	The Applicant's latest position with respect to this point is set out in response to ISH3 Action Point 18 in Application Document 9.135 Applicants Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110] .
5	Needs case	We would also like to note that the points made by other organisations about the actual need for this project seem at last to have received a considered (if not satisfactory) response from NGET; and in that context we also welcome the ExA's questions in ExQ3 on the requirements of national policy EN-1, where claims of Critical National Priority are, especially in protected landscapes and environments, required to be supported by a rigorous application of the mitigation hierarchy – which of course starts with the option of 'avoiding' altogether. The Applicant has been ignoring the needs argument throughout, relying on appeals to the Clean Power 2030 'mission' document for the assumption of support for a so-called 'critical and urgent' – but clearly very general - need for reinforcement of the grid. They should of course have first considered more efficient and cost effective methods of meeting both locational and general need for renewables, especially when proposing to build industrial infrastructure in a National Landscape with an extraordinarily high incidence of protected and preserved landscape, ecology and heritage.	The Applicant has made a number of submissions on need and does not add to them here.

Table 28.2 Applicant's Comments on Snape Parish Council Deadline 6 Submission [REP6-177]

Reference	Matter	Point Raised	Applicant's Comments
Written Submission for Issue Specific Hearing 3, Item 4 – Traffic and Transport			
	Junction Modelling and cumulative assessment of impacts against the baseline	The Applicant has maintained throughout the Application and the Examination the position that since the relative contribution of their construction, operation and maintenance traffic flows will be small in comparison to the total, cumulative traffic generated by the local community and the various energy (and road improvement) schemes which it takes into consideration, its impact will not be significant. This position was stated clearly several times during ISH3 – Sea Link traffic impact will be '...small...', or '...pretty negligible compared to total traffic flows...' {Mr Flanagan, for example, referring to the Kent Onshore scheme). As a result of this assumption, the Applicant has restricted its Environmental Assessment to a 'Note' rather than a full 'Assessment' and has resisted strongly any requests for formal junction modelling. Even after they have reluctantly agreed to junction modelling exercises in Kent and Suffolk, they are delivering less than Suffolk County Council has requested¹ and delivering it late. Mr Flanagan, speaking for the Applicant, at one point	This matter was discussed with SCC Highways on 30 March 2026 when it was agreed that whilst the Baseline traffic surveys (carried out in January/ February 2024) were appropriate for use (methodology and neutral month period of data collection was agreed with SCC in advance of the surveys), that it would nonetheless be useful to include a Sensitivity Test as part of the junction modelling to account for a potentially higher Baseline at other times of the year. The Applicant has therefore carried out a Sensitivity Test by identifying and applying a robust seasonality factor to the Baseline traffic survey results to reflect busier network conditions and then carrying this through to the other scenarios. The junction modelling methodology and results are reported within Application Document 6.3.2.7.A (B) Environmental Statement Appendix 2.7.A Transport Assessment Note [REP6-039] which was updated and submitted at Deadline 6. The results were also shared with SCC and ESC on 1 April 2026 for their review prior to Deadline 6. The junction capacity assessments (including the Sensitivity Test) carried out pursuant to discussions with SCC Highways demonstrate

Reference	Matter	Point Raised	Applicant’s Comments
		during the hearing suggested that in ‘going above and beyond’ by modelling just three junctions in Suffolk, NGET were also generous in stretching their capacity so as to deliver what had been asked for throughout the Examination, and specifically by the ExA in time for Deadline 5 (March 10th) instead by April 1st. The claim that this would allow SCC Highways time to review the new information by Deadline 6 was surely in contempt of the ExA’s lenience in setting the extended timetable in the first place, and inefficient in the context of the Examination. It also effectively prevents any substantive comment from Interested Parties in this Application. The question of NGET’s chosen baseline has been extensively raised, and the ExA will be clear that local communities consider the choice of January and February defective and wilfully obtuse. But the lengths to which the Applicant went during this hearing to deny that the choice of baseline could be in any way influential on their case for the insignificance of their construction traffic was surely alarming. We quote first of all Mr Belton, who claimed that changing the baseline ‘...wouldn’t change the outcomes of the impacts as a result of our schemes on the community schemes, that will just push, you know, the baseline slightly higher potentially...’ – this seems to say that changing the baselines would not have any effect on the overall impact of the ‘schemes’; but perhaps [redacted] meant to say merely that it would have no impact on NGET’s assessment of the impact? It’s hardly clear. However, made the Applicant’s position very clear indeed. He said, in answering a point on the choice of January and February as baseline months: ‘If the argument is the seasonality factor, the surveys were done in the Winter of 2024. That gives more difference between the impact of the scheme because you’ve got a lower baseline, so actually although the conclusion is ‘No Significant Effects’, if the baseline is higher it would be even less effect.’ (Our emphasis). Mr Dowd is saying that as the baseline increases, the impact of Sea Link decreases. He means – the impact relative to the total traffic numbers. But he does not say that. Sea Link have also referred in the Examination to the impact of Sizewell C Construction traffic as ‘background noise’. It is the same error. To put it as simply as possible: if a road is safe and efficient at 100 vehicles per hour, but unsafe at more than 100 vehicles per hour, and the baseline community traffic plus (say) SZC traffic produce in total 99 vehicles per hour; then if Sea Link (say) add 5 vehicles per hour to the load, then it does not matter that their traffic is a mere 4.8% of the total – the road is now unsafe, and they are part of that problem. SZC traffic is not part of the ‘background noise’, it is part of the moving and cumulative baseline against which they ought to be modelling their own corporate impact, and then, preferably with the highways authority and the other NSIPs, finding better solutions. We ask the ExA to ensure that Sea Link’s modellers clearly understand that relative impact is not the key issue here. There are junctions within the Sea Link construction routes that are already at or above capacity, and adding	that the Proposed Project will not have a significant effect on the operation of key local junctions and that the conclusions within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] are valid and robust. Notwithstanding the above, the Baseline traffic flows which have informed Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] are based on an agreed survey methodology with SCC Highways and remain appropriate for the purposes of the original assessment work. The Applicant’s position on this matter remains unchanged from that previously summarised within Application Document 9.79 Applicant’s Comments on Written Representations [REP2-034] and Application Document 9.34.1 (B) Applicant’s Detailed Responses to the Relevant Representations identified by the ExA [REP2-014]. The above Sensitivity Test has been carried out for the purposes of the junction modelling in Suffolk only, following further consultation with SCC Highways. No further traffic surveys or seasonality adjustments are required to inform Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054], as agreed with SCC. SCC Highways has also confirmed within their Deadline 6 submission [REP6-184] that the Environmental Assessment would have been misleading had it been based on higher summer traffic flows due to reduced proportional impacts of the Proposed Project. This matter was also discussed with SCC Highways on 30 March 2026 when it was agreed that the Baseline traffic surveys were appropriate for use, given that the methodology and period of data collection was agreed with SCC in advance of the surveys.

Reference	Matter	Point Raised	Applicant's Comments
		even 1% more will have significant effects. Even if they are caused by trivial percentages of the overall traffic.	

29. Applicant’s Comments on the Submission from Thanet District Council

29.1 Introduction

29.1.1 Table 29.1 summarises the Applicant’s comments on Thanet District Council Deadline 6 Response [REP6-185] Thanet District Council Response to Action Points from ISH3 of the response outlines the purpose of the submission.

29.1.2	Reference	Matter	Point Raised	Applicant’s Comments
Thanet District Council Response to Action Points from ISH3 of the response				
General				
1		Submit any suggested drafting (whether relating to matters raised in ExQ3 or not) which you consider should be included in the draft Development Consent Order (dDCO), with reasons why you consider it is necessary	TDC refers to previous submissions which have provided wording for the various requirements and refers to our submission under ExQ3 accompanying this document, for recent comment.	Noted.
Traffic and Transport				
11		The ExA requires the applicant to work with the County Councils (as Highway Authorities) to consider how any caps to HGV movements could be secured with wording also submitted, should the Secretary of State deem that capping is necessary. Please confirm whether this should be a requirement or part of a control document for securing the caps. This should also include which road links and junctions capping should be set and how the numbers of HGVs would be derived at to set the cap.	TDC defer to Kent County Council (KCC) as Highway Authority.	Noted.
18		If there are traffic delays due to proposed development construction traffic, either alone or in combination with other developments, is it likely that alternative routes would be taken by the public in their vehicles, potentially having an impact on more minor highways? If so, has	TDC defer to KCC as Highway Authority.	Noted.

29.1.2	Reference	Matter	Point Raised	Applicant's Comments
		this been assessed and is there actions needed to avoid this?		
Socio-economics and tourism				
24		The ExA require that the Councils work together and provide wording for a requirement within the DCO, if the Councils considered it necessary, for the monitoring and possible adaptive management in regards to tourism impacts	TDC is keen to work alongside the other Councils to provide wording for a requirement within the DCO in relation to the monitoring and possible adaptive management of tourism impacts. However, due to the timeframe between the ISH3 and Deadline 6 it has not been possible to undertake this Action Point for this submission.	Noted.
27		If there was to be a Skills and Employment Plan submitted by the applicant which would be considered acceptable by the Councils, would this be sufficient to overcome any remaining concerns relating to economic impacts?	As set out in the updated versions of Principal Areas of Disagreement Summary Statements (PADSS) [REP5-186] TDC would welcome a skills and employment plan but request the inclusion of a local education strategy and engagement with local education providers. It would be a good opportunity to capture these potential benefits, and the site would provide considerable educational opportunities beyond the employment elements. TDC would welcome the Applicant considering the inclusion of a local education strategy and in doing so would resolve any remaining concerns relating to economic impacts. However, this is notwithstanding the impacts on tourism which represents nearly 20% of Thanet's economy.	The Applicant has prepared Application Document 9.120 Detailed Skills, Supply Change and Employment Plan submitted at Deadline 6. This includes commitments to engage with local education providers, schools and colleges through existing national and regional programmes, including STEM outreach, careers engagement and apprenticeship promotion. As set out in the SSCEP [REP6-101], the Applicant's approach is to integrate with existing programmes rather than create new standalone initiatives. The Applicant does not consider it appropriate or proportionate to introduce a separate, bespoke "local education strategy" at this stage as education related activity is already embedded within the SSCEP [REP6-101] through engagement with Further Education providers, careers hubs and employability partners, ensuring that educational benefits beyond direct employment are captured without duplication.
28.		Are there remaining concerns with regard to the potential displacement of tourists by workers of the proposed development (or in combination with other workers of other developments in the area) in tourist accommodation?	As a coastal destination, the Visitor Economy is a vital sector for the local economy, supporting 8,257 jobs across Thanet. This accounts for 19% of total employment and is valued at £349 million, based on 2023 data Cambridge Model Economic Impact Report for Thanet. The impact of meeting the proposed peak accommodation demand in July 2028, with an estimated 169 construction workers involved in the Kent Onshore Scheme, will significantly disrupt the local visitor economy. This is particularly an issue for Ramsgate on the basis that it has the lowest number of bedstock in the Thanet district. On the basis that the development is in the district of Thanet, it is likely that the highest demand for accommodation will be here. The reports indicate that at the peak of construction in July 2028, 93% of the total accommodation capacity is expected to remain available for the public. However, this does not reflect what is observed locally and through anecdotal evidence. It is noted that this calculation is based on figures for Kent within a 60-minute drive which does not account for the higher occupancy levels experienced in the summer months in Thanet, as a prime coastal destination. The longer-term impact on the district of people being unable to stay locally is that they may consider there is not enough accommodation and only visit Thanet as day visitors. Additionally, if the bedstock is	The Applicant has undertaken a comprehensive and robust EIA and maintains its position that the Project will not give rise to significant effects on socio-economics, leisure and tourism following the application of appropriate mitigation. Overall, the Applicant considers that the combination of the EIA and supporting technical documents provide a robust, proportionate, and policy-compliant framework for assessing and managing socio-economic effects.

29.1.2	Reference	Matter	Point Raised	Applicant's Comments
			filled with workers, rather than visitors, they will not be spending the same amount of money in the local economy, and this will have an impact on the wider sector, outside of the accommodation. TDC would also like to raise a number of points from the Visitor and Tourism Assessment Technical Note - Kent [REP3-066]: (1) Accommodation Capacity: The applicant's "worst-case scenario" estimate of 67 average FTE workers needing accommodation in July does not align with TDCs local experience. TDC typically see little to no vacancy during the peak summer season. (2) Growth in Visitor Economy: Our visitor economy has grown significantly. Please refer to the 2023 economic data (2025 data is expected in October/November). While the Airbnb and private rental markets have expanded due to hotel shortages, demand still frequently exceeds supply during peak periods. (3) Increased Visitor Numbers: Since 2023, visitor numbers have risen, driven largely by the London market and attractions like Dreamland. The demand is so high during the summer season (June–September) that extra late-night trains are required to transport visitors who cannot find local accommodation. (4) Peak Workforce Demand: The estimate of 241 FTE workers required for two days represents a level of demand that cannot be met between May and October. We have historically been unable to fulfil similar large-scale requests from film productions. I can consult with the Communications team for specific evidence if required.	
Health and Wellbeing				
32		With regard to the proposed exceptions included in requirement 7, are there any that the Council considers as should be omitted or amended?	TDC suggest the removal of the following: e) delivery to the transmission works of abnormal loads and any highway works requested by the highway authority to be undertaken outside the core working hours; - This would be secured via Construction Traffic Manangement Plan and should require prior approval from the Local Highways Authority - so can be removed. f) the testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities; g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities; - This is very open to interpretation and seemingly allows for all construction work to be extended particularly when read with part 6 of the Requirement. k) intrusive and non-intrusive surveys; – This should be limited to surveys that cannot be undertaken during daytime hours – eg bat surveys, noise surveys etc.	The Applicant provided additional descriptions of these works at the request of the ExA in response to AP33 in Application Document 9.135 Applicants Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110]
34		All councils to work together to submit alternative wording with respect to core working hours including any restrictions and	TDC is aware of the amended wording proposed by SCC, which are supported in principle and we await the view of the Applicant to inform further comment (incorporating the inclusion of Thanet specific works within the wording)	The core working hours proposed (secured via requirement 7 of Document 3.2 Draft Development Consent Order) are required to facilitate the delivery of the Proposed Project, a critical nationally important electricity transmission infrastructure, by 2030. This reflects the need presented in the UK Government's Clean Power 2030 Action

29.1.2	Reference	Matter	Point Raised	Applicant's Comments
		exceptions required, if the councils consider this necessary.		Plan, responding to NESO's Clean Power 2030 report. The delivery of the Proposed Project in accordance with the programme set out in the Applicant's Transmission Licence, in accordance with the NESO clean power objectives, and in a way that reduces constraints costs being passed to consumers, is fundamental to the need case for the Proposed Project. The Proposed Project requires the ability to programme its work as necessary across a seven-day week. While it is not anticipated that Sunday and bank holiday working would be undertaken across the entire onshore elements of the project every weekend, the ability to utilise weekend days as required is critical to allow an effective delivery programme to be developed. Within the core working hours themselves, there are restrictions on noisy works (namely percussive piling) and on HGV movements on weekends, with neither percussive piling nor HGV deliveries occurring on Sundays or bank holidays with the exception of activities covered under requirement 7 paragraph (4). Furthermore, bank holiday weekends are excluded from the core working hours at the Suffolk converter station site and the Kent converter station and substation site, with further restrictions at Friston (Kiln Lane) substation (recognising that this is already consented via another project DCO). There are robust controls in a suite of management plans secured via requirements 5 and 6 of the dDCO that mitigate the effects of construction activity, noting for example Document 7.5.3 Outline Onshore Construction Environmental Management Plan [REP6-074], Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP6-134], and Application Document 9.83 Outline Code of Construction Practice [REP4-232]. The Applicant's position reflects that set out in its responses to ExQ 1GEN49 in Document 9.73 Applicant's Responses to First Written Question [REP3-069] and its responses to AP106 Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2)ISH2 Action Point 106 [REP4-086].
Cultural Heritage				
39		Does there need to be any changes to the draft DCO or the support documents submitted by the applicant in relation to cultural heritage? If so, please set this out with alternative or additional wording.	TDC does not have any further comments in relation to cultural heritage.	Noted.
Cumulative Effects				

29.1.2	Reference	Matter	Point Raised	Applicant's Comments
44.		The applicant and the Councils to work together and provide a document which provides the reasonings of the parties and DCO (and/or if appropriate REAC) wording to secure the measures identified in responding to 2WQ 2CEIntra3 should the Secretary of State deem this to be necessary.	The Council is unable to update on this as discussions are yet to take place.	The Applicant met with TDC on 22 April 2026 to discuss these points as well as other matters arising from the Rule 17 letter issued by the ExA on 21 April 2026. <u>AP44</u> <u>TDC Position:</u> It is unlikely that further mitigation measures are available to mitigate significant intra-project cumulative effects as the relevant mitigation measures have already been imposed for the relative topics. Whilst other potential mitigation measures are still being discussed for each topic. In addition, the Applicant has advised the exact intra-project impacts are not fully known at this stage and are subject to detailed design and construction programme. <u>Applicant's Position:</u> The Applicant shares TDC's position as set out above.
48.		Applicant and local authorities to develop a joint position statement with regard to the unmitigated significant residual landscape and visual effects to see if there are further mitigation measures that can be included or compensation measures to offset any residual significant effects, if the Secretary of State considers that to be necessary.	The Council is unable to update on this as discussions are yet to take place.	<u>AP48</u> <u>TDC Position:</u> The Applicant has made clear that no further mitigation is possible to reduce the significant effects on the landscape and visual amenity. This includes additional foreground planting which the Applicant concludes would conflict with the special features of the landscape character (E1 – Stour Marshes). There may be some possibility for compensatory measures in the form of landscape enhancements within Landscape Character Area E1 but this would not mitigate the impact on the landscape from the proposed development. <u>Applicant's Position:</u> The Applicant considers that potential avoidance, reduction and mitigation measures have been deployed as fully as possible. There is no policy or legal requirement that the mitigation hierarchy requires all residual landscape and visual effects to be compensated for or that it is appropriate for alternative landscape compensation to be provided if it is accepted that there are any residual adverse landscape and visual effects that result from the Proposed Project.
49.		Continue discussions with the councils to seek to identify appropriate mitigation, including measures to compensate and offset significant effects. Provide a position statement at DL6, which includes reasoning as to why the parties consider these measures to be necessary, or not, and wording that can secure such measures should the Secretary of State deem them	The Council is unable to update on this as discussions are yet to take place.	<u>AP49</u> <u>TDC Position:</u> TDC are of the view that there are additional developments within a 5km radius of the site as identified within the Inter-Project Cumulative Effects Assessment Update – Technical Note [REP6-098] which have not been shortlisted. Due to their proximity to the site, there could be likely significant cumulative effects arising from traffic and transport and landscape and visual amenity. The justification for excluding these sites from the short list given their proximity is insufficient. Therefore, TDC cannot confirm if the proposed mitigation to address the cumulative effects is sufficient. However, it is understood

29.1.2	Reference	Matter	Point Raised	Applicant's Comments
		necessary. All parties to clearly identify any deemed conflicts they consider remain with the applicant's ability to meet the requirements of the Critical National Priority test.		that relevant mitigation measures have already been imposed for the relative topics with limited additional mitigation available. <u>Applicant's Submission</u>: It is the Applicant's position that the significant residual effects of the project have been mitigated, following the mitigation hierarchy, to the fullest extent possible. The mitigation hierarchy has been followed throughout the development of the Proposed Project and the Applicant's response to 3GEN1 in Application Document 9.136 Applicant's Responses to Third Written Questions demonstrates how each stage in the mitigation hierarchy has been applied to all significant residual effects as far as possible.
Noise and Vibration				
55		Meet with the ESC and TDC (and if relevant KCC and SCC) for a tripartite noise meeting. The aim of the meeting: • draft a dDCO requirement relating to the s61 process and confirm whether s61 commitments should be on the face of the DCO or within the outline construction noise and vibration management plan (oCNVMP). • agree wording of Article 49 as it relates to both construction and operation. • draft a dDCO requirement for operational converter and substation noise limits and confirm whether noise thresholds should be on the face of the DCO or part of the REAC.	The Council's Senior Environmental Health Practitioner attended a meeting with the Applicant and the Suffolk Councils last week. The Applicant's Acoustic Consultant is due to issue a technical note to be reviewed and agreed by the Councils. At the time of submission the technical detail had not been received.	Noted. The technical note (9.33 Operational Noise Levels - Technical Note [REP6-128]) has subsequently been provided.
Ecology and Biodiversity				
84.		Comment on the applicant's proposed approach to accessing the hoverport and intertidal area, including use of wheel washing as set out in its response to 2ECOL24 [REP5-135].	TDC are not satisfied with the Applicant's proposals to 2nd written questions for access via the hoverport. The responses are ambiguous and fail to provide confidence that the structural stability of the concrete slabs and the contaminants contained within the structure have been fully considered. TDC is not satisfied that conservation of species listed on: Wildlife & Countryside Act 1981 Schedule 8, Conservation of Species and Habitat Regulations 2017 Schedules 5 & 2, and Kent that are present on the hoverport will be adequately protected during the "works". TDC raises the following points: • The Applicant must Specify the type of "matt" or "tracking" that can and will be used to spread the load.	The Applicant confirms that a new Requirement has been included within the DCO at Deadline 7 for Access at Pegwell Bay. The Outline Cable Specification and Installation Plan (9.92) has also been updated at Deadline 7 to reflect this new Requirement. In response to matting and imposed loading from vehicles crossing the hoverport; the use of matting to spread loads is a proven method used for conveying equipment across very low strength ground such as peat bogs. As an example, for a 5m width trackway the bearing pressure imposed beneath the mats would be 1.5kPa for a 4WD vehicle and 16.6kPa for a 35t excavator. The pressure exerted by a human foot is typically 60-80kPa. The pressure from an excavator using 5m width

29.1.2	Reference	Matter	Point Raised	Applicant's Comments
			● Where will the load be spread to? The load will need to be "transferred" to load bearing ground rather than "spread" over a concrete slab surface that has no support. ● The matting has not been specified, therefore the land owner cannot comment on the suitability of the “matting/tracking” to transfer load to stable ground. ● What non-invasive surveys will be undertaken to establish the structural stability of the hoverpad launch area? ● How will the applicant determine the structural capacity of the proposed route? ● Wheel washing to be undertaken in both directions, as there is potential for invasive species to be tracked back onto hoverport and any on-site contaminants, including fuel/oil back into the bay. Highway to Hoverport and Hoverport to Foreshore. <u>Applicants Document 7.5.3 (C) - B66</u> ● Ground vibration could still damage the rootstock of dock plants (<i>Rumex</i> spp.) which is where the fire clearwing moth (<i>Pyropteron chrysidiformis</i>) larvae feed. ● The Pre-construction botanical survey should define priority species to avoid and/or mitigate for. ○ Sussex Emerald Moth's (<i>Thalera fimbrialis</i>) food plant: Wild Carrot (<i>Daucus carota</i>) ○ Firey Clearwing Moth footplant: Dock species' rootstock ○ Including any species listed on: Wildlife & Countryside Act 1981 Schedule 8, Conservation of Species and Habitat Regulations 2017 Schedules 5 & 2, and Kent Nature Recovery Strategy named species – which includes orchid species ○ Temporal restrictions of high impact construction works (heavy vehicular movement, loud piling...) during: ■ Overwintering period for migratory birds ■ Larval/ breeding season for suitable rare/protected species ○ Inclusion of a detailed Habitat Restoration and Compensation Plan, distinct from general site reinstatement. ■ This plan must be prepared post-consent and detail: specific methodologies, material sourcing, and success criteria for the restoration of any temporarily disturbed habitat (saltmarsh, mudflats, and hoverport vegetation) and, if necessary, habitat compensation for any unavoidable permanent loss. ■ This plan must be agreed upon with Natural England and the Kent Wildlife Trust prior to works commencing. The Applicant must provide additional protective measures to prevent accidental damage to plant stands from accidental encroachment during construction phase. The Applicant must expand on the Ecologist presence to supervise construction activities throughout length of project. <u>Applicants Document 7.5.3 (C) - B67</u> ● The Applicant must specify the buffer implementation in order for its adequacy to be assessed.	matting is therefore 18%-28% of that imposed by a person walking on the concrete.mThe route of the trackway will be selected to cross the most structurally sound areas of the hoverport based on the preconstruction structural surveys that will be required to comply with measure W37 of the REAC [REP6-134]. The width and specifications of the trackway construction (matting and any required geotextile underlay) will be designed based on the structural survey and assessment.mmThe nature and coverage of surveys to inform the structural assessment of the hoverport will be determined by the specialist structural engineering consultant. Without wishing to pre-empt their assessment methodology, an initial site inspection is undertaken to inform the survey requirements, with Ground Penetrating Radar likely to be a key part of the investigations in this case. mmThe wheel washing station will function in both directions; for vehicles and plant coming off the intertidal area, and those going onto the intertidal area. mmRegarding vibration, the number of vehicles traversing the hoverport is low (a few dozen per day even at peak times) and they will be slow moving. Vibration arises when driving over uneven surfaces. Photographs submitted into the examination show that through the vegetated areas where invertebrates and reptiles are most likely to be present due to the availability of cover from predators, the access roads are flat intact tarmac with no crevices. The concrete apron is much more sparsely vegetated and therefore there is a lower likelihood of relevant species being present due to the high exposure to predators. Moreover, in this area only low-pressure vehicles will be used to move to and from the intertidal area. These produce little to no ground vibration. There will be no piling at the hoverport.mRegarding the ecology walkover survey to avoid vegetation, commitment B66 already states that a route through the hoverport will be marked out, which avoids tracking over vegetation, including orchids and particularly the foodplants of the two Schedule 5 species, specifically naming dock and wild carrot. Commitment B70 commits to this route being shared with key stakeholders. mmSince no vegetation removal is to be undertaken (other than lateral trimming of bushes) and no significant vibration will be caused by HGV movement and no ‘high impact works’ or indeed any construction works, are proposed for the hoverport the other restrictions proposed are considered unnecessary. Similarly, a Habitat Restoration and Compensation Plan is not required since no habitat will be removed. To avoid accidental damage to plant stands from accidental encroachment during construction phase the route through the hoverport will be fenced. Once the route has been fenced there should be no need for an ecologist to be present although the Environmental Clerk of Works will be present throughout the project to check matters such as retention of fencing.mIn response to low bearing pressure plant and vehicles in the intertidal area, the bearing pressure of a typical excavator is 60-69kPa, so equivalent or lower than a human foot. Typically for mud and soft sand, 4WD vehicle tyre pressures are reduced to 10-20psi, resulting in a bearing pressure of 63-81 kPa and similar to that of a human foot.mImpacts to benthic infaunal communities within the mudflats at Pegwell Bay, as a result of all the Proposed Project cable installation activities, including the movement of

29.1.2	Reference	Matter	Point Raised	Applicant's Comments
			• The low pressure bearing plant machines must be specified in order for this to be assessed. • What is considered low pressure?	low ground pressure vehicles, will be temporary and very localised and will recover over timescales expected to be within a period of months to 1-2 years, depending on the scale of disturbance. This is evidenced by the observed recovery of benthic communities at Pegwell Bay, following cable installation for the Nemo Link project, which can be considered to be the activity resulting in the greatest mudflat disturbance, which was shown to be very rapid in the Nemo Link Interconnector Year 3 Post Construction Intertidal Technical Report (EcoMarine, 2020). The report states that 'following an initial decrease in abundance and diversity in 2018, intertidal communities have been resilient to the physical disturbance resulting from the burial of the cable in 2017. Natural tolerance coupled with fast natural recruitment has resulted in a rapid recovery of faunal communities in 2020'. Furthermore, the monitoring report also states 'Data collected during the year-one and year-three post construction surveys showed that the loss of intertidal fauna was localised and temporary, and by 2020 faunal communities and habitats present along the cable route reflect those seen during the baseline survey'. It should be noted that plant has previously worked in the Pegwell Bay for the Nemo and Thanet OWF cable installations.
29.1.3	Table 29.2 summarises the Applicant's comments on Thanet District Council Deadline 6 Response [REP6-186] Thanet District Council Written summary of Oral Submissions Made at ISH3 of the response outlines the purpose of the submission.			
29.1.4	The Applicant's has responded to Thanet District Council Deadline 6 Response [REP6-274] in Application Document 9.150 Applicant's Comments on Responses to Third Written Questions.			

Table 29.1 Applicant's Comments on Thanet District Council Deadline 6 Submission [REP6-185]

Reference	Matter	Point Raised	Applicant's Comments
Thanet District Council Response to Action Points from ISH3 of the response			
General			
1	Submit any suggested drafting (whether relating to matters raised in ExQ3 or not) which you consider should be included in the draft Development Consent Order (dDCO), with reasons why you consider it is necessary	TDC refers to previous submissions which have provided wording for the various requirements and refers to our submission under ExQ3 accompanying this document, for recent comment.	Noted.
Traffic and Transport			
11	The ExA requires the applicant to work with the County Councils (as Highway Authorities) to consider how any caps to HGV movements could be secured with wording also submitted, should the Secretary of State deem that capping is necessary. Please confirm whether this	TDC defer to Kent County Council (KCC) as Highway Authority.	Noted.

Reference	Matter	Point Raised	Applicant's Comments
	should be a requirement or part of a control document for securing the caps. This should also include which road links and junctions capping should be set and how the numbers of HGVs would be derived at to set the cap.		
18	If there are traffic delays due to proposed development construction traffic, either alone or in combination with other developments, is it likely that alternative routes would be taken by the public in their vehicles, potentially having an impact on more minor highways? If so, has this been assessed and is there actions needed to avoid this?	TDC defer to KCC as Highway Authority.	Noted.
Socio-economics and tourism			
24	The ExA require that the Councils work together and provide wording for a requirement within the DCO, if the Councils considered it necessary, for the monitoring and possible adaptive management in regards to tourism impacts	TDC is keen to work alongside the other Councils to provide wording for a requirement within the DCO in relation to the monitoring and possible adaptive management of tourism impacts. However, due to the timeframe between the ISH3 and Deadline 6 it has not been possible to undertake this Action Point for this submission.	Noted.
27	If there was to be a Skills and Employment Plan submitted by the applicant which would be considered acceptable by the Councils, would this be sufficient to overcome any remaining concerns relating to economic impacts?	As set out in the updated versions of Principal Areas of Disagreement Summary Statements (PADSS) [REP5-186] TDC would welcome a skills and employment plan but request the inclusion of a local education strategy and engagement with local education providers. It would be a good opportunity to capture these potential benefits, and the site would provide considerable educational opportunities beyond the employment elements. TDC would welcome the Applicant considering the inclusion of a local education strategy and in doing so would resolve any remaining concerns relating to economic impacts. However, this is notwithstanding the impacts on tourism which represents nearly 20% of Thanet's economy.	The Applicant has prepared Application Document 9.120 Detailed Skills, Supply Change and Employment Plan submitted at Deadline 6. This includes commitments to engage with local education providers, schools and colleges through existing national and regional programmes, including STEM outreach, careers engagement and apprenticeship promotion. As set out in the SSCEP [REP6-101], the Applicant's approach is to integrate with existing programmes rather than create new standalone initiatives. The Applicant does not consider it appropriate or proportionate to introduce a separate, bespoke "local education strategy" at this stage as education related activity is already embedded within the SSCEP [REP6-101] through engagement with Further Education providers, careers hubs and employability partners, ensuring that educational benefits beyond direct employment are captured without duplication.
28.	Are there remaining concerns with regard to the potential displacement of tourists by workers of the proposed	As a coastal destination, the Visitor Economy is a vital sector for the local economy, supporting 8,257 jobs across Thanet. This accounts for 19% of total employment and is valued at £349 million, based on 2023 data Cambridge Model Economic Impact Report for Thanet. The impact	The Applicant has undertaken a comprehensive and robust EIA and maintains its position that the Project will not give rise to significant effects on socio-economics, leisure and tourism following the application of appropriate mitigation. Overall, the Applicant considers

Reference	Matter	Point Raised	Applicant's Comments
	development (or in combination with other workers of other developments in the area) in tourist accommodation?	of meeting the proposed peak accommodation demand in July 2028, with an estimated 169 construction workers involved in the Kent Onshore Scheme, will significantly disrupt the local visitor economy. This is particularly an issue for Ramsgate on the basis that it has the lowest number of bedstock in the Thanet district. On the basis that the development is in the district of Thanet, it is likely that the highest demand for accommodation will be here. The reports indicate that at the peak of construction in July 2028, 93% of the total accommodation capacity is expected to remain available for the public. However, this does not reflect what is observed locally and through anecdotal evidence. It is noted that this calculation is based on figures for Kent within a 60-minute drive which does not account for the higher occupancy levels experienced in the summer months in Thanet, as a prime coastal destination. The longer-term impact on the district of people being unable to stay locally is that they may consider there is not enough accommodation and only visit Thanet as day visitors. Additionally, if the bedstock is filled with workers, rather than visitors, they will not be spending the same amount of money in the local economy, and this will have an impact on the wider sector, outside of the accommodation. TDC would also like to raise a number of points from the Visitor and Tourism Assessment Technical Note - Kent [REP3-066]: (1) Accommodation Capacity: The applicant's "worst-case scenario" estimate of 67 average FTE workers needing accommodation in July does not align with TDCs local experience. TDC typically see little to no vacancy during the peak summer season. (2) Growth in Visitor Economy: Our visitor economy has grown significantly. Please refer to the 2023 economic data (2025 data is expected in October/November). While the Airbnb and private rental markets have expanded due to hotel shortages, demand still frequently exceeds supply during peak periods. (3) Increased Visitor Numbers: Since 2023, visitor numbers have risen, driven largely by the London market and attractions like Dreamland. The demand is so high during the summer season (June–September) that extra late-night trains are required to transport visitors who cannot find local accommodation. (4) Peak Workforce Demand: The estimate of 241 FTE workers required for two days represents a level of demand that cannot be met between May and October. We have historically been unable to fulfil similar large-scale requests from film productions. I can consult with the Communications team for specific evidence if required.	that the combination of the EIA and supporting technical documents provide a robust, proportionate, and policy-compliant framework for assessing and managing socio-economic effects.
Health and Wellbeing			
32	With regard to the proposed exceptions included in requirement 7, are there any that the Council considers as should be omitted or amended?	TDC suggest the removal of the following: e) delivery to the transmission works of abnormal loads and any highway works requested by the highway authority to be undertaken outside the core working hours; - This would be secured via Construction Traffic Manangement Plan and should require prior approval from the Local Highways Authority - so can be removed.	The Applicant provided additional descriptions of these works at the request of the ExA in response to AP33 in Application Document 9.135 Applicants Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110]

Reference	Matter	Point Raised	Applicant's Comments
		f) the testing or commissioning of any electrical plant installed as part of the authorised development including undertaking of any identified corrective activities; g) the completion of works delayed or held up by severe weather conditions which disrupted or interrupted normal construction activities; - This is very open to interpretation and seemingly allows for all construction work to be extended particularly when read with part 6 of the Requirement. k) intrusive and non-intrusive surveys; – This should be limited to surveys that cannot be undertaken during daytime hours – eg bat surveys, noise surveys etc.	
34	All councils to work together to submit alternative wording with respect to core working hours including any restrictions and exceptions required, if the councils consider this necessary.	TDC is aware of the amended wording proposed by SCC, which are supported in principle and we await the view of the Applicant to inform further comment (incorporating the inclusion of Thanet specific works within the wording)	The core working hours proposed (secured via requirement 7 of Document 3.2 Draft Development Consent Order) are required to facilitate the delivery of the Proposed Project, a critical nationally important electricity transmission infrastructure, by 2030. This reflects the need presented in the UK Government's Clean Power 2030 Action Plan, responding to NESO's Clean Power 2030 report. The delivery of the Proposed Project in accordance with the programme set out in the Applicant's Transmission Licence, in accordance with the NESO clean power objectives, and in a way that reduces constraints costs being passed to consumers, is fundamental to the need case for the Proposed Project. The Proposed Project requires the ability to programme its work as necessary across a seven-day week. While it is not anticipated that Sunday and bank holiday working would be undertaken across the entire onshore elements of the project every weekend, the ability to utilise weekend days as required is critical to allow an effective delivery programme to be developed. Within the core working hours themselves, there are restrictions on noisy works (namely percussive piling) and on HGV movements on weekends, with neither percussive piling nor HGV deliveries occurring on Sundays or bank holidays with the exception of activities covered under requirement 7 paragraph (4). Furthermore, bank holiday weekends are excluded from the core working hours at the Suffolk converter station site and the Kent converter station and substation site, with further restrictions at Friston (Kiln Lane) substation (recognising that this is already consented via another project DCO). There are robust controls in a suite of management plans secured via requirements 5 and 6 of the dDCO that mitigate the effects of construction activity, noting for example Document 7.5.3 Outline Onshore Construction Environmental Management Plan [REP6-074], Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP6-134], and Application Document 9.83 Outline Code of Construction Practice [REP4-232].

Reference	Matter	Point Raised	Applicant's Comments
			The Applicant's position reflects that set out in its responses to ExQ 1GEN49 in Document 9.73 Applicant's Responses to First Written Question [REP3-069] and its responses to AP106 Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2)ISH2 Action Point 106 [REP4-086] .
Cultural Heritage			
39	Does there need to be any changes to the draft DCO or the support documents submitted by the applicant in relation to cultural heritage? If so, please set this out with alternative or additional wording.	TDC does not have any further comments in relation to cultural heritage.	Noted.
Cumulative Effects			
44.	The applicant and the Councils to work together and provide a document which provides the reasonings of the parties and DCO (and/or if appropriate REAC) wording to secure the measures identified in responding to 2WQ 2CEIntra3 should the Secretary of State deem this to be necessary.	The Council is unable to update on this as discussions are yet to take place.	The Applicant met with TDC on 22 April 2026 to discuss these points as well as other matters arising from the Rule 17 letter issued by the ExA on 21 April 2026. <u>AP44</u> <u>TDC Position</u>: It is unlikely that further mitigation measures are available to mitigate significant intra-project cumulative effects as the relevant mitigation measures have already been imposed for the relative topics. Whilst other potential mitigation measures are still being discussed for each topic. In addition, the Applicant has advised the exact intra-project impacts are not fully known at this stage and are subject to detailed design and construction programme. <u>Applicant's Position</u>: The Applicant shares TDC's position as set out above.
48.	Applicant and local authorities to develop a joint position statement with regard to the unmitigated significant residual landscape and visual effects to see if there are further mitigation measures that can be included or compensation measures to offset any residual significant effects, if the Secretary of State considers that to be necessary.	The Council is unable to update on this as discussions are yet to take place.	<u>AP48</u> <u>TDC Position</u>: The Applicant has made clear that no further mitigation is possible to reduce the significant effects on the landscape and visual amenity. This includes additional foreground planting which the Applicant concludes would conflict with the special features of the landscape character (E1 – Stour Marshes). There may be some possibility for compensatory measures in the form of landscape enhancements within Landscape Character Area E1 but this would not mitigate the impact on the landscape from the proposed development. <u>Applicant's Position</u>: The Applicant considers that potential avoidance, reduction and mitigation measures have been deployed as fully as possible. There is no policy or legal requirement that the mitigation hierarchy requires all residual landscape and visual effects to be

Reference	Matter	Point Raised	Applicant's Comments
			compensated for or that it is appropriate for alternative landscape compensation to be provided if it is accepted that there are any residual adverse landscape and visual effects that result from the Proposed Project.
49.	Continue discussions with the councils to seek to identify appropriate mitigation, including measures to compensate and offset significant effects. Provide a position statement at DL6, which includes reasoning as to why the parties consider these measures to be necessary, or not, and wording that can secure such measures should the Secretary of State deem them necessary. All parties to clearly identify any deemed conflicts they consider remain with the applicant's ability to meet the requirements of the Critical National Priority test.	The Council is unable to update on this as discussions are yet to take place.	<u>AP49</u> <u>TDC Position</u>: TDC are of the view that there are additional developments within a 5km radius of the site as identified within the Inter-Project Cumulative Effects Assessment Update – Technical Note [REP6-098] which have not been shortlisted. Due to their proximity to the site, there could be likely significant cumulative effects arising from traffic and transport and landscape and visual amenity. The justification for excluding these sites from the short list given their proximity is insufficient. Therefore, TDC cannot confirm if the proposed mitigation to address the cumulative effects is sufficient. However, it is understood that relevant mitigation measures have already been imposed for the relative topics with limited additional mitigation available. <u>Applicant's Submission</u>: It is the Applicant's position that the significant residual effects of the project have been mitigated, following the mitigation hierarchy, to the fullest extent possible. The mitigation hierarchy has been followed throughout the development of the Proposed Project and the Applicant's response to 3GEN1 in Application Document 9.136 Applicant's Responses to Third Written Questions demonstrates how each stage in the mitigation hierarchy has been applied to all significant residual effects as far as possible.
Noise and Vibration			
55	Meet with the ESC and TDC (and if relevant KCC and SCC) for a tripartite noise meeting. The aim of the meeting: • draft a dDCO requirement relating to the s61 process and confirm whether s61 commitments should be on the face of the DCO or within the outline construction noise and vibration management plan (oCNVMP). • agree wording of Article 49 as it relates to both construction and operation. • draft a dDCO requirement for operational converter and substation noise limits and confirm whether noise thresholds	The Council's Senior Environmental Health Practitioner attended a meeting with the Applicant and the Suffolk Councils last week. The Applicant's Acoustic Consultant is due to issue a technical note to be reviewed and agreed by the Councils. At the time of submission the technical detail had not been received.	Noted. The technical note (9.33 Operational Noise Levels - Technical Note [REP6-128]) has subsequently been provided.

Reference	Matter	Point Raised	Applicant's Comments
	should be on the face of the DCO or part of the REAC.		
Ecology and Biodiversity			
84.	Comment on the applicant's proposed approach to accessing the hoverport and intertidal area, including use of wheel washing as set out in its response to 2ECOL24 [REP5-135].	TDC are not satisfied with the Applicant's proposals to 2nd written questions for access via the hoverport. The responses are ambiguous and fail to provide confidence that the structural stability of the concrete slabs and the contaminants contained within the structure have been fully considered. TDC is not satisfied that conservation of species listed on: Wildlife & Countryside Act 1981 Schedule 8, Conservation of Species and Habitat Regulations 2017 Schedules 5 & 2, and Kent that are present on the hoverport will be adequately protected during the "works". TDC raises the following points: • The Applicant must Specify the type of "matt" or "tracking" that can and will be used to spread the load. • Where will the load be spread to? The load will need to be "transferred" to load bearing ground rather than "spread" over a concrete slab surface that has no support. • The matting has not been specified, therefore the land owner cannot comment on the suitability of the "matting/tracking" to transfer load to stable ground. • What non-invasive surveys will be undertaken to establish the structural stability of the hoverpad launch area? • How will the applicant determine the structural capacity of the proposed route? • Wheel washing to be undertaken in both directions, as there is potential for invasive species to be tracked back onto hoverport and any on-site contaminants, including fuel/oil back into the bay. Highway to Hoverport and Hoverport to Foreshore. <u>Applicants Document 7.5.3 (C) - B66</u> • Ground vibration could still damage the rootstock of dock plants (Rumex spp.) which is where the fire clearwing moth (Pyropteron chrysidiformis) larvae feed. • The Pre-construction botanical survey should define priority species to avoid and/or mitigate for. ○ Sussex Emerald Moth's (Thalera fimbrialis) food plant: Wild Carrot (Daucus carota) ○ Firey Clearwing Moth footplant: Dock species' rootstock ○ Including any species listed on: Wildlife & Countryside Act 1981 Schedule 8, Conservation of Species and Habitat Regulations 2017 Schedules 5 & 2, and Kent Nature Recovery Strategy named species – which includes orchid species ○ Temporal restrictions of high impact construction works (heavy vehicular movement, loud piling...) during: ■ Overwintering period for migratory birds ■ Larval/ breeding season for suitable rare/protected species ○ Inclusion of a detailed Habitat Restoration and Compensation Plan, distinct from general site reinstatement.	The Applicant confirms that a new Requirement has been included within the DCO at Deadline 7 for Access at Pegwell Bay. The Outline Cable Specification and Installation Plan (9.92) has also been updated at Deadline 7 to reflect this new Requirement. In response to matting and imposed loading from vehicles crossing the hoverport; the use of matting to spread loads is a proven method used for conveying equipment across very low strength ground such as peat bogs. As an example, for a 5m width trackway the bearing pressure imposed beneath the mats would be 1.5kPa for a 4WD vehicle and 16.6kPa for a 35t excavator. The pressure exerted by a human foot is typically 60-80kPa. The pressure from an excavator using 5m width matting is therefore 18%-28% of that imposed by a person walking on the concrete.mThe route of the trackway will be selected to cross the most structurally sound areas of the hoverport based on the preconstruction structural surveys that will be required to comply with measure W37 of the REAC [REP6-134]. The width and specifications of the trackway construction (matting and any required geotextile underlay) will be designed based on the structural survey and assessment.mmThe nature and coverage of surveys to inform the structural assessment of the hoverport will be determined by the specialist structural engineering consultant. Without wishing to pre-empt their assessment methodology, an initial site inspection is undertaken to inform the survey requirements, with Ground Penetrating Radar likely to be a key part of the investigations in this case. mmThe wheel washing station will function in both directions; for vehicles and plant coming off the intertidal area, and those going onto the intertidal area. mmRegarding vibration, the number of vehicles traversing the hoverport is low (a few dozen per day even at peak times) and they will be slow moving. Vibration arises when driving over uneven surfaces. Photographs submitted into the examination show that through the vegetated areas where invertebrates and reptiles are most likely to be present due to the availability of cover from predators, the access roads are flat intact tarmac with no crevices. The concrete apron is much more sparsely vegetated and therefore there is a lower likelihood of relevant species being present due to the high exposure to predators. Moreover, in this area only low-pressure vehicles will be used to move to and from the intertidal area. These produce little to no ground vibration. There will be no piling at the hoverport.mRegarding the ecology walkover survey to avoid vegetation, commitment B66 already states that a route through the hoverport will be marked out, which avoids tracking over vegetation, including orchids and particularly the foodplants of the two Schedule 5 species, specifically naming dock and wild carrot. Commitment B70 commits to this route being shared with key stakeholders. mmSince no vegetation removal is to be undertaken (other than lateral trimming of bushes) and no significant vibration will be caused by HGV movement and no 'high impact works' or indeed any

Reference	Matter	Point Raised	Applicant's Comments
		■ This plan must be prepared post-consent and detail: specific methodologies, material sourcing, and success criteria for the restoration of any temporarily disturbed habitat (saltmarsh, mudflats, and hoverport vegetation) and, if necessary, habitat compensation for any unavoidable permanent loss. ■ This plan must be agreed upon with Natural England and the Kent Wildlife Trust prior to works commencing. The Applicant must provide additional protective measures to prevent accidental damage to plant stands from accidental encroachment during construction phase. The Applicant must expand on the Ecologist presence to supervise construction activities throughout length of project. <u>Applicants Document 7.5.3 (C) - B67</u> ● The Applicant must specify the buffer implementation in order for its adequacy to be assessed. ● The low pressure bearing plant machines must be specified in order for this to be assessed. ● What is considered low pressure?	construction works, are proposed for the hoverport the other restrictions proposed are considered unnecessary. Similarly, a Habitat Restoration and Compensation Plan is not required since no habitat will be removed. To avoid accidental damage to plant stands from accidental encroachment during construction phase the route through the hoverport will be fenced. Once the route has been fenced there should be no need for an ecologist to be present although the Environmental Clerk of Works will be present throughout the project to check matters such as retention of fencing.mIn response to low bearing pressure plant and vehicles in the intertidal area, the bearing pressure of a typical excavator is 60-69kPa, so equivalent or lower than a human foot. Typically for mud and soft sand, 4WD vehicle tyre pressures are reduced to 10-20psi, resulting in a bearing pressure of 63-81 kPa and similar to that of a human foot.mImpacts to benthic infaunal communities within the mudflats at Pegwell Bay, as a result of all the Proposed Project cable installation activities, including the movement of low ground pressure vehicles, will be temporary and very localised and will recover over timescales expected to be within a period of months to 1-2 years, depending on the scale of disturbance. This is evidenced by the observed recovery of benthic communities at Pegwell Bay, following cable installation for the Nemo Link project, which can be considered to be the activity resulting in the greatest mudflat disturbance, which was shown to be very rapid in the Nemo Link Interconnector Year 3 Post Construction Intertidal Technical Report (EcoMarine, 2020). The report states that ‘following an initial decrease in abundance and diversity in 2018, intertidal communities have been resilient to the physical disturbance resulting from the burial of the cable in 2017. Natural tolerance coupled with fast natural recruitment has resulted in a rapid recovery of faunal communities in 2020’. Furthermore, the monitoring report also states ‘Data collected during the year-one and year-three post construction surveys showed that the loss of intertidal fauna was localised and temporary, and by 2020 faunal communities and habitats present along the cable route reflect those seen during the baseline survey’. It should be noted that plant has previously worked in the Pegwell Bay for the Nemo and Thanet OWF cable installations.

Table 29.2 Applicant’s Comments on Thanet District Council Deadline 6 Submission [REP6-186]

Reference	Matter	Point Raised	Applicant's Comments
Thanet District Council Written summary of Oral Submissions Made at ISH3			
Item 4. Traffic and Transport			
1.1.3	Junction Modelling	TDC are concerned that the junctional modelling is based on a list of cumulative sites that is out of date and missing a number of sites which TDC has previously raised. Therefore, TDC would like to confirm if the junction capacity modelling will be updated once the list of cumulative sites is updated as planned at Deadline 6 to take into consideration developments post March 2025.	The Applicant’s position with respect to the cumulative sites that have been assessed and included as part of the junction capacity modelling within Kent is set out within Application Document 9.108 Applicant’s Response to January Hearing Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP5-126] , within Table 3.1 under Action Point 61.

Reference	Matter	Point Raised	Applicant's Comments
			Following this and a meeting held with KCC Highways on 31 March 2026, it was confirmed that the junction modelling has been completed to the satisfaction of KCC Highways. As set out in KCC's Deadline 6 submission [REP6-168] with respect to the junction modelling and the other information submitted by the applicant through Examination (Reference 22): <i>"Yes, we are of the view that there is sufficient evidence now submitted to demonstrate the specific and cumulative impacts of the proposed development's construction phase."</i> KCC also provided the above response within their Deadline 6 response to the Examining Authority's Third Written Question 3TT3 [REP6-265] with respect to the junction modelling and cumulative assessment of highway impacts during the construction phase of the Proposed Project. A sufficiently robust assessment of traffic and highways issues has therefore been carried out by the Applicant, both for the proposed development alone and also when considered cumulatively. Therefore, no further junction modelling is necessary or will be carried out.
Item 5. Socio-Economics and Tourism			
1.1.4	Tourism	TDC would welcome monitoring of the impact on tourism accommodation. Due to the location of the development demand is likely to be highest in the Thanet District. As highlighted previously TDC have concerns regarding bed space and accommodation.	The Applicant has provided a detailed response regarding tourism impact monitoring and mitigation within Document 9.136: Applicant's Responses to Third Written Questions [REP6-111] (see 3SERT2). Full details of commitments relevant to tourism are provided within Application Document 9.84 Register of Environmental Actions and Commitments (REAC).
1.1.5	Tourism	It is acknowledged that whilst Suffolk has multiple DCOs there is the potential for similar effects to be experienced in Thanet due to Sea Link, Manston Airport and a large number of residential developments that are coming forward in the area.	The Applicant has undertaken a comprehensive and robust EIA and maintains its position that the Project will not give rise to significant effects on socio-economics, leisure and tourism following the application of appropriate mitigation. Overall, the Applicant considers that the combination of the EIA and supporting technical documents provide a robust, proportionate, and policy-compliant framework for assessing and managing socio-economic effects.
1.1.6	Tourism	TDC confirmed that a statement has been provided by the TDC Tourism and Culture Manager which would be provided in writing. This has been provided in response to ISH3 Action Point 28.	Noted.
1.1.7	Skills and Employment Plan	Whilst not raised at ISH3, TDC would like to confirm that TDC met with the Applicant recently to discuss a Skills And Employment Plan. We would welcome a Requirement and support the wording suggested by Suffolk County Council (SCC).	The Applicant has prepared Application Document 9.120 Detailed Skills, Supply Change and Employment Plan submitted at Deadline 6. In addition to this, the Applicant has provided detailed response and further commentary regarding SCC's suggestions in relation to the SSCEP within Application Document 9.136 Applicant's Responses to Third Written Questions (please refer to 3SERT1). Additionally, please also refer to section 9.4 Skills, Supply Chain and Employment Plan within Application Document 9.153 Applicant's Response to the ExA's Rule 17 Letter.

Reference	Matter	Point Raised	Applicant’s Comments
Item 6 – Health and Wellbeing			
1.1.8	Core working hours	TDC agreed with the points raised by SCC and East Suffolk Council (ESC) that the exceptions to the core working hours are too extensive and there is a need to understand the full scope of these exceptions with a view of limiting these to true exceptions. When taken with the start up and close down hour either side of the core working hours it gives the Applicant a broad scope to undertake construction activities outside of the core working hours which undermines the purpose of having core working hours set out in Requirement 7.	The core working hours proposed (secured via requirement 7 of Document 3.2 Draft Development Consent Order) are required to facilitate the delivery of the Proposed Project, a critical nationally important electricity transmission infrastructure, by 2030. This reflects the need presented in the UK Government’s Clean Power 2030 Action Plan, responding to NESO’s Clean Power 2030 report. The delivery of the Proposed Project in accordance with the programme set out in the Applicant’s Transmission Licence, in accordance with the NESO clean power objectives, and in a way that reduces constraints costs being passed to consumers, is fundamental to the need case for the Proposed Project. The Proposed Project requires the ability to programme its work as necessary across a seven-day week. While it is not anticipated that Sunday and bank holiday working would be undertaken across the entire onshore elements of the project every weekend, the ability to utilise weekend days as required is critical to allow an effective delivery programme to be developed. Within the core working hours themselves, there are restrictions on noisy works (namely percussive piling) and on HGV movements on weekends, with neither percussive piling nor HGV deliveries occurring on Sundays or bank holidays with the exception of activities covered under requirement 7 paragraph (4). Furthermore, bank holiday weekends are excluded from the core working hours at the Suffolk converter station site and the Kent converter station and substation site, with further restrictions at Friston (Kiln Lane) substation (recognising that this is already consented via another project DCO). There are robust controls in a suite of management plans secured via requirements 5 and 6 of the dDCO that mitigate the effects of construction activity, noting for example Document 7.5.3 Outline Onshore Construction Environmental Management Plan [REP6-074], Application Document 9.84 Register of Environmental Actions and Commitments (REAC) [REP6-134], and Application Document 9.83 Outline Code of Construction Practice [REP4-232]. The Applicant’s position reflects that set out in its responses to ExQ 1GEN49 in Document 9.73 Applicant’s Responses to First Written Question [REP3-069] and its responses to AP106 Document 9.90 (A) Applicant’s Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2)ISH2 Action Point 106 [REP4-086].
Item 7 – Cultural Heritage			

Reference	Matter	Point Raised	Applicant's Comments
1.1.9	Cultural Heritage	TDC has no additional comments to make in relation to listed buildings and associated assessments.	Noted.
Item 8 – Cumulative Effects			
1.1.10	Cumulative Effects	Our position is similar to that of ESC and is outlined within our ISH2 Additional Questions submission. We await submissions by the Applicant at Deadline 6 and the outcome of discussions arising from the relevant Action Point. In particular we look forward to meeting with the Applicant and having sight of their response to the Action Point in relation to landscape and visual effects and consideration of mitigation as the ExA have highlighted. Specifically, as it appears that no further mitigation can be proposed to mitigate the effect on the PRow to address these impacts.	Please see the TDC positions set out above in response to Action Points 44, 48 and 49
Item 9 – Marine Physical Environment			
1.1.11	Exit and Entry Pits across the trenchless crossing works	TDC would welcome the exit and entry points to be georeferenced and set out as a specific works no.	The Applicant confirms that this is not possible until detailed design. As secured within Condition 8 of the dML <i>The licensed activities or any part of those activities must not commence until details of the final cable route, including coordinates have been approved by the MMO pursuant to paragraph 4(1).</i>
1.1.12	Use of pneumatic casing	With regards to the use of pneumatic casing, also relevant to other coastal foreshore issues, clarification is sought on the Applicant's definition of foreshore. It is related to the use of pneumatic casing amongst the other issues, but the Applicant refers to the intertidal zone as offshore when it could be more specifically and accurately referred to as foreshore and nearshore. The Seaward HDD drill pit has been described as offshore, which may lead to the misunderstanding that the HDD pit is located further seaward than it is. This has now been clearly defined on drawings in the latest suite of documents as being located on the foreshore rather than offshore.	The Applicant confirms the Requirement 16 and Condition 10 of the dML have been updated at Deadline 7 to: <i>10 (1) Landfall installation must only use trenchless landfall techniques between the onshore transition joint bay and the exit pits. (2) No exit to trenchless landfall techniques must occur within 105m of saltmarsh habitat within Pegwell Bay. (3) The temporary working area will be located at a minimum distance of 50m from the edge of the saltmarsh habitat within Pegwell Bay. (4) No exit to trenchless landfall techniques must occur within 50m of MLWS at Leiston to Aldeburgh SSSI. (5) No exit to trenchless landfall techniques must occur within 45m east of the continual Coralline Crag outcrop in Suffolk as identified in plate 2.3 of the Coralline Crag Technical Note. (6) Pneumatic casing installation shall not be used below MHWS unless otherwise agreed in writing with the MMO, following provision of appropriate underwater noise assessment and agreement of any relevant mitigation proposals. (7) No open-cut trenching will be permitted for the repair and maintenance of cables installed by trenchless techniques between the onshore transition joint bay and the exit pits unless otherwise approved by the relevant planning authority in consultation with the statutory nature conservation body</i>
1.1.13	Drilling Fluids	Furthermore, with regards to the drilling fluids referred to in Design Development Report [APP-321], Paragraph 2.3.6 of Appendix A states that bentonite is recognized on the OSPAR list of substances used and discharged offshore when referring to the Seaward drill pit, which is actually located on the foreshore. Therefore, it needs to be confirmed	The Applicant confirms that the OSPAR List of Substances Used and Discharged Offshore is for all elements of the marine environment as provided in their guidance. This includes the foreshore.

Reference	Matter	Point Raised	Applicant's Comments
		that appropriate mitigation has been proposed and secured for the use and discharge of bentonite in the foreshore area. Generally, offshore has been used ambiguously when it should be foreshore.	
Item 10 – Noise and Vibration			
1.1.14	Section 61 application	TDC welcomed ExAs consideration of the proposed wording set out in response to ExQ2 2NV3 as set out by TDC [REP5-207]. In addition, TDC requests the commitment NV03 in the REAC which requires the contractor to carry out a detailed noise and vibration study is updated to require all updated noise and vibration assessments to be submitted to and approved by the relevant Local Planning Authority prior to confirming if a section 61 application is required.	Noted. The commitment is has been included at Deadline 6 in 7.5.8.2 (C) Outline Construction Noise and Vibration Management Plan – Kent [REP6-084] .
1.1.15	Section 61 application	This is effectively a precursor to a section 61 application which allows TDC to assess the potential noise and vibration impacts from construction and if these are significant a section 61 application can be required.	Noted. The commitment is has been included at Deadline 6 in 7.5.8.2 (C) Outline Construction Noise and Vibration Management Plan – Kent [REP6-084] .
1.1.16	Section 61 application	TDC welcomes the recommendation for East Suffolk Council, TDC and the applicant to meet separately and confirm the appropriate approach and wording in relation to noise and vibration matters and a section 61 application.	Noted. This meeting took place on 9 April 2026.
1.1.17	Construction vehicle noise assessment in Pegwell Bay	TDC are content with the methodology used to assess the noise impact.	Noted.
1.1.18	Operational noise emissions from converter stations and substations including, but not limited to, low frequency noise emissions and evidence to demonstrate that 5dB below background level is unachievable	TDC accepts that 34dB background noise is very low and would likely have a negligible impact on the nearest residential receptor that is over 500m away. However, the Kent Operational Noise Assessment at table 1.6 shows 5dB below background noise levels is achievable as it states a -12dB rating during daytime and a -6dB at nighttime. Therefore, if it is stated in the ES it is unclear how it cannot be achieved.	Noted. Justification for the proposed limit is provided in 9.33 Operational Noise Levels - Technical Note [REP6-128] . The 34 dB L _{Af,Tr} limit is purely to comply with planning policy (being below the lowest observed adverse effect level). It is not possible to commit to a specific level below this level, even if the operational noise assessment presented in the ES demonstrates that certain levels may be achieved in principle. This is due to potential design changes which may affect noise levels (although in principle these should result in, at worst, small changes to noise levels). However, commitment NV09 of 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134] ensures that noise levels are as low as reasonably possible. Additional commitments are include at Deadline 7 to provide design information, demonstrating that all practicable noise mitigation measures are included in the design. These two commitments combined ensure compliance with planning policy, and the requirements of the local planning authority to achieve noise levels as low as possible.
1.1.19	Section 61 application	In response to ExQ2 2NV1, TDC requested day and night time noise limits of 30dB (LAeq,T) at NSR - daytime 24dB (LAeq,T) at NSR - nighttime	As above
1.1.20	Section 61 application	As well as an assessment of low-frequency noise to be undertaken. The difference between the C-weighted and A-weighted equivalent	A comparison of dBC and dBC levels is not appropriate. BS 4142 contains an appropriate method for assessing tones and this is included in the proposed commitments. This is was discussed and

Reference	Matter	Point Raised	Applicant's Comments
		continuous sound pressure levels (LCeq,T – LAeq,T) measured at the nearest noise sensitive receptor shall not exceed 10dB.	agreed during the tri-partite meeting on 9 April 2026 (noting that the point raised was prior to the meeting taking place).
1.1.21	Section 61 application	TDC welcomes the suggestion from ExA for a tripartite meeting between TDC, East Suffolk Council and the applicant to agree a requirement for operational noise.	Noted. This meeting took place on 9 April 2026.
Item 11 – Air Quality			
1.1.22	Traffic emissions assessment	TDC have no further comments on this matter.	Noted
1.1.23	Operational back-up generator assessment	TDC are content with the human health aspect of REAC provision AQ11 in terms of location of the back up generators.	Noted
Item 13 – Ecology and Biodiversity			
1.1.24	Pegwell Bay and former hoverport access and disturbance	TDC were asked to confirm whether it is now satisfied with the applicant's proposals in response to second written questions for access via the hoverport in terms of use of track matting but no wheel wash, and the provision of a hoverport condition monitoring plan. TDC confirmed that a response would be provided in writing.	Noted
1.1.25	Biodiversity Net Gain	TDC confirmed no further comments in relation to biodiversity net gain.	Noted

30. Applicant’s Comments on the Submission from Walberswick Parish Council

30.1 Introduction

30.1.1 Table 30.1 summarises the Applicant’s comments on Walberswick Parish Council Deadline 6 Response [REP6-187].

Table 30.1 Applicant’s Comments on Walberswick Parish Council Deadline 6 Submission [REP6-187]

Reference	Matter	Point Raised	Applicant’s Comments
Response of Walberswick Parish Council to the Sealink DCO at Deadline 6 (13 April 2026)			
		I am responding on behalf of Walberswick Parish Council as the Councillor delegated to deal with NSIP projects in our area including Sealink. I attended online for the ISH hearings that took place on 24-26 March 2026. I did not make any oral representation given the request of the Panel to receive written input when possible. I am writing in response to two key issues – alternative route to the Saxmundham converter station and cumulative impact -- as discussed during the March hearings.	Noted
	Converter Site: Better Access from the North	Walberswick Parish Council would like to strongly support the submission of Suffolk County Council at Deadline 5 10 March 2026 (REP4-149 and REP5 -179 Appendix A) for the alternative access route to the Saxmundham Converter Station site. We support SEAS written representation at Deadline 5 that clearly rebuts NGET’s ill-conceived and risk laden argument for the Benhall Railway Bridge/Fromus River bridge proposal. As SCC, ESC, SEAS and all other IPs who spoke on this subject pointed out, the alternative route put forward by SCC makes an abundance of sense if NGET wants to put its converter station in Saxmundham. We believe that any responsible company would embrace SCC’s proposed alternative as it so clearly provides a better, more sustainable and hugely less damaging access to the converter station site. The arguments put forward for this alternative route both in the written submission and at the hearings were an extraordinarily sensible and compelling compromise as it would make use of the disused Leiston airfield, would put traffic on the Sizewell Link Road whose purpose is precisely to take construction traffic off of local roads, would provide an access that could more easily be used by Lionlink if such a project were to go forward and would enormously decrease the impact on local residents and communities. It would negate the need for the risky and unproven work on the Benhall Railway Bridge which, as we and all other local councils and groups pointed out during earlier submissions, would cause not only very significant hardship on the local residents and would overpower local roads, but would disrupt the functioning of the Greater Anglia Rail passenger line as well as SZC’s rail line. As we argued in previous submissions, it cannot be in the public interest for a project like SeaLink (that, at any rate, is	<u>The Applicant has explained in detail why it does not consider this proposal to be an appropriate alternative – see p.11 of Document 9.107: Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125].</u> <u>The Applicant has carefully considered the potential impacts of the options relating to the proposed bridge – see Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement [CR1-055].</u>

Reference	Matter	Point Raised	Applicant's Comments
		unnecessary) to disrupt SZC which is the largest infrastructure project in the country and is tax-payer funded. Any disruption to SZC's construction timeline and supporting infrastructure such as the rail line must be avoided as it is so contrary to the national interest. We find it inexplicable that NGET should dig in its heels and refuse to accept this compromise route. Its arguments simply don't hold up as the SZC Link Road will be accessible long before the SeaLink construction would begin. In terms of travel time, the experience of SZC construction has shown that despite forecasts, construction vehicle and worker traffic is just as likely to come from the north as the south meaning that there cannot be any appreciable difference in travel times or marginal costs for SeaLink in approaching the converter station from the north as from the south. Given how fraught with problems NGET's preferred route is, one can only conclude that in continuing to refuse this very sensible compromise, NGET is being less than candid about future plans for even more damaging infrastructure for the same area and is seeking to keep these plans hidden from the public and the Examining Authority as long as possible. We remain opposed to SeaLink particularly given the evidence that the 1 project fails to meet the Needs Case. However, if ExA is minded to support permission or the SoS is minded to permit development, it should ONLY be on the basis that the northern route proposed by SCC is used. Cumulative Impact The Walberswick Parish Council would also like to align itself with the statements made by SCC, ESC, SEAS, Fiona Gilmore, Dr Charlotte Fox and the numerous other Parish Councils and Interested Parties who spoke at the March hearings about the cumulative impact of SeaLink and the inferiority of the analysis undertaken by NGET in understanding, accepting and mitigating these impacts. We find it particularly risible that NGET should attempt to argue that because its project is smaller than SZC, then there is a problem of attribution to SeaLink and that somehow that negates or lessens the project's impact. That is illogical.	
	Cumulative Impacts	There is no housing available for SeaLink's workforce given SZC's already voracious appetite, there are no local workers that can help SeaLink avoid having to bring in hundreds of temporary workers from outside the area, the roads are already overloaded with construction lorries, the surrounding communities are already suffering from the noise and disruption to their daily lives from ongoing projects. We note one truly ridiculous statement of NGET that implied that as communities would be unable to distinguish between the impact of SZC from that caused by SeaLink, then NGET could not be held to account for its additional impact! We are not sure how NGET uses the same reasoning for its continued insistence that it should be permitted to work 12 hours a day, 365 days a year given that the other NSIPs have at least marginally contained themselves by avoiding Sundays and bank holidays. Simply put, SeaLink's contribution to cumulative impact is "the straw that broke the camel's back" and it should be rejected on that basis. However, if the project were allowed to go forward, then it must only be on the basis that NGET undertakes a more robust analysis and acceptance of cumulative impact, minimises this by using the northern route, by working fewer hours, by abiding by all ongoing agreements	A comprehensive cumulative assessment of the impacts of Sea Link and other projects in Suffolk, including SZC, has been undertaken within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. The impacts relating to worker housing as combined with SZC are considered at p.126 of that document, and no significant effects are considered likely for the reasons given therein.

Reference	Matter	Point Raised	Applicant's Comments
		and undertaking work in a way that does not interfere with ongoing NSIPs and that gives appropriate and meaningful mitigation to affected communities and the environment. The current DCO application does none of this.	

31. Applicant’s Comments on the Submission from Westleton Parish Council

31.1 Introduction

31.1.1 Table 31.1 summarises the Applicant’s comments on Westleton Parish Council Deadline 6 Response [REP6-188].

Table 31.1 Applicant’s Comments on Westleton Parish Council Deadline 6 Submission [REP6-188]

Reference	Matter	Point Raised	Applicant’s Comments
		Westleton is village 5 miles north of Friston and Saxmundham and 1 mile inland from the Suffolk coast. Westleton and its residents are already suffering the effects of the Sizewell C construction – notably, significantly increased peak-time traffic through the village, heavier traffic on local roads and the destruction of the surrounding environment and its habitat, much of which is Natural Landscape and Sites of Special Scientific Interest. Sea Link will add to these adverse impacts. Westleton Parish Council supports the comments made by the East Suffolk Communities Energy Partnership, Substation Action Save East Suffolk, and Suffolk Energy Action Solutions which note the projects extensive impacts. We also support the comments made by the Parishes and residents closest to the construction sites and the resultant infrastructure. In particular, we are concerned that the “needs case” for the Sea Link project has not been adequately made by National Grid Electricity Transmission (NGET), nor has NGET adequately demonstrated how it will transport Abnormal Indivisible Loads over the Benhall Bridge to the converter station site. Both of these are of sufficient concern to warrant further in-depth examination before a decision can be taken on the project. More specifically, Westleton Parish Council is very concerned about the additional traffic the construction of the project will put on to the local road network in addition to the already heavy Sizewell C and Scottish Power Renewables traffic. Of note is that Sizewell C peak construction will coincide with the Sea Link and LionLink projected timelines. The local road network is already suffering as a consequence of the Sizewell C and Scottish Power Renewables traffic and Suffolk County Council seems to be in a running battle to repair the damage being caused to the A12; the local B roads are faring no better. For Westleton, our primary concern is the B1125. As we noted in our deadline 2 submission, the road is suffering a 45% increase in traffic volume and high traffic speeds during peak hours because of Sizewell C traffic. In recent weeks, this traffic has included HGV tipper trucks – we are currently trying to ascertain their destination. As a consequence, the road’s condition is worsening – with increased potholes, verges becoming gullies, and both made worse when the road floods - as it is does when it rains. Through the village of Westleton, the increased peak-time traffic is creating noise and air pollution and making junctions and pedestrian crossings within the village dangerous to navigate.	The need case for Sea Link is set out in several application documents, primarily the Strategic Options Back Check Report [APP-320], the Planning Statement [AS-057], and the Design Development Report [APP-321] and most recently in REP5-142 and the response to 2GEN1 in [REP6-106]. Without revisiting these submissions there is, as a matter of national policy, a critical requirement for significant reinforcement of the transmission system to facilitate the connection of renewable energy sources and to transport electricity to where it is used. The Applicant has set out a number of options for AIL deliveries, as confirmed in the crossing feasibility study [REP4-101].

Reference	Matter	Point Raised	Applicant's Comments
		Our concerns for the B1125 are that: 1. NGET does not plan to impose restrictions on its worker access routes to site, so peak hour traffic on the road will likely increase further; 2. The NGET documents do not adequately explain how NGET will police its construction traffic – we note this is also a concern of the Examining Authority as per its Question 3TT6 for answer by the applicant before 13 April. We therefore do not know how NGET will ensure that HGVs originating from the north will stay on the A12 and do not try to use the B1125 as a short cut - particularly if the proposed northern route is chosen. 3. Further to the previous point, NGET have said that 15% of its HGV traffic will come from the north. However, as we have seen with Sizewell C, this is not necessarily what will happen as a higher percentage of HGV traffic has been originating from north of the Sizewell C site than was planned. Therefore, if the project is approved, Westleton Parish Council urges the Inspectorate to require the DCO to include the conditions that: 1. No Sea Link worker, construction and HGV traffic may use the B1125. 2. That the Sea Link vehicle ban be policed by trackers placed in all Sea Link worker, construction and HGV vehicles. 3. That workers and contractors' contracts require they abide by to the routing rules. 4. That all Sea Link vehicles be marked as such on the front and back of the vehicles. 5. That NGET be required to contribute to a Suffolk County Council fund for road repairs. Thank you.	

32. Applicant’s Comments on the Submission from Alan John Almond

32.1 Introduction

32.1.1 Table 32.1 summarises the Applicant’s comments on Alan John Almond Deadline 6 Response [REP6-189]

Table 32.1 Applicant’s Comments on Alan John Almond Deadline 6 Submission [REP6-189]

Reference	Matter	Point Raised	Applicant’s Comments
		This part of East Anglia is already overwhelmed by the building of Sizewell C. It would be more appropriate for Sealink to take their project to a place with an effective infrastructure and an already industrialised landscape. Thousands of people visit this area to escape the destruction caused by industrialisation. Where will they go when it’s destroyed	The Applicant has a responsibility as a transmission licence holder to develop and maintain an efficient, coordinated, and economic electricity transmission system. The Proposed Project is required to reinforce the network in the Suffolk and Kent areas, as set out in Application Document 7.2 Strategic Options Back Check Report [APP-320], and cannot be located elsewhere. The Applicant’s view is that the Proposed Project includes sufficient measures to avoid and mitigate adverse environmental impacts to an acceptable level, and that the draft DCO [REP6-004] is a robust method for securing this mitigation.

33. Applicant’s Comments on the Submission from Andrew McDonald

33.1 Introduction

33.1.1 Table 33.1 summarises the Applicant’s comments on Andrew McDonald Deadline 6 Response [REP6-190].

Table 33.1 Applicant’s Comments on Andrew McDonald Deadline 6 Submission [REP6-190]

Reference	Matter	Point Raised	Applicant’s Comments
1 - 4		1 I have previously made written and oral submissions on cumulative traffic management and impact pressures, especially in respect of the limited choice of study area that NGET have chosen; and also in about their expressed lack of concern for traffic pressures consequent upon the addition of SeaLink traffic to SPR/SZC/LionLink outside that area. Road users (as they are now demonstrating) are quick to respond to danger and delay on their present routes by finding alternatives, and this should have been part of NGET’s forecast and assessment processes. 2 We are now in a sort of unregulated test phase for these cumulative impacts. Last weekend’s A12/A1094 closure for SZC works led straight away to a 3-400% increase in traffic through Snape Village towards Tunstall and the A1152 (as I believe I have forecast in previous written responses), and similar pressure on Sternfield Road, especially at the B1121 junction. HGV pressure on the A1094 consequent upon Sea Link’s consenting would have the same effect, but would embed these ‘escape routes’ into normal behaviour. 3 The impacts on rural roads, quiet lanes, verges and hedgerows are already emerging purely on the basis of one (admittedly very large) project and its traffic impacts. Severance, Pedestrian Delay, Fear and Intimidation, and Non-Motorised Amenity effects are with us already, so let me give you an example of an NSIP’s attempted cumulative impact mitigation) - SPR’s EA1N/EA2 ‘traffic management’ works at Snape Church junction, which as an intervention against severance are apotropaic rather than effective - unless you consider that an unmarked, unsigned and invisible kerb marking at a notoriously difficult junction close to a stretch of national speed limit A road to be in any way ‘traffic management’. At least they recognise the danger, although their intervention is ineffective and limited to an ineffective study and impact area. Apotropaic, since you ask, means ‘designed to ward off evil, usually through magical means’. 4 In projects of this scale it is more usual to use junction modelling than magical means to ensure that infrastructure can handle future demand while minimizing congestion. It is a critical component of transport assessments, and so I’d like to just ask why Sea Link’s proposals are being examined without a full traffic assessment; and with junction modelling squeezed out, like blood from a stone, from this immensely well resourced and very large company at the last possible deadline?	The Applicant has undertaken a full traffic and transport assessment within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. Following a number of discussions with the relevant highway authorities, the Applicant submitted the junction modelling within Kent at Deadline 5 within Application Document 6.3.3.7.A (B) Environmental Statement Appendix 3.7.A Transport Assessment Note [REP5-029]. Junction modelling for Suffolk was submitted at Deadline 6 within Application Document 6.3.2.7.A (B) Environmental Statement Appendix 2.7.A Transport Assessment Note (Clean) [REP6-039].

34. Applicant’s Comments on the Submission from Angela Stevens

34.1 Introduction

34.1.1 Table 34.1 summarises the Applicant’s comments on Angela Stevens Deadline 6 Response [REP6-191].

Table 34.1 Applicant’s Comments on Angela Stevens Deadline 6 Submission [REP6-191]

Reference	Matter	Point Raised	Applicant’s Comments
		I object more and more to the above project as the weeks go on. Recent research has unearthed even more proof that this Sea Link project is not needed! The Applicant alleges that Sea Link is "required for the connection of Five Estuaries OWF and firm connection of Rampion." Rampion connects within SC2 but there is no mention of the requirement for infrastructure reinforcement within SC2 to enable Rampion to connect at Bolney in either the Ex A recommended report, or the SoS decision letter. In fact Sea Link was not mentioned AT ALL in either the Ex A recommendation report or the SoS decision letter. Here is the link to the Ex A recommendation report for Rampion: https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010117-002458Examining%20Authority%E2%80%99s%20Recommendation%20Report%20PART%20B.pdf Here is the link to the SoS decision letter: https://nsip-documents.planninginspectorate.gov.uk/published-documents/EN010117-002452Secretary%20of%20State%20for%20Energy%20Security%20and%20Net%20Zero%E2%80%99s%20Decision%20Letter.pdf Sea Link is not needed for the firm connection of Rampion and to suggest otherwise is wrong. Unless I can be PROVED wrong, I continue to object strongly to the Sea Link project	The Applicant has set out the overriding need for the Proposed Project in numerous documents throughout the DCO Application, The need case for Sea Link is set out in several application documents, primarily Application Document 7.2 Strategic Options Back Check Report [APP-320], the Planning Statement [AS-057], and Application Document 7.3 Design Development Report [APP-321] and most recently in REP5-142 and the response to 2GEN1 in REP6-106. Without revisiting these submissions there is a critical requirement for significant reinforcement of the transmission system to facilitate the connection of renewable energy sources and to transport electricity to where it is used. In specific response to this submission, it was never assumed that Rampion 2 would connect directly into the Proposed Project.

35. Applicant’s Comments on the Submission from Caroline Pope

35.1 Introduction

- 35.1.1
- Table 35.1 summarises the Applicant’s comments on Caroline Pope Deadline 6 Response [REP6-192 & REP6-193].
- 35.1.2
- The Applicant’s has responded to Caroline Pope Deadline 6 Response [REP6-277] in **Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions.**

Table 35.1 Applicant’s Comments on Caroline Pope Deadline 6 Submission [REP6-192 & REP6-193] (the same submission)

Reference	Matter	Point Raised	Applicant’s Comments
		FIRSTLY, I MUST SAY HOW TIME-CONSUMING, CONFUSING, AND DIFFICULT THIS PROCESS HAS BEEN, AND THE SMALL NUMBER OF PEOPLE PROTESTING AT THESE HEARINGS DOES NOT REFLECT THE STRENGTH OF OPINION AGAINST THIS PROPOSED SEALINK PROJECT!	The Applicant acknowledges these points but notes that they are high level concerns and it is therefore difficult to address them granularly.
		THE OLD REWILDED HOVERPORT SITE IS LINKED TO PEGWELL BAY NATIONAL NATURE RESERVE AND IS A WILDLIFE HAVEN. I AM STRONGLY OBJECTING TO NATIONAL GRID COMPULSORY PURCHASING THIS AREA, AS THEY WILL RUIN IT FOR THE WILDLIFE, PLANT LIFE, AND EVERYONE! THIS AREA HAS BEEN LEFT TO NATURE TO RECLAIM, AND IT IS DOING A VERY GOOD JOB OF IT! BIRDS, MAMMALS, AND UNUSUAL PLANTS SUCH AS THE BEE AND LIZARD ORCHIDS HAVE TAKEN UP RESIDENCE THERE. THESE AREAS NEED OUR UPMOST CARE AND PROTECTION. THE OLD REWILDED HOVERPORT AREA IS EASILY ACCESSIBLE FOR EVERYONE, AND IT IS ONE OF THE FEW PLACES OF REFUGE, LEFT IN THANET, WHERE PEOPLE CAN GO AND SPEND TIME IN NATURE, AND GET AWAY FROM THE STRESSES OF LIFE. IN A RECENT SMALL SURVEY ON FACEBOOK NEARLY 300 PEOPLE SAID THEY USE THE OLD HOVERPORT SITE ONCE A MONTH OR MORE! IN REALITY THIS NUMBER IS MUCH LARGER! NATIONAL GRID COMPULSORY PURCHASING THIS AREA WILL TAKE THIS AWAY FROM THE LOCALS AND TOURISTS TO THANET. THERE IS ALSO THE THREAT THAT NATIONAL GRID WILL CAUSE EXTENSIVE DAMAGE TO THE VULNERABLE SURFACE OF THE OLD HOVERPORT WITH THEIR HEAVY VEHICLES, MACHINERY, AND EQUIPMENT, ALLOWING POLLUTANTS TO ESCAPE AND POLLUTE THE BAY! THE NEMO LINK CABLE, WHEN THAT WAS PUT THROUGH PEGWELL BAY, CAUSED IRREVERSIBLE DAMAGE TO THE AREA, WHEN THEY ABANDONED THE HORIZONTAL DRILLING TECHNIQUE FOR OPEN TRENCHING! (THERE HAS BEEN NO MITIGATION FOR THIS EITHER!) SINCE NATIONAL GRID CANNOT 100% GUARANTEE THAT NONE OF THE ABOVE INCIDENTS MAY OCCUR, AND THEY WILL NOT WANT TO ABANDON THEIR PROJECT ONCE IT HAS COMMENCED! SEALINK MUST NOT BE GRANTED PERMISSION! THERE IS TOO MUCH AT RISK! THIS AREA IS TOO PRECIOUS AND VALUABLE TO BE GAMBLLED WITH! THIS WHOLE PROPOSED SEALINK PROJECT WILL BE A MASSIVE NATIONAL SECURITY RISK! WE HAVE SEEN THAT IN THESE RECENT TIMES OF CONFLICT, IT IS THE ENERGY INFRASTRUCTURE THAT IS TARGETED AND BOMBED! THE PROPOSED CONVERTER STATION IS TO BE THE LARGEST IN EUROPE, SO THIS WILL BE A PRIME TARGET! WE SHOULD LEARN FROM WHAT IS GOING ON IN THE WORLD AND NOT ALLOW SUCH BIG PROJECTS TO BE BUILT! THE QUESTION OF WHETHER WE NEED THIS PROJECT NEEDS TO BE FULLY EXAMINED! I DO NOT THINK THIS IS THE CASE, NOR THE RIGHT WAY OF GOING ABOUT IT! I AM NO EXPERT, BUT BETTER TECHNOLOGIES ARE BEING	• The reasons for the Change Request in relation to the hoverport, Change Request 1, are set out throughout the Application, including within the Application Document 9.76.2 (C) Change Request Report [CR1-052]. The Applicant’s view is there is a lot of merit in having the flexibility to find the most suitable route and avoid areas of particular degradation or ecological value. • The Applicant is confident that the Proposed Project incorporates robust measures for identifying and managing potential impacts from the Hoverport. • The Applicant has already provided responses relating to the colliery spoil and confirmed that there is no risk as a result of the proposed access across the hoverport. • The Applicant notes that NEMO link is a separate project submitted by a separate legal entity. The Applicant also notes the submissions of NEMO Link in this regard.

Reference	Matter	Point Raised	Applicant's Comments
		DEVELOPED ALL THE TIME! WE CANNOT AFFORD TO MAKE SUCH PLANETARY AND ENVIRONMENTALLY COSTLY MISTAKES AS GRANTING THIS PROPOSAL WOULD CAUSE! PRESENTLY THIS COUNTRY IS IN A MAD DASH TO REACH NET ZERO! BUT THIS WILL BE AN ABSOLUTE DISASTER IF WE HAVE NO COUNTRYSIDE, NATURE AND WILDLIFE LEFT! ONE THING WE KNOW FOR CERTAIN IS THAT IF THIS SEALINK PROJECT IS ALLOWED TO GO AHEAD, IT WILL CAUSE MASSIVE AMOUNTS OF DEVASTATION TO OUR MARINE ENVIRONMENTS AND MARINE LIFE, OUR ONSHORE NATURAL ENVIRONMENTS, AND TO OUR ALREADY STRUGGLING WILDLIFE! PLEASE EXAMINERS CAREFULLY CONSIDER WHETHER SEALINK WILL BE DOING US MORE HARM THAN GOOD! THEN REJECT IT!	
		I would also like to further add to my comments that I do not believe that there is an absolute need for this project to go ahead. I believe that the existing cables could be reinforced and upgraded to carry more power. Also, the cumulative different projects that have been developed and recently been completed I believe would be enough without Sealink. National Grid I believe are wanting this infrastructure on their books so to speak to benefit themselves as a company and their shareholders. I also have seen a very worrying question from the planning inspectorate to National Grid asking about the deposit of plastic and synthetics at sea! (ExQ3: No 28.Other 25 February 2026 30TH1.).	The need case for Sea Link is set out in several application documents, primarily Application Document 7.2 Strategic Options Back Check Report [APP-320], Application Document 7.1 (D) Planning Statement [REP6-054], and Application Document 7.3 Design Development Report [APP-321] and most recently in REP5-142 and the response to 2GEN1 in REP6-106. Without revisiting these submissions there is as a matter of national policy a critical requirement for significant reinforcement of the transmission system to facilitate the connection of renewable energy sources and to transport electricity to where it is used.
		If National Grid are planning this, won't this also be damaging to our marine environment? Question to Applicant Deposit of plastic and synthetics at sea <i>Part 1(7) (e) of the dDML sets out that plastic and synthetics are authorised for deposit at sea. NPS EN-15.15.11 states that assessment should include other uses of material before disposal to sea.</i> Applicant: - confirm whether this assessment has been carried out or whether it would be secured through a control document. - Provide an estimate of quantities and likely locations. MMO/NE: Comment as to whether this is acceptable. The Marpol convention Annex V bans the disposal of all plastics and synthetic materials from ships anywhere at sea! There are so many damaging outcomes that this proposed sealink project will cause from the Suffolk end, right through to the Kent end, and there are so many other less damaging alternatives that I am most strongly urging you examiners, to most strongly reject this proposal	The Applicant has responded to this point in its response to 30TH1 in [REP6-111].

36. Applicant’s Comments on the Submission from Charlotte Fox

36.1 Introduction

36.1.1 Table 36.1 summarises the Applicant’s comments on Charlotte Fox Deadline 6 Response [REP6-194].

Table 36.1 Applicant’s Comments on Charlotte Fox Deadline 6 Submission [REP6-194]

Reference	Matter	Point Raised	Applicant’s Comments
		I have so many questions. For instance, I wish I understood why a plan to transmit the entire output from all four Scottish Power North Sea offshore windfarms to an existing connection point at Bramford was allowed to be derailed by a short-sighted cost cutting move that meant that construction impacts remained the same, but only half of the electricity could be transmitted to Bramford after all. And how that cost-cutting move was allowed to pass as a non-material change when it was clearly a material change. Or why connection for the Scottish Power electricity that could no longer go to Bramford was offered at a connection point in Friston that didn’t even exist. Or why this back to front connection approach at Friston which enabled the National Grid connection hub to sneak by stealth through a planning back door opened by Scottish Power was allowed to slip through the net. Or why the words expressed by the Examining Authority at the Scottish Power DCO that caution should be observed in order to avoid harms exceeding benefits were more projects to be connected at the “de-facto” connection hub at Friston in the future, are being ignored. And why, even though the needs case for Sea Link is highly questionable, the project has been escalated to National Priority Infrastructure status and all planning balance seems to have gone out of the window. I could go on.... As cautioned by the Examining Authority, Sea Link is lifting the lid on electrical infrastructure projects being connected at Friston as we can already see with the giant solar parks that seem to be popping up on the planning horizon and this means that one single community is being subjected to more infrastructure imposition than ever before. No one seems to have a handle on what is happening to the human beings living here in NSIP Land, but let me tell you, we’re already struggling and it sometimes feels as though we are stuck in a horrid social experiment in which the aim is to see how far a local community can be pushed and pushed before it completely falls apart. It is all way too much and between the Developers and Ofgem, we feel as if the East Suffolk community has been well and truly sold down the river. We have a right to live our daily lives without being subjected to such unprecedented levels of cumulative adverse impacts and even if this imposition is justifiable in the name of the greater good, there must be a tipping point at which the local community’s sacrifice becomes too great and we end up with mental and physical health issues that result in us paying too high a price? But who is looking out for that point and how will it even be recognised? Trust me, I’m a	The need case for Sea Link is set out in several application documents, primarily Application Document 7.2 Strategic Options Back Check Report [APP-320], Application Document 7.1 (D) Planning Statement [AS-057], and Application Document 7.3 Design Development Report [APP-321] and most recently in REP5-142 and the response to 2GEN1 in REP6-106. Without revisiting these submissions there is as a matter of national policy a critical requirement for significant reinforcement of the transmission system to facilitate the connection of renewable energy sources and to transport electricity to where it is used. The Applicant recognises the cumulative infrastructure context in East Suffolk and the concerns raised about stress, mental health and wellbeing. Health and wellbeing has not been approached narrowly or solely. Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] of the Environmental Statement includes an assessment which considers construction related stressors such as noise, vibration, traffic, visual effects and community disruption, both alone and cumulatively where required by the EIA Regulations

Reference	Matter	Point Raised	Applicant's Comments
		doctor – prevention is better than cure and it would be much better to pre-empt us reaching breaking point rather than picking up the pieces	

37. Applicant’s Comments on the Submission from Cllr Rebecca Wing

37.1 Introduction

37.1.1 Table 37.1Table 37.1 summarises the Applicant’s comments on Cllr Rebecca Wing Deadline 6 Response [REP6-195].

Table 37.1 Applicant’s Comments on Cllr Rebecca Wing Deadline 6 Submission [REP6-195]

Reference	Matter	Point Raised	Applicant’s Comments
1.	Environmental Concerns	As a Councillor and resident of Ramsgate who enjoys and benefits from the wide variety of open spaces in Thanet, one of which as a dog owner, is the use of the Hoverport, I would like to submit the following concerns:	The flora and fauna of the hoverport is expressly addressed in Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP6-024] : see e.g. sections 2.7.15-2.7.16 and 2.7.53.
		There appears to be little if any attempt by the NG to understand the unique flora and fauna at the old Hoverport, ecological surveys seem to be lacking and would have identified what is there, in what numbers and how it links to the wider ecology of the area. There is little effort to acknowledge the importance of the site given it has now been rewilding for the last 30 plus years and its significance now as a biodiverse habitat located within a designated RAMSAR site, National Nature Reserve and Site of Special Scientific Interest (SSSI).	Please refer to the Applicant’s response to 2ECOL24 in Application Document 9.123: Applicant’s Responses to Second Written Questions [REP5-135] for the proposed control measures to which the Applicant has committed.
2.	Risk of Pollution	The makeup of the Hoverport is a mixture of concrete, making up the old landing site for hovercraft, scrubland and saltmarsh. There has been no assessment of how what is planned will impact all these distinct areas. I am especially concerned about the extensive concrete area which was built on the sands of Pegwell Bay near Cliffsend, using reclaimed land formed from 300,000 tons of spoil from the now closed Chislet Colliery. This was used to build up the chalk bedrock, to create a terminal and apron. Coal mine spoil is well evidenced as a significant potential pollutant and environmental hazard, consisting of waste rock, shale and coal rejects generated during mining, which can cause long-term pollution to air, soil, and water through leaching, spontaneous combustion, and erosion. My concern is that the extensive use of this site by the NG will disturb the already fragile cement surface and in so doing will pollute the environment. The NG have not addressed this very real concern at all and it is hard to see how what they propose will not speed up the damage to the already fragile cement surface. Indeed, there are wider concerns that if the CPO and DCO are approved fresh water would be at risk of contamination due to the extensive earthworks, drilling and need for massive amounts of gravel to be introduced that are not native to the unique nature of Minster Marshes. Southern Water data states that 80% of Thanet’s water comes from ground source from the chalk Aquifer and River Stour and so the risk is very real, with public confidence at an all-time low regarding water companies and the EA capacity to monitor and enforce, we are extremely worried. We are also horrified that it appears the NG are planning to	Regarding the potential release of contaminants into coastal waters, the risk of the release of contamination from the hoverport is considered to be very low. However, notwithstanding this low risk, the Applicant has committed (commitment W37) to preparing a hoverport condition monitoring plan post consent to monitor the condition of the hoverport during construction. This will include measures for identifying and managing any potential contamination risk and will be prepared in consultation with the EA, NE, KWT and TDC for approval by TDC. This commitment is included in Application Document 7.5.2 (D) Outline Offshore Construction Environmental Management Plan, Application Document 7.5.3 (D) Outline Onshore Construction Environmental Management Plan and Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) all submitted at Deadline 6. More generally, the Applicant has fully assessed the potential effects on both the water environment and groundwater in Application Document 6.2.3.4 Part 3 Kent Chapter 4 Water Environment [APP-064] and Application Document 6.2.3.5 Part 3 Kent Chapter 5 Geology and Hydrogeology [APP-065] respectively. It has concluded that no significant effects are likely to arise as a consequence of the Proposed Project.

Reference	Matter	Point Raised	Applicant's Comments
		deposit plastics and synthetics at sea, providing little/no detail and assessment of impact in relation to this.	In relation to the concern about the deposit of plastics and synthetics, please refer to the Applicant's response to 3OTH1 from Application Document 9.136 Applicant's Responses to Third Written Questions [REP6-111] .
3.	Loss of Local Amenity & Impact on Neighbours	NG documentation indicates that the impact to loss of this amenity for the many people that use the hoverport has been assessed as 'insignificant'. They state that much of the hoverport will still be accessible but it is hard to see how a narrow strip by the cliffs next to their construction site would offer the peace, tranquillity and right to explore the whole site and the flora and fauna that presently exists. Birdsong will be replaced by the noise and pollution of heavy machinery and much of the site will be destroyed and inaccessible. The loss of local amenity and impact on neighbours is hardly 'insignificant' and the NG have made no attempt to engage with users or locals to assessed the present use and value of the site as an extremely important and highly valued amenity or the impact on the health and well-being of those that use it, including myself, should this part of their DCO application be approved.	There are no plans to close any of the registered public rights of way, where they interact with the access to the Hoverport these will be managed during the periods of time when construction traffic is using the site. The access route across the hoverport will be fenced off, however crossing points will be provided to maintain public access where necessary.
4.	Assessed Need and Transparency	This site has been a late addition to the main DCO and involves an extremely wide area of Pegwell Bay as well as a proposed CPO of the old Hoverport site. It is not clear why they need to CPO the old Hoverport site which would mean a total loss of amenity and ongoing negative impact on the biodiversity of the site and Pegwell Bay, forever. Given the lack of detail here it would seem that the NG have simply decided to try and take the site, with little evidence to justify their decision making or indeed why they need it. The only justification seems to be to avoid negative impact at another location, indeed, they make little or no attempt to investigate negative impacts at this site and present a comparison, which would justify their need for this site.	As stated at section 2.2.3 in Application Document 9.13 (C): Pegwell Bay Construction Method Technical Note (Clean) [REP4-229] , the need for hoverport access arises as a consequence of the HDD exit pits being located in the upper intertidal mudflats.
		In summing up, the NG appears to have done little to assess the real value and importance of the site in relation to biodiversity, amenity and its significance within the wider environmental network of the area, of which significant parts are high value biodiversity. Following involvement in the hearing as both a speaker and observer I would also like to raise the following concerns: 1. Water Management: In relation to the main convertor site on the Minster Marshes the NG plans to use a system of SUD's and attenuation tanks to manage water. This system was also initially approved for use by the nearby BESS plant who subsequently found that due to shallow ground water, they now discharge into the River Stour, a SUD's system was subsequently deemed not fit for purpose. Given the site the NG plans to use is a marsh and constantly waterlogged our fear is that they too will abandon the use of SUD's and also seek to discharge into the River Stour and/or Minster Stream, increasing flood risk away from the site and as well as increasing potential contamination.	The Applicant notes this observation. The Applicant recognises that the potential for future environmental changes associated with the Proposed Project during construction, operation and decommissioning are currently a source of concern for local tourism. To address this concern, the Applicant has undertaken a comprehensive and robust EIA. In relation to the specific points raised: 1. Water Management For the reasons set out in Application Document 6.8 (B) Flood Risk Assessment [REP6-052] the Applicant is of the view that Kent Converter Station can be safely constructed without increasing the risk of flooding elsewhere. 2. Fire Risk

Reference	Matter	Point Raised	Applicant's Comments
		a. Question: Has the NG made any attempt to look at this issue in light of what the neighbouring BESS had to do and have they looked at the potential impact both on and off site of having to move to discharging water into the River Stour and/or Minster Stream in terms of flood risk, which the area is already prone to? In short, do they have any back up plans if a SUDs system fails to be 'fit for purpose'? 2. Fire Risk: With an increasing accumulation of new energy developments in and around the proposed site, many with their own inherent fire risk, there is real concern that if a major incident was to happen in more than one location, that the Fire Service would be unable to cope, available water might not be enough , or water pressure drop and that fire fighting runoff may well be contaminated. We had a recent incident at one of the high-rise tower blocks which resulted in a drop of water pressure for households, Southern Water issued an alert. a. Question: Has there been any consideration by the NG concerning the potential impact and management or a major incident, including fire in more than one location, including the proposed site? b. Question: Has a major incident event been assessed by the appropriate authority, bringing together a multi-agency response to deal with it, in order to protect both people and the environment? 3. Delivery of Equipment and Gravel from the Port of Ramsgate: As you are possibly not aware there are a number of issues relating to the transport of equipment and gravel that centre around the tunnel which provides access to and from the Port of Ramsgate, avoiding the town centre, built up residential/retail areas and difficult and inappropriate roads and junctions. The tunnel has regular maintenance which is undertaken during the day when the tunnel is shut to all traffic. Recently, the tunnel was shut for an extended period following an accident. During these closure's all port traffic must use the alternative route along Military Road, which takes you past the harbour and retain businesses at the Military Arches. The road here is also a narrow mostly single vehicle width and is shared with pedestrians. There is also a tight 'hairpin' bend to access the B2054 to get out of town and another tight turn at the Churchill Tavern on this B road. This road is totally inappropriate for the proposed traffic and there appears to have been no attempt by the NG to assess this. More recently, following the incident in the tunnel, as Town and District Councillors we have been made aware of further health & safety issues which have resulted in the shelving of plans to upgrade the B2054 at the exit of Military Road and back into town. In addition, KCC have also placed further width restrictions on traffic passing through the tunnel and have informed Town and District councils that it requires a spend of 6 million pounds to upgrade it. a. Question: Are the NG aware of these issues relating to the tunnel access for traffic to and from the Port of Ramsgate, have they assessed the present situation, the clear health & safety concerns which exist as well	The Applicant included a new commitment within the Deadline 5 submission of Application Document 7.5.3 (C) Outline Onshore Construction Environmental Management Plan [REP5-068]. This secured that 'As described in the Suffolk and Kent Drainage Strategies (Documents 9.17.1 and 9.17.2), penstock valves will be installed to isolate the outfalls of the drainage systems serving the operational substations and converter stations to prevent a pollution incident in the event of fire detection. The valves will be designed to close automatically, with a manual override available in the event of automation failure and the systems would be suitably maintained over the operational lifetime of the Project' 3. Delivery of Equipment and Gravel from the Port of Ramsgate The concerns about traffic are noted. The construction vehicle routing has also been designed to minimise impacts across the highway network, as set out within Application Document 7.5.1.2 (B): Outline Construction Traffic Management and Travel Plan [REP6-064]. Application Document 6.2.3.7: Part 3 Kent Chapter 7 Traffic and Transport [APP-067] concludes that construction traffic generated by the Proposed Project is not expected to result in any significant impacts on the surrounding highway network with the identified management and mitigation in place. 4. Cumulative Impact The Applicant has carefully assessed the cumulative impacts of the proposed development in itself and with regards to cumulative impacts arising from other relevant projects: see Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073]

Reference	Matter	Point Raised	Applicant's Comments
		as what is an urgent need to upgrade the tunnel and the present restrictions placed on traffic as a result? b. Question: Has the NG assessed the use of Military Road when the tunnel is shut and do they have any contingency plans if there is a prolonged shutting of the tunnel? 4. Cumulative Impact: The NG have made little, if any attempt to seriously consider the combined impact of the numerous other developments in and around their proposed site. These include, a water treatment plant, Nemo, the largest BESS plant in the country, Battery Storage Connector, Grid Stability plant, Biomass Plant, Solar Farms as well as a school and the Village of Minster. a. Question; Are the NG going to undertake a full and comprehensive assessment of how their proposal will interact with these other developments during both construction and delivery phases, including whether this combined impact will be further increased, for example, the combined impact of various developments discharging runoff into the River Stour and Minster Stream, light and noise pollution and visual impact for example?	

38. Applicant’s Comments on the Submission from Cllr T-J Haworth-Culf

38.1 Introduction

38.1.1 Table 38.1 summarises the Applicant’s comments on Cllr T-J Haworth-Culf Deadline 6 Response [REP6-196].

Table 38.1 Applicant’s Comments on Cllr T-J Haworth-Culf Deadline 6 Submission [REP6-196]

Reference	Matter	Point Raised	Applicant’s Comments
		Please may I thank you for your time and consideration throughout this DCO Hearing.	The meeting did take place, and the Applicant will engage with Aldeburgh Town Council and other stakeholders in future. Whilst noting their opposition to the Proposed Project, the Applicant will engage with the Town Council through a range of methods, including regular written updates and meetings at key stages of construction.
	Meeting with ATC (& others?)	The Inspectors’ direction that the Applicant engage promptly with a local council was welcomed. It is noted that an invitation to meet had been extended to the Applicant on 26 February 2026, ahead of the March hearings. The first meeting with Aldeburgh Town Council subsequently took place on 1 April. It is submitted that this delay reflects a wider pattern of insufficiently timely engagement with affected communities. The purpose of such meetings— namely, to discuss and secure meaningful commitments to community engagement—should have been fulfilled at a much earlier stage. In this respect, the concerns raised by ATC and LTC are supported. I am positive that you as Inspectors would like to know if meetings with the other local town and parish councils have happened?	
	Project Overall	I continue to agree with ATC (Aldeburgh town council) and LTC (Leiston town council) that the project is fundamentally misconceived and should be refused permission. The points set out below are therefore made only in the event that permission is nevertheless granted.	
	Town Roads and Roundabout	I support that no construction or operational traffic should pass through Aldeburgh. While the Applicant has indicated that HGV movements during construction are expected to be fewer than 10 per day, there is presently no enforceable mechanism securing that limit within the draft DCO or REAC. The position advanced by ATC is endorsed: any such restriction must be secured through a legally enforceable cap.	Following further consultation with SCC Highways and Aldeburgh Town Council in March/ April 2026, a daily cap of ten HGV movements will be imposed at the A1094 Leiston Road Roundabout within Aldeburgh, to minimise potential impacts of construction traffic at this location (associated with construction works at S-BM01 and S-BM02). Application Document 7.5.1.1 (B) Outline Construction Traffic Management and Travel Plan – Suffolk [CR1-041] was updated to include this commitment at Deadline 6.
	Tourism Mitigation.	The Applicant’s approach to defining the affected area of Aldeburgh— limited to land within 500 metres of the Suffolk Onshore Scheme Boundary—is considered to be unrealistically narrow. This concern, as raised by ATC, is supported. It fails to reflect the way in which the town	The Applicant retains the position that there will not be significant adverse effects on socio-economics and tourism resulting either from the Proposed Project alone or cumulatively.

Reference	Matter	Point Raised	Applicant's Comments
		functions as an integrated tourism destination. The town as a whole must be incorporated.	The Applicant has responded to Suffolk County Council's suggestion [REP5-185] of a tourism fund in its response to Question 3SERT2 of [REP6-111]. For the reasons set out there the Applicant does not consider it necessary, justified or proportionate to contribute to a tourism fund.
	Character of the Tourism Economy.	The description advanced by SEAS, and mentioned by ATC, is endorsed. The tourism economy of the Suffolk coast, and Aldeburgh in particular, depends upon its unspoilt coastal environment, historic character, and internationally recognised cultural assets, including the Aldeburgh Festival and Snape Maltings. Visitors are attracted by tranquillity and cultural identity rather than conventional resort features. Any proper assessment must take account of these characteristics. Leiston and Thorpeness must be equally included as important areas of tourism.	
	Assessment and Mitigation of Tourism Impacts.	Strong support is given to the proposal advanced by SCC in its LIR, and supported by ATC and LTC, that tourism businesses within at least 2km of the red line boundary should be identified and assessed. A targeted mitigation package should then be developed. Such an approach is necessary to ensure that mitigation and any compensation are directed to those most directly affected, rather than being diluted across a wider area, particularly in light of uncertainties around future local government arrangements in Suffolk.	
	Landfall	Recent and unexpected erosion at Thorpeness introduces a further element of uncertainty that cannot be ignored. The fact that this erosion was not anticipated even by leading experts underlines the need for a precautionary approach. The concerns raised by AcT pc, ATC and LTC in this regard are supported.	The Applicant acknowledges this and is of the view that the landfall and related matters have been given full consideration during the Examination.
	Emergency Services.	The concerns raised regarding emergency service provision remain significant and unresolved. Aldeburgh has a relatively elderly population and a seasonal increase in vulnerable visitors. With no local A&E facility and the nearest hospital located approximately 24 miles away in Ipswich, delays caused by congestion—particularly on the A1094—could have serious consequences. Consideration should be given to practical mitigation measures, including additional support for emergency response services.	A complete traffic and transport assessment for the Suffolk Onshore Scheme has been undertaken in Application Document 6.2.2.7: ES Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. This assessment does not identify any significant impacts on the highway network during the construction phase with the proposed embedded mitigation and control and measurements in place as set out within Application Document 7.5.1.1 (D): Outline Construction Traffic Management and Travel Plan Suffolk, which is secured through Requirement 6 of Schedule 3 of the dDCO [REP6-004].
	Community Benefit.	Despite public statements supporting community benefit for host communities, no specific offer has been made in respect of Aldeburgh. This inconsistency, as identified by many others is of concern. A clear and meaningful package of local benefits should be secured.	The Applicant has provided details of a community benefit fund its response to 3SERT4 of Document 9.136: Applicant's Responses to Third Written Questions [REP6-111]. The Applicant does highlight however that this will be a general fund and not one specific to Aldeburgh.
	<i>Additional Submission – Vehicle Identification Stickers – As per ATC submission.</i>	The position advanced by ATC regarding vehicle identification is supported. The absence of identification measures places this project below the standard adopted by comparable schemes. The use of clearly visible vehicle identification stickers would assist with route compliance, provide reassurance to residents, and contribute to public safety, including safeguarding considerations. This measure should be required.	

Reference	Matter	Point Raised	Applicant's Comments
	Residents and Businesses within 300m of red line boundaries	Continued concerns for residents and businesses that are within the 300m boundary of works – it remains unclear how all of these people will have their interests and well being looked after to the highest standard. If mitigation is not happening for all of these people and businesses then a clear package of direct compensation must be given to all impacted within the 300m or part off that business or address. It is not just about noise and inconvenience; there will be impacts on access and quality of life for many residents – this has not been assessed and impacts could be felt for many years.	Measures to address disruption and potential effects on mental health and wellbeing arising from construction activities are secured within Application Document 9.84 Register of Environmental Actions and Commitments (REAC). As explained in Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058], after taking into account the embedded control and management measures, no likely significant adverse effects have been identified after full consideration.
	Concerns remain regarding approval.	At no fault to the Inspectors, it appears increasingly likely that the Government is minded to approve this project regardless of the serious and unresolved concerns raised; such an outcome would risk causing profound and lasting harm to the character, economy, and wellbeing of the Aldeburgh area and my whole division, undermining both public confidence and the integrity of the decision-making process.	The Applicant acknowledges this and is of the view that the matters surrounding the submisison have been given full consideration during the Examination, and that Secretary of State will in due course decide this application in accordance with s.104 Planning Act 2008

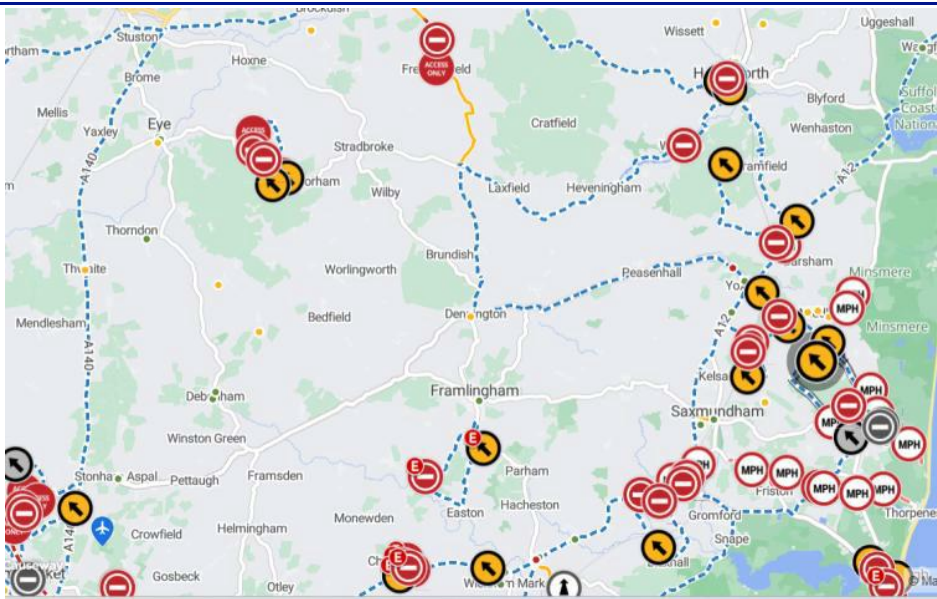
39. Applicant’s Comments on the Submission from Coral Duncan

39.1 Introduction

39.1.1 Table 39.1 summarises the Applicant’s comments on Coral Duncan Deadline 6 Response [REP6-197].

Table 39.1 Applicant’s Comments on Coral Duncan Deadline 6 Submission [REP6-197]

Reference	Matter	Point Raised	Applicant’s Comments
Change of Order Limits relating to the Benhall Railway Bridge			
		I am taking the opportunity to raise several points I was unable to do so with my original response to Sea Links original DCO application. When National Grid presented the proposed converter station at Sternfield, there was no mention of the Benhall Bridge being modified, with the potential to cause me and my community to be isolated. I believe I was misled by National Grids’ original Sea Link DCO. Access to the Sternfield site via Benhall Bridge was flagged as inadequate much earlier in the consultation process. National Grid had chosen to dismiss this as the impactful barrier it is (which should demand a DCO in itself) and has thought to slip these changes in as minor improvements for ease and speed. These CR1 changes have been a deliberate attempt to sneak hugely impactful changes into the DCO without proper due diligence and scrutiny. We deserve true and proper assessments of the potentially catastrophic impacts our communities and environments will suffer. These must be done before any such project proceeds, but in a true and honest way, not those presented with bias by the developer who deem the impacts as minimal or negligible. The impact of any of the three options of the Benhall Bridge changes will be devastating, to not only the older folk caged up in their homes denied access to their community, but to those, like my family, who rely on access to the A12 to commute to work – whose journey time has increased by 40% over the past six months with the current live NSIP projects. This is the current state of the roads we have to negotiate and manage (fig.1), another NSIP thrust upon us without due assessment and evaluation is reckless and damaging to our wellbeing and mental health.	The Applicant has provided Application Document 9.112 (A) Benhall Railway Bridge - Crossing Feasibility Study [REP4-101] to clarify the options under consideration for the movement of ALLs. However, the Applicant notes that detailed design of the mini-bridge option would not be provided during examination as it would be dependent on the detailed design of the project, including the transformer and selection of the haulage delivery vehicle. The applicant notes that SCC is unable to comment on the 28-day closure for remedial works at this time. The submission includes a temporary road closure from S/RO/0090/a to S/RO/0090/b as shown within Application Document 2.7 Access, Rights of Way and Public Rights of Navigation Plans [CR1-011].



Our family crosses the Bridge up to 8 times a day during the working week. To obstruct our everyday lives would be an unsurmountable demand on local people.

I do a yoga class in a local village hall, which has been well attended for a year. However, class numbers are dwindling in size since the current crazy number of road works in our local area.

People who attend from surrounding villages, such as Tunstall, Gt Glemham, Yoxford etc. are too worried to travel now; concerned with negotiating unexpected road closures, travelling their local lanes encountering inappropriate sized lorries and an overwhelming increased volume of traffic.

This is a root cause to social isolation. It is challenging enough once retired or disabled to keep connected. Social networks are important, and we country folk depend on getting out and meeting up for our mental wellbeing. We attend networks of Churches and village halls in this area, we volunteer, work, socialize and worship via these arteries. I am witnessing people choosing to stay at home because of the fear of travelling from village to village.

Please be made aware that social isolation is a major factor contributing to depression and mental health issues. The East Coast of Suffolk suffers a disproportionate number of people suffering compared to national statistics.

‘There’s a growing body of evidence that social isolation and loneliness has a significant negative impact on people’s health and wellbeing, on happiness, on productivity and on society as a whole. Different groups think about it and experience it differently, and it has a lot of different causes...’

Cited: East Suffolk Council Community Partnership, October 2025

‘Mental health in Suffolk is the lowest it’s been since we started measuring in March 2020. That’s even worse than at any point during the pandemic.’

Cited: <https://www.suffolkmind.org.uk/about-us/our-research/>

Reference	Matter	Point Raised	Applicant's Comments
		The impact of any of the three proposed bridge plans will cause chaos to my community's everyday livelihoods and significantly impact our mental health and wellbeing.	
		Local people should have had the opportunity to consider SCC's northern access route proposal when the access routes were being considered at the statutory consultation stage back in 2023. It now appears NG are averse to the Northern access route as it would add over 40 thousand hours to the HGV times. With 12,000 vehicles a day using that part of the A12, restrictions and traffic lights will add at least 1 hour per day to this journey. As a rough estimate, on a 5-day working week, that is 60 thousand hours other travellers, Sizewell C HGV's, business and commuters will be having to absorb in both time and fuel. Do we all invoice NG for time and fuel for every delay as our worth is obviously seen as a lot less valuable than NG drivers. Sizewell C have around 1000 HGV movements a day at present, so 2000 return trips. The enforced delays from Benhall Bridge works will impact Sizewell C HGV's to a far greater extent than the declared hours lost to NG HGV's. Why do NG feel their time and costs are more valuable than the thousands of users of the A12 who these impacts daily when the bridge is closed and diversions / traffic controls in place. Another reason NG refute the Northern route as it is Sizewell C emergency access. As Sizewell C is planned to be operational many years after SeaLink, and the HGV and construction traffic will have concluded by that time. I would like to say this is not a strong objection to using the Northern route. The Benhall Bridge is our emergency access route, again SeaLink are showing no consideration for the villages around Saxmundham, or Saxmundham itself. Another flaw in the access scheme is the issues at Little Glemham, the culvert that runs under the road there is already noted for Sizewell drivers to go dead slow as it is weak, there has been no mention anywhere of what NG plan to do to resolve this as the 400 tonne plus transports that will need to use that route will collapse that part of the A12.	The Applicant directly responded to SCC's proposal for the northern route to be used and it relies on its explanation set out in [REP5 125]. Without revisiting the conclusions of that document, the Applicant remains firmly of the view that the northern access route was properly considered at the pre application stage and was objectively assessed to be a materially worse option than the 'western route' proposed by the Applicant. As set out in REP5-125 the different route alternatives were the subject of two rounds of assessment and it is not correct to say that there has not been a proportionate assessment of the available access route alternatives.

40. Applicant’s Comments on the Submission from David Rix and Ian Rix

40.1 Introduction

- 40.1.1
- Table 40.1 summarises the Applicant’s comments on David Rix Deadline 6 Response [REP6-198].
- 40.1.2
- Table 40.2 summarises the Applicant’s comments on David Rix Deadline 6 Response [REP6-210].

Table 40.1 Applicant’s Comments on David Rix Deadline 6 Submission [REP6-198]

Reference	Matter	Point Raised	Applicant’s Comments
Summary of Land Parcels and Rationale for Objection			
		As requested by the Planning Inspector at the Public Inquiry on 25th March 2026, we set out below a summary of the individual Land Parcels in question and the rationale for our objection to their inclusion within the Compulsory Acquisition powers. We will prepare a detailed submission ahead of ‘Deadline 6’ of any remaining Objections, after a meeting with Sea Link, as listed in the action points. Sea Link are clearly aware of the existing SPR Option Area, as the boundaries were included within the plan of the area, in the response to the first CAH on the 27th January, Page 75 of EN020026-002931-9.121 Applicant's Comments on Other Submissions Received at Deadline 4.	Noted – Thank you and to confirm we are aware of the extent of land included in the SPR Options and where they have been exercised or remain as an Option. The Applicants appreciate that the consenting and delivery of the Kiln Lane Substation is complicated and some elements remain unresolved at the close of examination. The Applicant will continue to engage with Messrs Rix as the delivery progresses and matters such as landscaping proposals are clarified. Until that point it is inappropriate to vary the application and associated voluntary agreement so as not to inadvertently prejudice the delivery of Kiln Lane. The Applicant can be clear they do not seek to acquire more than is necessary to deliver the proposed Project and will continue to engage with Messrs Rix as matters develop.
	Plot 2/20D	The area was left to facilitate access between two fields created by SPR’s purchase of the adjoining land. We understand the need for access for National Grid to the pylons, as stated by James Buckley, but not the need for them to acquire this land. Any ecological mitigation or landscaping will not be able to be undertaken so close to pylon structures. The applicant has already stated their willingness to grant us access over the area and hence it leads us to believe the plot will not be used for anything beyond this use. The current explanation for requirement to purchase land remains ambiguous. We don’t understand the necessity for powers other than access rights in this area for the applicant to deliver the Project.	The Applicant has not been furnished with the detail of any agreement between SPR /EA1N or EA2 or Messrs Rix in relation to this access provision. The area remains identified as being required for mitigation and landscaping – this does not necessarily mean vegetation will be planted directly below or around the existing OHL. Once the SPR landscaping plans are formally approved the Applicant will review and engage further with Mr Rix in the anticipation a mutually acceptable position on access can be agreed. The Applicant seeks to acquire land (Class1 rights) where the current nature and use will be permanently changed, and they require control to ensure delivery.
	Plot 2/20 F + B	No further justification has been provided for the additional land required over and above what SPR have already acquired to facilitate the same access. The Planning Inspectorate has already approved the SPR’s access plans and therefore we do not believe that Sea Link requires further powers	The Applicant confirms the pink area on the below Heads of Terms plan, part plot 2/20, referred to by Mr Rix is under Option to SPR as shown in the plan provided by SPR and has not been excluded from the SPR Option agreement.

Reference	Matter	Point Raised	Applicant's Comments
		over any additional land to construct the proposed service road necessitated to deliver the Project. If additional land is taken the field size and shape left will be unviable with modern farming practices and the required efficiencies.	As has been set out previously the land is required to accommodate a veteran tree identified in the Applicants surveys and allow for a diversion of the UKPN 33KV line.
	Land Parcel 2.20 C	We wish for this plot to reflect SPR's landscaping proposals. We hope this will be corrected following the meeting on 1st April 2026 between Sea Link and SPR, which will enable us to withdraw out objection. Our aim is to ensure that no unnecessary land parcels are acquired by Sea Link.	The Applicant confirms the pink area on the below Heads of Terms plan, part plot 2/20, referred to by Mr Rix is under Option to SPR as shown in the plan provided by SPR and has not been excluded from the SPR Option agreement. The SPR landscaping proposals are not yet formally signed off – once they have been approved, the Applicant will review and consider if it is necessary to refine the areas required or not.
	Plots 2/38, 2/39 and 2/99	There is an existing hedgerow on the roadside. The effect of the acquisition of rights over this land will be to narrow the field entrance at the same time as impacting on the visibility splays which are required when moving large machinery in and out the field. What Sea Link are seeking to impose on us would not be acceptable within their own policies for visibility and movement of large machinery and equipment.	The Applicant again confirms these plots are already under Option to SPR to deliver the Kiln Lane substation, which is mirrored in the Sea Link application. The Project Description in Part 1, Chapter 4 [REP1A-003] sets out the rationale for inclusion of the SPR order limits within the Sea Link Order Limits, which is why this has been included in the Sea Link Order and related Heads of Terms.
	Plot 2/11and 2/11 A	Sea Link have repeatedly advised that they do not wish to look at alternative access routes. There are existing tracks which could bring them to within 30 metres of the proposed inspection bay. Sea Link have been aware of this for a considerable period (1 year) and it has been brought to their attention on multiple occasions. In the event that access over the existing tracks cannot be established the, at the very least, the right of way could run beside the PROW (a footpath) constructed by SPR to minimise impact on the cultivation and cropping of the field. We feel that the current proposals appear to maximise, rather than minimise, disturbance to our farming activities within the field. We believe that surveys have been carried out on land for both alternative access routes are situated.	As has been previously stated in responses to earlier representations, The Applicant acknowledges Plot 2/11 is owned by Mr Rix and not subject to SPR Option. It is included in the Application as Class 5 compulsory rights of access. This is to enable the Applicant to access the cables and junction boxes post construction. It is necessary for the applicant to be able to access the junction boxes for inspection and maintenance. The Applicant will liaise with Mr Rix to establish is there is a suitable alternative but until an alternative is agreed and documented it must retain this route. It is not envisaged this access will be used frequently thus any disruption will be kept to a minimum. Any unlikely damage arising as a result of taking access will be covered by the Compensation Code. The alternatives put forward to date would impact additional landowners and is outside the Order Limits.
	Land Parcels 2/17 and 2/18	The current landscape plans do not allow for maintenance of the ditch, into which drainage from the field discharges. We will require access to maintain the ditch to ensure the free movement of water down the ditch line from the land.	Plot 2/17 and Plot 2/18 are under Option to SPR for acquisition. The Project Description in Part 1, Chapter 4 [REP1A-003] sets out the rationale for inclusion of the SPR order limits within the Sea Link Order Limits, which is why this has been included in the Sea Link Order and related Heads of Terms. SPR's landscaping plans are not yet formally approved.
	Land Parcels 2/5, 2/7 and 2/7b	We wish for this area to mirror that of the SPR plans for access/service road. The Project Description in Part 1, Chapter 4 [REP1A-003] sets out the rationale for inclusion of the SPR order limits within the Sea Link Order Limits, which is why this has been included in the Sea Link Order and related Heads of Terms. The requirement / necessity for Plot 2/7b has not been explained.	Plot 2/5 is owned by Mr Rix. Plot 2/7 is under option to SPR. Plot 2/5 is required for temporary purposes to facilitate utility services. It will be returned to if former use and Mr Rix's control post construction. The Project Description in Part 1, Chapter 4 [REP1A-003] sets out the rationale for inclusion of the SPR order limits within the Sea Link Order Limits, which is why this has been included in the Sea Link Order and related Heads of Terms.

Reference	Matter	Point Raised	Applicant's Comments
		If for visibility why, as detailed above, (reference Plots 2/38, 2/39 and 2/99), are Sea Link appearing to wish to restrict our own visibility, whilst at the same time purchasing our land to remove hedging and trees?	SPR's landscaping plans are not yet formally approved.
	Land Parcels 1/93, 1/94, 1/99 and 1/100	Our feedback to Sea Link throughout the consultation process has been to exclude these land parcels. To say that, at our request, area required should be widened, is factually incorrect. At no point during the discussions between Sea Link, Suffolk County Council and East Suffolk Council, were we, the Landowners, consulted as to our views, comments or suggestions. We do not believe that a new hedge at this location integrates the into the existing surrounding landscape but, rather, detracts from it. There is no evidence of historic planting alongside the road. As a Family, we have been at the property since the 1960's. The wood to the east of the land parcels was only planted in the 1960's and, before that, was part of the adjoining arable field. Secondary hedging already exists on the brow of the hill and the area in question is in the lowest part the surrounding landscape. We do not believe that the establishment of a hedge at this location will aid in screening the development being undertaken by National Grid. The planting of the hedge will cause damage to the adjacent Christmas tree plantation through shading, moisture retention and nutrient competition. Sea Link have yet to explain why it is not possible for the proposed ecological mitigation to be located elsewhere away from the edge of the road. The project can be built and exist without the use of this land and in our opinion it causes unnecessary impact on our family business.	The requirement for the hedge as essential mitigation for landscape and visual effects has been set out in previous responses made by the Applicant including Application Document 9.34.3 (B) Applicant's Response to Relevant Representation from Affected Landowners [REP2-018]. The additional function of the hedgerow and hedgerow tree planting has been previously set out by the Applicant in Table 12.1 of Application Document 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-132]. The proposed hedgerow and tree planting form part of the wider landscape and visual mitigation measures presented in Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065]. Section 5 refers specifically to the proposals put forward to mitigate the overall Impact of the project including the proposed hedge along the B1119. These are an essential part of the mitigation hierarchy to reduce effects on landscape character and visual amenity. The hedgerow and tree planting along the B1119 have been developed through the pre-application stage with Suffolk County Council and East Suffolk Council where the planting is considered to be an essential component to the landscape mitigation. BS 5837:2012 (Trees in relation to design, demolition and construction) recommends that shading is calculated equivalent to tree height and is drawn as an arc (taken from the stem position) from north west to due east. The radius of the arc is equal to the height of the tree with the arc representing the shadow cast through the main part of the day. On that basis it would not be possible for shadow to be cast on the land occupied by Christmas trees. Furthermore, the 5 m access strip for maintenance of the hedgerow as shown in 1LVIA8 in Application Document 9.73 Applicant's Responses to First Written Questions [REP3-069] which would lie to the south of the hedgerow would mean that even if there was some shade cast from the hedgerow during early morning light, the shade wouldn't extend beyond the access track (based on the likely 3-4 m height that the hedgerow would be maintained at).

Table 40.2 Applicant's Comments on Ian Rix Deadline 6 Submission [REP6-210]

Reference	Matter	Point Raised	Applicant's Comments
CAH 2 Submission			

Reference	Matter	Point Raised	Applicant's Comments
	SEAL-AAP009	We would ask the Planning Inspector note that this Submission has been made without the benefit of a meeting with the Applicant and SPR as, despite a request to do so, they were unable to meet with us before the current deadline. We will look to submit an updated Submission after the current deadline but before the close of the Examination on the 5th of May, so long as the Applicant offers us the opportunity to meet with them to discuss the points below.	The Applicant does not believe that a joint meeting between Messrs Rix, SPR and themselves would be productive at this stage as many elements remain in flux. SPR continue to develop their landscaping proposals and detailed design of the Kiln Lane substation. There is nothing further to add at this stage which would alter the position between the Applicant Messrs Rix. Explanation and justification has been provided to all of the points raised to date on numerous occasions. It is understood from Messrs Rix agent that as the SPR land interests included in the proposed project, following the Applicants meeting with SPR has not reduced, there would be little point in another meeting. The Applicants appreciate that the consenting and delivery of the Kiln Lane Substation is complicated and some elements remain unresolved at the close of examination. The Applicant will continue to engage with Messrs Rix as the delivery progresses and matters such as landscaping proposals are clarified. Until that point it is inappropriate to vary the application and associated voluntary agreement so as not to inadvertently prejudice the delivery of Kiln Lane. The Applicant can be clear they do not seek to acquire more than is necessary to deliver the proposed Project and will continue to engage with Messrs Rix as matters develop.
	Plot 2/20D	The area was left to facilitate access between two fields created by SPR's purchase of the adjoining land. We understand the need for access for National Grid to the pylons, as stated by James Buckley, but not the need for them to acquire this land. Any ecological mitigation or landscaping will not be able to be undertaken beneath the existing pylon structures. The Applicant has already stated their willingness to grant us access over the area and hence it leads us to believe the Plot will not be used for anything beyond this use. The plot was to be left in the agreement with SPR to facilitate access between the two retained fields. The current explanation for the requirement to purchase the land remains ambiguous. We don't understand the necessity for Powers in relation to this Plot, other than access rights in this area for the Applicant to deliver the Project.	The Applicant has not been furnished with the detail of any agreement between SPR /EA1N or EA2 or Messrs Rix in relation to this access provision. The area remains identified as being required for mitigation and landscaping – this does not necessarily mean vegetation will be planted directly below or around the existing OHL. Once the SPR landscaping plans are formally approved the Applicant will review and engage further with Mr Rix in the anticipation a mutually acceptable position on access can be agreed. The Applicant seeks to acquire land (Class1 rights) where the current nature and use will be permanently changed, and they require control to ensure delivery.
	Plot 2/20 F + B	No further justification has been provided for the additional land required over and above what SPR have already acquired to facilitate the same access road on to the site. The land required by SPR has already been purchased, ready to facilitate implementation. The Planning Inspectorate has already approved SPR's access plans and we therefore do not believe that the Applicant requires further Powers over any additional land to construct the service road proposed to deliver the Project. If additional land is taken the field size and shape left will be unviable with modern farming practices and the required efficiencies. This would be compounded with the adverse effects of shading and moisture	The Applicant confirms the pink area on the below Heads of Terms plan, part plot 2/20, referred to by Mr Rix is under Option to SPR as shown in the plan provided by SPR and has not been excluded from the SPR Option agreement. As has been set out previously the land is required to accommodate a veteran tree identified in the Applicants surveys and allow for a diversion of the UKPN 33KV line.

Reference	Matter	Point Raised	Applicant's Comments
		competition that woodland/hedge land planting creates and the ongoing maintenance issues for us as the landowner and occupier. The Applicant has failed to justify why any additional areas are required in addition to the proposed road to be built by SPR. We feel that any areas beyond the existing SPR design are not required by the Applicant in order to implement the Project and have an unnecessary long term adverse impact on ourselves and our family business.	
	Land Parcel 2.20 C	We wish for this plot to reflect SPR's landscaping proposals. We hope this will be corrected following the meeting on 1st April 2026 between Sea Link and SPR, which will then enable us to withdraw our Objection. Our aim is to ensure that no unnecessary land parcels are acquired by Sea Link. We are yet to have our follow up meeting with the Applicant in regard to the outcome of their meeting on the 1st of April.	The Applicant confirms the pink area on the below Heads of Terms plan, part plot 2/20, referred to by Mr Rix is under Option to SPR as shown in the plan provided by SPR and has not been excluded from the SPR Option agreement. The SPR landscaping proposals are not yet formally signed off – once they have been approved, the Applicant will review and consider if it is necessary to refine the areas required or not.
	Plots 2/38, 2/39 and 2/99	There is an existing hedgerow on the roadside. The effect of the acquisition of rights over this land will be to narrow the field entrance at the same time as impacting on the visibility splays which are required when moving large machinery in and out the field. What Sea Link are seeking to impose on us would not be acceptable within their own Policies for visibility and movement of large machinery and equipment. The level of woodland planting in the SPR plans, in front of the converter station, should be acceptable to facilitate screening of the development. We therefore believe that these plots are not required by the Applicant in order to deliver the Project.	The Applicant again confirms these plots are already under Option to SPR to deliver the Kiln Lane substation, which is mirrored in the Sea Link application. The Project Description in Part 1, Chapter 4 [REP1A-003] sets out the rationale for inclusion of the SPR order limits within the Sea Link Order Limits, which is why this has been included in the Sea Link Order and related Heads of Terms.
	Plot 2/11and 2/11 A	Sea Link have repeatedly advised that they do not wish to look at alternative access routes. At a previous meeting, in early 2025, with National Grid representatives it was suggested to them that an alternative access, over the existing drive leading Fristonmoor Barn and High House Farm, would have provided them with access to within a much shorter distance of the same location. We do not understand why this alternative option was not explored, rather than impact a productive arable field. In the event that access over the existing tracks cannot be established then, at the very least, the right of way should run beside the PROW (a footpath) constructed by SPR to minimise impact on the cultivation and cropping of the field. This would also allow for easier travel to the inspection bay. The current proposal would likely be impassable during the winter months, choosing the wettest and most heavy (due to clay soils) parts of the field. We believe our alternative proposals would benefit the Applicant in the long term and minimise disturbance to the occupiers' of the land. We feel that the current proposal appears to maximise, rather than minimise, disturbance to our farming activities within the field, as well as causing ongoing issues into the future.	As has been previously stated in responses to earlier representations, The Applicant acknowledges Plot 2/11 is owned by Mr Rix and not subject to SPR Option. It is included in the Application as Class 5 compulsory rights of access. This is to enable the Applicant to access the cables and junction boxes post construction. It is necessary for the applicant to be able to access the junction boxes for inspection and maintenance. The Applicant will liaise with Mr Rix to establish is there is a suitable alternative but until an alternative is agreed and documented it must retain this route. It is not envisaged this access will be used frequently thus any disruption will be kept to a minimum. Any unlikely damage arising as a result of taking access will be covered by the Compensation Code. The alternatives put forward to date would impact additional landowners and is outside the Order Limits.

Reference	Matter	Point Raised	Applicant's Comments
		Surveys have already been carried out on land for both alternative access routes proposed. The Applicant has already had engagement with all relevant Landowners, with regard to the proposed alternative access. It has been frustrating that no other routes have been considered despite numerous requests or at least evidence that they looked at other routes.	
	Land Parcels 2/17 and 2/18	The current landscape plans do not allow for maintenance of the ditch, into which drainage from the field discharges. We will require access to maintain the ditch to ensure the free movement of water down the ditch line from the land. We seek for this area to mirror SPR plans.	Plot 2/17 and Plot 2/18 are under Option to SPR for acquisition. The Project Description in Part 1, Chapter 4 [REP1A-003] sets out the rationale for inclusion of the SPR order limits within the Sea Link Order Limits, which is why this has been included in the Sea Link Order and related Heads of Terms. SPR's landscaping plans are not yet formally approved.
	Land Parcels 2/5, 2/7 and 2/7b	We wish for this area to mirror that of the SPR plans for access/service road. In turn we will remove our objection. The requirement / necessity for Plot 2/7b has not been explained. If for visibility why, as detailed above, (reference Plots 2/38, 2/39 and 2/99), are Sea Link appearing to wish to restrict our own visibility, whilst at the same time purchasing our land to remove hedging and trees? We believe any area outside of the plans of SPR within these plots to be unnecessary for the delivery of this project.	Plot 2/5 is owned by Mr Rix. Plot 2/7 is under option to SPR. Plot 2/5 is required for temporary purposes to facilitate utility services. It will be returned to if former use and Mr Rix's control post construction. The Project Description in Part 1, Chapter 4 [REP1A-003] sets out the rationale for inclusion of the SPR order limits within the Sea Link Order Limits, which is why this has been included in the Sea Link Order and related Heads of Terms. SPR's landscaping plans are not yet formally approved.
	Land Parcels 1/93, 1/94, 1/99 and 1/100	Our feedback to Sea Link throughout the consultation process has been to exclude these land parcels. To say that, at our request, area required should be widened, is factually incorrect. At no point during the discussions between Sea Link, Suffolk County Council and East Suffolk Council, were we, the Landowners, consulted as to our views, comments or suggestions. We do not believe that a new hedge at this location integrates the into the existing surrounding landscape but, rather, detracts from/removes it. The road, due to its low-lying position, forms ice and frost in the winter period. The addition of a hedge at this location will increase the risk to road users. There is no evidence of historic planting alongside the road. As a Family, we have been at the property since the 1960's. The wood to the east of the land parcels was only planted in the 1960's and, before that, was part of the adjoining arable field. Secondary hedging already exists on the brow of the hill and the area in question is in the lowest part the surrounding landscape. We do not believe that the establishment of a hedge at this location will aid in screening the development being undertaken by National Grid. In Document: 6.3.2.1.D Part 2 Suffolk, Page 12, Table 1.5 'Assessment of effects on Representative Viewpoint 5', as can be seen from the projected image, the buildings will stand out against the skyline, when viewed from various directions. The proposed planting of a hedge alongside the road will do little to mitigate the views of the buildings and,	The requirement for the hedge as essential mitigation for landscape and visual effects has been set out in previous responses made by the Applicant including Application Document 9.34.3 (B) Applicant's Response to Relevant Representation from Affected Landowners [REP2-018]. The additional function of the hedgerow and hedgerow tree planting has been previously set out by the Applicant in Table 12.1 of Application Document 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-132]. The proposed hedgerow and tree planting form part of the wider landscape and visual mitigation measures presented in Application Document 7.5.7.1 (C) Outline Landscape and Ecological Management Plan - Suffolk [REP4-065]. Section 5 refers specifically to the proposals put forward to mitigate the overall Impact of the project including the proposed hedge along the B1119. These are an essential part of the mitigation hierarchy to reduce effects on landscape character and visual amenity. The hedgerow and tree planting along the B1119 have been developed through the pre-application stage with Suffolk County Council and East Suffolk Council where the planting is considered to be an essential component to the landscape mitigation. BS 5837:2012 (Trees in relation to design, demolition and construction) recommends that shading is calculated equivalent to

Reference	Matter	Point Raised	Applicant's Comments
		taken in the round, add little to the existing landscape, given the existing presence of the Christmas trees. In addition, the planting of the hedge will cause damage to the adjacent Christmas tree plantation through shading, moisture retention and nutrient competition. This can stretch to 24m out in to the field away from the planting. The Christmas tree's are ever more becoming an important source of income for the Family, with the external pressures on traditional forms of farming. We have a small and finite amount of land on the farm that is suitable for this practice, proximity to customers and the brand that has been built over 30 years. We are already having a large area of this production land being sterilised for this practice due to the cable route. We feel strongly that the acquisition of these Plots unnecessarily increase this damage. Sea Link have yet to explain why it is not possible for the proposed ecological mitigation to be located elsewhere away from the edge of the road. We believe the Project can be built without the use of this land and in our opinion it causes unnecessary impact on our Family business.	tree height and is drawn as an arc (taken from the stem position) from north west to due east. The radius of the arc is equal to the height of the tree with the arc representing the shadow cast through the main part of the day. On that basis it would not be possible for shadow to be cast on the land occupied by Christmas trees. Furthermore, the 5 m access strip for maintenance of the hedgerow as shown in 1LVIA8 in Application Document 9.73 Applicant's Responses to First Written Questions [REP3-069] which would lie to the south of the hedgerow would mean that even if there was some shade cast from the hedgerow during early morning light, the shade wouldn't extend beyond the access track (based on the likely 3-4 m height that the hedgerow would be maintained at).

41. Applicant’s Comments on the Submission from Dr Stephanie Bunn

41.1 Introduction

41.1.1 Table 41.1 summarises the Applicant’s comments on Dr Stephanie Bunn Deadline 6 Response [REP6-201].

Table 41.1 Applicant’s Comments on Dr Stephanie Bunn Deadline 6 Submission [REP6-201]

Reference	Matter	Point Raised	Applicant’s Comments
1.	The overview	After the last 6 weeks of hostilities in the Middle East, no-one could deny the need for the UK to maintain an independent, strong and effective power network. However, a much clearer overview of needs and the system must be taken given the current developments. Critically, as , CEO Octopus Energy and a key Government advisor put it in the Times (26th March 2026), the current proposal will be outdated before it is complete, and our energy supply needs to be more flexible, multi-stranded and adaptable. There are upcoming systems and more appropriate sites which would cause less disruption, be no more costly, and would be much more effective into the future. The current international situation has further illustrated the need for an improved and more strategically designed planning. The recent Middle East situation has also highlighted the folly of concentrating any energy supply along one converging route which would make the country very vulnerable to hostile attack.	For the reasons set out throughout the DCO Submission but most recently set out in REP5-142, the Applicant considers that there is an urgent need for the Proposed Project consistent with the need identified in NPS EN-1. Alternative solutions have been considered fully by the Applicant through the development of the Proposed Project: see Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] and Application Document 7.2 Strategic Options Back Check Report [APP-320].
2.	The proposal	a) The planning application is weak, lacking thoroughness, and is ill-judged in its research and the guarantees it makes. For example, the initial proposal did not take into account the weakness of the Benhall Bridge for transportation of heavy goods to the proposed site. Once National Grid realised its error, its subsequent research was incomplete, not thorough and minimised local impact. No alternative access routes were investigated. Alongside the bridge, the impact of the proposed route for the three communities, Benhall, Sternfield and Saxmundham would be profoundly socially and environmentally damaging in terms of dust, noise, and light pollution. Yet no alternatives have been considered. b) The cumulative impact of the diverse Sealink, Sizewell and Lionlink projects on the above communities is unacceptable. It would make the lives of local people intolerable for years to come. This ‘all one’s eggs in one basket’ approach to energy supply by National Grid is also clear folly, given the current strategic international situation.	As explained in Application Document 9.112 (A) Benhall Railway Bridge – Crossing Feasibility Study [REP4-101], the Applicant has investigated mitigation measures in greater detail in response to submissions made by the local highway authority and interested parties. The Applicant does not, however, accept that there are routing issues or that the Bridge cannot be managed. The Applicant also does not accept that alternative access routes to the Saxmundham Converter Station have not been investigated. Section 3.8 of Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] demonstrates that a number of alternative permanent accesses were originally identified and explored. Inter-project cumulative projects for the Suffolk Onshore Scheme are fully addressed in Application Document 6.2.2.13 Part 2 Suffolk Chapter 12 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060].
3.	Local cultural, environmental and heritage background	This region is loved by both locals and our many visitors for its unique environmental beauty and its Suffolk farming culture, its ecological significance, and its history. Snape Maltings, just a mile away from the proposed planned works, is an internationally significant site for music and culture, as is the Aldeburgh Festival. Our area is also home to internationally renown RSPB Minsmere. The landfall for Sealink is an RSPB ‘super-flyway’ for endangered	In respect of ecological impacts, there has been comprehensive assessment as detailed in Application Document 6.2.2.2 (D) Environmental Statement Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP4-025] .

Reference	Matter	Point Raised	Applicant's Comments
		migrating birds, along with being home to cuckoos, terns, bitterns, swifts and others. In terms of potential damage, we have already lost 26,000 trees, including many ancient oaks, due to Sizewell preliminary work which has brought a terrible loss of habitat and corresponding huge increase in traffic. The area cannot take anymore without losing its cultural and ecological uniqueness and it would be transformed from a very special cultural and an environmentally sensitive part of the UK into an industrial site. This would be a terrible waste, not to mention an ecological crime. In regard to heritage, there are no other regions of the UK whose ancient Saxon history, as highlighted by Sutton Hoo, features as a permanent international exhibition in the British Museum and is on all their publicity. Other linked ancient sites and remains are spread across the proposed Sealink area, which is a flanked by a second ship burial site, ancient Saxon churches, a woodhenge and horse burial sites. To wilfully build over, or in the vicinity of these sites would be to disregard our heritage. This proposed planned infrastructure site cannot reasonably go ahead in this area. There are more suitable, less sensitive and culturally significant areas.	The Applicant has provided an updated Cultural Heritage ES Chapter at Deadline 6 which will include assessment of these assets, as provided during Examination in Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]: see Application Document 6.2.2.3 (B) Environmental Statement Part 2 Suffolk Chapter 3 Cultural Heritage [REP6-020].

42. Applicant’s Comments on the Submission from Elizabeth Trudy Duffield and Matthew Garrard

42.1 Introduction

- 42.1.1 Table 42.1 summarises the Applicant’s comments on Elizabeth Trudy Duffield Deadline 6 Response [REP6-202].
- 42.1.2 Table 42.2 summarises the Applicant’s comments on Elizabeth Trudy Duffield Deadline 6 Response [REP6-280].

Table 42.1 Applicant’s Comments on Elizabeth Trudy Duffield Deadline 6 Submission [REP6-202]

Reference	Matter	Point Raised	Applicant’s Comments
		I made a submission at the OFH in March and in summary would like to say the following: I am very concerned about the cumalative impacts of this project and do not feel the applicant understands or is concerned about the impact this will have on our local community. I was concerned when the applicant described sealink as having an insignificant impact on the community in comparison to Sizewell and that sizewell is background noise in relation to sealink. As a resident living in Sternfield I wish the Examiners to know that Sizewell is having a massive impact on the local community and this needs to be acknowledged. Sealink on top of the impact of Sizewell will have an unacceptable impact on our health and wellbeing in so many measurable ways when considering our stress levels. The applicant does not seem to understand how rural communities function and the importance of good reliable road links to Ipswich and beyond. Sizewell has meant that a 40 minute journey is often disrupted and extended. A reasonable person can except this in the short term but not for the extended period the building of Sealink would mean for Saxmundham and surrounding routes. Having followed the agenda items between March 25th to March 27th the applicant seemed unaware of the impact of using Benhall Bridge as access as opposed to the favoured route put forward by Suffolk County Council. The Council have an understanding and acknowledgement of the frequent road disruption we are currently experiencing and their proposed northern route using Sizewell infrastructure would prevent the disruption closing Benhall Bridge would bring. As a local resident it is clear that in the applicants view we can have extra time and inconvenience put onto our journeys but the applicant is not prepared to in relation to Suffolk CC route. Suffolk CC know the area and the traffic issues well and the reiteration of the applicant doing their modelling in the low season just illustrates this. No thought was given by the applicant to the extra impact the tourist season brings for road travel. Local country roads can not take tourist traffic and heavy plant and construction traffic. some of the	The Applicant has prepared a cumulative impact assessment relating to onshore impacts in Suffolk – see [APP-059] and in particular section 13.4. The cumulative assessment that was undertaken included a consideration of the impacts from the delivery of Sizewell C.

Reference	Matter	Point Raised	Applicant's Comments
		junctions are extremely dangerous and the road through Sternfield and Friston is unsuitable.	
		I can tell you that over Jan, Feb and March Siemens have been doing investigation works on the proposed access route on behalf of the applicant. Access to these works were off Church Hill Sternfield and gave me an opportunity to engage with the workers. Many commented on how tricky the site was to access and how difficult the local country roads were to navigate for the plant needed for the further exploratory works. It concerned me that at the same time heavy plant was on the fields opposite Hurts Hall the applicant had also instructed orthinologists and other environmental assessors to conduct surveys of the local wildlife. The wildlife we normally see completely disappeared whilst the heavy plant was on the field and did not return until they left. It seemed that any results would be skewed and suggest there was not the birdlife and wildlife that we know exists. Interestingly wildlife returned on /siemens departure. When I explained about the proposed northern route the workforce could see the absolute sense in using existing infrastructure rather than the river Fromus crossing as proposed. It was also concerning to here from the environmental specials during the specific issue hearing that the saluation ponds to take excess water are not in the best locations as flooding continues to be an issue for local residents. Properties alongside the Fromus have flooded this winter (gardens) and I was not reassured in relation to excess water on the highways during construction. The applicant suggested that a taxi service could be provided for the residents of Whitearch park if Benhall bridge was closed but seemed unaware that there are simply not enough taxis locally as it is and this has been made worse since Sizewell has come on stream. Taxis have to be booked in advance and cannot respond to immediate need.	As set out in [REP4-101], the Applicant remains confident in its proposals for the construction access to the Suffolk converter station site, and that the remediation to the Benhall Railway Bridge remains its preferred option, as discussed with the local highway authority. Additional options for moving AILS have been retained as they provide surety to the Applicant of the validity of construction access for all necessary construction traffic for the project.
		There seems to be no provision made for pedestrians or cyclists using the B1221 from Benhall and the route would become extremely hazardous if used for construction traffic over several years during the build of Sealink and then possibly Lionlink. Suffolk Councils proposed route would protect access to local services for residents of Benhall and Sternfield and does not involve closing our access onto the A12 which is especially vital in an emergency situation. Our local SEAS campaign group has clearly illustrated that the need is not there and the power could be taken to Kent by upgrading existing power lines or using a brownfield site. During the Specific issue hearings we were not given an opportunity to examine this in detail and I really hope the examiners take on this issue. Sealink will forever change our local landscape and Heritage and this is unforgivable if this is not absolutely necessary as I believe it isnt. The evidence suggests there are better more environmentally sustainable ways of achieving net zero. I was concerned that on the last agenda item under ecology and biodiversity that the applicant gave no clear commitment to restoring the landscape other than the bear minimum and could not say what these would look like or where they might be. This is especially distressing as a local resident who cherishes the landscape to hear in relation to representatives of East	

Reference	Matter	Point Raised	Applicant's Comments
		Suffolk outlining the high failure rate of recent tree planting in the local area. I am also very concerned about the protected horse chestnut by the proposed Fromus crossing as the applicant has not specified how that will be safeguarded and protected. Our landscape, biodiversity and ecology will be harmed by this project but can be somewhat protected by using the northern access route so the Fromus valley and vista of Hurts Hall is protected.	
		In my role as a community volunteer for a local food project I hear many local people who are distressed and anxious about what is happening to their local environment but feel powerless to engage with this process. They have lived in Saxmundham and the local villages for many years and feel rural communities have no voice and can be sacrificed for big corporations like NG who are working for shareholder profit and using tax payers money to further their aims. The applicant has been disingenuous in describing Sternfield as an industrial setting when in fact we have a vegetable processing unit and duck farm that no way reflects the scale of the Sealink project. This simply unfair and not justifiable given the alternative options to get energy to the south east. I now dread any correspondence from the applicant. They have not engaged with the local community in a meaningful way and suggesting they appoint a liaison person once the project is granted does not answer our concerns in relation to cumulative effects, noise , vibration, traffic, loss of heritage and landscape. The applicant constantly moves their red lines on paperwork and this project gets bigger and if permission is granted I envisage them carrying out works without proper authorization. I am deeply concerned and want to repeat again the stress and anxiety this is bringing to residents directly affected. There is no meaningful mitigation put forward.	These concerns are acknowledged. All feedback received during the multiple phases of consultation has been carefully reviewed and considered. The Applicant's approach to consultation is thorough – see for example p.82 of [REP2-022]. The Applicant will conduct its works in line with permissions and consents granted.

Table 42.2 Applicant’s Comments on Trudy Duffield and Matthew Garrard Deadline 6 Submission [REP6-280]

Reference	Matter	Point Raised	Applicant's Comments
		As owners of the above property we wish to formally object to compulsory acquisition of plots 1/2, 1/4, 1/5, 1/7, 1/8 1/9, 1/10, 1/11 as this will directly affect our property and we have outlined our objections throughout the Sealink process. We are affected persons for the purpose of the Planning Act 2008 and interested parties and our interested party reference numbers are above. We continue to formally object to this development.	Trudy Duffield and Matthew Garrad are Category 3 interests living in the vicinity of the proposed project. A Category 3 interest includes parties that the applicant thinks would be, or might be, entitled to make a relevant claim for compensation under section 10 of the Compulsory Purchase Act 1965 and/or Part 1 of the Land Compensation Act 1973 and/or section 152(3) of the Planning Act, if the Order sought by the application were made and fully implemented.
		The plots outlined would significantly affect our rights to a private and family life as located very close to our property with the development limits now extending to our boundary and we have been identified as having category 3 interests. There would prolonged long term harm in terms of noise, vibration, dust traffic and artificial lighting. These effects would last beyond the construction period into the future blighting our	The Applicant is not seeking any land interest or property rights from this affected party Their Category 3 interest is where an owner may be in a position to bring about a claim for loss due to the construction or operation of the scheme. The Compensation Code adequately addresses any property impact without the need for a separate purchase scheme.

Reference	Matter	Point Raised	Applicant's Comments
		latter years which we wish to enjoy in our home. The scheme would result in a degradation of our homes setting and is wholly inappropriate in a rural setting. The applicant has made no formal mechanism to compensate me for the blight and reduction of value of our home. There are no formal compensation measures made by the applicant to address this. The applicant is going forward with compulsory purchase but has not demonstrated the need adequately to justify this. We are aware as local homeowners that there are better alternatives to delivering this scheme. There has been no meaningful engagement by the applicant to avoid, mitigate or reduce the impacts on our property and the surrounding rural landscape. This failure undermines the justification for the exercise of compulsory powers. Cumulative impacts on us as property owners have not been considered effectively and I maintain my objection to the compulsory acquisition and or temporary possession of land within the order limits.	Statutory Blight is a mechanism whereby a property owner can bring forward the intended purchase of a property. It only applies where a developer intends to purchase the property to deliver the scheme. There are some useful Government Guides in relation to the impact of Compulsory Purchase, available at Compulsory purchase and compensation: guide 1 - procedure - GOV.UK with Guides 1 and 4 being the most applicable. The Applicant is not aware that this owner has taken the necessary steps to market their property or has any intention of moving house. Should this not be the case we would be pleased to engage with this property owner. One of the tests of Compulsory Acquisition is that the public benefit must outweigh the private loss. This information and how the Applicant believes it has met the necessary tests is set out in the Statement of Reasons (REP6-008).
		I hope that the examining authority will agree that the impact of compulsory purchase within this scheme will have disproportionate and unjustified impacts on interested parties and that the Applicant has not met the statutory tests required to justify compulsory purchase. I apologise for the use of emotive language but this scheme will blight the rural landscape of and our property sits within this as one of the original Lodges. Suffolk is being unfairly blighted by energy infrastructure and we believe these special landscapes need to be preserved for not just ourselves but future generations. The impact of this development will severely effect our health and socioeconomic wellbeing and there is nothing within the Applicants submissions that will adequately compensate us for this.	Noted.

43. Applicant’s Comments on the Submission from Fiona Cramb

43.1 Introduction

43.1.1 Table 43.1 summarises the Applicant’s comments on Fiona Cramb Deadline 6 Response [REP6-203]

Table 43.1 Applicant’s Comments on Fiona Cramb Deadline 6 Submission [REP6-203]

Reference	Matter	Point Raised	Applicant’s Comments
		As an affected person I was invited to speak at the compulsory purchase hearing on March 25th and would have asked to speak on this agenda item • to discharge the ExA’s duty to hear persons affected by compulsory acquisition (CA) and temporary possession (TP) proposals (affected persons) who requested to be heard and to address related matters Following an accident, I wasn’t able to attend and speak. This is what I would have said. I want to register my objection to the Sealink project in the strongest terms. I wish to endorse all submissions made by Suffolk Energy Action Solutions (SEAS) and in particular those made regarding cumulative impact and those challenging the need for Sealink. I don’t wish to repeat the arguments SEAS make all of which I support.	This is noted. The Applicant’s responses to the individual submissions made are set out below.
	Cumulative impact -our situation	Eight years ago, we were living quietly in a lovely renovated 15th farmhouse more than half a mile from the nearest road reached by quiet lane situated in the middle of arable fields enjoying a peaceful existence with views across to the village and across the fields on all sides . We enjoyed the dark skies, wonderful stars, wildlife, an extensive footpath network which enabled us to walk from our home to Friston, Knodishall , Saxmundham, Kelsale and towards Snape and Aldeburgh to join the Suffolk Coastal path, visit neighbours and a enjoy a generally idyllic peaceful existence. Our family home now of over 25 years. In 2018 thanks to Friston Parish Council (not SPR who had failed to communicate with us despite reaching stage two of their statutory consultation by then) we discovered National Grid(NG) and Scottish power renewables(SPR) plans to industrialise the fields between us and Friston. Since then our rural idyll and our experience of it has been completely wrecked by years of successive consultations, surveys, hearings, examinations and huge personal financial and emotional expense fighting these plans.	The Applicant notes the concerns raised, which spans a range of environmental and social disciplines. As an overarching point, the Environmental Statement that forms part of this DCO submission explains the implications of the Proposed Project, along with the steps the Applicant to which has committed to mitigate adverse effects. Further, the cumulative impact of the Proposed Project alongside other NSIPs have been considered fully in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. As to the specific points raised: Concerns about landscape and visual changes are noted. NPS EN-1 paragraph 5.10.5 recognises that ‘Virtually all nationally significant energy infrastructure projects will have adverse effects on landscape’. Nonetheless, the Applicant has carefully designed the Suffolk Onshore Scheme to minimise harm to the landscape. Reasonable mitigation has been provided where appropriate. These are explained in Application Document 6.2.2.1 (B) Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023] and assessed in detail within Application Document 6.3.3.1.C ES Appendix

Reference	Matter	Point Raised	Applicant's Comments
		Throughout all of this all the developers NG , SPR, Sealink and now Lionlink have drawn the red lines of their DCO site limits along our boundary ie our garden fence . Three (four if you include the NG substation) have claimed the same land around us with much the same limits. None of these developers wish to compulsorily purchase any of our small amount of land consisting of garden and a small paddock. Despite that the impact on us is enormous, it's beyond adequate description. We and our immediate neighbour are amongst the most badly effected because of our proximity to the about to be built National Grid “ Kiln Lane “ substation and the multitude of projects connecting or planned to connect here. As I said to the inspectors at the initial open floor hearings, we are absolutely “at the eye of the storm”. I repeated what I had predicted in submissions I made to the SPR planning inspectors that ultimately we would be in encircled by cable routes , haul roads , construction sites and blighted by industrial scale infrastructure, cut off from the footpath network and our friends and neighbours, blighted by noise, disruption, loss of dark skies , suffer the loss of our privacy and security with hundreds of workers swarming over the site constructing at least four different projects simultaneously a few hundred yards away from our home. And I'm sorry to say is that what is now happening and will continue for years with no end in sight as more projects are constructed. Our situation must be quite unique in that there is not simply one project which will be constructed and then there will be an end to it. We are faced with consecutive projects coming forward and being developed simultaneously with no end in sight. The impact of this drawing of the line is immeasurable. The impact on our mental and physical health , our security , the impact on our community and neighbours. Indeed the toll has already been too great for one of our nearest neighbours and friend. So we now find ourselves in a home that is no longer the sanctuary it was and is both environmentally and financially blighted with no chance of any compensation for the loss of value to our property or as I understand it for the disruption that we are experiencing already. This is the reality of cumulative impact.	3.1.C Landscape Designation and Landscape Character Assessment [APP-145]. Concerns about access to the PRoW network are noted. These have been considered in 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio economics Recreation and Tourism [REP1A-005]. Concerns about construction impacts, including noise, are addressed in Application Document 6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise and Vibration [AS-109]. The Applicant has committed to measures intended to mitigate any effects arising during construction, operation, and decommissioning, which are secured within Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134]. Concerns about the impact on mental and physical health are noted, as well as that on communities and neighbours. A complete health and wellbeing assessment, which addresses these matters, has been undertaken for Suffolk in Application Document 6.2.2.11 (B) Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058], which concludes that there are no anticipated significant effects as a result of the Proposed Project. Concerns about financial blight are noted. Any diminution in property value falling within a proper head of claim, e.g. section 10 of the Compulsory Purchase Act 1965 and Part 1 of the Land Compensation Act 1973, will be considered on an individual basis in accordance with the Compensation Code.
	Cumulative impact-multiple projects	I do want to draw your attention to the list of planned projects known about which which effect us directly:	The Applicant does not accept that its submissions on cumulative impact treat the impact of the Proposed Project “<i>as if it is happening in isolation from any other project</i>”. This mischaracterises the approach taken by the

Reference	Matter	Point Raised	Applicant’s Comments
		The NG substation(Kiln Lane) and projects already in the public domain which are planned to connect there - SPR EA (1) N and EA (2) , interconnectors Sealink and Lionlink and the Helios energy (solar) farm. Also directly affecting us is the Suffolk Water Recycling Transfer and Storage Project proposed to bring water to Sizewell C. The proposed pipe routes run to the north of our home between us and the B1119 crossing Sealink’s proposed converter site, their cable route and indeed proposed converter sites and cable routes for Lionlink (which begs the question as to whether they are aware of this) and crossing Fristonmoor Lane (again our only access). Then there are the projects which are already impacting the local area the major one being Sizewell C which is already having an enormously negative impact on East Suffolk. I’m sure that the inspectors have seen for themselves the level of destruction and disruption on their travels around the area. In addition there are improvement works on the A12, housing developments in Saxmundham and Benhall and Sealink’s works to Benhall bridge all of which will contribute to yet more disruption for local residents. As Sealink’s submissions on cumulative impact treat the impact of the project as if it is happening in isolation from any other project their assessment of the effects can only be described as complete fiction. We are already dealing with the impact of NG and SPR ‘s projects as well as Sizewell C and the lack of coordination. For example recently Sealink (unsuccessfully) challenged SPR ‘s plans for design and mitigation for the substation site which had been agreed after extensive discussion with local residents when they came before the planning authority- the local council. And again recently when we thought things couldn’t get any worse we discovered that Lionlink propose to build a huge construction compound adjacent to Fristonmoor Lane (our only access) their proposed site reaching right up to the edge of our small paddock yards from our home. This in addition to the proposed cable route to the east of us finally cutting us off from our nearest neighbours. It’s not too late to stop this. Please prevent more needless destruction of this wonderful area by refusing to consent Sealink.	Applicant throughout all of its assessments, which has been to consider the effects of the Proposed Project together with other projects, including those referred to in this representation: see Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060], Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073], and Application Document 6.2.4.11 (B) Part 4 Marine Chapter 11 Inter Project Cumulative Effects [REP1A-011].

44. Applicant’s Comments on the Submission from Fiona Gilmore

44.1 Introduction

44.1.1 Table 44.1 summarises the Applicant’s comments on Fiona Gilmore Deadline 6 Response [REP6-204]

Table 44.1 Applicant’s Comments on Fiona Gilmore Deadline 6 Submission [REP6-204]

Reference	Matter	Point Raised	Applicant’s Comments
	1. NGET’s brazen attempt to downplay the inevitable adverse impacts of the Sea Link project	On two occasions the Barrister speaking on behalf of NGET dismissed the possibility of assessing the impact that Sea Link may have on tourism and the interrelated issues of traffic, emergency services, access for local residents and other road infrastructure problems. Her argument was that Sizewell C was such a vast project and its impacts were so profound that it was really difficult to isolate any impacts that Sea Link would be making because in her opinion it was a very small project in comparison and the ripple impact of SZC “ its noise” (metaphorically and literally speaking) drowned out the impact of smaller energy projects. The NGET argument is simply hocus pocus. National Grid wishes to draw a veil over the adverse impacts of Sea Link and other related projects such as LionLink, the National Grid substation and ScottishPower’s projects and infer that it’s impossible to assess the impacts individually and they suggest in a cumulative sense SZC is by far the greatest initiator of adverse impacts. In fact, it is dazzlingly clear that there are significant individual adverse impacts which can be attributed to each energy project because each one has a particular cable route and particular HGVs choosing their preferred route for their particular purpose. There are many local residents living along the cable routes and around the substation/ converter zones who are directly and profoundly affected by National Grid’s plans in particular, but hardly impacted by SZC except for the heavier traffic. Sea Link and the other substations and converters use cable trenches which carve their way across bird sanctuaries, SSSI, habitat corridors, lowland wetlands, meadows and copses, close to homes in hamlets and villages along the way, blighting hundreds of acres of flat countryside and the actual substation/ converter edifices absorb over 88 football pitches with concrete blocks towering over church steeples and the surrounding flat landscapes. These energy projects curiously have more adverse impacts on tourists than SZC because they spread across miles of coastal Suffolk whilst SZC is more contained to its Sizewell location. The HGVs for SZC cause much congestion but their	This is a mischaracterisation of the Applicant’s position. The Applicant’s approach, from the outset, has been to consider the potential cumulative effects of the Proposed Project together with other projects, including Lion Link, EA1N/EA2, Sizewell C etc. This is explained in full in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060], Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Effects [APP-073], and Application Document 6.2.4.11 (B) Part 4 Marine Chapter 11 Inter Project Cumulative Effects [REP1A-011]. This approach has been applied across the consideration of environmental effects, including inter alia traffic, ecology, landscape and visual effects etc. Insofar as the Applicant made any reference to the difficulty of isolating effects attributable to the Proposed Project at Issue Specific Hearing 3 and Open Floor Hearing 3 this was in relation to the specific discussions about monitoring for tourism, as well as health and wellbeing. The Applicant’s view is that the relative scale of the Proposed Project, when compared to other NSIPs in the area, would mean monitoring would be unlikely to achieve a meaningful outcome in these specific respects. It is wrong, however, to suggest from this that the Applicant has failed, or refused to, conduct a proper cumulative assessment of the Proposed Project generally. The Applicant has provided details of a community benefit fund its response to 3SERT4 of Application Document 9.136: Applicant’s Responses to Third Written Questions [REP6-111].

Reference	Matter	Point Raised	Applicant's Comments
		routes are only in part the same as for the other energy projects. The A12 is a common denominator and the A1094 is generally used for their employee vehicles. The HGVs and other related vehicles for these projects use country roads and lanes such as the A1094 dedicated historically to residents, emergency services, farming tractors, tourists, trades and commuters. At high tourist season these roads are already severely congested. Our quantitative tracking studies in 2021 show bumper to bumper traffic during September and the concern is that the energy projects will be the “tipping point”. NGET suggests that it will be hard to identify the possible decline in specific tourism sectors because SZC will be the main reason for any change. The Sea Link detrimental effect is far greater than the relative proportion of HGVs and other vehicles required by Sea Link. That is due to its particular cable route which has landfall at Aldeburgh North Warren, and which is visible to tourists who visit Aldeburgh and Thorpeness using the single connecting road for these two tourism hot spots. Sea Link project is not hidden away from tourists, on the contrary, it is unabashedly taking a highly exposed landfall location as is LionLink at Walberswick. Most tourists do not go to Sizewell and the majority of tourists will avoid Sizewell given the flattening of the trees and hedges in the approach to Sizewell. However, tourists visiting Aldeburgh and Thorpeness, Walberswick and the other cable route villages will be faced with construction works, noise and dust for years to come. If National Grid had chosen an industrial brownfield site such as Grain these issues would disappear because Grain is not a highly successful tourism resort. Aldeburgh and the coastal Suffolk region is not Grain. It will however become more like Grain as a consequence of the intense industrialisation process. That in turn leads to the commoditisation of the tourism sector. That has huge implications for the SMEs and for those livelihoods dependent on a thriving fine food and hospitality economy. Until a baseline attitudinal tracking study is carried out exploring responses to the cumulative impacts of seven energy projects but also the Sea Link project in terms of its location and specific areas of impact, NGET cannot dismiss the threats as insignificant. Our estimate of the tourism decline amounts to circa £0.5 billion over 12 years of construction. The Sea Link project along with National Grid's substation and LionLink represents at least a third of the true impacts of the seven energy projects , given the particular geography of the cable routes. We would expect full compensation to the tourism sector for that loss. At the last Hearing for Tourism, we were made aware of the ESC initiative to have set up a committee tasked with the tracking and monitoring of visitors' attitudes to the energy projects and the associated issues. Sea Link can be included in this ongoing tracking study. That requires various aspects of Sea Link's plans to be addressed in the questionnaires, in particular the construction works planned at landfall.	
	2. Alternative sites have not been given sufficient consideration.	In view of the threatened seismic change in character to this region as a consequence of Sea Link and the other energy projects, it is incumbent on National Grid to rethink its plans and present with full transparency the	The Applicant's position is that alternative options have been considered from the outset of the design. These have been fully

Reference	Matter	Point Raised	Applicant's Comments
		alternative site options including Bradwell, Ardleigh and Grain. These options were never presented by National Grid as comprehensive assessments including cost benefit analyses(CBA) . SEAS presented a CBA for Bradwell. It is staggering how National Grid has continued to cruise through with one of the most ill conceived, irrational and damaging energy plans without any serious questioning of the logic for an energy hub to be located in a precious wildlife and tourism hot spot. As we continue to state, Netherlands, Belgium and other North Sea countries choose existing industrial zones for their major energy hubs such as Rotterdam and Zeebrugge.	explored. An appraisal of the relative merits and demerits of alternatives can be found in: • Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368] • Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369] • Application Document 8.3 Strategic Options Report (October 2023) [APP-370] • Application Document 7.2 Strategic Options Back Check Report [APP-320] • Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044].
	3. National Grid has not been honest about its massive ambitions for this area	[redacted] National Grid is a past master of subterfuge and disingenuity. During the SPR EA1N and EA2 Hearings, National Grid ESO and NGET chose not to participate in specific Hearings despite requests from the ExA to attend to answer questions relating to their true objectives for this region. It was impossible for the ExA to assess the true cumulative impacts as there was an opaqueness around the various projects and their plans. “ National Grid is hiding behind the skirts of SPR” was the community’s concern. Here once again, we see National Grid obfuscating and choosing to avoid inconvenient truths. The quantitative assessments are lacking - for tourism,traffic flow data for tourism peaks on the roads, noise and vibration and for almost every other major issue. Either National Grid is simply arrogant and thinks that they can ride roughshod over communities and the rest or National Grid is dissembling because they know that the hard evidence is against them. As we have consistently said for the last three years, this is the wrong project in the wrong place at the wrong time.	This allegation is false. The Applicant did participate in the SPR project examinations. This is evidenced by the submissions by National Grid Electricity Transmission into the Examinations available on the East Anglia Two Planning Inspectorate website. As explained above, the Applicant’s position is that cumulative impacts have been fully considered and evidenced. including: • Tourism (Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio Economics, Recreation and Tourism [REP1A-005] and Application Document 6.2.3.10 (B) Part 3 Kent Chapter 10 Socio economics Recreation and Tourism [REP1A-007]. • Traffic peaks (Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] and Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]) • Noise and vibration (Application Document 6.2.2.9 (B) Part 2 Suffolk Chapter 9 Noise and Vibration [AS-109] and Application Document 6.2.3.9 (B) Part 3 Kent Chapter 9 Noise and Vibration [AS-111]).

45. Applicant’s Comments on the Submission from George Cooper

45.1 Introduction

45.1.1 Table 45.1 summarises the Applicant’s comments on George Cooper Deadline 6 Response [REP6-205]

Table 45.1 Applicant’s Comments on George Cooper Deadline 6 Submission [REP6-205]

Reference	Matter	Point Raised	Applicant’s Comments
		Good morning, Inspector, and members of the Examining Authority.	Noted
		My name is George Cooper. For the past three years, since 2021, I and a licensed British Trust for Ornithology bird ringer have been conducting systematic ringing surveys on the exact land proposed for the Minster Converter Station and across a large part of the draft Order Limits for the Kent side of the Sea Link project.	
		National Grid’s ecological surveys do not show the true scale of the wildlife that uses this site and the wider Minster Marshes.	The bird surveys carried out by the Applicant expressly included nocturnal field surveys. This is explained at 1.3.24 to 1.3.29 of Application Document 6.3.3.2.C (B) ES Appendix 3.2.C Wintering Bird Survey Report 2023-2024 [REP1A-017] . The dates for these visits are set out at Table 1.2 of the same document. The suggestion that skylark, woodcock, and jack snipe “ <i>do not appear</i> ” in the Applicant’s documents is wrong – these species are all named and addressed in the same document above. This representation amounts to no more than a disagreement with the results of the professional assessments undertaken by the Applicant.
		We ring more than 1,000 birds every single year in the hedge and scrub area right in the centre of the proposed converter station footprint. Over 40 species, including many red-listed birds such as Nightingale, Linnets and Song Thrush. At night, using a thermal imager, we carry out night ringing and witness something the applicant’s surveys completely missed: the proposed converter site becomes a wildlife spectacle. Thousands of birds descend to feed, drink from the ditches, and roost. We ring Skylark, Woodcock, Jack Snipe and other species that simply do not appear in National Grid’s documents.	No conceivable error in the baseline relied upon in the Habitats Regulations Assessment and the oLEMP is made out. There is correspondingly no breach of the EIA Regulations and/or conflict with NPS EN-1 as alleged.
		For the past three years we have ringed between 90 and 100 percent of all the Skylark, Jack Snipe and Woodcock recorded anywhere in Kent – the vast majority of them on the exact land National Grid wants to build on.	
		Yet look at the applicant’s own documents in the Examination Library: Their Kent Ecology and Biodiversity Chapter (6.2.3.2, latest version REP5-017) and the Wintering Bird Survey Reports (REP1A-017 for 2023-2024 and earlier versions) record just two Skylarks across the entire Minster Marshes in places.	
		Their Breeding Bird Surveys (REP1A-021) and Vantage Point Surveys (REP1A-023) contain no nocturnal data whatsoever– only daytime and bat-focused night walks (Appendix 3.2.L).	

Reference	Matter	Point Raised	Applicant's Comments
		This is materially incorrect and incomplete information. The baseline in the Environmental Statement is wrong. The Habitats Regulations Assessment (latest REP5-036) and the Outline Landscape and Ecological Management Plan (REP4-067) are built on that false baseline. That breaches the Infrastructure Planning (EIA) Regulations 2017 – which demand a full and accurate description of the existing environment – and NPS EN-1 paragraphs 5.25–5.32, which require proper assessment of functionally linked land for the Thanet Coast and Sandwich Bay SPA/Ramsar.	
		National Grid's plans show they intend to acquire land right up to the boundary of the Sandwich Bay and Hacklinge Marshes SSSI. There is no buffer zone between their industrial infrastructure and the SSSI. The converter station and substation would literally encircle this internationally important wetland, turning it into an isolated island in the middle of an industrial desert.	The area proposed to offset the loss of functionally-linked land for golden plover has been discussed with Natural England, who has not raised any outstanding concerns on this matter. What is more, the cumulative impacts of loss of functionally linked land have been addressed in Application Document 6.6 (H) Habitats Regulations Assessment Report [REP6-050].
		An area already battered by other electrical infrastructure projects would be further degraded and rendered worthless to the abundant wildlife that depends on it. Kent Wildlife Trust, the RSPB and Natural England have all raised similar concerns in their Written Representations about the failure to apply the mitigation hierarchy and the cumulative loss of functionally linked land.	Potential contamination risks, traffic impacts, and habitat impacts have been fully considered in the respective chapters within the Environmental Statement.
		This loss cannot be mitigated or replicated.	
		The Minster Marshes are unique: close to Pegwell Bay, sheltered by high ground from the sea, part of a vast open landscape that gives overwintering birds room to forage. The mitigation land National Grid has proposed is surrounded by industry, main roads, constant noise and light pollution – the exact opposite of what these birds need.	
		Combined with the unassessed sulphate mobilisation from their proposed Controlled Modulus Columns, the unmodelled thousands of extra HGV movements, and the direct habitat destruction, the Kent side of this project will cause irreversible damage to wildlife and the agricultural marshland that supports it.	
		I implore you, on behalf of the thousands of birds that rely on this unique site every day and night, and on behalf of the people of Kent who value our internationally protected sites and minster marshes: turn down this ill-conceived and hugely environmentally damaging project.	
		Thank you	

46. Applicant’s Comments on the Submission from Glynis Robertson

46.1 Introduction

46.1.1 Table 46.1 summarises the Applicant’s comments on Glynis Robertson Deadline 6 Response [REP6-206]

Table 46.1 Applicant’s Comments on Glynis Robertson Deadline 6 Submission [REP6-206]

Reference	Matter	Point Raised	Applicant’s Comments
		My name is Glynis Robertson and I am a resident of Aldeburgh. Over the past three years, I have followed this project closely, and I wish to register a clear, calm, and reasoned objection to the proposal. However, maintaining that position is becoming increasingly difficult for me—and for many others—when National Grid continues to [redacted] the robust, transparent, and policy-compliant evidence required to substantiate its case. While I support the transition to net zero, the Sea Link proposal is poorly planned, misleadingly presented, and places an unfair and excessive burden on Suffolk communities.	Noted. The Applicant’s responses to the individual submissions made are set out below.
		I share widespread concerns that the application was premature and supported by insufficient evidence to justify the examination of a Development Consent Order. In particular, the Applicant has failed to produce a [redacted] cumulative impact assessment, despite clear requirements under the EIA Regulations, National Policy Statements EN-1 and EN-5, and established good practice. The failure to properly assess cumulative effects is fundamental. Suffolk is not facing a single project, but a concentration of multiple major infrastructure schemes—offshore wind connections, substations, converters, grid reinforcements, and other NSIPs—many of which are co-located or sequential. Yet these have not been meaningfully assessed together. The result is a significant underestimation of the true scale, duration, and intensity of impacts. This is not an abstract concern. The reality for residents is one of overlapping construction periods, prolonged disruption, and what has been described as a “generational” timescale of impact. Even where individual impacts might appear acceptable in isolation, their combined and continuous effect is not.	The Applicant can confirm that cumulative effects of the Proposed Project together with other NSIPs in the Suffolk area have been properly assessed, and are explained in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]. Further work to reflect the updated list of committed developments was produced following ISH2 and can be found at Application Document 9.110 Inter-Project Cumulative Effects Assessment Update - Technical Note [REP6-098] submitted at Deadline 6.
		NGET has not adequately demonstrated how it will protect the Suffolk Coast and Heaths National Landscape, nor how it will meet its statutory duties under Section 85 of the Countryside and Rights of Way Act. The cumulative industrialisation of the landscape— through multiple substations, pylons, access routes, and	Full consideration has been given to the Suffolk Coast and Heaths National Landscape, along with the concerns raised about effects to landscape character, within Application Document 6.2.2.1 (B) ES Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023] and

Reference	Matter	Point Raised	Applicant's Comments
		associated infrastructure—has not been properly assessed and risks fundamentally altering its character.	Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097] . The Applicant considers that the duty to seek to further the purposes of the National Landscape has been complied with. The Applicant submitted Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120] at Deadline 1 . This technical note provides a single source of reference for material relating to the Section 85 duty within the DCO application documentation.
		The ecological evidence underpinning the proposal is also weak. Baseline survey data is incomplete, and the cumulative ecological assessment excludes or underplays the combined effects of multiple projects on habitats, species, and ecological networks. This includes potential fragmentation, repeated disturbance, and long-term degradation, none of which have been robustly quantified.	This submission has been insufficiently particularised to enable anything beyond a high-level response. The Applicant confirms that the effects on habitats and ecology have been fully assessed under Application Document 6.6 (H) Habitats Regulations Assessment Report [REP6-050] and summarised (in respect of Suffolk) in Application Document 6.2.2.2 (E) Part 2 Suffolk Chapter 2 Ecology and Biodiversity [REP6-018] .
		There are also serious concerns regarding transport impacts. Evidence suggests that traffic assessments underestimate peak HGV movements and fail to account for the cumulative effects of multiple concurrent projects, as well as other planned developments and roadworks. This risks masking the true burden on rural roads that are already unsuitable for sustained heavy use.	Construction traffic effects in Suffolk have been fully assessed in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport . The Applicant confirms that these assessments have been based on peak number of HGV movements. Cumulative impacts have also been taken into account.
		In addition, there has been no meaningful assessment of the cumulative impact on tourism and the local economy. The Applicant has failed to establish a proper baseline or undertake quantitative analysis, despite the clear dependence of the area on its natural landscape and heritage. This landscape, designated as a Heritage Coast in the 1970s, has taken over 50 years to develop into one of the UK's most valued National Landscapes. It risks being significantly damaged within a decade, with recovery taking far longer—if it is possible at all.	The Applicant's position is that its assessment of tourism and socio-economics within Application Document 6.2.2.10 (B) Part 2 Part 2 Suffolk Chapter 10 Socio Economics, Recreation and Tourism [REP1A-005] , expanded upon in Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065] is robust. The conclusion reached is that the Proposed Project is unlikely to result in significant adverse effects on visitors and Suffolk's visitor economy generally.
		There is also a growing and justified concern about the impact on health and mental wellbeing being overlooked. The prolonged uncertainty, stress, and cumulative burden of multiple large-scale developments are already affecting members of the community, yet these effects have not been properly assessed or acknowledged.	The Applicant acknowledges the potential uncertainty and stress that may be associated with the construction and operation of major infrastructure projects. A complete health and wellbeing assessment has been undertaken for Suffolk under Application Document 6.2.2.11 Part 2 Suffolk Chapter 11 Health and Wellbeing [APP-058] . This concludes that no likely significant adverse effects will result from the Proposed Project.
		Crucially, there has been no meaningful, joined-up strategic planning that considers the totality of these impacts. Alternatives that could reduce cumulative harm—such as offshore coordination, alternative routing, or different connection strategies—have not been properly or transparently evaluated.	The Applicant is committed to coordinating with other major infrastructure projects where possible. It has already sought to achieve strategic coordination where such opportunities have arisen, e.g. through colocation of infrastructure. Further detail of coordination efforts, as well as consideration of alternatives, are contained in Application Document 7.13 Coordination Document [APP-363] and Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] .

Reference	Matter	Point Raised	Applicant’s Comments
		Plus, there is a fundamental issue of fairness. Suffolk communities are being asked to shoulder a disproportionate share of nationally significant infrastructure, with limited corresponding local benefit. The balance between national need and local impact is not just strained—it is inequitable.	As noted above, inter-project cumulative effects in Suffolk have been considered. The Applicant recognises that a number of projects are being proposed in the Suffolk area. A significant amount of the electricity generation for Great Britain is off the east coast. This electricity needs to come ashore and be delivered to the whole of the country as over 80% of UK electricity demand is outside of London, therefore it is vital that new infrastructure is provided for the whole country and the electricity generated is distributed accordingly.
		Finally, the Sea Link needs case seems to have fallen away, which NGET continually deny. I support SEAS, ESC and SCC in their ‘needs’ submissions which I hope the ExA will seriously consider, especially if there are cheaper alternatives.	The need case for the Proposed Project has not fallen away. Need is a matter that the Applicant has consistently addressed throughout the Examination, most recently in the Applicant’s response to 2GEN1 in Application Document 9.131 Applicants Comments on Responses to Second Written Questions [REP6-106] .
		With only a few weeks remaining in the examination period, I urge the Examining Authority to require National Grid to provide clear, robust, and policy-compliant evidence addressing these outstanding concerns. Failing that, I ask that these unresolved and fundamental deficiencies are fully and transparently reflected in your report to the Secretary of State. Thank you.	Noted.

47. Applicant’s Comments on the Submission from Good Connections Walberswick Ltd

47.1 Introduction

47.1.1 Table 47.1 summarises the Applicant’s comments on Good Connections Walberswick Ltd Deadline 6 Response [REP6-206].

Table 47.1 Applicant’s Comments on Good Connections Walberswick Ltd Deadline 6 Submission [REP6-206]

Reference	Matter	Point Raised	Applicant’s Comments
SEA LINK CHANGE REQUEST 1 – OPEN FLOOR HEARING 3			
	A Pattern of Incomplete Evidence	Across all five changes, there is a consistent theme: This project was submitted too early, without sufficient evidence, and is now being corrected on the fly. That is not how nationally significant infrastructure should be planned.	This is a mischaracterisation of the position. This application for the Proposed Development was, of course, accepted by the Secretary of State for examination: see [PD-001]. This means that it was concluded that the application (including accompaniments) met the standard required under section 55(3)(f) of the Planning Act 2008. Further, it is relevant that the ExA after consideration concluded that the proposed changes under CR1 did not amount to a materially different project from that which was applied for: see [PD-011].
	Change 1 – Hoverport, Kent	This is perhaps the clearest example of incomplete work by the Applicant. There are no site-specific ecological surveys. We do not know what species are present. We do not know what habitats are at risk. Even more concerning, important saltmarsh habitat has been omitted from the plans entirely. That is not a minor oversight—it is a critical failure. Without proper data: ● Impacts cannot be assessed ● Legal protections for species cannot be ensured ● And the mitigation hierarchy—avoid, reduce, compensate—cannot be applied A proposal like this cannot be approved	Habitat and ecology at the former hoverport are expressly identified and addressed in Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP6-024]. The Applicant confirms that access will be limited to open unvegetated hardstanding. Having walked the site, the Applicant is confident that sufficiently open and unvegetated routes exist. As such, there will be no traversal of habitats. The Applicant therefore does not see a current necessity for surveys. The Applicant has already committed in the REAC (measure B66) to pre-construction botanical survey. This will identify areas of habitat suitable for larval foodplants or other ecological receptors to be avoided. The Applicant notes that Natural England in its consultation response to Change 1 stated that it was ‘content with the change’ to access at the former hoverport as ‘this change is intended to avoid impacts to saltmarsh habitat, in line with our relevant representation comments’.
	Change 2 – Friston Substation	Here, the concern is about future expansion by the back door. The shift toward a Gas Insulated Substation, which can be up to 16 metres high, represents a very different visual and landscape impact compared to the lower Air Insulated alternative.	This is a misunderstanding of Change 2. No expansion to the substation is proposed as part of this proposed change and the dimensions of the substation would remain as previously assessed. The change to the LoDs is such that they align those of the Scottish Power Renewables (SPR) applications. It is emphasised that a

Reference	Matter	Point Raised	Applicant's Comments
		But more importantly, it raises a clear planning concern: Is this change not just for Sea Link—but for future connections and expansion? If so, the community is being asked to accept impacts today, without clarity about the scale of impacts tomorrow. That is not transparent planning.	substation in exactly this location of the same dimensions already has consent through the SPR applications, with the impact of the substation considered acceptable in consenting the projects.
	Change 3 – Heritage Feature	This change shows something important. What was first identified as a possible Neolithic henge was later reclassified after further surveys. That tells us something very simple: The original surveys were not sufficient. And if that is true for archaeology, where else is the evidence incomplete? The Suffolk coast is extremely rich in heritage. We should not be discovering what is there after the application has been submitted.	It is not accepted that the surveys initially carried out by the Applicant were insufficient. The Applicant has taken a rigorous approach to archaeological assessment work for the Proposed Project, informed by discussions with County Council archaeologists and Historic England. The surveys undertaken prior to submission were robust and appropriate to inform the Environmental Impact Assessment. It is common for trial trenching along underground cable routes to be carried out post consent and a find during trial trenching does not call into question the scope of surveys prior to submission of an application. The Applicant notes that its proposed approach is supported by both County Council archaeologists and Historic England.
	Change 4 – Benhall Railway Bridge	This is about access—and common sense Suffolk County Council has put forward a credible northern route alternative. It: • Avoids the constraints of the railway bridge • Removes the need for new structures across the Fromus Valley • Reduces impacts on sensitive landscapes and heritage areas And importantly, it uses existing infrastructure corridors. Yet this option has not been properly considered. This again raises a fundamental issue: Why are reasonable alternatives not being fully assessed, as required by national policies EN-1 and EN-5?	This submission is misconceived. As explained in Application Document 9.107 Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125], alternative access routes were identified and fully explored.
	Change 5 – Hedgerow and Drainage	This is the only change that is partially welcome. Improving drainage and enabling hedge maintenance is sensible. But even here, the proposal falls short. There is a missed opportunity to provide meaningful landscape screening, such as a proper tree belt to reduce the visual impact of the converter station. And there are still concerns about impacts on local farming.	The Applicant is confident that the proposed hedge included within the DCO application will provide the screening required to mitigate the visual impact at this location as identified in the ES. A double planted hedgerow is proposed along the B1119 and the detail of the hedgerow will be developed at detailed design stage. Potential impacts to farming are addressed in Application Document 6.2.2.6 (B) Part 2 Suffolk Chapter 6 Agriculture and Soils [PDA-019]. Soil handling will be undertaken in accordance with good practice as set out in Application Document 7.5.10.1 (B) 7.5.10.1 (B) Outline Soil Management Plan – Suffolk [REP6-066].
	The Bigger Picture – Cumulative Impact	These changes cannot be looked at in isolation. Communities here are already experiencing the effects of major infrastructure projects: • Traffic congestion	<u>The Applicant confirms that cumulative effects of the Proposed Project together with other NSIPs in the Suffolk area have been properly assessed, and are explained in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]. Further work to reflect the updated list</u>

Reference	Matter	Point Raised	Applicant’s Comments
		● Road safety risks ● Pressure on housing and rising rents ● Environmental damage and fragmentation of wildlife corridors ● And very real impacts on people’s health and wellbeing Sea Link does not exist in a vacuum—it adds to an already overwhelming cumulative burden.	<u>of committed developments was produced following ISH2 and can be found at Application Document 9.110 Inter-Project Cumulative Effects Assessment Update - Technical Note [REP6-098] submitted at Deadline 6.</u>
	Conclusion	Taken together, these five changes point to a single conclusion: This project was not ready for submission. Key surveys were incomplete. Alternatives were not properly assessed. And mitigation remains vague or deferred. That is not consistent with the requirements of national policy, nor with the standards expected of nationally significant infrastructure. So my request to the Examining Authority is this: ● Give these changes the closest possible scrutiny ● Require proper evidence, not assumptions ● And ensure that if this project were ever to proceed, it is subject to the strongest possible protections for communities and the environment But above all— Recognise that these late changes are not minor adjustments. They are symptoms of a much deeper problem with the project as a whole. And a project which is simply not needed.	The Interested Party is referred to points made above.

48. Applicant’s Comments on the Submission from Gordon Young

48.1 Introduction

- 48.1.1
- Table 48.1 summarises the Applicant’s comments on Gordon Young Deadline 6 Response [REP6-208].
- 48.1.2
- Table 48.2 summarises the Applicant’s comments on Gordon Young Deadline 6 Response [REP6-278].

Table 48.1 Applicant’s Comments on Gordon Young Deadline 6 Submission [REP6-208]

Reference	Matter	Point Raised	Applicant’s Comments
Written Representation of Oral Representation at OFH3 by Gordon Young (Affected Party)			
	Executive Summary	1. This submission summarises my oral representation to the Open Floor Hearing. It focuses on three principal concerns: (i) access, (ii) site selection, and (iii) the need for the project. In summary: The proposed access via the Benhall Railway Bridge and B1121 is uncertain, high risk, and likely to cause unacceptable disruption, as identified by Suffolk County Council (SCC). The Saxmundham site is fundamentally flawed, requiring disproportionate engineering interventions, including a new crossing of the River Fromus, resulting in harm to the landscape and heritage setting. The Applicant’s reliance on co-location with LionLink does not constitute genuine coordination, but instead concentrates cumulative impacts on local communities. The need for Sea Link in its current form remains unproven, particularly where lower-impact alternatives may exist. The cumulative impact of multiple NSIPs is already placing significant strain on community wellbeing, which must be afforded proper weight. 2. Taken together, the proposal represents ill-considered access, a flawed site, and an insufficiently justified need case, resulting in unacceptable cumulative impacts.	Noted
	Introduction	4. I am an affected party, living approximately 500 metres from the proposed converter station at Saxmundham. 5. I support the transition to renewable energy. However, such infrastructure must be delivered in a manner that is strategic, coordinated, and proportionate, and which fairly balances national need with local impacts. 6. In my view, the current proposal fails to achieve that balance.	
	Access	7. The proposed reliance on the Benhall Railway Bridge and the B1121 raises serious concerns. The route is constrained, with uncertain structural capacity and unproven engineering solutions, and presents a high risk of disruption. 8. SCC has clearly identified that the deliverability of this access route remains in serious doubt.	(7) The Applicant provided document 9.112 Benhall Railway Bridge – Crossing Feasibility Study [APP4-101] at Deadline 4 in answer to the discussion around the Benhall Railway Bridge. The B1121 is a designate local access HGV Route and the Benhall Railway Bridge is currently certified for 46 tonnes which will cater for over 90% of the construction

Reference	Matter	Point Raised	Applicant's Comments
		9. Recent experience of the A12 closure at Friday Street demonstrates the extent of disruption that can arise from a single constraint in the local network. The proposed works would introduce multiple concurrent constraints, including impacts to the B1121 and the East Suffolk rail line. 10. This has implications for emergency service access, daily commuting, and the functioning of local communities, and is therefore unacceptable. 11. A credible alternative exists. SCC's proposed northern access route, utilising the consented Sizewell C Link Road, the former RAF Leiston airfield, and the B1119, would: • Avoid reliance on the Benhall Railway Bridge; • Remove the need for a new crossing of the River Fromus; and • Represent a more coordinated and deliverable solution. 12. This approach better reflects what should be understood as genuine coordination between NSIP projects.	traffic for the project, over bridging (mini-bridge) is a proven method of crossing structures. (8) The Applicant has responded to all of SCC's submissions to the examination (9) The Proposed Project has no planned closures of the A12 for any of the works required. Any closures of the B1121 will be agreed with SCC as will the diversion routes. Any closures of the Railway will be agreed with Network Rail (10) The Applicant has been discussing any potential road closures with the Emergency services and has agreed to provide prior notice to all Emergency services before closures take place. Residents who live to the North of the Benhall Railway Bridge will not be restricted on access to their properties or to Saxmundham , residents of Whitearch Park will be provided with a minibus or taxi service during bridge closures. (11) The applicant provided a response to the SCC Northern Access route in 9.107: Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125] (12) Coordination is ongoing with all NSIP's in the Region. Coordination does not always follow the use of the same routes and to reduce impact on some communities ,communities, coordination could result in using different access routes.
	Site Selection	13. The access constraints arise directly from the fundamental unsuitability of the chosen site. 14. The site only functions through significant engineering interventions, including works to the Benhall Railway Bridge and the construction of a new bridge across the River Fromus. These would result in permanent harm to the setting of Hurts Hall and the wider landscape. 15. As has been identified, this represents a disproportionate solution to a self-imposed problem. 16. Given the sensitivity of this location, any such intervention would need to be of exceptionally high design quality, fully responsive to its historic and landscape context. At present, there is no confidence that this standard can be achieved, and insufficient detail has been provided. 17. The Examining Authority has observed a clear contrast at the Hornsea 3 converter station, located adjacent to major infrastructure near the A47. That site demonstrates appropriate siting, accessibility, and separation from residential communities. 18. By comparison, the current proposal appears to be retrofitting solutions to overcome an inherently unsuitable location. 19. The Applicant's justification of the site based on co-location with LionLink does not amount to meaningful coordination. Co-location alone does not reduce impacts; it compounds them at a single location.	The Applicant undertook a thorough assessment of sites at the CPRSS stage and then undertook backcheck exercises at key stages in the pre application period. The Saxmundham site remained the Applicant's preferred site throughout. The effect on Hurts Hall has been thoroughly assessed and is considered to represent less than substantial harm. The Applicant cannot comment on the Hornsea 3 Converter station siting, or associated routeing, except to note that the constraints present on the outskirts of the city of Norwich are likely to be in stark contrast to the constraints present in East Suffolk, where the Proposed Project had to connect to the transmission system.
	Need for the Project	20. There is a fundamental question as to whether Sea Link is required in its current form. 21. Evidence presented within the Examination indicates that alternative solutions, including upgrading existing transmission infrastructure, could	In respect of Suffolk, cumulative effects of the Proposed Project together with other NSIPs in the Suffolk area have been properly assessed, and are explained in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060].

Reference	Matter	Point Raised	Applicant's Comments
		potentially deliver the same outcomes at lower cost and with reduced environmental and community impact. 22. This calls into question the strength of the Applicant's case for need. 23. Where a less harmful and more efficient alternative may exist, it is essential that the proposal is rigorously justified. Cumulative Impacts and Mental Health 24. The proposal must be considered within the wider context of multiple overlapping NSIPs, including Sizewell C, EA1N and EA2, LionLink, and the Essex Suffolk Water project. 25. This represents over a decade of continuous disruption, with limited opportunity for respite. 26. For local communities, this creates a sustained environment of uncertainty, affecting sleep, work, and daily life, and resulting in observable stress and fatigue. 27. The cumulative impact on community mental health and wellbeing is real and ongoing, and must be given appropriate weight within the Examination. 28. In this context, it is essential that construction working hours are controlled to allow meaningful respite. Seven-day working would be incompatible with safeguarding community wellbeing and should not be permitted.	Further work to reflect the updated list of committed developments was produced following ISH2 and can be found at Application Document 9.110 Inter-Project Cumulative Effects Assessment Update - Technical Note [REP6-098] submitted at Deadline 6. Both documents include consideration of the potential for cumulative health and wellbeing effects, however no such effects are anticipated. The need case for the project is a matter that the Applicant has consistently addressed throughout the Examination in various documents, including most recently in the Applicant's response to 2GEN1 in Application Document 9.131 Applicants Comments on Responses to Second Written Questions [REP6-106]. The Applicant has responded to the issue of core working hours in response to point 10.1 in document 9.153. Applicant's Response to the ExA's Rule 17 Letter
	Conclusion	29. Clean energy infrastructure is necessary, but it must be delivered in a way that is strategic, coordinated, and proportionate. 30. In this case: • The access strategy is ill-considered and uncertain; • The site selection is fundamentally flawed; and • The case for need remains insufficiently demonstrated. 31. Furthermore, the cumulative burden placed on local communities—particularly in terms of mental health and quality of life—is significant and must not be underestimated. 32. It is also a matter of concern that local knowledge and lived experience do not appear to have been given sufficient weight in the development of the proposal. 33. For these reasons, I respectfully submit that the proposal, in its current form, fails to achieve an appropriate balance between national benefit and local impact	Please see above responses.

Table 48.2 Applicant's Comments on Gordon Young Deadline 6 Submission [REP6-278]

Reference	Matter	Point Raised	Applicant's Comments
Response to Action Point 27 - Compulsory Acquisition Hearing 2(CAH2) by Gordon Young (Affected Party)			
		I am an Affected Person for the purposes of the Planning Act 2008, I am listed in the Book of Reference as having Category 2 and Category 3 interests in land within the proposed Scheme Order limits, namely in plots 1/2, 1/ 4, 1/5, 1/7, 1/8, 1/9, 1/10, 1/11. and have previously set out my objections (RR-1866, REP1A-106, REP2-081, REP3A-079, REP6-208) to the proposed Sea Link Scheme. I write to confirm that my objection to the	The Applicant is not seeking any land interest or property rights from this affected party. Their Category 2 interest is in relation to the services supplying the objector's property. There is no impact to these services. They will be maintained at all times.

Reference	Matter	Point Raised	Applicant's Comments
		compulsory acquisition and/or temporary possession of land and rights remains unchanged. My interests fall within the Order Limits and relate to plots in close proximity to my home and its immediate surroundings (the land required for the access road is located with 250 meters south of my home and the converter station is located approximately 500 meters east of my home.). The inclusion of this land within the Scheme Order Limits places my residential amenity, setting, and enjoyment of my property directly at risk. My objection remains for the following reasons:	Their Category 3 interest is where an owner may be in a position to bring about a claim for loss due to the construction or operation of the scheme. There are some useful Government Guides in relation to the impact of Compulsory Purchase, available at Compulsory purchase and compensation: guide 1 - procedure - GOV.UK with Guides 1 and 4 being the most applicable.
		Firstly, the proposed compulsory acquisition represents a significant and unjustified interference with my rights to private and family life and to the peaceful enjoyment of my property. The scale and proximity of the proposed works, including access routes, construction activity, and associated infrastructure, would result in substantial and prolonged adverse effects, including noise, vibration, dust, traffic, and artificial lighting. These impacts would be experienced over an extended construction period and beyond.	One of the tests of Compulsory Acquisition is that the public benefit must outweigh the private loss. This information and how the Applicant believes it has met the necessary tests is set out in the Application Document 4.2 Statement of Reasons (REP6-008). There are some useful Government Guides in relation to the impact of Compulsory Purchase, available at Compulsory purchase and compensation: guide 1 - procedure - GOV.UK with Guides 1 and 4 being the most applicable.
		Secondly, the Scheme would result in a material degradation of the setting and character of my home and its surroundings. The introduction of major infrastructure in close proximity to residential properties is wholly inappropriate in this location and would fundamentally alter the rural character and amenity currently enjoyed.	One of the tests of Compulsory Acquisition is that the public benefit must outweigh the private loss. This information and how the Applicant believes it has met the necessary tests is set out in the Application Document 4.2 Statement of Reasons (REP6-008).). There are some useful Government Guides in relation to the impact of Compulsory Purchase, available at Compulsory purchase and compensation: guide 1 - procedure - GOV.UK with Guides 1 and 4 being the most applicable.
		Thirdly, my property would be subject to clear and foreseeable blight. The presence of the Scheme and its associated impacts would adversely affect both the enjoyment and the value of my home, with no adequate mechanism offered by the Applicant to address this harm. The absence of any meaningful discretionary purchase or compensation scheme further exacerbates this position.	Statutory Blight is a mechanism whereby a property owner can bring forward the intended purchase of a property. It only applies where a developer intends to purchase the property to deliver the scheme. There are some useful Government Guides in relation to the impact of Compulsory Purchase, available at Compulsory purchase and compensation: guide 1 - procedure - GOV.UK with Guides 1 and 4 being the most applicable.
		Fourthly, the use of compulsory acquisition powers in this instance is neither necessary nor proportionate. The Applicant has failed to demonstrate a compelling case in the public interest, particularly given the ongoing and unresolved concerns regarding the need case for the project and the availability of less harmful alternatives, including offshore coordination solutions and alternative siting strategies.	The Applicant is not seeking any land interest or property rights from this affected party. Their Category 2 interest is in relation to the services supplying the objector's property. There is no impact to these services. They will be maintained at all times. Their Category 3 interest is where an owner may be in a position to bring about a claim for loss due to the construction or operation of the scheme. There are some useful Government Guides in relation to the impact of Compulsory Purchase, available at Compulsory purchase and compensation: guide 1 - procedure - GOV.UK with Guides 1 and 4 being the most applicable.

Reference	Matter	Point Raised	Applicant's Comments
		Fifthly, there has been no meaningful engagement by the Applicant to explore opportunities to avoid, reduce, or mitigate the impacts on my property and surrounding land. This failure undermines the justification for the exercise of compulsory powers.	One of the tests of Compulsory Acquisition is that the public benefit must outweigh the private loss. This information and how the Applicant believes it has met the necessary tests is set out in the Application Document 4.2 Statement of Reasons (REP6-008).
.		Finally, the cumulative impacts of this Scheme, when considered alongside other major infrastructure projects affecting the area, significantly intensify the harm experienced by local residents. As set out in previous submissions, including those relating to health and wellbeing, the Environmental Statement fails to adequately assess these cumulative and psychosocial effects, further undermining the justification for compulsory acquisition. For all of the above reasons, I maintain my objection to the compulsory acquisition and/or temporary possession of land and rights within the Order Limits. The Examining Authority is therefore respectfully requested to give full weight to the disproportionate and unjustified impacts on affected persons and to conclude that the Applicant has not met the statutory tests required to justify the use of compulsory acquisition powers.	The Application is supported by a full Environmental Statement that assess the impacts of the Proposed Project. The Applicant's assessment of inter-project cumulative effects has not identified any potential for significant effects. For a resident close to the Saxmundham Converter site this is likely to be because the order limits of the Sizewell C project are over 1km away from any substantial engineering works related to the construction of the Saxmundham Converter station, a distance over which many topic study areas will not overlap.

49. Applicant’s Comments on the Submission from Iain Brown

49.1 Introduction

49.1.1 Table 49.1 summarises the Applicant’s comments on Iain Brown Deadline 6 Response [REP6-209].

Table 49.1 Applicant’s Comments on Iain Brown Deadline 6 Submission [REP6-209]

Reference	Matter	Point Raised	Applicant’s Comments
OPEN FLOOR HEARING 24TH MARCH 2026			
		I am an Aldeburgh resident who is increasingly unconvinced by the veracity of the Applicant proposals overall and especially of the proposed changes that have been suggested to the ever-expanding footprint of the Friston / Kiln Lane NG Substation. This instance alone typifies the obfuscation and sleight of hand approach that we have endured during the process leading to this stage. As has been widely reported, in its rush to speed up the “Planning Process”, the Government is in danger of destroying the most valuable aspects of this Heritage Coast. As was highlighted recently by Suffolk County Council, and I quote; “Government is planning to overhaul the nuclear system to speed up building, strengthen national and energy security, cut costs, and not get “bogged down in processes,” as described by the Prime Minister. “Processes” that are currently the responsibility of local authorities, who are best-placed to consider the impacts on local communities and local environment. This means that projects directly affecting Suffolk like Norwich to Tilbury pylons, Sea Link and LionLink risk causing more harm to local communities and environment, when decisions and powers to discharge will fall to DESNZ, rather than experienced local authorities.” End quotes. In other words, it is practically removing the affected communities from any consultation process and effectively silencing opposition or protest to these ill-conceived energy projects in this region. As the Applicant has previously presented inaccurate information to the Examining Authority, it is of massive concern if this Process is to be further constrained without due reference to the Communities affected. For example, the ludicrous changes proposed for the Benhall Railway Bridge, which will certainly bring more chaos to an area already suffering the ravages of the Sizewell C development and the subsequent increase in heavy traffic flow. And with that has come an increase in traffic volume, erosion of road surfaces by heavy vehicles, increased danger to local road users and severely impacting the wildlife that is displaced and frequently killed on the roads.	The Applicant corrects a mistaken belief relating to the “<i>ever-expanding footprint of the Friston / Kiln Lane NG Substation</i>”. As part of Change 2 sought under CR1, this simply aligns the limits of deviation for the Friston (Kiln Lane) Substation such that this application aligns with that of Scottish Power Renewables (SPR). No expansion to the substation is proposed as part of the proposed change and the dimensions of the substation would remain as previously assessed. The footprint secured reflects the same footprint already consented under the SPR DCOs. Throughout the development of the Proposed Project, the Applicant has undertaken three rounds of consultation over a period of approximately 2.5 years. Residents have had ample opportunity to provide informed feedback on the emerging scheme, and these views have been taken into account, as set out in Application Document 5.1 Consultation Report [APP-301]. The effects that arise from the changes in relation to Benhall Railway Bridge are addressed in Application Document 9.76.5 Change Request: Addendum to Volume 6 Environmental Statement. The conclusion is that the proposed change is not likely to result in any new or different likely significant environmental effects to those already assessed. As explained at Open Floor Hearing 3, commercial negotiations with the Crown Estate are advancing well following an all-parties meeting on 25 February 2026. Heads of terms are now in an agreed position and with legal for progression. The Applicant remains committed to positive engagement with landowners to acquiring land by agreement. In respect of Suffolk, cumulative effects of the Proposed Project together with other NSIPs in the Suffolk area have been properly assessed, and are explained in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]. Further work to reflect the updated list of committed developments was produced following ISH2 and can be found at Application Document

Reference	Matter	Point Raised	Applicant’s Comments
		Even the Applicant’s negotiations with the Crown Estate appear to have met resistance, with Crown Estate indicating - “deep unease about the environmental consequences and cumulative impact”. And as their recent evidence of negotiations with other landowners has shown, the Applicant is very far from having overcome the myriad of objections that still persist in agreeing access in many areas. Naturally, the cumulative impact of this onslaught of energy projects has a majorly adverse effect on the local communities, their economic prospects, continued viability and general health and well-being. And there is already massive stress on the natural resources of the area which will exponentially increase to a catastrophic level if further projects like Sea Link and Lionlink are consented. There are many questions as yet left unanswered and it begs the major question, as to whether the Applicant has fully addressed the fundamental Need for this project to even be in this area at all? And how can the Applicant justify the compulsory acquisition of land when the Needs case remains so obviously unproven? Under EN-1 and the Planning Act of 2008, these powers require a compelling case in the public interest, and in this instance a case which many believe has not been met. This whole proposal must be reconsidered and not be consented at this stage and most certainly , not in this region. It is the wrong project in the wrong place.	9.110 Inter-Project Cumulative Effects Assessment Update - Technical Note [REP6-098] submitted at Deadline 6. The need case for the project is a matter that the Applicant has consistently addressed throughout the Examination in various documents, including most recently in the Applicant’s response to 2GEN1 in Application Document 9.131 Applicants Comments on Responses to Second Written Questions [REP6-106].

50. Applicant’s Comments on the Submission from Joan Edlis

50.1 Introduction

50.1.1 Table 50.1 summarises the Applicant’s comments on Joan Edlis Deadline 6 Response [REP6-211].

Table 50.1 Applicant’s Comments on Joan Edlis Deadline 6 Submission [REP6-211]

Reference	Matter	Point Raised	Applicant’s Comments
1.	Benhall Bridge	- NGV purposefully disregarded knowledge of Benhall bridge structural constraints learned during SPR DOC hearings which they attended. This to undermine strawman alternate routes and privilege the preferred Western Route only deemed suitable based on undisclosed information. - NSIP AIL trips total at least 10-18 Sea Link, 37 Lion Link and 10-28 Scottish Power not the seven in published information - knock-on effects of upgrade will permanently industrialise rural area	The suggestion that the Applicant purposefully disregard knowledge is baseless. The various options for access were properly considered under Application Document 9.112 (A) Benhall Railway Bridge - Crossing Feasibility Study [REP4-101] and Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]. The potential impacts on rural character have been fully considered in Application Document 6.2.2.1 (B) Environmental Statement Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-024].
2.	Fromus Crossing	If above is recognised, the Crossing would be redundant, leading to - no loss of heritage site (Hurts Hall) - no loss of Fromus Valley site (EA statement during hearing) - no need for permanent maintenance (Applicant recategorized this as an ‘asset’ not to be decommissioned) - reduces budget for fixed infrastructure against cost of slightly longer travel times if SCC proposed route utilised Is this actually a project-based issue or a financial issue of how funds spent are categorised for tax or other balance sheet purposes, and in reality, nothing to do with the groundworks?	This is a misunderstanding. The Benhall Railway Bridge to which the Applicant refers in all its documents is the B1121 Road over Rail Bridge at Main Road Benhall, not the bridge crossing the River Fromus on the B1121 Church Hill. The latter bridge is not intended to be used for any construction traffic HGVs.
3.	Traffic load/roundabout modelling	- carefully chosen baseline disregards seasonal fluctuation of tourists and farm equipment - modelling ignores cumulative effect of multiple NSIPs (wrong inaccurate assessment of significant roundabouts for modelling only three is deficient) I support SCC proposal of sharing SZC haul road/Leiston Airfield with other NSIPs	The Applicant disagrees with these submissions. Baseline data, which was collected during a “neutral” time of year, is relevant to the junction modelling only insofar as determining whether junctions would operate over capacity, and that this has been appropriately addressed within the assessment. This approach is standard practice, is in line with guidance and was agreed with relevant highway authorities prior to the assessment being undertaken. Applying a seasonality factor to the baseline data would not materially alter the conclusions of the assessment, but would simply marginally increase baseline figures without changing the overall results.

51. Applicant’s Comments on the Submission from Julie Townsend

51.1 Introduction

51.1.1 Table 51.1 summarises the Applicant’s comments on Julie Townsend Deadline 6 Response [REP6-212].

Table 51.1 Applicant’s Comments on Julie Townsend Deadline 6 Submission [REP6-212]

Reference	Matter	Point Raised	Applicant’s Comments
		Sea Link’s Needs Case is fundamentally flawed. National Grid has not demonstrated that this project is required on the timescale claimed or that it represents the best use of public and consumer funds. The company’s modelling relies on out-of-date assumptions about generation and demand patterns from the early East Anglia studies — studies that pre-date Sizewell C delays, the upgrade review of offshore wind targets and the accelerated roll-out of HVDC technology, and the change of Nautilus’ connection site to Grain. National Grid presents Sea Link as an urgent necessity when the evidence shows there is time to design better solutions that deliver significant cost savings, as well as socio-economic and environmental benefits. Sea Link has been described as the “missing link”, but National Grid has never shown what specific generation it will carry or how it fits within a clearly-modelled future network. There is no transparent system analysis of alternative HVDC paths or demand-side reinforcement. The Needs Case rests on assertion, not evidence. Sea Link’s Needs Case is fundamentally flawed. National Grid has not demonstrated that this project is required on the timescale claimed or that it represents the best use of public and consumer funds. The company’s modelling relies on out-of-date assumptions about generation and demand patterns from the early East Anglia studies — studies that pre-date Sizewell C delays, the upgrade review of offshore wind targets and the accelerated roll-out of HVDC technology, and the change of Nautilus’ connection site to Grain. National Grid presents Sea Link as an urgent necessity when the evidence shows there is time to design better solutions that deliver significant cost savings, as well as socio-economic and environmental benefits. Sea Link has been described as the “missing link”, but National Grid has never shown what specific generation it will carry or how it fits within a clearly-modelled future network. There is no transparent system analysis of alternative HVDC paths or demand-side reinforcement. The Needs Case rests on assertion, not evidence. SEAS therefore urges the Examining Authority to find that the project fails the basic test under EN-1 and EN-5: that a proposal must be demonstrably necessary and proportionate to its claimed purpose. Until a credible, transparent strategic assessment is produced, this DCO application can surely not be recommended for consent.	The Applicant has fully addressed the needs case for the Proposed Project in number of documents submitted to the Examination. Together, they demonstrate a consistent, robust, and evidenced needs case. The most recent submissions can be found at the Applicant’s response to 2GEN1 of Application Document 9.131 Applicant’s Comments on Responses to Second Written Questions [REP6-106]. Attention is also drawn to Application Document 9.129 Applicant’s Response to 2GEN1 and 2GEN2 in respect of Need [REP5-142] in which the Applicant makes specific submissions in relation to the needs case. Alternative solutions have been considered, the details of which are set out within: • Application Document 8.1 Corridor Preliminary Routeing and Siting Study (October 2022) [APP-368] • Application Document 8.3 Strategic Options Report (October 2023) [APP-370]; • Application Document 7.2 Strategic Options Back Check Report [APP-320]; • Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]. As explained in the answer to 2GEN1 within REP6-106, the ‘alternatives’ proposed by SEAS do not address the issues identified in APP-320. They do not meet the tests set out within NPS EN-1.

Reference	Matter	Point Raised	Applicant’s Comments
		Alternative Sites and Alternative technology landscape and ecological harm and displacement, and extreme upheaval to nearby communities — including an unsound and disruptive logistics route through Benhall and Saxmundham that National Grid is now trying to fix through late “non-material” changes. Crucially, offshore innovations — including options for offshore converter platforms and direct HVDC connection to more suitable inland or brownfield substations closer to demand such as Isle of Grain, West Grain, Bradwell, Thames Gateway — were dismissed without ROBUST AND TRANSPARENT comparative analysis. These options could have avoided almost all onshore impacts. SEAS will be presenting some of these options at the Issue Specific Hearings. The Alternative Sites assessment therefore fails the policy test under EN-1 and EN5, which require clear justification where a project imposes greater environmental or community harm than reasonable alternatives. Until a credible, transparent assessment of alternative locations and routes is produced, consent CAN SURELY NOT be granted.	

52. Applicant’s Comments on the Submission from Karen McKenzie

52.1 Introduction

52.1.1 Table 52.1 summarises the Applicant’s comments on Karen McKenzie Deadline 6 Response [REP6-213].

Table 52.1 Applicant’s Comments on Karen McKenzie Deadline 6 Submission [REP6-213]

Reference	Matter	Point Raised	Applicant’s Comments
		I would like to start by saying I am confused about the timetable we are now following. I prepared for the Open Floor Hearing in February to address CR1, but that hearing was cancelled. I have therefore assumed that today’s hearing covers not only CR1, but also any documentation that has been changed or added since Deadline 4. I am sure I am not alone in this confusion. And regarding additional document, just in the last 11 days, the applicant has submitted another 149 documents, 56 of which are updates to existing ones. Many are on their 6th iteration and Habitats is on its 7th. In many cases, the changes appear minor, such as altered titles or capitalisation, but the volume makes it extremely difficult to identify what has materially changed. It seems deliberate. It has been nigh impossible to review all these documents in the time frame. I think the Applicant is now pushing the Rochdale Envelope too far. They weren’t ready and they still aren’t. I am sure I am not alone in finding that this process is unfairly stacked in favour of the applicant and disadvantages those of us who do not work full-time on this project as the applicant and you yourselves do. Given the volume of new and revised material, I imagine it is a challenge even for you to keep pace.	The Applicant acknowledges the complexity of the consent process for Development Consent Orders, which may be difficult to navigate for Interested Parties. It is well-recognised that the Examination process under the Planning Act 2008 is an iterative and evidence-led process. The Applicant has endeavoured to take into account stakeholder feedback that has emerged during the Examination. Further, the Applicant is required to respond formally to written respond formally to written questions, representations from multiple parties, emerging areas of agreement or disagreement, and ExA requests for clarification or refinement designed to resolve issues transparently before a recommendation is made. Such obligations make it necessary for the Applicant to make updates to application documents and/or issue new documents, as it has properly done.
		Turning specifically to Change 1 and the proposed extension to the Draft Order Limits at the Hoverport: the documentation appears to imply that the applicant now intends to use the north-eastern part of the slipway, rather than the southernmost section, in order to avoid the saltmarsh. However, by allowing the southern area to remain part of the DOL, it appears to me that the applicant would still be permitted to damage this area of saltmarsh is not removed and should you recommend approval to the Secretary of State as the application currently stands. I also note that REP2-011, the Construction Method Technical Note, was only published on 18 February. Table 2.1 of which lists a number of options for construction, which suggests there still remains uncertainty about whether the least damaging methods will actually be used. As I have said previously, the project has completely failed to apply the first step of the mitigation hierarchy, which is avoidance of damage to this important RAMSAR site. I recognise that this is primarily a written process, and that three minutes is insufficient to address all of my remaining concerns. I would therefore respectfully request that you will allow me, and others, to provide additional	The Applicant has committed to avoiding damage to saltmarsh habitat from the outset of the design of the Proposed Project, which has informed the selection of trenchless HDD methods. The Applicant is confident that the mitigation hierarchy has been properly applied. Since REP2-011, further updates have been made to Technical Note: see Application Document 9.13 (D) Pegwell Bay Construction Method Technical Note [REP6-104].

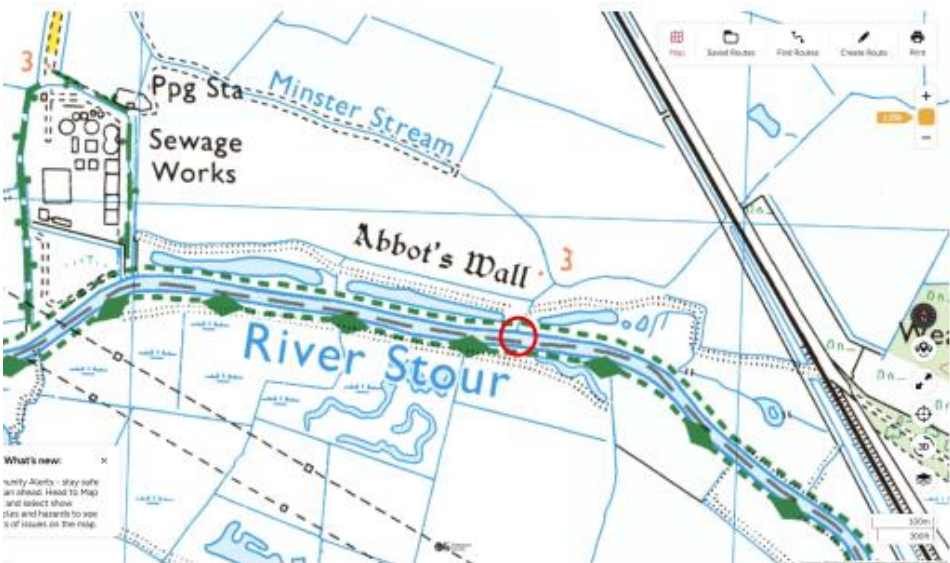
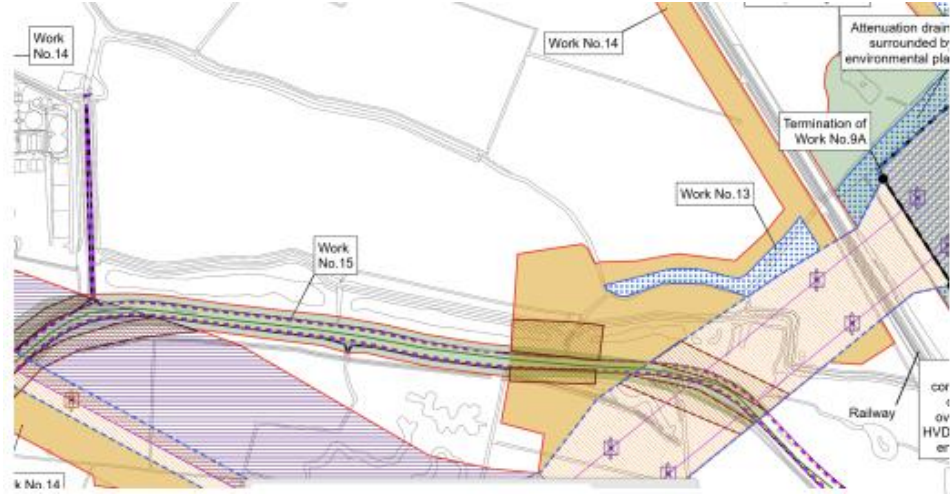
Reference	Matter	Point Raised	Applicant's Comments
		written information where concerns have not been adequately addressed throughout the remainder of the examination.	

53. Applicant's Comments on the Submission from Karen McKenzie on behalf of Save Minster Marshes

53.1 Introduction

53.1.1 Table 53.1 summarises the Applicant's comments on Karen McKenzie on behalf of Save Minster Marshes Deadline 6 Response [REP6-214].

Table 53.1 Applicant's Comments on Karen McKenzie on behalf of Save Minster Marshes Deadline 6 Submission [REP6-214]

Reference	Matter	Point Raised	Applicant's Comments
	Further submission on behalf of Save Minster Marshes in response to ISH3 question	 This is where George Cooper has identified the probable beaver lodge where the Minster Stream joins the River Stour. George Cooper has a CL52 Beaver licence and as such has had extensive training and experience of beavers. He hopes the project will not force him to have to use his licence for the removal of dead beavers.  It appears from REP4-007 2.5.2. Works Plans Kent page 4 sheet 2 that the entrance to the Minster Stream is marked for special	The Applicant considers the information provided on beaver to be useful supplementary information. The presence of beaver on this section of the River Stour is already known and was established in the Applicant's own surveys reported in 6.3.3.2.H ES Appendix 3.2.H Riparian Mammal Survey Report and 6.4.3.2.H ES Figures Kent Riparian Mammal Report. The location identified is close to the temporary bridge over the River Stour which is required for the overhead line works. While the temporary bridge over the River Stour will not directly interact with the river (since the abutments will be 8m back from the bank top) it is possible that construction of the bridge could lead to disturbance of any lodge in this location if it is present at time of installation. However, the bridge is unlikely to be installed before 2028 and as noted at ISH3, beaver (and other riparian mammal) distribution changes over time. Because of this, the Kent oLEMP submitted at D6 notes that <i>'beaver and otter may adjust their distribution, and this will be picked up during update riparian mammal surveys prior to and during construction'</i>. This is reflected in the survey schedule in Appendix B of the Kent oLEMP. In the event that, as the construction of the temporary bridge over the River Stour approaches, a beaver lodge is confirmed to be present in this area, then either the temporary bridge abutments or alignment will be moved within the order limits to a non-disturbing distance if possible, or an A12 licence will be obtained from Natural England to facilitate the dismantling of any lodge, and suitable mitigation provided in accordance with the licence conditions.

Reference	Matter	Point Raised	Applicant's Comments
		attention. In addition, Work no. 15 mitigation which is vague across the whole project is not detailed and is not required here as it will interfere and cause disturbance to the beaver habitat. The following three images were taken at the location shown on first page taken 29 March 2026, by George Cooper in response to the request from Dr Richard Hunt from the Examining Authority during ISH3.	
			
		Figure 1 : Beaver channel to River Stour taken 29 March 2026	



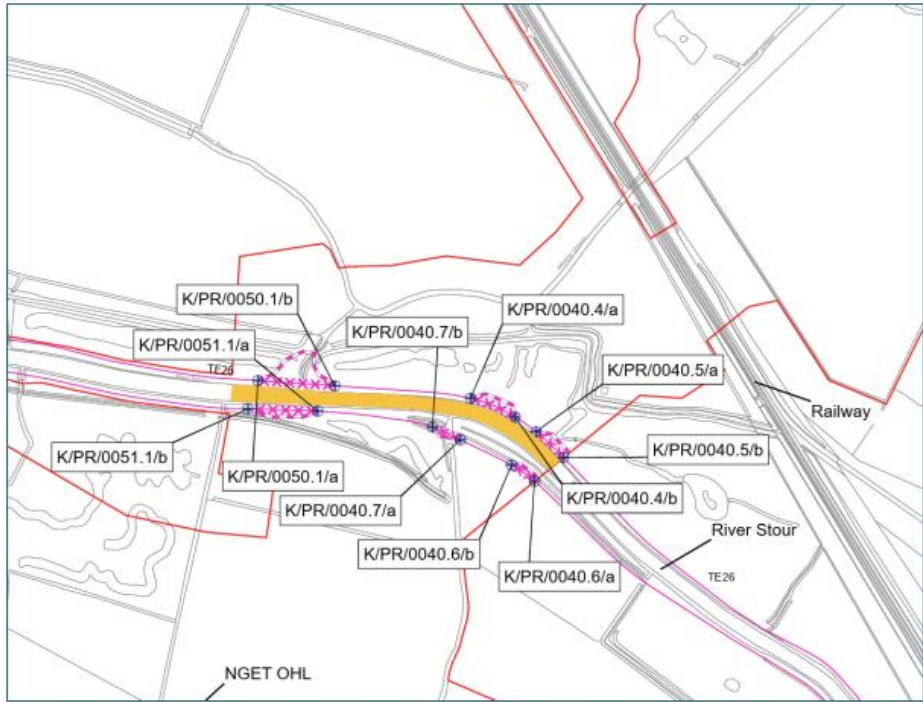
Figure 2 : Beaver trail going under a large patch of brambles taken 29 March 2026

This is the likely location of the beaver lodge.



Figure 3 : Beaver activity evidence the other side of the bramble patch taken 29 March 2026

We have turn to the **Draft DCO Document REP-005** for the only reference to what the Works Nos could mean on the ground and find very little detail there.
REP-005 **EN020026-002935-3.1(H) draft Development Consent Order** page 60 states

Reference	Matter	Point Raised	Applicant's Comments
		“Work No. 12 – Kent Overhead Line Works Works as shown on Sheets 1 and 2 of the Works Plans – Kent comprising removal and modification works to existing overhead electric line, and the construction and installation of new overhead electric line from Work No.11 near Minster and the existing Richborough to Canterbury overhead electric line, which may include — (a) temporary work areas and laydown areas associated with the installation and pulling of overhead electric cables; (b) temporary culverts and/or bridges over other water courses;” We have to turn to the Footpath document CR1-011 2.7: Access, Rights of Way and Public Rights of Navigation Plans to see any detail and guess what is going on here – see over page.	
			
		Figure 4: Extract from page 19 of CR1-011 We can only assume that the stopping up of the footpath TE26 and the work on the other side of the river, stopping up the Saxon Shore Way is for bridge construction – just where the beaver lodge activity is shown. The concentration of work in this area for up to 4 years will be an unacceptable disturbance to protected wildlife habitat.	

54. Applicant’s Comments on the Submission from Karl Pearsall

54.1 Introduction

54.1.1 Table 54.1 summarises the Applicant’s comments on Karl Pearsall Deadline 6 Response [REP6-215].

Table 54.1 Applicant’s Comments on Karl Pearsall Deadline 6 Submission [REP6-215]

Reference	Matter	Point Raised	Applicant’s Comments
		I am a resident and business owner in Saxmundham, now the epicentre of cumulative and escalating disruption. We are being encircled. To the west, a housing expansion is planned to increase the town’s size by approximately 40%. To the north, significant infrastructure works, including water constraints linked to Sizewell. To the east, Sizewell impacts and other energy developments are on every Road. And now, to the south, the proposal for major works at Bennell Bridge our primary access route This is unacceptable. This work at Bennell Bridge would be prolonged it would materially worsen cumulative impacts. It introduces further environmental harm, visual degradation, and, most importantly, sustained disruption to a key access corridor that residents rely upon daily. If this unnecessary project is to proceed, a northern route must be properly considered and implemented instead. I don’t want to be trapped further. Just this weekend, we witnessed a failure of coordination and planning with the A12 closed at Friday Street while, simultaneously, rail services were suspended and replaced with buses. There was effectively no reasonable access in or out of the area. This is not an isolated incident. If basic alignment between road and rail closures cannot be achieved, there is no confidence that more complex, long-term infrastructure planning will be managed effectively. With no accountability or penalty. The consequences of all this compound: Tourism is being actively undermined, fewer return visits and negative word-of-mouth impact, people want to escape for beauty, not for roadworks. It depends on accessibility, environment, and experience. All three are now under sustained threat. Meanwhile, the town's character is changing. Short-term worker Accommodation is replacing tourism-based occupancy. This alters spending patterns and service types, reduces support for local businesses, and erodes the cultural fabric of our high street.	The Applicant notes the concerns raised. The Applicant refers to Application Document 9.107 Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station, which specifically addresses the identification and consideration of alternative access routes. This concludes that the western access at Benhall Railway Bridge remained the preferred option as it provides the shortest access off the A12 and minimises the amount of construction traffic on the rest of the local road network whilst providing a dedicated purpose-built access into the site which would result in fewer complications with regards to maintenance activities, any planned maintenance and undertaking of any emergency maintenance during the operational stage of the Proposed Project. Details of the consideration of the alternative accesses are set out from section 3.8 of Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered. As explained at Open Floor Hearing 3, the Applicant held a further transport meeting with SCC Highways on 30 March 2026 when SCC confirmed that following the works, Friday Street (A12/ A1094 junction) had been opened that morning, and that Yoxford (A12/ B1122 junction) would be opened the day after on 31 March 2026. Therefore, whilst there will be ongoing landscaping works at these junctions into the summer of 2026, there will be no overlap between these specific junction works and the Suffolk Onshore Scheme. The improvements will increase the baseline capacity of the highway network, reducing existing levels of driver delay and providing a benefit to existing road users, as well as construction traffic associated with the Suffolk Onshore Scheme, particularly at Friday Street (A12/ A1094 junction) which is one of the principal access routes from the A12. Traffic impacts generally are covered in Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. Impacts on tourism, hospitality and local economy have been fully considered in Application Document 6.2.2.10 (B) Part 2 Suffolk Chapter 10 Socio-Economics, Recreation and Tourism [REP1A-005].

Reference	Matter	Point Raised	Applicant's Comments
		We are also facing a sustained decline in quality of life: constant roadworks, traffic management, noise, and overnight freight movements. This is not a temporary inconvenience—it is long-term degradation. Residents I know are considering leaving, but cannot do so without financial loss, as property values are already being affected by uncertainty and prolonged disruption. Hospitality is under pressure from all directions. This impacts young people starting out in life, with employment opportunities The elderly and vulnerable residents face increasing barriers to accessing Healthcare. Under heavy vehicle use, and subject to diversions, local roads are becoming congested and unsafe. Therefore, for Saxmundham • The southern access route must be preserved and kept open • Bennell Bridge must not be reinforced or used as the primary solution • A northern route must be properly developed and utilised instead if this bad idea goes ahead • Coordination across all projects must be demonstrably improved and enforced. This community is already under significant strain. The cumulative impact of These proposals are excessive and unreasonable. I urge you to rule out Bennell Bridge access, to protect both the accessibility and the integrity of this community.	As for any concerns about property values, any appropriate heads of claim will be considered on a case-by-case basis in accordance with the Compensation Code.

55. Applicant’s Comments on the Submission from Louise Chadwick

55.1 Introduction

55.1.1 Table 55.1 summarises the Applicant’s comments on Louise Chadwick Deadline 6 Response [REP6-216].

Table 55.1 Applicant’s Comments on Louise Chadwick Deadline 6 Submission [REP6-216]

Reference	Matter	Point Raised	Applicant’s Comments
		I’ve lived in the area since 2000 and was compelled to speak despite being extremely nervous and stressed. My husband and I, along with many others, find it difficult to cope with the cumulative impact of multiple, destructive projects threatening our rural idyll. We moved here to enjoy the beauty and tranquility of our countryside but for many years have had to battle destructive Sizewell C, and for the last nine the growing number of energy related projects planned to devastate our special surroundings. I cannot ignore the further atrocities the Applicant proposes. It’s insulting that the Applicant has only now introduced significant changes which must please be dismissed, as must the threat of the whole Sea Link project. National Grid failed to properly engage in the original Planning Inspectorate examination of EA1N/EA2, resulting in its sub-station being permitted by subterfuge to provide grid connections. Change 2 now unnecessarily and deceptively proposes using Sea Link to expand the site thereby creating a larger "connection hub" which could accommodate additional grid connections without needing specific permissions. Change 4 relates to Benhall Railway Bridge which was never properly assessed despite warnings from Suffolk County and local councils. National Grid’s late and unacceptable route plans for 300 ton AILS ought to have been included as part of the original DCO application, and it’s deplorable they’re only introduced now as though a minor change. They risk prolonged significant disruption to local residents and traffic, particularly if the route is later used for Lion Link. Proper assessment of the northern route proposed by Suffolk County Council would be far more sensible. Please do not allow these Machiavellian changes to flawed Sea Link proposals for an unnecessary project.	The Applicant did not fail to properly engage in the examinations for EA1N/EA2, having participated in those processes. This representation appears to misunderstand Change 2. Change 2 does not expand the site for the Kiln Lane (Friston) substation beyond that already consented by the SPR applications. The reasons for seeking Change 2 are to enable flexibility under the Proposed Project such that the substation can be consistent with the SPR plans. This is fully explained in Application Document 9.76.2 (A): Change Request Report [CR1-052]. There is no intention to build a larger substation. Whilst potential future connections are possible, these will be subject to future consents and any impact would be considered at the time of any future application. The Applicant rejects the suggestion that Benhall Railway Bridge was not properly assessed. The weight limit of 46 tonnes would be suitable for almost all of the Applicant’s traffic, save for a limited number of AILs required for mitigation measures. The final details relating to AIL are typically developed after a DCO is made after loads and programme for delivery is known, as well as the condition of the highway is known at the relevant time. The Applicant had originally proposed an overbridge solution. However, the Applicant has undertaken further work due to concerns from SCC and ESC. The substance of Change 4 relates to this further work that the Applicant has done exceptionally. As explained in Application Document 9.107 Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125], the Applicant has considered fully alternate access routes, including the northern route proposed by SCC. Its conclusion is that the western access remained the preferred option as it provides the shortest access off the A12 and minimises the amount of construction traffic on the rest of the local road network whilst providing a dedicated purpose-built access into the site which would result in fewer complications with regards to maintenance activities, any planned maintenance and undertaking of any emergency maintenance during the operational stage of the Proposed Project.

56. Applicant’s Comments on the Submission from Luigi Beltrandi

56.1 Introduction

56.1.1 Table 56.1 summarises the Applicant’s comments on Luigi Beltrandi Deadline 6 Response [REP6-217].

Table 56.1 Applicant’s Comments on Luigi Beltrandi Deadline 6 Submission [REP6-217]

Reference	Matter	Point Raised	Applicant’s Comments
	Lack of a Masterplan	This coastal community is witnessing rapid and profound landscape change: what was once primarily a farming and tourist area is being transformed into an industrial zone. This escalating process has progressed through de facto fragmentation, with developers submitting separate individual Development Consent Order (DCO) applications as if each project were independent, when in fact they are interconnected and interdependent. This approach has been orchestrated from the outset by National Grid. Since 2019, three major infrastructure DCOs have already been submitted two of which have been approved. The lack of transparency surrounding what is proposed constitutes an abuse of the planning system and demonstrates a disregard for the community and environment onto which these projects are being imposed. The absence of a visionary coordinated masterplan has already resulted in costly and unnecessary outcomes. For example, the DCO for East Anglia ONE (EA1) granted permission in 2014 for up to 1,200 MW. The project was subsequently revised to around 714 MW using HVAC (alternating current) transmission, with a non-material change approved in 2016. By accepting this supposedly non-material change, the Planning Inspectorate enabled a requirement for an additional substation at Friston to serve EA1N. Had only EA2 required a grid connection using the Sizewell C cable corridor, the connection could have been delivered in a far more sustainable manner. The EA1 experience illustrates how national energy planning is being compromised by developers altering critical project parameters after consent has been granted. The government’s current agenda of driving rapidly toward Net Zero regardless of consequences places the Inspectorate in the challenging position of determining whether the ‘harms outweigh the benefit’. While Net Zero is unquestionably of great national importance, the means of achieving it is equally critical. Without an overarching masterplan that integrates projects, identifies interdependencies, and demonstrates how shared infrastructure could	The Applicant notes the concerns raised. The Applicant is committed to coordinating consenting and delivery with other projects where opportunities are available. Opportunities to co-locate infrastructure have been identified and progressed, e.g. at the Suffolk Converter Station in Saxmundham. The Applicant has also engaged positively with Scottish Power Renewables (SPR) in relation to the Friston (Kiln Lane) Substation to achieve alignment in approach. A report has been submitted to the Examination which details the Applicant’s approach to coordination with other major infrastructure projects with the aim of reducing environmental impacts: see Application Document 7.10 Coordination Document [APP-363].

Reference	Matter	Point Raised	Applicant's Comments
		minimise multiple cable corridors and other intrusive onshore works, there is no assurance that the process is being delivered sustainably. Sustainability and the Planning Framework Sustainability is embedded within the National Planning Policy Framework. The purpose of the planning system is to contribute to sustainable development providing homes, commercial development, and infrastructure in a manner that meets today's needs without compromising the ability of future generations to meet theirs. The United Kingdom, along with other UN Member States, is committed to the 17 Global Goals for Sustainable Development, which encompass social progress, economic wellbeing, and environmental protection. The Inspectorate must therefore treat energy infrastructure holistically, not as a series of isolated schemes. It is a vast, interconnected system whose infrastructure requirements, environmental impacts, and social consequences must be managed at a landscape and regional scale. Done well, East Anglia could become a model of how to balance ambition with care; done poorly, as is currently happening, the region's communities and natural heritage will be diminished.	
	Cumulative Impact	A Regional Overview To illustrate the cumulative burden, here are major existing and proposed energy related projects in the region: 1. Sizewell C – new nuclear power station 2. East Anglia One North (EA1N) and East Anglia Two (EA2) – offshore wind farms with onshore infrastructure converging near Friston 3. Sea Link 4. LionLink (UK–Netherlands interconnector) 5. Nautilus interconnector 6. Other wind farm extensions, e.g., Five Estuaries offshore Wind Farm 7. Proposed solar and battery installations, such as a 250 MW solar + storage project near Friston 8. New water supply infrastructure for Sizewell C, proposed by Anglian Water These projects are not independent. It has become extremely clear especially after the recent public consultation on Sealing that these interdependent projects are being purposefully disclosed and applied for sequentially by developers to disguise their impact and scrutiny on the communities they affect. As an example, the Inspectorate has not even required the developers to produce an integrated physical model showing how all these projects integrate within the landscape consequently continues to be complicit in assessing these projects individually. All issues appear possible to be mitigated however do the benefits out way the harm. Many of the projects share or overlap cable routes, substations, land, and construction timelines. The scale of developments being undertaken is transformative and the current destruction of the environment can clearly be seen attached aerial photos of Sizewell C and the EA1N, EA2 it is not difficult to imagine the further destruction that the proposed emerging projects will bring.	The Applicant acknowledges the potential for cumulative impacts. As such, the cumulative effects of the Proposed Project together with other NSIPs in the Suffolk area have been properly assessed and are explained in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060]. Further work to reflect the updated list of committed developments was produced following ISH2 and can be found at Application Document 9.110 Inter-Project Cumulative Effects Assessment Update - Technical Note [REP6-098] submitted at Deadline 6.
	Call for Action	I therefore call for a moratorium on all proposed infrastructure projects, whether already submitted or emerging, until they can be coordinated within a comprehensive, visionary, and integrated masterplan which looks to minimise their cumulative impact on the local community and environment.	The Applicant notes these concerns but reiterates that the Proposed Project has been designated as a Critical National Priority (CNP) and Accelerated Strategic Transmission Investment (ASTI) project (as introduced by Ofgem).

Reference	Matter	Point Raised	Applicant's Comments
	Sizewell C, EA1 and EA2 Sites from the Air	  	The Applicant's comments are set out above.

57. Applicant’s Comments on the Submission from Mark Chandler

57.1 Introduction

57.1.1 Table 57.1 summarises the Applicant’s comments on Mark Chandler Deadline 6 Response [REP6-221].

Table 57.1 Applicant’s Comments on Mark Chandler Deadline 6 Submission [REP6-221]

Reference	Matter	Point Raised	Applicant’s Comments
Response for Deadline 6			
	5.0 Mr Edward Spanton	Until the Applicant can assure Mr Spanton that the project will not prejudice the extension of St Augustine’s Golf Course (a matter that has been discussed at great length), then Mr Spanton formally objects to the proposal. The extension to the golf course involves a number of plots, however the most pertinent are 3/50, 3/51, 3/54 & 3/55. The project encompasses the importation of inert spoil to alter ground levels, including the installation of associated infrastructure. A draft Statement of Common Ground has been provided by the Applicant, however no further details have been provided. The Applicant is to specifically provide a plan showing where levels will need to be reduced over the underground cables and also confirm the restrictions that will be placed on Mr Spanton in respect of works over the easement strip. The likelihood of reaching agreement depends on the Applicant providing the necessary detail, in order that the parties involved can determine the likely impact on the golf course extension and whether the course design can be amended to take into account the project and the associated works.	The Applicant understands that the concern of Mr Spanton relates to the proposed extension of St Augustine’s Golf Course (a matter that has been discussed at great length), hence Mr Spanton formally objects to the proposal. The extension to the golf course involves a number of plots, however the most pertinent are 3/50, 3/51, 3/54 & 3/55. The project encompasses the importation of inert spoil to alter ground levels, including the installation of associated infrastructure. A draft Statement of Common Ground has been provided by the Applicant, The Applicant has also provided a plan showing where levels will need to be reduced from the proposed level changes over the underground cables and also confirm the restrictions that will be placed on Mr Spanton in respect of works over the easement strip.
		For the avoidance of doubt I am instructed by our other clients, St Augustine’s Golf Club (Plots 3/99 & 3/66) and Ebbsfleet Minster Ltd (Plots 3/46 & 3/47) to also lodge an objection on their behalf, for the same reasons as stated above.	The Applicant notes that Mark Chandler, as agent for and on behalf of St Augustine’s Golf Club (Plots 3/99 & 3/66) and Ebbsfleet Minster Ltd (Plots 3/46 & 3/47), also submitted objections for the same reasons as stated above.
	23.0 Mr James Pace	Included at Appendix 1 is the Decision relating to the recent case heard at the Upper Tribunal (Lands Chamber) between Mr S Robertson and Mr & Mrs Pace. This Decision provides all of the necessary detail and concluded that the restrictive covenant was enforceable. As such, should the Applicant wish to enter into a voluntary agreement with Mr Robertson then a parallel agreement would also have to be reached with Mr & Mrs Pace. This would apply to both temporary and permanent land use. Terms have been put to the Applicant on behalf of Mr & Mrs Pace.	The Applicant understands the position with the restrictive covenant and will engage with Mr and Mrs Pace via their agent. We understand this should not prevent Mr Roberston signing the Heads of Term.

Reference	Matter	Point Raised	Applicant's Comments
	26.0 Mr I Mather	The scale of the Land Plans (EN020026-002801-2.3 Land Plans Part 2 of 2) make it difficult to determine exactly which plot corresponds with the rights sought by the Applicant to divert existing electricity lines, however it appears to be plot 4/17. The issue is that, should the project be consented then rights are to be granted for the diversion of the existing 11kV overhead line, yet the Applicant cannot confirm where, within the plot the lines will be installed and the methodology for doing so. The question therefore remains that with such a level of uncertainty how can the Applicant confirm that all of the land is specifically required under the Order?	It is standard practice in such projects to provide a solution for the necessary diversions ahead of the detailed design being available and to ensure the diversion can happen within the necessary timeframes – the principle consents ‘a’ solution not necessarily ‘the’ solution without needing to rely on the Utility Undertakers Statutory powers.

58. Applicant’s Comments on the Submission from Michael Hills

58.1 Introduction

58.1.1 Table 58.1 summarises the Applicant’s comments on Michael Hills Deadline 6 Response [REP6-222].

Table 58.1 Applicant’s Comments on Michael Hills Deadline 6 Submission [REP6-222]

Reference	Matter	Point Raised	Applicant’s Comments
		In the last year, the once calm and peaceful countryside around us has already changed beyond belief. The blocked roads, the endlessness heavy duty traffic, the noise, the pollution and it gets worse by the day. Local people especially the elderly are deeply worried about what is happening, how often do we hear people ask ‘what is going on and when will it all stop?’ But this is early days - just the beginning of the Sizewell C construction, but the real devastation will kick off if and when National Grid’s Sea Link plans are given the go ahead. No other part of the UK has everbeen subjected to such a sudden catastrophic damage to its environment. For a normal person it is very difficult to find out what is happening as it changes so often. The leaflets are wordy, the language technical and rather than inform they confuse. The general consensus is that it is intentional - if people are unable to follow your plan then they'll give up and stop bothering you. For example two recent issues are very upsetting	The Applicant acknowledges the DCO consenting process is complex and can be difficult to navigate for some people. The nature of the Proposed Project necessarily requires the discussion of technical subjects. The Applicant remains committed to positive engagement with all stakeholders who wish to express their views of the Proposed Project.
		1. That National Grid want to increase the area of the land for the Friston substation, presumably to allow connection to additional sources?	Change 2, which is sought in order to align the Friston substation to align with SPR consents, does not increase the size of the substation beyond that already consented under the SPR projects. Any future connections to additional sources will of course be subject to future consenting processes and any impact would be considered appropriately at the time of any future proposal.
		2. That Benhall Bridge bridge can be restructured to use as another access point to the substation construction. This will cause chaos for local residents, and will disrupt vital rail services. The applicants seem unwilling to consider the other route to the north of Saxmundham.	This is incorrect. The northern route has been expressly considered as explained in Application Document 9.107 Applicant's Response to Suffolk County Council's Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125] and Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044].
		Everybody agrees that wind generated electricity is a good thing if not essential. Unfortunately the focus has been concentrated entirely on the technical infrastructure and with little regard for local people’s lives. Please think again.	The Applicant notes these comments.

59. Applicant’s Comments on the Submission from Michael Mahony

59.1 Introduction

59.1.1 Table 59.1 summarises the Applicant’s comments on Michael Mahony Deadline 6 Response [REP6-223].

Table 59.1 Applicant’s Comments on Michael Mahony Deadline 6 Submission [REP6-223]

Reference	Matter	Point Raised	Applicant’s Comments
		I would like to thank the examining authority for asking National Grid to provide an explanation to me in respect of the upgrade works to the pylons on my land and why these fall within the existing easement. This is action point 25 arising from CAH2 with a deadline (Deadline 6) of today's date, 13 April 2026. As of the time of submission of this comment I have received no such explanation.	The Applicant followed up with Mr Mahony on the day of CAH2 and have since followed up with an email as follows; Further to the Compulsory Acquisition Hearing in March, National Grid have provided a response to the ExA’s action points at Deadline 6 (EN020026-003280-9.135 Applicants Response to March Hearing (CAH2 and ISH3) Action Points.pdf). This includes a response to action point 25 which was in relation to the query you raised about National Grid’s existing rights to undertake works to the overhead line. For ease we have summarised National Grid’s position below: As you are aware, NGET are comfortable that the existing Deed of Easement (attached) provides them with the required rights to undertake the necessary works to their existing apparatus. These rights are detailed below: In respect of the deed of grant dated 16th August 2002 between (1) Charles Grenville Vernon Wentworth and (2) The National Grid Company plc, this grants National Grid the rights to erect retain use maintain repair renew inspect and remove the “electric lines” as defined in the deed. The definition of “electric lines” as well as referring to the conductors and the towers, refers to “the equipment required by [National Grid] in connection therewith” which then forms part of the definition of “electric lines”. This is intended to refer to the equipment required by National Grid from time to time rather than at the date of the deed. The backstays, catch points and horns fall within the definition of “electric lines” and are permitted by the deed. NGET stated at the hearing last week that they are not prepared to offer a separate licence agreement for these works as it would undermine the existing Deed here, and across the wider network. We do however appreciate your comments and concerns raised outside of the hearings

Reference	Matter	Point Raised	Applicant's Comments
			regarding your neighbour, Mr Fulford, and that your intention is to keep the access route that NGET use to the towers off Mr Fulford's land. The Deed includes the entirety of the field within which the Overhead Line sits, which is now split in ownership between you and your neighbour. NGET will therefore be able to take access, under the existing Deed, using the gate on your land off Saxmundham Road. At our meeting on site on 23rd February, James Buckley confirmed that this gate would be suitable for the access that is required. This is a commitment that NGET can make now to minimise disruption to your neighbour. NGET will also have a duty to compensate you for any proven losses caused by their works as well as reimbursing your reasonably and properly incurred agents fees in connection with the Sea Link project and the planned works. As indicated below we will keep in touch regarding the programme of the works. Please do let me know if you have any further queries on this.

60. Applicant’s Comments on the Submission from Norman Kenneth Bate

60.1 Introduction

60.1.1 Table 60.1 summarises the Applicant’s comments on Norman Kenneth Bate Deadline 6 Response [REP6-224].

Table 60.1 Applicant’s Comments on Norman Kenneth Bate Deadline 6 Submission [REP6-224]

Reference	Matter	Point Raised	Applicant’s Comments
		The new suggested road route to the converter stations in Saxmundham Traffic coming from the south via Ipswich will travel to the new SzC roundabout at Friday St. why has this traffic island been built? That’s because the A12 is already the worst A road in the country and because of the massive increase in traffic that SzC will produce. So already our rural countryside is under pressure from a massive infrastructure project. Then instead of turning right off the A12, through Benhall, over the railway bridge that everone knew was unsuitable due to weight restrictions, and up past Hurts Hall to the proposed Converter Station Sites. The extra traffic will now continue north along the A12 towards Saxmundham past the proposed 800 new housing developments who’s only access will be via the A12! Then continue to the junction at Rendham Road, Saxmundham (already an accident black spot) on to the dogs leg crossing near the Poachers then on to the Kelsale junction, through to Yoxford new road to SzC via the new SzC traffic island. Between Saxmundham and the poachers pocket junction are 2 footpaths which cross the A12. That might seem strange having a footpath crossing an A road but this is rural Suffolk, so that’s normal, but no longer.these are already a concern due to increased traffic so a least one new foot bridge will be required over the A12. Plus 4 traffic islands or better still underpasses for all the junctions mentioned earlier otherwise they all will become accident black spots. Running underneath this section of the infamous A12 runs two waterways, namely the Brook which runs through Saxmundham into the River Fromus which already has poor water quality and the Gull stream which already has terrible water quality. Both will be negatively affected by the extra toxic cocktail of chemicals which will come from the break pads and tyres from this massive increase in traffic further damaging our local river system. The same will happen a little further along the A12 as the river Fromus itself runs under the A12 north of the Kelsale junction. From there the traffic up on the new SzC road towards Leiston but instead of going through Leiston they are proposing a new road over the old airfield and onto the level crossing not far from Cakes and Ale	Traffic impacts in Suffolk have been carefully considered – see Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054]. A comprehensive cumulative assessment of the impacts of Sea Link and other projects in Suffolk has been undertaken within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. Traffic and transport cumulative impacts in concert with Sizewell C are assessed under that – see Table 13.31. See also the Applicant’s response to 1TT1 at p240 of Document 9.134: Applicant’s Comments on Other Submissions Received at Deadline 4 and Deadline 5. The assessment within Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] is based on a daily peak of 173 HGVs (173 arrivals and 173 departures) associated with the Suffolk Onshore Scheme. This represents the busiest single day of the construction programme in terms of HGV activity, which is expected to occur in 2027.

Reference	Matter	Point Raised	Applicant's Comments
		caravan park. There they will need to cross a single railway track SzC level crossing so that will be a massive bottleneck or will it will need widening?- then the intention is to join the very busy Leiston to Saxmundham road and which is an extremely narrow and twisty Road. So yet again another traffic island would be required. And good luck with getting two lorries to pass each other travelling in opposite directions as they will need to stop and tentatively move forward as the road is to narrow so another catastrophe. NG expect around 350 lorries loads a day per converter stations, so that's 700 with the round trip. That is only the Lionlink Converter Station traffic. Add to that Sealink traffic probably the same again, making 1,400 lorry trips plus massive amounts of SzC traffic. The number of road kill such as deer, badgers etc that are killed on these section of road will be greatly increased- yet again showing why a rural iddil such as Suffolk is unsuitable for this amount of infrastructure projects. The noise alone should rule it out, especially the empty return lorry's on the A12. The traffic on the Saxmundham to Leiston Road (I drive along it four times each week) is getting steadily more congested especially now the huge SzC buses are using it will be gridlocked, when the lorries are queuing to turn onto it from the tiny level crossing and then again as the try to manoeuvre onto the proposed converter stations sites. 1,400 extra lorry every day for years. Really it simple is far too much and NG must put these converter stations and cables offshore. Not forgetting the above is the best route- heaven help us. Any competent engineer would have taken one look at this area and concluded it was probably one of the most unsuitable place in the U.K. to build converter stations. They should keep it simple and efficient- just mirror Nautilus for LionLink and then Sealink wouldn't even be needed. And to finish a National security questions? Why would any government put 30% of our countries power into a 5 mile radius when we can see how easily it could be destroyed by such a Russia or the Iranians	

61. Applicant’s Comments on the Submission from Paul Atkinson

61.1 Introduction

61.1.1 Table 61.1 summarises the Applicant’s comments on Paul Atkinson Deadline 6 Response [REP6-225].

Table 61.1 Applicant’s Comments on Paul Atkinson Deadline 6 Submission [REP6-225]

Reference	Matter	Point Raised	Applicant’s Comments
		Before I begin, I want to ask the Applicant one simple question: Does anyone on the Sea Link team actually live here? Because reading their submissions, it often feels as though they believe they understand our communities, our landscape, and our daily experience better than the people who live here — and even better than the Councils who work with these conditions every day. Nowhere is this disconnect clearer than the impacts on access and Benhall Railway Bridge. The Applicant’s own feasibility study confirms the bridge is restricted to 46 tonnes and anticipates 15 closures just for AIL movements. And if full strengthening is required, they allow for a worst-case 28-day closure of the B1121, tied to Network Rail possessions and weekend blockades of the East Suffolk Line. For Saxmundham and the surrounding villages, losing this access even once is disruptive. Losing it repeatedly — or for weeks — is devastating. None of this has been properly assessed. What may be “deliverable” for the Applicant is simply not liveable for us. There is also a serious contradiction in their own evidence. In the Benhall Bridge Feasibility Study, each transformer weighs 315 tonnes. But in their Suffolk Design Approach for the new Fromus Bridge, they state the combined weight could be up to 500 tonnes. These figures cannot both be correct. If the Applicant cannot provide a consistent AIL weight, how can the Examination have confidence in their engineering, their traffic modelling, or their appraisal of alternatives? This inconsistency goes to the heart of whether their preferred access route is credible. All of these problems stem from a deeper issue: the wrong site was chosen. The Saxmundham converter station site is fundamentally inaccessible. Every potential access route requires major engineering interventions, environmental harm, or community disruption. The Applicant is now trying to retrofit access solutions to a site that was never suitable. This is why I support the alternative northern route proposed by Suffolk County Council. The Applicant’s preferred route requires a completely new bridge over the Fromus — a permanent structure in an untouched valley, with irreversible landscape harm. Their claim that mitigation will reduce this to “minor” after 15 years is speculative at best. Why damage an unspoilt valley when a viable alternative exists? The Councils’ northern route avoids the Fromus valley entirely, avoids months of disruption at Benhall Bridge, avoids pushing construction traffic through Saxmundham, and uses an existing strategic corridor already suited to heavy loads. Those of us who live here will carry the consequences of	The Applicant has already to responded to many of the points raised here – see Table 31.1 of Document 9.134: Applicant’s Comments on Other Submissions Received at Deadline 4 and Deadline 5 [REP6-109]. The alternative route suggested by SCC has also been reviewed and the Applicant has explained in detail why it would not be suitable – see p.49-50 of [REP4-089]. There is no contradiction in relation to AIL weight. The weight limits of the bridge have been carefully considered as per the crossing feasibility study [REP4-101]. The Applicant has carefully considered landscape and visual impacts on the bridge – see p47 of [REP4-023]

Reference	Matter	Point Raised	Applicant’s Comments
		Sea Link long after the Applicant has left — and even more so if LionLink is added on top. We are already living with the cumulative burden of multiple NSIPs in this small area. We should not be expected to absorb further avoidable harm simply because the Applicant chose the wrong site and is now trying to engineer its way out of that mistake. These are the wrong plans in the wrong place — and it is the people who live here who will pay the price. I submit this written representation for Deadline 6 to formally record and expand upon the evidence I provided at both Open Floor Hearing 3 and Issue Specific Hearing 3. In addition to the access and engineering concerns above, I raised a specific ecological issue regarding a veteran tree and an active [redacted] located immediately [redacted]. This matter has now been captured by the Examining Authority as Action Point 74, and I provide further detail here to assist the Authority in securing a full and transparent response from the Applicant. Two weeks before ISH3, I spoke directly with an ecologist undertaking surveys on behalf of Siemens. She confirmed that the veteran tree contains a [redacted], that barn owls are highly sensitive to disturbance, and that a minimum 30-metre offset from any works would normally be advised. However, based on the Applicant’s own plans, the tree is only 10–15 metres from the proposed access road and bridge footprint. It also lies within the Order Limits, meaning construction activity will surround it. The Applicant’s response at ISH3 did not address this specific point. They referred to generic mitigation (owl boxes, timing restrictions) and suggested the Siemens ecologist’s advice related only to ground investigation works. This does not resolve the underlying issue: if 30 metres is considered appropriate for temporary survey works, the Examination requires clear justification for any smaller buffer during major construction. The Applicant’s Tree Protection Plan (REP5-113) shows a nominal 30- 40 metre radius around the veteran tree. However, the surrounding construction features make it impossible to maintain a functional 30-metre ecological buffer. To the north, the bridge embankments and approach road sit directly against the buffer line. To the south, the attenuation pond and its feeding ditch occupy the space immediately below the tree. To the west, the access road corridor runs close to the canopy edge. The tree is therefore hemmed in on three sides, with the fourth side still within the working area. Even if a 40 or 50-metre circle is drawn, the actual separation between the tree and construction works is only 10–15 metres. A drawn buffer is not a delivered buffer. For a Schedule 1 species such as barn owls, a meaningful buffer must be continuous, undisturbed, and free from noise, vibration, lighting, and heavy machinery. The Applicant’s design fails all of these requirements. This ecological conflict is compounded by the heritage implications of the Applicant’s decision to move the bridge approximately 40 metres closer to [redacted] (Grade II). To support my concerns, I am attaching the Suffolk Historic Gardens & Parks Inventory entry for , and I also provide the publicly accessible link here: [redacted]. The Inventory provides detailed, independent evidence about the historic and landscape significance of [redacted] and its parkland. It records that the Hall “stands in its own park... on rising ground in the valley of the River Fromus,” emphasising that the valley is integral to the Hall’s historic setting.	

Reference	Matter	Point Raised	Applicant's Comments
		The river was deliberately widened in the 18th century to create a designed water feature, forming part of the Regency landscape. The Inventory also notes that the Hall and its parkland form “a pretty object as seen from the main road,” and that views from the B1121 and across the surviving parkland remain important to the Hall’s setting. The proposed access road and bridge would sit directly within these views, fundamentally altering the character of the approach and the relationship between the Hall, its parkland, and the Fromus valley. The Inventory describes the historic drives that once approached [redacted], including the main drive that “bridged the river and swept through the parkland to the western entrance front.” This demonstrates that the river crossing has always been a sensitive, designed element of the landscape. The Applicant’s proposed new bridge is not a restoration of a historic route; it is an industrial-scale intervention in a location never intended for such infrastructure. Crucially, the Inventory explicitly warns that the landscape setting of [redacted] is “threatened by the cumulative effects of... energy and infrastructure projects such as Sizewell C, Sealink, Lionlink and Nautilus,” and that planting schemes “will in no way mitigate the severe visual impact.” This is a direct, independent confirmation that the type of development proposed by the Applicant is incompatible with the historic landscape. The relocation of the bridge intensifies this harm by bringing the structure further into the surviving parkland and closer to the historic views described in the Inventory. It also compounds the ecological conflict around the veteran tree. The design now forces a choice between protecting the veteran tree and [redacted], or protecting [redacted]. A well-designed scheme should not force harm in one direction or the other. Action Point 74 asks the Applicant to confirm that an appropriate offset — “for example 30 m” — has been applied to avoid disturbance to barn owls. Based on the evidence, the Applicant cannot apply a 30-metre buffer, and their own plans demonstrate this. Their oral response did not address the physical impossibility of achieving the buffer, and the bridge relocation has created a new heritage impact that has not been assessed. Independent heritage evidence confirms that the landscape cannot absorb further infrastructure without severe harm. The Applicant’s design for the River Fromus crossing is therefore constrained to the point that it cannot protect a veteran tree, a Schedule 1 barn owl roost, or the setting of [redacted]. The drawn buffers in CR1-064 are not deliverable on the ground, and the bridge relocation has introduced new impacts that have not been properly assessed. Given the availability of the Councils’ northern route — which avoids the Fromus valley entirely — there is no justification for imposing these avoidable harms on the environment, heritage assets, or the community.	

62. Applicant’s Comments on the Submission from Philip Smith

62.1 Introduction

62.1.1 Table 62.1 summarises the Applicant’s comments on Philip Smith Deadline 6 Response [REP6-226].

Table 62.1 Applicant’s Comments on Philip Smith Deadline 6 Submission [REP6-226]

Reference	Matter	Point Raised	Applicant’s Comments
	Not a Project in Isolation	Sea Link is not being proposed in isolation. It sits alongside other major infrastructure projects. Yet the reality experienced by local communities is this: The combined impact is far greater than the sum of the individual projects. And that combined impact has not been properly assessed.	The Applicant recognises that the Proposed Project should not be considered in isolation. It has therefore assessed the effects together with other major infrastructure projects. The details for the Suffolk area are contained in Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060] . Further work to reflect the updated list of committed developments was produced following ISH2 and can be found at Application Document 9.110 Inter-Project Cumulative Effects Assessment Update - Technical Note [REP6-098] submitted at Deadline 6 .
	What Communities Are Experiencing	Across this area, people are already living with: • Severe congestion on rural roads never designed for heavy construction traffic • Increased road accidents and wildlife deaths • Pressure on housing, with rising rents and limited availability • Noise, disruption, and loss of tranquillity • And a growing toll on people’s health and wellbeing These are not theoretical impacts. They are happening now. Sea Link will add directly to this burden.	The Applicant notes and recognises these concerns. As explained above, the cumulative impacts of the Proposed Project together with other major infrastructure projects have been properly assessed.
	Failure to Properly Assess Cumulative Effects	The Applicant’s approach to cumulative impact is inadequate in three key ways: First, it underestimates the scale of overlap between projects—particularly in terms of timing and geography. Second, it fails to properly assess combined effects on key receptors: • Local communities • The road network • And the natural environment, including fragmented wildlife corridors Third, it does not provide meaningful mitigation for these combined impacts. Mitigation is considered project by project—but not in a way that reflects the lived reality on the ground.	This is not accepted. None of these alleged failures are particularised to enable anything beyond a high-level response. The temporal and geographical overlap between projects has been properly taken into account. The alleged failures to properly assess combined effects on key receptors are not made out. Where necessary and possible, additional mitigation has been proposed to reduce the potential for significant overall cumulative effects across the projects.

Reference	Matter	Point Raised	Applicant's Comments
	Change Requests Reinforce the Problem	The changes we are discussing today only reinforce this concern. See below. They highlight: • Incomplete information • Evolving design • And a lack of strategic coordination This increases the risk that cumulative impacts are being continually underestimated and deferred.	
	What Is Needed	At a minimum, there must be: • A transparent and comprehensive cumulative impact assessment across all major projects • Proper coordination between developers • And enforceable mitigation that reflects the combined, not individual, impacts Without this, communities will continue to bear an unfair and unsustainable burden.	The Applicant considers this is adequately reflected in the approach it has taken to assessment, coordination, and mitigation.
	Conclusion	Cumulative impact is not a secondary issue. It is the defining issue for this project and this region. And at present, it has not been properly understood, assessed or mitigated. For that reason alone, this project should not proceed as proposed..	Please refer to the responses above.

63. Applicant’s Comments on the Submission from Piers Sturridge

63.1 Introduction

63.1.1 Table 63.1 summarises the Applicant’s comments on Piers Sturridge Deadline 6 Response [REP6-227]

Table 63.1 Applicant’s Comments on Piers Sturridge Deadline 6 Submission [REP6-227]

Reference	Matter	Point Raised	Applicant’s Comments
1.		Whatever happened to the plans for the various projects to reduce their impact by working together. Even the three National Grid projects are not cooperating.	The Applicant is committed to coordinating consenting and delivery with other projects where opportunities are available, including the colocation of infrastructure.
2.		The road chaos on the A12 and at Friday Street over the past year has ably demonstrated the inability of the local road system to be able cope with the numbers and tonnage of construction vehicles. It has had a major effect on the viability of local shops, businesses, the essential visitor trade and substantially reduced local use of the A12 to move around the area. Despite the completion of the Friday Street roundabout, the massive cumulative effect of construction traffic for all the energy hub projects as the real build-work ramps up will completely overwhelm the small local roads. The weakness of the Benhall Bridge and the proposed access straight off the A12 will be another long term major blockage and result in pushing traffic chaos both around Benhall and into the streets of Saxmundham further denigrating the viability of the town. Moving the Saxmundham site access to the new Yoxford /Sizewell link road may be inconvenient to NG, but will protect local businesses and residents and perhaps demonstrate some cooperation between the projects.	The Applicant acknowledges the disruption experienced by local residents. The Applicant held a further transport meeting with SCC Highways on 30 March 2026 when SCC confirmed that following the works, Friday Street (A12/ A1094 junction) had been opened that morning, and that Yoxford (A12/ B1122 junction) would be opened the day after on 31 March 2026. Therefore, whilst there will be ongoing landscaping works at these junctions into the summer of 2026, there will be no overlap between these specific junction works and the Suffolk Onshore Scheme. The improvements will increase the baseline capacity of the highway network, reducing existing levels of driver delay and providing a benefit to existing road users, as well as construction traffic associated with the Suffolk Onshore Scheme, particularly at Friday Street (A12/ A1094 junction) which is one of the principal access routes from the A12. The consideration of alternative accesses to the Saxmundham Converter Station is set out in full at Application Document 9.107 Applicant’s Response to Suffolk County Council’s Deadline 4 Submission on Alternate Access to Saxmundham Converter Station [REP5-125] and section 3.8 of Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044]. This included the suggested access from the Sizewell Link Road.
3.		NG dreamt up their scheme some fifteen years. Over the past decade we have all suffered and paid for the hubris of politicians, and big corporations only caring about their shareholders.	The Applicant has no comments on this matter.
4.		We need only look at the Ukraine War or the current Iran conflict to realise that the days of three rank infantry squares and cavalry charges on foreign fields are long gone and battles and wars are won by destroying infrastructure using low flying drones or high flying planes with powerful bombs controlled by operators hundreds if not thousands of miles away on Ai backed computers to destroy the past, present	The Applicant has no comments on this matter.

Reference	Matter	Point Raised	Applicant's Comments
		and futures of their enemies. Drone costs in munitions terms are minimal, the risk to the operators negligible and the effect on infrastructure, the local population and a national economy just devastating.	
5.		National Grid and EDF are creating one of the largest energy hubs in Europe on the coast in just 5 sq.miles. It is supposed to supply a third of the UK's energy. But Sizewell C towers on a cliff top rising 60 metres above the North Sea, its golf ball sister Sizewell B glistening in the sunlight next door. The Sealink and Lionlink convertor stations, each the size of Buckingham Palace sitting hug-a-mugger on top of a hill. A ribbon of pylons stretching to the horizon and farms planted with solar panels and battery parks. Just sitting Ducks like us local residents. There are no plans to change the schemes. No plans to hide them, mitigate their vulnerability or protect them or any of us. Not going to happen here - tell that to Dubai or Qatar. Maybe this once was energy security – but not in today's world.	A complete assessment has been undertaken for the landscape and visual effects of the Suffolk Onshore Scheme, including cumulative effects together with other major infrastructure projects: see Application Document 6.2.2.1 (B) ES Part 2 Suffolk Chapter 1 Landscape and Visual [REP4-023] and Application Document 6.2.2.13 ES Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter Project Cumulative Effects [APP-060].
6.		National Grid claims that it needs all its infrastructure in close proximity to reduce energy loss. This is simply not true, the 5km radius they claim essential is a fallacy. They are not concerned about energy loss routing their power many miles to the Ai data hubs which are huddled around cities.	The reasoning for a search parameter of approximately 5 km from the network connection point has been explained in the documents submitted to the Examination, see e.g. Application Document 8.2 Options Selection and Design Evolution Report (October 2023) [APP-369]. A distance greater than this would trigger the need for reactive compensation equipment on the network resulting in additional land take and cost. This search parameter was however used as a guide, so as not to discount potentially suitable sites at a slightly greater distance where the benefits might outweigh the additional land take and cost.
7.		Whatever happened to concerns about food security. National Grid is ripping up hundreds upon hundreds of acres of prime agricultural land and converting it into an industrial wasteland. They are land grabbing much more than they need and inflating their construction sites to maximise their opportunities and destroying the rural countryside which is one of the major attractions that made Suffolk tourism viable.	The Applicant acknowledges the concerns about food security. The potential impact any development which disrupts agricultural activity has on food security is complex given the range of variables involved. In terms of policy, there is no requirement to have to take account of food security other than the reference to seeking to minimise impacts on best and most versatile (BMV) land; the assessment of impacts on BMV land in Suffolk is addressed within Application Document 6.2.2.6 (B) ES Part 2 Suffolk Chapter 6 Agriculture and Soils [PDA-019]. Impacts on tourism have been addressed under Application Document 6.2.2.10 (B) ES Part 2 Suffolk Chapter 10 Socio Economics, Recreation and Tourism [REP1A-005]. See also Application Document 9.40 Visitor and Tourism Assessment Technical Note – Suffolk [REP3-065]

64. Applicant’s Comments on the Submission from Rhett Griffiths

64.1 Introduction

64.1.1 Table 64.1 summarises the Applicant’s comments on Rhett Griffiths Deadline 6 Response [REP6-228].

Table 64.1 Applicant’s Comments on Rhett Griffiths Deadline 6 Submission [REP6-228]

Reference	Matter	Point Raised	Applicant’s Comments
ORAL TESTIMONY (OFH3)			
1.	Lived experience of cumulative impact	In terms of lived experience, the cumulative impact of even the current active projects is already weighing heavily on the area and is extraordinarily stressful. We are already seeing increasing and significant traffic disruption that feeds into all areas of life, pressure on the tourism experience and local businesses, and growing impacts on people’s wellbeing and mental health, well before the main construction phases have begun. Sizewell C is only just ramping up and other projects including but not limited to the National Grid Friston Hub, EA1N/EA2 are only just starting. When you look at the predicted overlap of peak construction activity across multiple planned projects — which has not been properly assessed in a realistic way, we are nowhere near the peak yet — we are in the foothills of the Himilayas ahead, well before the most significant impacts kick in. The realistic prospect is a continuous, multi-project programme of construction over many years, bringing with it prolonged and overlapping duration of these cumulative effects over many years, with little or no respite. Sizewell C alone places very significant strain on the area. Sea Link would add to that, particularly through use of the existing fragile local road network, which supports everyday life, emergency access, and the tourism economy. This includes the A1094 — effectively the sole and in places narrow arterial route from the A12 to the coast. Yet a proper cumulative traffic assessment, including junction modelling, has still not been provided. This modelling was raised by ExA in the 2nd Written Questions for deadline 5, but the necessary modelling is now only expected at Deadline 6, with very limited time remaining in the Examination. For a project that has been in development for many years, this is staggering and unacceptable, this highlights my concern that the cumulative traffic effects have not been properly assessed, and is an example of the many shortcomings in this application.	A comprehensive cumulative assessment of the impacts of Sea Link and other projects in Suffolk has been undertaken within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. Traffic and transport cumulative impacts in concert with Sizewell C are assessed under that – see Table 13.31. See also the Applicant’s response to 1TT1 at p240 of Document 9.134: Applicant’s Comments on Other Submissions Received at Deadline 4 and Deadline 5.
2.	There has been Assessment failure → precaution	There is no complete or coherent cumulative assessment, and the material provided is not sufficiently location-specific and does not reflect lived experience conditions on the ground.	The Applicant’s cumulative assessment is thorough and robust. It is difficult however to respond granularly to these general criticisms.

Reference	Matter	Point Raised	Applicant's Comments
		As well as no complete, holistic assessment across projects, there is insufficient data to support the conclusions drawn. As a result, the assessment of significance is not robust. In the absence of a complete cumulative assessment and sufficient data, impacts cannot be assumed to be limited. It is not possible to conclude that effects will be minor. A precautionary approach is therefore required, and there is a clear and credible risk of significant adverse cumulative effects.	
3.	ExA precedent gives clear guidance	This is reinforced by the findings of the Examining Authority for EA1N and EA2 They concluded that local harm was substantial and that mitigation was only just sufficient on balance. They also warned that cumulative effects in the Friston area were already so substantially adverse that the utmost care would be required in considering any further development. We are now in precisely that situation, with further infrastructure proposed in the same area. That is clear guidance for the consideration of this Application.	The Applicant has addressed the comments of that ExA and their applicability to the Proposed Project – see p.347 of [REP2-034] .
4.	Mitigation and DCO control	I oppose the project and do not consider that a robust needs case or proper alternatives assessment has been demonstrated in a policy-compliant way (2024 EN-Suite). However, if consent were to be granted, mitigation cannot be relied upon where the cumulative impact assessment is incomplete, because the scale and interaction of effects are not properly understood. Furthermore mitigation must be secured within the DCO itself. It cannot be left to outline plans or future agreement with councils. If mitigation is not secured at this stage, it will not be delivered in practice. This is particularly important given the continuous and overlapping nature of these impacts. Without effective coordination between projects, there will be no meaningful respite. As an example, working hours must therefore be aligned across projects (e.g. with SPRs) to ensure that there is at least some respite for residents and for visitors and the tourism economy. Without that coordination, the reality will be continuous disruption over many years. This should include clear limits on construction hours — weekday and Saturday daytime only, after 8am — with no routine Sunday or Bank Holiday working unless specifically agreed.	The Applicant's cumulative impact assessment is not incomplete and it is not explained in what way it is incomplete. The Applicant has made a range of commitments to mitigate the impacts of the Proposed Project that will be secured by the DCO.
	Closing	In summary, the cumulative impact is already being experienced, the assessment remains incomplete despite repeated requests from the Examining Authority, and there is a clear and credible risk of significant adverse cumulative effects. In those circumstances, the Application does not demonstrate a [redacted] or [redacted] cumulative impact assessment, and this is a matter which goes to the heart of whether development consent can properly be granted.	

65. Applicant’s Comments on the Submission from Sarah Courage

65.1 Introduction

65.1.1 Table 65.1 summarises the Applicant’s comments on Sarah Courage Deadline 6 Response [REP6-229].

Table 65.1 Applicant’s Comments on Sarah Courage Deadline 6 Submission [REP6-229]

Reference	Matter	Point Raised	Applicant’s Comments
		I am a local resident in East Suffolk near Saxmundham and object to the proposal to build a 26 metre convertor station on rural farmland above Saxmundham. I also strongly object to the proposed route from the A12 over the Benhall Railway Bridge on the B1121. The weight limit of 46 tonnes would be vastly exceeded by the HGV's and the AIL's weighing up to 315 tonnes (transformers of immense length too) needed to access the proposed convertor station. The construction of a new access road and massive bridge over the River Fromus would devastate the woodland area and ruin the aspect of the Grade 11 listed property Hurts Hall. The alternative route approved by Suffolk County Council should be chosen using the A12 and then at Yoxford taking the Sizewell Haul Road. Far less extra construction and loss of habitat. PLEASE seriously consider this option. Local residents and businesses struggling with the cost of living crisis already cannot bear the disruption of the increased HGV traffic. This impending threat to our precious town and surrounding countryside is deeply upsetting. We will have to try to live amongst it if you do not listen to our concerns. I fear a [redacted].	The Applicant acknowledges these concerns. The Applicant has carefully considered the use of the bridge for AIL transport, per the crossing feasibility study [REP4-101]. The alternative route suggested by SCC has also been reviewed and the Applicant has explained in detail why it would not be suitable – see p.49-50 of [REP4-089].

66. Applicant’s Comments on the Submission from Stephanie Jane Harrison

66.1 Introduction

66.1.1 Table 66.1 summarises the Applicant’s comments on Stephanie Jane Harrison Deadline 6 Response [REP6-230].

Table 66.1 Applicant’s Comments on Stephanie Jane Harrison Deadline 6 Submission [REP6-230]

Reference	Matter	Point Raised	Applicant’s Comments
		I would be grateful if you would please take the following comments and points into consideration when examining the National Grid’s Sea Link project. These are in addition to my previous written objections and verbal submission of 24 March 2026. I feel it is worth pointing out that writing submissions and speaking at the various hearings takes a great deal of nervous energy and causes untold amounts of stress. National Grid have whole departments of experts to handle their applications whereas normal untrained individuals such as myself have an uphill struggle trying to make their viewpoints known and put forward their objections within the time frames and regulations laid down. I do hope the inspectors will understand this and take this into account when reading my comments.	The potential effects of the construction methods and use of the hoverport arising from the changes made to the application (accepted by the ExA on 5 December 2025) are considered in Change Request: Addendum to Volume 6 Environmental Statement [CR1-055]. The explanation for including the hoverport is set out at §2.2 of that document. An assessment of environmental impacts is set out at §3.2. There are no proposals to use the former hoverport as a compound but only as a route of access. The use of the former hoverport as a construction, operation, and maintenance access was part of the application as submitted in March 2025. The change application (accepted by the ExA on 5 December 2025) broadened the Order Limits at the hoverport to provide flexibility that will allow final routeing to be selected that avoids encroaching on the saltmarsh. This change was made specifically to ensure access to the foreshore could be achieved without any impact upon saltmarsh habitats, which have encroached towards the southern hovercraft ramp in recent years.
	COMPULSORY PURCHASE OF THE HOVERPORT AND ACCESS TRACK	I am extremely concerned about the way National Grid [NG] has proceeded with this part of its application. It has been suggested that its last minute inclusion of the Hoverport within their plans is a mere minor amendment. This is completely misleading. It is also disrespectful to the planning process. It is a major change, which will have a vast far-reaching impact on many levels including on the environment and local communities. However in addition to this, I have one major concern regarding NG’s proposed amendment. NG seem to be suggesting that use of the Hoverport is actually essential to their plans. If this is the case, then it is a great worry that they were unable to foresee this at the initial planning stages. To discover that their plans require such major change at this late stage in the planning process suggests at best supreme and a lack of due diligence, which is a great worry if they are to be trusted to manage a project of such magnitude and importance going forward. Indeed, if their initial planning abilities are this flawed, one wonders whether they are even suitably equipped to carry out such an important construction project. A more cynical viewpoint is that this last minute amendment has been introduced to allow it to slip through with only minimal opportunities for it to be fully examined and the devastating consequences taken into account. This is a form of creeping development often seen in large projects and must not be	

Reference	Matter	Point Raised	Applicant's Comments
		permitted. This is underhand and one has to question the integrity of an organisation who works in this way, if this is the case. So the question is: is it gross or and practices? In either case, then surely such a nationally important project should not be overseen by an organisation who behaves in such a way. As can be seen, the research to justify the use of the hoverport is at best sketchy. It is very apparent that there have been little or no proper surveys done regarding the suitability of this site for its proposed use. It is not clear whether this is again because of a lack of due diligence and foresight or specifically planned in order to avoid discovering the major hindrances and blocks to using the site. Whatever the reason, the use of the hoverport cannot be fully considered until a full and comprehensive examination and surveys at all levels have been carried out. Then comprehensive mitigation plans need to be drawn up and submitted for inspection, investigation and approval or dismissal. However, there are no such comprehensive mitigation plans. And I suspect the reason for this lack of suitable mitigation planning is because it is impossible to mitigate the permanent damage which will be caused to such a unique environmental site by the proposed works. The old hoverport is precious and should be protected at all costs. Due to its re-wilding over the last 30 plus years it offers a unique habitat and supports rare orchids and reptiles as well as many birds. It is extremely rare for such a site to exist and its destruction is not to be undertaken lightly. And its destruction is assured if NG are allowed to proceed with their plans. The Hoverport's foundational structure is fundamentally unsuitable for the works proposed, and will almost certainly fail in the long term causing yet more destruction. This is an environmental disaster waiting to happen. The ground is not stable. It mainly comprises large portions of broken and deteriorating concrete on an unstable base. It also has underground tunnels and waterways. It was built over 30 years ago specifically for hovercraft not HGV lorries carrying very heavy loads of aggregate. The site was constructed by the National Coal Board and Cementation with 300,000 tons of 'NCB colliery spoil heap shale' being used as a base which was then covered by concrete slabs. The surface construction was never designed to withstand the extreme loads of heavy plant such as piling rigs, excavators and frequent passages of heavily laden aggregate lorries. Colliery spoil typically contains pollutant such heavy metals including arsenic, lead and copper. If [when] the surface breaks up these will leach into the salt marsh and Pegwell Bay causing devastating and irreparable damage. The hoverport foundations will simply not support such heavy ['both in terms of load and frequency] traffic. In addition, pollutants from the vast amounts of aggregates that NG wish to store on the land will also inevitably leach into the salt marsh and Pegwell Bay.	

Reference	Matter	Point Raised	Applicant's Comments
		Why have NG not yet conducted a full survey of the area and then presented plans to mitigate any such outcomes? This must be done before their plans can even be considered. Yet again their application is incomplete. Within a short period of time after works begin, the unsuitability of this site will become apparent and then massively expensive repairs will be needed. By which time the devastating impact on this incredibly rare and precious wildlife site will have been permanently destroyed, which is both heartbreaking and impossible to justify. It is a classic case of destroying the environment to allegedly save the environment [but at the same time create some huge profits for some individuals]. Also the access track leading to the hoverport is narrow and I suspect will need to be strengthened, supported and possibly widened in parts. It is frequently used at the moment to give access for wheelchair users, cyclists, families with prams and baby buggies. I assume this will be closed off, perhaps permanently, shutting out a community of users from a precious and unique space which supports the well being and mental health of very many people. I was shocked that NG have tried to suggest the hoverport is barely used! I am fortunate enough to live opposite the hoverport and see how many people use the hoverport on a regular basis. It supports so many and it seems grossly unfair that it should suddenly be arbitrarily taken away without any consideration by NG or an in depth consultation, rather than a rushed last minute poorly publicised addendum to a plan. Many people are still unaware this is even happening	
	GENERAL POINTS	As has been asserted by a great many others, this whole site is fundamentally unsuitable for such as project. To build on marsh land which is shifting and subject to tidal changes and ongoing increased risk of flooding seems unbelievably short sighted. Recent weather reports assert that more and more flooding is likely throughout the world. It seems short sighted [insane?] to permanently damage and reduce an area which currently helps mitigate flooding to farmland and housing communities in the way currently served by the Minster Marshes. Initially this site may seem the cheapest option, which is clearly a major factor for a company that seems to put profitability above all else. But it may well turn to to be far more expensive when continued ongoing mitigation is required to hold back the tide of increased flooding and an unstable environment. In light of recent political events, including the revelation of a nearby Russian submarine cruising our waters, I would question whether enough consideration has been given to the national security of this site. It would seem to present a very easy target for any hostile force, should they wish to harm our energy / communication system. I wonder if sufficient thought has been put into this aspect of the site. Finally, of course we all support working towards a more environmentally friendly world but when we destroy the environment in order to save the environment then one has to wonder where is the common sense.	The Applicant has addressed concerns relating to the building of elements of the Proposed Project on marshland – see p.23 of [REP2-022].

Reference	Matter	Point Raised	Applicant's Comments
		This might be the right project but it is without doubt in the wrong place.	

67. Applicant’s Comments on the Submission from Stephen Palmer

67.1 Introduction

67.1.1 Table 67.1 summarises the Applicant’s comments on Stephen Palmer Deadline 6 Response [REP6-231].

Table 67.1 Applicant’s Comments on Stephen Palmer Deadline 6 Submission [REP6-231]

Reference	Matter	Point Raised	Applicant’s Comments
		I spoke at the Open Floor hearing earlier this week at Ufford and understood that I should follow up my 3 min slot with the main points of my representation. My representations focused on the Converter Station buildings proposed on the outskirts of Saxmundham, Suffolk. I have 3 points I wish to highlight: As part of the examination of the NSIP proposal by the Planning Inspectorate, I would ask that the inquiry considers;	The below requests to the ExA are noted. The Inquiry procedure has considered these issues in detail.
1.		External Converter building design options which are specifically designed to reduce the visual impact of the buildings on the environment,	Noted.
2.		Groundwork design options to effectively lower the floor level of the buildings by sinking into the site perhaps coupled with concomitant earth bunding aimed at obscuring the building mass from ground sightlines.	Noted.
3.		I gather that traffic modelling and impact analysis on the affected highway network is due at deadline 6. Whilst we await this information, I consider the suggestion of the local highway authority for an alternative access route to the converter site via the NE utilising the new Sizewell C link road & crossing the former Leiston Airfield to be worthy of serious consideration. The access route proposed by the applicant from the Benhall to Saxmundham Road is fraught with difficulties and will adversely affect residents of both Benhall and Saxmundham.	The alternative route suggested by SCC has been reviewed and the Applicant has explained in detail why it would not be suitable – see p.49-50 of [REP4-089].

68. Applicant’s Comments on the Submission from Terry Haworth

68.1 Introduction

68.1.1 Table 68.1 summarises the Applicant’s comments on Terry Haworth Deadline 6 Response [REP6-232].

Table 68.1 Applicant’s Comments on Terry Haworth Deadline 6 Submission [REP6-232]

Reference	Matter	Point Raised	Applicant’s Comments
		I write to reiterate my continuing and significant concerns regarding the adequacy of any mitigation and compensation arrangements for my family’s home and the residents on the site and for all residents and businesses affected by the proposed development. In particular, there remains a lack of clarity or conversation as to how those located along the full extent of the red line route—and especially those within, or directly adjacent to, the 300-metre corridor—will receive fair, proportionate, and properly directed compensation. These individuals and businesses are likely to experience the most acute and prolonged impacts. The anticipated effects go well beyond temporary inconvenience. They include sustained noise, disruption to daily life, loss of amenity, and a fundamental erosion of the quiet and peaceful environment upon which both residents’ wellbeing and local businesses depend. The potential consequences for mental health and overall quality of life are a matter of serious concern and, to date, appear insufficiently addressed. It is essential that a clear, transparent, and enforceable framework is put in place to ensure that those most directly affected are both recognised and appropriately supported. Mitigation and compensation must be targeted, meaningful, and reflective of the true scale of impact experienced. I urge that these issues be given urgent and careful consideration.	The Applicant believes the Compensation Code adequately addresses any residual impact of the proposed project which has not or cannot be mitigated and suggest Ms Haworth's professional advisers should be well versed in such matters. There are some useful Government Guides in relation to the impact of Compulsory Purchase, available at Compulsory purchase and compensation: guide 1 - procedure - GOV.UK with Guides 1 and 4 being the most applicable.

69. Applicant’s Comments on the Submission from Theresa Thorne

69.1 Introduction

69.1.1 Table 69.1 summarises the Applicant’s comments on Theresa Thorne Deadline 6 Response [REP6-233].

Table 69.1 Applicant’s Comments on Theresa Thorne Deadline 6 Submission [REP6-233]

Reference	Matter	Point Raised	Applicant’s Comments
		Good Morning. My name is Theresa Thorne, and I am speaking on behalf of the residents of Whitearch Park in Benhall. At the outset, I would like to make it clear that we recognise change and progress as an essential part of modern life. We understand the importance of developing cleaner energy and sustainable infrastructure for future generations, and we do not stand in opposition to that broader goal. However, we do believe it is both reasonable and necessary to consider carefully the concentration of large-scale energy projects within what is, in reality, a relatively small and closely connected area. The Suffolk coastline, once widely recognised and valued as a Heritage Coast, is already undergoing significant transformation. Across the region, we are seeing the effects of ongoing development—road closures, diversions, increased traffic, and major construction activity. Importantly, this is only the beginning. Further largescale projects, including Sealink and other planned developments, have yet to commence, and their cumulative impact remains a serious concern. While these projects may bring clear national and strategic benefits, we respectfully ask that equal weight is given to the local consequences for communities such as Benhall and Saxmundham. These are not abstract locations on a map; they are established communities where people live, work, and have chosen to spend important stages of their lives. Whitearch Park is home to residents ranging in age from 60 to 92. Many moved here with the intention of downsizing and enjoying a quieter, more peaceful, and less stressful stage of life. For some, this is not simply a preference but an important aspect of maintaining their health and wellbeing. Increasingly, however, the level of disruption, activity, and uncertainty surrounding ongoing and proposed developments is beginning to affect that sense of stability. One specific example concerns the railway line that runs close to our homes. The recent decision to use this line during the night in connection with construction activity has caused understandable concern among nearby residents. While we fully acknowledge that the railway itself is not new, the change in how it is being used represents a significant and material difference for those living closest to it. Nighttime operations introduce a level of disturbance that was not previously experienced and is particularly challenging for older residents.	The Applicant acknowledges this representation and in particular its analysis of impacts as they relate to older residents. A comprehensive cumulative assessment of the impacts of Sea Link and other projects in Suffolk has been undertaken within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. Impacts on local residents form part of that analysis. Commitments have been made to assist residents of Whitearch Park – see for example p.25 of [REP4-089]. Traffic impacts in Suffolk have been carefully considered – see Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054].

Reference	Matter	Point Raised	Applicant's Comments
		We were encouraged when a noise barrier was initially proposed as a potential mitigation measure. However, we were disappointed when this proposal was later withdrawn. Of equal concern was the perception among residents that those most directly affected were not fully involved in that decision-making process. Meaningful engagement is essential if communities are to feel heard and respected. Traffic presents another growing and very tangible concern. In recent months, there has already been a noticeable increase in the volume of vehicles using Main Road in Benhall. For some residents, particularly those with reduced mobility or slower reaction times, it is becoming increasingly difficult and stressful to exit safely onto the road. This is not simply an inconvenience—it is a matter of safety and confidence in everyday activities. Looking ahead, there is understandable anxiety about how traffic levels may develop as further construction progresses, particularly in and around Saxmundham. Many residents now routinely allow additional time for even routine journeys to appointments, reflecting the unpredictability and congestion that are already emerging. In this context, the proposal from Suffolk County Council to utilise the Northern Route for access to the converter stations site is viewed very positively by residents of Whitearch Park. As this route is already under construction for other related developments, its inclusion represents a practical and potentially effective way to reduce additional strain on local roads such as those through Benhall. We would therefore respectfully request that this route is formally incorporated into the Development Consent Order. Beyond the practical impacts, there is also a more intangible but equally important concern: the pace and scale of change itself. For those who have lived in Suffolk for many years, there is a deep sense of connection to the character and identity of the area. Increasingly, residents express sadness at how quickly that character appears to be changing. Conversations within Benhall and Saxmundham often return to the same themes—uncertainty, loss of tranquillity, and concern for the future wellbeing of the community. We fully appreciate that national infrastructure projects are complex and necessary, and that difficult decisions must often be made. However, we respectfully ask that these decisions do not lose sight of the people who will live with their consequences on a daily basis. It is not only the physical environment that is affected by cumulative development, but also the mental wellbeing and quality of life of residents. For an older community in particular, prolonged disruption, increased noise, traffic, and uncertainty can have a significant and lasting impact. In conclusion, I would ask the panel to consider carefully the cumulative effect of these developments—not only in terms of infrastructure and logistics, but in terms of human impact. The residents of Whitearch Park, along with those in Benhall and the wider Saxmundham area, are asking not for development to stop, but for it to be managed in a way that is balanced, considerate, and genuinely responsive to the communities it affects.	

Reference	Matter	Point Raised	Applicant's Comments
		Thank you for listening. I sincerely hope that the voices, experiences, and wellbeing of the people who live here will carry as much weight in your deliberations as the infrastructure that is planned for this landscape.	

70. Applicant’s Comments on the Submission from Timothy John Harrison

70.1 Introduction

70.1.1 Table 70.1 summarises the Applicant’s comments on Timothy John Harrison Deadline 6 Response [REP6-234].

Table 70.1 Applicant’s Comments on Timothy John Harrison Deadline 6 Submission [REP6-234]

Reference	Matter	Point Raised	Applicant’s Comments
Point 1	Underhand planning application practise	The application has taken many twists and turns and has included a great many addendums, add-ons and requests seeking evermore permission to expand both the site and the the amount of permissions granted. The application in its present form is a very different proposition to that which was originally proposed and I feel has been designed to mis-lead and confuse enormous amounts of local people that would suffer as a result of this project being allowed to go ahead. The majority of people I speak to about this say something like “oh yeah I objected to that ages ago” they are astonished that their objection then carries no weight regarding todays application. This is Creeping development pure and simple executed by experienced people who are used to changing the goal posts and wearing everyday folk down with a relentless bombardment of new or adjusted proposals. If the planning expectorate wanted a true gauge of local peoples opinion it would insist on a new proposal being submitted with ALL the addendums included and then have it posted in the local news paper with an extended time frame to gather the results which I suspect will be mighty	All feedback received during the multiple phases of consultation has been carefully reviewed and considered. The Applicant’s approach to consultation is thorough – see for example p.82 of [REP2-022].
Point 2	Wildlife protected habitat	I am not an expert regarding the protection of wildlife and habitat although having attended a couple of planning forums there appears to be no shortage of people with expert knowledge so I defer to them for details although I fully support that it would be wrong to loose something so precious. Being aware of my limitations I googled:“what would happen if migratory birds stopped coming?” The rather sobering response was:“If migratory birds stopped coming, it would cause a devastating cascade effect, resulting in mass extinctions of bird species, ecological imbalances, and massive agricultural disruptions. Migratory birds are crucial for ecosystem health, acting as natural pest control, pollinators, and seed dispersers”. My next thought was if we are so dependent on annual migration then so must other countries. How would the governments of Africa, Europe and Scandinavia react to “a devastating cascade effect” on their economy brought about by the foolish acts of one country. I may email them to find out. I suspect they are unlikely to condone it. In fact digging a little deeper it appears that there are international laws in place designed specifically to avoid such circumstances occurring, which	The Applicant has carefully considered effects on wildlife including on migratory birds and made appropriate commitments in light of that analysis (see in that regard the Applicant's response at p.28 of [REP2-022]).

Reference	Matter	Point Raised	Applicant's Comments
		it would appear this proposal is in breach of, I would urge the inspectors to research this before (another) international crisis is triggered.	
Point 3	Roads infrastructure noise and pollution	I have mentioned my concerns in this regard in previous communications so will not waste time reiterating all the points this time. I am still keen to have them noted. Suffice to say :The roads are too narrow to support large HGV's The roundabouts lack the required approach and departure lane width The Ramsgate roundabout is controlled by traffic lights and is poorly designed, two HGV's nose to tail stopped at 2 of the 4 sets of lights will protrude into the lanes designated for free flow and will stop the roundabout functioning.This is already the case. The Hoverport was not designed to support heavy weights of vehicles or stored aggregates it was designed for Hovercraft. The increase in traffic will undoubtedly increase noise and pollution it will also adversely affect the well being of the many visitors who enjoy the well laid out paths and lawn areas.	Traffic impacts in Kent and Suffolk have been carefully considered – see Application Document 6.2.2.7 Part 2 Suffolk Chapter 7 Traffic and Transport [APP-054] and Application Document 6.2.3.7 Part 3 Kent Chapter 7 Traffic and Transport [APP-067]. It is not clear which roundabout is being referred to. In any case, an assessment of Road Safety in relation to the Proposed Project has been carried out in the aforementioned documents. The safety of various roundabouts relating to Ramsgate have been considered – see for example the Applicant's response at p.469 of [REP2-034].
Point 4	Green space and the enjoyment of visitors	As mentioned in previous communications and alluded to above the area attracts a great many people from many different backgrounds All come to enjoy the local attractions including the Viking ship and the nearby cafes. There are far reaching beautiful views out across Pegwell Bay. Adjacent to the viking ship there is a large flat grass area surrounded by safe wide flat multi-user paths that see a tremendous amount of activity from horse riders, dog walkers, strollers, parents with toddlers or push-chairs, school parties hospital/convalescent/care homes that appreciate the ability to easily access the area with wheel chairs and a place to park the mini bus. The area also plays host to car clubs, motor cycle clubs and pet clubs. All of this will suffer from HGV traffic as well as the loading unloading of aggregates on the hover port directly below the viking ship tourist attraction.	The Applicant has addressed impacts on attractions like the Viking Ship at p.9 of [REP4-100] .
Point 5	Strategic national security	In the news recently it appears that the uk armed forces have been monitoring Russian navy vessels including submarines that are suspected of mapping out essential power and communication lines underwater. We as a nation are now planning to group all of these power lines together and place them one one huge easily targeted building! REALLY! Finally I have no problem with acknowledging the fact that we seem to need ever greater amounts of electricity and feel that generating from renewable resources is the way forward. My problem is trying to come to terms with the multi level costs involved. The costs of building a converter station on a swamp is a ridiculous and hideously expensive idea. Building anything on marsh land is a poor idea as is proven throughout history. There are extraordinary measures that are needed to make building on unstable land (theoretically) possible, this is essentially using vast quantities of materials in order to fight the laws of nature, this approach is at best temporary. one idea suggested is deep piling and transporting vast amounts of aggregate. This in turn leads to the need to acquire more space to store these aggregates.	The Applicant has addressed concerns relating to the building of elements of the Proposed Project on marshland – see p.23 of [REP2-022] .

Reference	Matter	Point Raised	Applicant's Comments
		The amount of fuel and resources needed to accomplish these feats. The amount of people being disturbed by the movement of HGV's the pollution they cause and the traffic disruption that ensues. The amount of people losing a place to relax and enjoy their free time The disruption to the rhythm of nature Plus of course "a devastating cascade effect" The knock on effect of placing a large concrete structure in a delta system critical to the draining of water away from housing and farm land particularly as we seem to be experiencing new record breaking weather events every year. ALL OF THIS CAN BE AVOIDED. If a more suitable site is located, and I'm assured there exists a choice of them. Why not build on stable land rather than a marshland nature reserve.	

71. Applicant’s Comments on the Submission from Victoria Caroline Hambley

71.1 Introduction

71.1.1 Table 71.1 summarises the Applicant’s comments on Victoria Caroline Hambley Deadline 6 Response [REP6-235].

Table 71.1 Applicant’s Comments on Victoria Caroline Hambley Deadline 6 Submission [REP6-235]

Reference	Matter	Point Raised	Applicant’s Comments
WRITTEN SUBMISSION FROM OPEN FLOOR HEARING			
		Like many who have already spoken, I participated in the extended 9-month examination for Scottish Power’s EA1N & EA2 projects. We all willing donated money so that SASES and SEAS could engage the best experts to address issues such as heritage, landscape, noise, flooding, lighting. We did this because - even if unable to stop the project - it was important to secure the best possible DCO with maximum mitigation firmly in place. These mitigations are essential owing to the unprecedented proximity of the substations and the NG hub to Friston village. As the examiners noted: “the local harm identified is substantial and should not be underestimated in its effect. Its mitigation has, in certain key respects, been found to be only just sufficient...” As the Sealink examination progresses it is alarmingly apparent that NG seeks to row back on much of the mitigation secured under the Scottish Power DCOs. It was understandable last year that, in the event that the Scottish Power projects did not go ahead, NG might seek to reapply for consent for the NG hub under its Sealink DCO. But EA2 is proceeding and its DCO, which includes design details and other mitigation relating to the NG hub, has been approved by the Secretary of State. These should now apply as an absolute minimum. A failure to do so would be an abuse of due process. At the end of the Scottish Power examinations the ExA observed “that the cumulative effects of the proposed development with other development on the connection site at Friston are “so substantially adverse that utmost care will be required in the consideration of any amendments and additions”. Quite the opposite appears to be happening. Instead of certainty and firmly established design principles, the Sealink DCO is riddled with vague generalisations and obfuscation so that everything can be reinterpreted by the developer further down the line. This is far from reassuring for those who have to live with the consequences. It is also unacceptable as, without a fully developed DCO setting out its legally binding obligations, the developer can do much as it likes.	The Applicant understands this representation to be concerned with the cumulative impacts occasioned by the Proposed Project in concert with other relevant projects. The concerns raised are acknowledged and have been carefully considered throughout the application process. A comprehensive cumulative assessment of the impacts of Sea Link and other projects in Suffolk has been undertaken within Application Document 6.2.2.13 Part 2 Suffolk Chapter 13 Suffolk Onshore Scheme Inter-Project Cumulative Effects [APP-060]. As regards the Applicant’s approach to the mitigation involved in projects like EA1 and EA2, see p.46 of [REP2-022]

Reference	Matter	Point Raised	Applicant's Comments
		I don't live in Friston but I live close by and have friends that do. Over the last 8 years I have witnessed the increasing toll that successive energy projects are having on their health and wellbeing. But it is the fear of what is yet to come that is causing wider anxiety. We foresee what is happening in Friston being repeated in Sternfield, Saxmundham, Walberswick. Villages that once thought themselves immune from the dangers of one project suddenly find themselves at the centre of another whether as host for more infrastructure, the location for landfall, part of the cable route, or the site for a mega solar farm. We live in fear of NG as they provide connection offers to further energy projects at what is clearly becoming a strategic NG connection hub - one that has never been consented but is being created by stealth. This is a huge imposition on the local community, particularly one that is already hosting Sizewell C, construction of which coincides with all NG's proposed projects. At the very least we expect honesty and clarity, and why the hard won mitigations contained in the EA2 DCO must prevail. Anything less suggests a DCO is not worth the paper it's written on calling into question the credibility of the whole NSIP process.	

72. Applicant’s Comments on the Submission from Matthew Denny

72.1 Introduction

72.1.1 Table 72.1 summarises the Applicant’s comments on Matthew Denny Deadline 6 Response [REP6-236] Written submission for OFH2.

Table 72.1 Applicant’s Comments on Matthew Denny Deadline 6 Submission [REP6-236]

Reference	Matter	Point Raised	Applicant’s Comments
Written submission for OFH2			
N/A	Pegwell Bay baseline surveys	Firstly, there are still no adequate baseline surveys for the Pegwell Bay hoverport. Without knowing what cracks and fissures and vegetation are present, there is no way of assessing or addressing potential impacts on legally protected reptile and invertebrate species.	See the Applicant’s response to this matter in point 12 of Table 19.10 Applicant’s Comments on the SEAS Deadline 5 Submission of Application Document 9.134 Applicant’s Comments on Other Submissions Received at Deadline 4 and Deadline 5.
N/A	Bats	Secondly, bats. Despite 9 species being recorded and amassing 22 points in the standard species assemblage evaluation methods, which correlates to National importance for species assemblage, which correlates to National importance for species assemblage, the applicant has downgraded this value to Regional, citing the relatively low bat encounter rates. But this assessment method should not incorporate encounter rates, only the number of species recorded. Therefore, this downgrading is flawed. The applicant’s own surveys and assessment acknowledge there is likely to be a barbastelle bat roost near to the Friston substation, yet they did not utilise the standard tracking surveys to find the location and status of this roost. Instead, they have largely ignored this issue. Nearby hedgerow sections, which could form important dispersal corridors for the roost, are to be removed. ■■■ and any disruption to a ■■■■ would be an impact at the National, or possibly, International level. The improvised mitigation currently proposed - introducing fake hedgelines to fill gaps created during the works - would surely need to be upgraded to minimise potential impacts if found to be a ■■■■ ■■■. The applicant is employing obfuscation here - hiding behind their inadequate survey methods to brush the issue aside, as, without surveys, there are no data to prove them wrong.	See the Applicant’s responses to these points as raised by Dr Denny on behalf of SEAS in verbal submissions at ISH2 and ISH3 (Application Document 9.133 (A) Applicant’s Written Summaries of Oral Submissions at Issue Specific Hearing 3). Regarding classifying the bat assemblage as ‘regional’ rather than ‘national’ the Suffolk Ecology and Biodiversity Chapter reports both valuations in paragraphs 2.7.48 and 2.7.49 so there is no attempt to suppress the ‘national’ valuation. However, as explained in paragraph 2.7.49 activity levels of all species recorded during the walked transects were considered to generally be low across the Suffolk Onshore Scheme and the Applicant considers it is entirely reasonable to take into account in their valuation not only the number of species recorded but also the levels of activity. Otherwise, no distinction is drawn between an area heavily used by a given species of bat and one lightly used. The Applicant would, however, note that even if the regional evaluation is set aside, and only the national evaluation is used, this would not change the significance of any effect reported in the ES chapter (i.e. it would not change any effect from not-significant to significant) and it would also not change the mitigation required since the presence of rare species such as barbastelle was taken into account in devising that mitigation. Indeed, several REAC commitment specifically reference the measures to be put in place to protect this species and/or its habitat (e.g. REAC measures B30 and B39).
N/A	Marsh harrier surveys	Thirdly, there have been no dedicated marsh harrier surveys. The Order Limits have suitable foraging habitat for the species, well within their foraging home range from two SPAs for which marsh harrier is a qualifying species. The species also nests in the SSSI within the Order Limits. I believe the applicant is likely to have overlooked functionally linked land for marsh harrier in their HRA.	The Applicant refers to their response to SEAS Relevant Representation on this point on page 322 of Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA (Clean).

Reference	Matter	Point Raised	Applicant's Comments
N/A	Nightjar Surveys	I also maintain my view from January's OFH that the applicant has not undertaken the most appropriate surveys for nightjars, with no acoustic recorder surveys carried out. Since a paper published over 10 years ago (Zwart et al 2013), it has been demonstrated that acoustic surveys are much more effective than traditional observer surveys, and I believe the surveys are therefore insufficient, given nightjar is a key Qualifying species of the adjacent Sandlings SPA, and are known to forage on grassland habitats across a wider area.	The Applicant notes that no organisation other than Dr Denny/SEAS has identified a need for such surveys, including Natural England, the local planning authorities, or RSPB.
	Red-throated diver disturbance impacts	Lastly, there remains disagreement over the issue of red-throated diver disturbance impacts, and for good reason. The Outer Thames Estuary supports 16% of the European wintering population, more than any other site in Europe. Statutory and non-statutory NGOs all say the offshore works will result in significant disturbance, but this has been continually refuted by the applicant. Is it not time for them to acknowledge there is too much uncertainty in this case, and to apply for a Derogation Order for this predicted residual impact?	To address any in-combination effects the Applicant has included activities requested by both NE and the JNCC, within the seasonal restriction, and this was reflected in the Red-throated Diver Protocol [REP6-090] and Habitats Regulations Assessment [REP6-050] submitted at Deadline 6. These measures avoid and/or mitigate any potential impacts on Red-throated Diver.
	Conclusion	In conclusion, the applicant needs to acknowledge the limitations of their ecological surveys, assessments and proposed mitigation. It is clear an underprepared, insufficient DCO application has been submitted, and we urge the Examiners to recognise this and continue to press the applicant on the above points, amongst others.	See detailed responses above.

73. Applicant’s Comments on the Submission from CPRE Kent

73.1 Introduction

- 73.1.1
- Table 73.1 summarises the Applicant’s comments on CPRE Kent Deadline 6 Response [REP6-238] comments on the RIES.
- 73.1.2
- The Applicant’s has responded to CPRE Kent Deadline 6 Response [REP6-259] in **Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions**.

Table 73.1 Applicant’s Comments on CPRE Kent Deadline 6 Submission [REP6-238]

Reference	Matter	Point Raised	Applicant’s Comments
Comments on the Report on the Implications for European Sites (RIES) at Deadline 6			
n/a	n/a	In terms of our substantive response, we welcome the Examining Authority’s observation at ISH3 that it is “not convinced” the Applicant has demonstrated that all residual impacts are those that cannot be avoided, reduced or mitigated. In CPRE Kent’s view, the scale of unresolved issues at this very late stage in the examination process only serves to reinforces the point we have made from the outset, namely Pegwell Bay is clearly the wrong landfall location. In this respect, it remains our clear view that the scheme failed at the first and most important stage of the mitigation hierarchy, namely avoidance. Instead, the Applicant is still trying to patch fundamental evidential and design flaws at the end of the examination, rather than demonstrating that the scheme was genuinely shaped by avoidance from the outset. We note however the ExA’s have a particular concern that the Applicant’s approach to in-combination effects has been too narrow. In this respect, we again wholeheartedly agree. Whilst much of the ExA’s concerns on this point are seemingly directed towards the Suffolk end of the scheme, we would strongly argue the same issue clearly applies in Kent. As we, KWT and others have continually pointed out, the Nemo Link has already disturbed the Thanet Coast and Sandwich Bay SPA and Ramsar, and the Thanet Coast SAC, through open-cut trenching of intertidal mudflats and saltmarsh habitats. Sea Link would obviously impose further pressure in the same location, as obviously would the reasonably foreseeable Aberdeenshire to Richborough project (with the fact this project has been omitted from the cumulative impact assessment indefensible in our view). In this respect, we would strongly agree with KWT and others that neither a lawful or precautionary approach to the assessment of cumulative impacts has been taken. Overall, it remains CPRE Kents strong view that the mitigation hierarchy has not been properly met. The scheme has not sort to avoid harm but is instead still trying to make a clearly unsuitable landfall location work.	The Applicant has ensured that all significant residual effects have been subject to consideration of the mitigation hierarchy, and has provided evidence of this in response to the ExA’s WQ3 3GEN1 in both 9.136 Applicant’s Responses to Third Written Questions and 9.136.1 Applicant’s Responses to Third Written Questions - Appendices. The Applicant has properly applied the mitigation hierarchy from the outset of the design for the Proposed Project. CPRE Kent’s disagreement with the choice of landfall at Pegwell Bay is noted, but the fact remains that the Applicant has fully considered alternative options for siting the Kent landfall as detailed in Application Document 6.2.1.3 Part 1 Introduction Chapter 3 Main Alternatives Considered [APP-044] and Application Document 8.1 Corridor Preliminary Routeing and Substation Siting study (October 2022) [APP-368]. In any event, the suggestion that avoidance has not been demonstrated is wrong – measures such as trenchless construction methods demonstrate precisely the design choices the Applicant has made to avoid direct contact with habitats. Cumulative impacts have been fully addressed in Application Document 6.2.3.13 Part 3 Kent Chapter 13 Kent Onshore Scheme Inter-Project Cumulative Impacts [APP-073] and the precautionary principle has been given full effect. CPRE Kent’s comments in relation to the Nemo Link project noted – the Applicant emphasises that is a separate project. In any event, as explained at ISH2, the Applicant has not identified any residual impacts associated with Nemo Link have affected the impact assessment for this Proposed Project. As for the ‘reasonably foreseeable Aberdeenshire to Richborough project’, the Applicant reiterates that there are currently no NGET plans for further cabling at Pegwell Bay. In such circumstances, there is no sufficiently reliable information on which any satisfactory assessment can be conducted.

Reference	Matter	Point Raised	Applicant's Comments
RIESQ3	Sandwich Bay SAC: trenchless landfall techniques	CPRE Kent completely agree with the point made by KWT that, as HDD is clearly being relied upon as mitigation measure, it was incorrect to screen out likely significant effects at the screening stage. Further, as we and others have continually pointed out, there is an obvious and very real risk that if trenchless methods fail the applicant will simply just seek a post-consent change to open-cut trenching. Against that context, we agree with KWT that the Order must be completely clear that open-cut trenching through saltmarsh or any other irreplaceable habitat cannot be permitted under any circumstances, including by way of any post-consent change. Requirement 16 should therefore be strengthened so that, if no feasible trenchless solution can be delivered at Pegwell Bay, the project does not proceed at this landfall location without a proper consideration of alternative happening first. Without such stronger wording and without assessment of the true worst case, a conclusion of no likely significant effect can not be maintained.	The Applicant confirms that following recommended edits received from the ExA on the 17th April 2026 with regards to the DCO and DML [The Examining Authority's schedule of changes to the draft development consent order (dDCO)], these updates have been applied to Requirement 16 and also DML Condition 10 at Deadline 7.
RIESQ7	Stodmarsh SPA / Ramsar: loss of FLL for hen harrier	Whilst CPRE Kent have not previously commented upon this issue, we nonetheless surprised to learn that species-specific survey work has not been conducted with respect to Hen Harriers given the proximity of the Stodmarsh SPA. Against this context, we cannot see how a conclusion of no likely significant effect can be made so look forward to seeing Natural England's response/may seek to comment further.	In Natural England's response to the ExAs RIES submitted at D6 the Applicant notes that they agree with the Applicant's conclusion of no likely significant effect for loss of functionally linked land for Stodmarsh SPA hen harrier.
ID 3.3.19	HDD failure risk at Pegwell Bay	We again repeat our point made at ID 2.3.7 above that If HDD and other trenchless methods fail, the scheme should simply not proceed at this location.	See comment above.
ID 3.3.23	golden plover mitigation site	Whilst we welcome the ExA summarising the concerns have consistently made regarding the completely ineffectual golden plover mitigation land with the RIES, we still cannot agree the proposed mitigation will truly replace the function of the existing land. Accordingly, CPRE Kent remains utterly unconvinced that the proposed mitigation land has been shown to be suitable or functionally equivalent to the land that would be lost.	Refer to the Applicant's response in Application Document 9.34.5 Applicant's Responses to Selected Relevant Representation Responses [REP1-115], specifically the Relevant Representation of CPRE. The wording of the management prescriptions for the golden plover mitigation land in the Kent oLEMP has been amended for D7 to address Natural England's comments about clarity and certainty of commitments.

74. Applicant’s Comments on the Submission from Joint Nature Conservation Committee

74.1 Introduction

- 74.1.1
- Table 74.1 summarises the Applicant’s comments on Joint Nature Conservation Committee Deadline 6 Response [REP6-239].
- 74.1.2
- The Applicant’s has responded to Joint Nature Conservation Committee Deadline 6 Response [REP6-264] in **Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions.**

Table 74.1 Applicant’s Comments on Joint Nature Conservation Committee Deadline 6 Submission [REP6-239]

Reference	Matter	Point Raised	Applicant’s Comments
Ornithology			
1.1 EN020026-002997 - Report on the Implications for European Sites	RIESQ31 (page 84) – The applicant has extended the seasonal restriction to include non-emergency operation and maintenance activities and secured this in the RedThroated Diver Protocol. Subject to discussion on extending the restriction to the 2km buffer, does this address your concerns on this matter. If not, explain what further measures you consider are needed.	Yes. JNCC are content with the inclusion of non-emergency operation and maintenance activities within the seasonal restriction.	The Applicant has extended the seasonal restriction to include a 2 km buffer around the Outer Thames Estuary SPA, as well as including routine operation and maintenance activities within the seasonal restriction for this site and the 2 km buffer. This was reflected in the Red-throated Diver Protocol [REP6-090] and Habitats Regulations Assessment [REP6-050] submitted at Deadline 6. The Applicant notes that the JNCC are content that this addresses any concerns.
	RIESQ34 (Page 91) - Comment on the applicant’s responses regarding its in-combination assessment for red throated diver. Does the JNCC consider an adverse effect on integrity (AEol) can be excluded from in-combination effects?	JNCC are content that AEol can be ruled out, alone and in-combination with other plans and projects. This is considering the full seasonal restriction on the cable burial activities and non-emergency operation and maintenance activities. This conclusion is also on the basis that the pre-lay grapnel activities comprise of slow-moving vessels and largely overlaps with high traffic shipping routes, and therefore will limit disturbance to red-throated diver to a minimum (Burger et al, 2019).	The Applicant has included routine operation and maintenance activities, as well as the pre-lay grapnel run, within the seasonal restriction for the Outer Thames Estuary SPA plus 2 km buffer. This was reflected in the Red-throated Diver Protocol [REP6-090] and Habitats Regulations Assessment [REP6-050] submitted at Deadline 6. The Applicant notes that the JNCC are content that AEol can be ruled out, alone and in-combination with other plans and projects.
1.2	EN020026-002853-7.8 (B) Red Throated Diver Protocol	JNCC welcome the additional proposed seasonal restrictions on the non-emergency operation and maintenance works proposed in the Red-throated Diver Protocol to reduce disturbance to red-throated diver.	The Applicant notes the JNCC comments.
1.3	EN020026-002914-6.6 (G) Habitats Regulations Assessment	JNCC reiterate that we do not consider that the Habitats Regulations Assessment (HRA) currently performs a robust in-combination assessment, and that our previous comments [REP3-090] on the assessment have not been incorporated. In our view, the sum total of potential impacts and the implications of this for conclusions of Adverse Effect on Integrity have not been sufficiently considered. However, given the commitments made by the project, we do not	To address any in-combination effects the Applicant has included routine operation and maintenance activities, as well as the pre-lay grapnel run, within the seasonal restriction for the Outer Thames Estuary SPA plus 2 km buffer.,This was reflected in the Red-throated Diver Protocol [REP6-090] and Habitats Regulations Assessment [REP6-050] submitted at Deadline 6.

Reference	Matter	Point Raised	Applicant’s Comments
		consider this to make a material difference to the conclusions of the assessment.	The Applicant also notes that the JNCC are content that AEol can be ruled out, alone and in-combination with other plans and projects.
Marine Mammals			
2.1 EN020026-002997 - Report on the Implications for European Sites	RIESQ13: Comment on the applicant’s updates to the in-combination assessment. Are you satisfied that AEol of the Southern North Sea SAC can be excluded from in-combination effects of underwater noise to harbour porpoise.	After review of the HRA, JNCC have no issues with the project alone assessment – using the Effective Deterrence Range (EDR) method, the project will not exceed the noise thresholds for the Southern North Sea SAC. For the in-combination assessment, each project has been assessed individually against the proposed development, but the impact of all projects that might occur on any one day has not been assessed. Given that the proposed project shall add a minimal amount of noise to the daily footprint, JNCC are content with this approach in this instance, although we recommend the developer join the Developers Coordination Forum to ensure that the daily threshold is not breached. However, we advise the seasonal threshold should be assessed in-combination with other projects using the appropriate EDR for each project. For most projects involving impulsive noise, this has been stated in the Report to Inform HRA (RIHRA), with the exception of Five Estuaries Offshore Windfarm. Based on the information provided, the EDR that could be applied for this project is 11km on the basis that noise abatement is to be used (JNCC, 2025). In addition, several of the windfarm projects discussed have made no mention of piling, even if said project was in the construction phase. Given the prevalence of piling in windfarm construction, this should be clarified, and if it is not required for a project, this should be clearly stated.	The Applicant confirms that an update was made to Application Document 6.6 (H) Habitats Regulations Assessment Report (Tracked) [REP6-051] submitted at Deadline 6 to include ALL projects with potential in-combination effects from underwater sound in relation to the Southern North Sea SAC. The assessment, which considered the WCS with EDR values of 20 km for offshore windfarm projects undertaking impact piling, found the daily threshold for the SNS SAC was exceeded, but the seasonal was not. During the updates it was understood that many of the offshore wind farm projects would be using noise abatement measures but in the absence of clear information on the final position for the many projects considered a WCS scenario was adopted for the assessment. The Applicant confirms that commitment (MM03) included in Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 7 has been updated following engagement with Natural England and JNCC. The revised commitment below reflects the following position received from Natural England and JNCC in an email to the Applicant dated 27/04/2026: NE and JNCC Position: <i>‘Based on the new information provided with regard to the in-combination assessment of underwater noise impacts on the Southern North Sea SAC and the management of those impacts, Natural England and JNCC are satisfied there will be no adverse effect on site integrity, provided the Applicants commitment to participate in and adhere to the Development Coordination Forum (DCF) is formally secured as a condition in the DCO/dML. This will support adherence with the noise management approach for this site and ensure the daily disturbance threshold is not breached. We also welcome the Applicants commitment to undertake SBP survey works during the summer period where practicable. We propose the following text for such a condition;</i> Updated commitment MM03 <i>No offshore construction or UXO removal may commence until the undertaker has provided confirmation to the MMO that they have begun participation in the Development Coordination forum. This participation must ~~not end until approved by~~ <u>continue until agreed with the MMO in consultation with the relevant Statutory Nature Conservation Bodies.</u></i> This is included in the following plans submitted at Deadline 7: • Application Document 7.5.2 (E)Outline Offshore Construction Environmental Management Plan and

Reference	Matter	Point Raised	Applicant's Comments
			• Application Document 7.5.11 (E) Outline Marine Mammal Mitigation Plan. This commitment is secured via Condition 4(1)(b) of the DMLDCO Schedule 3, Requirement 6 Offshore Construction Environmental Management Plan and DCO Schedule 3 and Requirement 6 Marine Mammal Mitigation Plan.
	RIESQ35: The applicant, NE and the JNCC are requested to confirm whether the ExA's understanding of their positions is correct and to provide clarifications where requested with a question mark ('?') For the Southern North Sea SAC, clarification is required regarding JNCCs agreement with the conclusion of no adverse effect from underwater noise.	As stated in our response to RIESQ13, we recommend that a seasonal threshold assessment is carried out for the Southern North Sea SAC using the EDRs from the other developments with overlapping timescales of the proposed project. At present JNCC are unable to agree that there would be no adverse effect on the Southern North Sea SAC incombination with other plans or projects.	The Applicant confirms that an update was made to Application Document 6.6 (H) Habitats Regulations Assessment Report (Tracked) [REP6-051] submitted at Deadline 6 to include ALL projects with potential in-combination effects from underwater sound in relation to the Southern North Sea SAC. The assessment, which considered the WCS with EDR values of 20 km for offshore windfarm projects undertaking impact piling, found the daily threshold for the SNS SAC was exceeded, but the seasonal was not. The Applicant confirms that commitment (MM03) included in Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 7 has been updated following engagement with Natural England and JNCC. The revised commitment below reflects the following position received from Natural England and JNCC in an email to the Applicant dated 27/04/2026: NE and JNCC Position: <i>'Based on the new information provided with regard to the in-combination assessment of underwater noise impacts on the Southern North Sea SAC and the management of those impacts, Natural England and JNCC are satisfied there will be no adverse effect on site integrity, provided the Applicants commitment to participate in and adhere to the Development Coordination Forum (DCF) is formally secured as a condition in the DCO/dML. This will support adherence with the noise management approach for this site and ensure the daily disturbance threshold is not breached. We also welcome the Applicants commitment to undertake SBP survey works during the summer period where practicable. We propose the following text for such a condition;</i> Updated commitment MM03 <i>No offshore construction or UXO removal may commence until the undertaker has provided confirmation to the MMO that they have begun participation in the Development Coordination forum. This participation must ~~not end until approved by~~ <u>continue until agreed with the MMO in consultation with the relevant Statutory Nature Conservation Bodies.</u></i> This is included in the following plans submitted at Deadline 7: • Application Document 7.5.2 (E) Outline Offshore Construction Environmental Management Plan and • Application Document 7.5.11 (E) Outline Marine Mammal Mitigation Plan.

Reference	Matter	Point Raised	Applicant's Comments
			This commitment is secured via Condition 4(1)(b) of the DMLDCO Schedule 3, Requirement 6 Offshore Construction Environmental Management Plan and DCO Schedule 3 and Requirement 6 Marine Mammal Mitigation Plan.
2.2 EN020026-002857-6.2.4.4 (H) Part 4 Marine Chapter 4 Marine Mammals	Section 4.4 Approach and Methodology:	Paragraph 4.4.4: JNCC note that the baseline data sources now include a number of additional sources to the SCAN IV data, including the Marine Mammal Management Units, Sea Watch Foundation, and relevant survey reports and journals. JNCC agree with these additional sources being used and note that our comments from the Relevant Representations (dated June 2025) have been acted upon.	Noted. Issue resolved.
	Section 4.8 Proposed project design and embedded mitigation	Reference is made to vessels complying with the International Regulations for Preventing Collisions at Sea 1972 (International Maritime Organisation, 1972), Regulation 10 of which provides guidance relating to vessel speed to reduce the risk of collision with other vessels. We note the explanation as to how this will be beneficial to marine mammals and welcome the inclusion of this.	Noted. Issue resolved.
	Section 4.9 Paragraph 4.9.49	JNCC agree that cetaceans do not need to be considered further for the airborne sound and visual disturbance impact as their primary sense is hearing. We defer to Natural England for impacts relating to pinnipeds.	Noted. Issue resolved.
	Section 4.11 Transboundary effects	We agree that owing to the nearest international border being 25km away (which is greater than any EDR), transboundary impacts for marine mammal species are unlikely.	Noted. Issue resolved.
2.3 EN020026-002465-7.5.11 (C) Outline Marine Mammal Mitigation Plan.	Volume 7 – Marine Mammal Mitigation Plan:	Paragraph 1.5.2 highlights guidance for managing disturbance within the Southern North Sea SAC (JNCC, 2020) as a measure included in Application Document 7.5.3.1 Construction Environmental Management Plan (CEMP) Appendix A, Outline Code of Construction Practice. However, it is not clear how this guidance has been considered within this mitigation plan (or the CEMP other than saying it will be adhered to). Please see previous comments regarding this guidance and proposed measures for red throated divers.	The Applicant has included the following commitment (MM02) adherence to JNCC guidance for assessing the significance of noise disturbance against conservation objectives of the SNS SAC (JNCC, 2020; JNCC, 2025c) in Application Document 7.5.11 (E) Outline Marine Mammal Mitigation Plan . This commitment MM02 is also included as a commitment in Application Document 7.5.2 (E) Outline Offshore Construction Environmental Management Plan and Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) all submitted at Deadline 7. Under this commitment, the Applicant is required to ensure all survey and UXO removal activities adhere to and are completed in accordance with the JNCC guidance for minimising risk of injury to marine mammals through the measures listed in Application Document 7.5.11 (E) Outline Marine Mammal Mitigation Plan under Section 1.8 Mitigation Measures to be Implemented.

75. Applicant’s Comments on the Submission from Natural England

75.1 Introduction

75.1.1	Table 75.1 summarises the Applicant’s comments on Natural England Deadline 6 Response [REP6-251] – Cover Letter.
75.1.2	Table 75.2 summarises the Applicant’s comments on Natural England Deadline 6 Response [REP6-242] – Appendix A6 Additional Comments on Suffolk Onshore Ecology.
75.1.3	Table 75.3 summarises the Applicant’s comments on Natural England Deadline 6 Response [REP6-243] – Appendix B6 Additional Comments on the Kent Onshore Aspects.
75.1.4	Table 75.4 summarises the Applicant’s comments on Natural England Deadline 6 Response [REP6-244] – Appendix D6 Additional Comments on Marine Physical Environment.
75.1.5	Table 75.5 summarises the Applicant’s comments on Natural England Deadline 6 Response [REP6-245] – Appendix E6 Additional Comments on Intertidal and Benthic Ecology Advice.
75.1.6	Table 75.6 summarises the Applicant’s comments on Natural England Deadline 6 Response [REP6-246] – Appendix F6 Additional Comments on Marine Mammals.
75.1.7	Table 75.7 summarises the Applicant’s comments on Natural England Deadline 6 Response [REP6-247] – Appendix G6 Additional Comments on Offshore Ornithology.
75.1.8	Table 75.8 summarises the Applicant’s comments on Natural England Deadline 6 Response [REP6-248] – Appendix H6 Additional Comments on the Suffolk LVIA

75.1.9	Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments

Table 1: Natural England’s Advice On: LVIA

Document reviewed: [REP5-137] 9.124 Landscape and Visual Nighttime Assessment

	Natural England notes that the viewpoints included do not include viewpoints within the Suffolk and Essex Heaths Protected Landscape and therefore does not fall within Natural England’s remit. Should viewpoint regarding impact within the National Landscape or its setting be submitted we would be pleased to comment.	Comment acknowledged.

Table 2: Natural England’s Advice on LVIA

Document reviewed: [REP5-135] 9.123 Applicant's Responses to Second Written Questions

	Natural England notes that the responses from the Applicant regarding Landscape Matters largely reiterate comments made in REP5-132 9.121 Applicant's Comments on Other Submissions Received at Deadline 4. Natural England have provided detailed comments for REP5-132 included below and consider these are equally applicable to Landscape and Visual matters within REP5-135. Natural England provided a detailed response at Deadline 4, Appendix H4 [REP4-194]. We confirm that we have thoroughly reviewed the numerous references to prior documents in forming our conclusions, that the matter remains unresolved.	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document.

Table 3: Natural England’s Advice on LVIA

Documents reviewed: [REP5-131] 9.119 Applicant's Comments on Late Responses to ExA First Written Questions

75.1.9	Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
1 – 1LVIA 7		National Landscape (NL) duty Provide your comments on Document 9.47 NL Duty Section 85 Duty Technical Note [REP1 120], including the approach to the s85 duty, the natural beauty indicators in table 3.2 and the special qualities indicators in table 3.3 and the cumulative effects on the NL in section 4 and tables 4.1 and 4.2. In your response include consideration of whether the extent and nature of the preferred area of acid grassland on plate 3.2 of [REP1-120] is sufficient and the appropriateness of the maintenance period of 10 years.	Natural England notes that the Applicant has not provided a specific response to LVIA matters in this submission and refers to REP5-132 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 for this issue. Please see our detailed comments to REP5-132 below	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document.

Table 4: Natural England’s Advice on LVIA

Documents reviewed: [REP5-132] 9.121 Applicant's Comments on Other Submissions Received at Deadline 4

1 (Table 5.1)	Natural England advise that information to understand the fertility status of the 6ha area is needed, in addition to any further necessary mitigation. It is not clear how our comments have been addressed. The Applicant refers back to REP2-014 (section 2.3), REP3-064 (Table 15.1, points 9–15), with additional information provided in REP4-241 (Table 3.1, point 6). These documents affirm the Applicants position thatproviding the additional information is not needed . <i>. 'Some movement of nutrients may occur but the refined area for habitat restoration is existing degraded acid grassland, and most is approximately 200 m south of the pig farm. Given the under-managed and bracken and gorse invaded nature of the degraded acid grassland there is considerable opportunity for enhancement in quality by introducing appropriate management. Given that reversion of former arable land is no longer proposed but instead existing degraded acid grassland, generally, further from the pig farm, will be restored by improved management</i>	Natural England continues to advise that understanding the soil pH is needed to provide a robust evidence base to support the proposals for 6ha acid grassland enhancement. The project is relying on acid grassland enhancement to compensate for loss of 7.5ha of grassland through open trenching. Natural England notes the Applicant states there is no requirement for pH testing or fertility assessment on the area of land proposed for acid grassland restoration because there is already acid grassland present, albeit in a degraded condition. For clarity our advice relates to the feasibility of restoring acid grassland to the intended condition given the presence of the nearby pig farm and agricultural operations, and the requirement to provide suitable baseline evidence. We advise that the influencing factors of the pig farm and land use (on the Ph of the soil for example) may restrict the project’s ability to retore acid grassland as stated. This is therefore a risk to stated outcomes. The fact that the management is limited to 10 years is a further limiting factor. In addition, it is unclear if the rotation regime will include movement of the pigs in closer proximity to the 6ha area during the 10-year period. It remains unclear why the acid grassland enhancement cannot be secured for the lifetime of the project and what the intended use of this area of land will be post the ten-year period.	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document and in Application Document 9.153 Applicant’s Response to the ExA’s Rule 17 Letter submitted at Deadline 7. Moreover, the Suffolk oLEMP submitted at Deadline 7 has included (in Section 5) a commitment to confirming the pH of the enhancement area, a discussion of the baseline situation and how the management proposals will enhance opportunities for wildlife including that already present, and to discuss the way in which the adjacent farming operation has been taken into account in devising the management measures and how the enhancement can be delivered despite the adjacent farming operation.

75.1.9	Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
			A clear management plan including baseline status and objectives should be provided and secured in the oLEMP with contingency measures should acid grassland enhancement not proceed as expected. Furthermore, it appears that the 6ha contains deciduous woodland and additional habitat of biodiversity value, which should not be carefully considered by the proposals.	
2 (Table 15.5 Ref 2)	The following is included as a key issue as the project is relying on the success of restored acid grassland for direct impacts to acid grassland habitats within the Protected Landscape. Natural England continue to advise that additional evidence is required regarding the baseline habitat type of this area (a portion of which appears to be deciduous woodland priority habitat). Information regarding soil pH and influencing factors such as the adjacent agricultural land use have not been evidenced. The applicant refers back to Evidence regarding the baseline habitat type, soil pH, the adjacent agricultural land use and reasoning for the 10-year commitment should be referred to within Table 15.1 contained in Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]. Further information on the adjacent agricultural land use is also referred to within AP44 contained in Application Document 9.90 (A) Applicant’s Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4 086].	Please see comments above (ref table 15.1) for Natural England advice on this matter In addition, AP44 is referenced which again does not provide further clarification on the influencing factors of the adjacent pig farm and agricultural practices.	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document.	
3 (Table 15.5 Ref 2 (cont’d))	It is not clear how the 10-year management plan would be sufficient to provide the stated gains, either on ecological grounds or Landscape and Visual. This is a clear risk to the efficacy of compensation. Furthermore, the pre-commencement management of this area does not appear to be substantiated in the LEMP or Plate 3.2 within Document 9.47 [REP1120].	This matter has not been addressed in the document	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document.	
4 (Table 15.5 Ref 2 (cont’d))	The table appears to contain conflicting advice as follows: <i>resulting in no significant adverse effects on the SECHNL at any project stage for the Proposed Project alone or at operation cumulatively. A temporary significant adverse cumulative effect is reported, and all mitigation options have been explored.</i>	Clarification as a temporary significant effect has been identified. The first stage of the mitigation Hierarchy is avoidance, and we continue to advise that the applicant has not provided a clear justification as to why sensitive habitats within the Protected landscape cannot be traversed via trenchless techniques.	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document. Further information on the application of the mitigation hierarchy has been referred to within the response to 3GEN1 contained within Appendix A of Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112].	

75.1.9	Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
			This would demonstrate compliance with the mitigation hierarchy and mitigate in itself remaining concerns regarding the temporary nature of the landscape and visual impact extending into the operational stage should reinstatement in the location of the trenches fail, or contingency measures needed should the 6ha of acid grassland fail. Furthermore, this would be in line with the LURA duty for which the mitigation hierarchy should be applied at each stage. In addition, trenchless techniques would mitigate impacts to FLL associated with the Sandlings SPA.	
5 (Table 15.5 Ref 2 (cont'd)		Clarification is required of the term “multifunctional enhancements” for this area. This should be evidenced by a clear audit trail of impact, mitigation and as a last resort compensation with quantum provided for each impact. This is a requirement of the mitigation hierarchy. Enhancement is provided in addition to mitigation and compensation. Natural England consider open trenching to be a direct impact requiring compensation and we reiterate that this area would not be able to be considered for BNG as this must be secured for 30 years.	An explanation for the term multifunctional benefits does not appear to have been addressed by the applicant. <i>The acid grassland enhancement measures are considered to compensate for the short term and temporary cumulative effects and provide further enhancement for the SECHNLP within the operational phase of the Proposed Project (as set out in Plate 3.1 within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]).</i> Natural England reiterates that if the 6ha of land appears to be included to compensate for direct impacts to c.7.5 ha of acid grassland within the Protected Landscape then it is not clear how this can also be considered as an enhancement in particular as the duration of works is limited to 10 years. In addition, we note that the Applicant reaffirms their position that the acid grassland enhancement proposals are appropriate and proportionate to demonstrate compliance with the Section 85 duty. Therefore, the acid grassland appears to be compensation for acid grassland loss (albeit less than that being impacted ,7.5 ha with associated biodiversity loss). In addition, the area does not provide additional acid grassland as the area is already acid grassland habitat. Natural England advise that the audit trail explanation detailing how the 6ha area is also enhancement and demonstrates compliance with the Section 85 LURA remains outstanding.	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document.

75.1.9	Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
			We reiterate that in order to conserve the acid grassland trenchless techniques should be adopted. <i>Regarding this the applicant Refers to Table 15.1 of Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]. To use a trenchless technique along the small area of priority habitat acid grassland would involve extending the duration of works close to Sandlings SPA and Leiston-Aldeburgh SSSI. This is considered less desirable than the much shorter timescale of open trenching through the acid grassland.</i> This does not reflect the loss of 7.5 ha of acid grassland within the Protected Landscape, we have advised that we do not agree that the term small scale is appropriate and that the impact to the special qualities of the Protected Landscape as whole is appropriate. It is not clear how the time taken for the acid grassland to recover and risks involved compared with the extended works time to avoid impact is substantiated, in particular as HDD compound setup is to occur outside the breeding season.	
6 (Table 15.5, 3)		Natural England continues to advise that further evidence is required to support the assessment conclusions regarding significance of effect during construction. We have provided the following comments which should be clarified as part of the provision of further/updated evidence. A clear Assessment of impact on each Special Quality remains outstanding. Table A.1 (Appendix A Document 9.73.1) does not address each defining feature of the National Landscape and instead provides an overall assessment of impact. Narrative is not substantiated with audit/evidence for each feature. For example, the presence of the barge, landing operations, lighting, do not appear to have been considered within the assessment.	The applicant refers to Application Document 9.94 (A) Planning Statement Addendum [REP4-092] provides the Special Qualities Indicators baseline and further detail relating to the assessment of the sub-factors. The applicant also refers to Application Document 9.73.1 Applicant's Responses to First Written Questions – Appendices [REP3 070] for detail on how the sub-factors of the Natural Beauty Indicators have the potential to be affected by the Proposed Project. We note that the applicant maintains that the additional narrative demonstrates that the non-significant effects reported at construction and operation within the Environmental Statement for the SECHNL remains justified. We advise that although the sub- factors have been acknowledged (which we welcome) each subfactor remains within an overall assessment which lacks clarity on how each subfactor may be impacted. For example, Relative wildness includes a lack of human influence sub factor: It	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document.

75.1.9	Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
			remains unclear how machinery/lighting traffic/personnel associated with the construction works has been considered within this sub factor. The assessment continues to rely on the temporary nature of the impact to lessen significance (which may extend into operation) and the small scale of impact which is not appropriate as we have advised. We continue to advise that trenchless crossings should be further assessed. With regards to duration, it is Natural England's understanding that short term impacts include impacts up to one-year, medium term up to 5 years, with long term beyond 5 years. This needs to be clearly considered within the receiving landscape, considering how long habitats will take to recover, wider impacts within the affected area of the PL and how these can be minimised and how effective compensation is on the special qualities of the Protected Landscape	
7		It is not clear how impacts to the Heritage Coast have been considered. • Impacts on the setting of the National Landscape via open trenching have not been included. • The assessment cites the impact as small scale which is not appropriate. The impact must be considered on the special qualities of the National Landscape. • The assessment conclusions rely on the temporary nature of impact. The impact of open trenching may extend into the longer term. The conclusion requires justification and in addition how avoidance of impact has been considered. • It is not clear where compensation for significant cumulative impacts has been provided.	Regarding Heritage Coast The applicant refers 1LVIA11 within Application Document 9.73 Applicant's Responses to First Written Question [REP3-069] for reference however this does not reference Heritage coasts Natural England have noted the reference AP46 and AP47 within Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]. It would be helpful to provide a conclusion of effect on the Heritage Coast from impacts to the landfall area and associated works with specific regard to Heritage Coasts. We note that AP47 includes a conclusion and that this is based on short term impacts, but it would be helpful to cite the specific assessment material and evidence relating to this. Regarding setting the applicant refers to document Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097] and that setting, as an indirect effect, is addressed for each Natural Beauty Indicator where relevant. The justification for omitting impacts on the setting of the Natural Beauty indicators has not	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document.

75.1.9	Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
			been included, and it would be helpful to include the full of special qualities and subsets in this assessment, alongside the location of the evidence supporting the conclusions. The setting does not appear to be considered in Special Quality terms and indeed the conclusion is that: The construction activity affecting the AONB and its setting would be localised and the main activity of the laying of the HVDC cable is not considered to be dissimilar to typical agricultural machinery on arable fields and the seasonal disturbance of soils which is characteristic of arable land. There would be highly localised temporary adverse effects on scenic quality, natural heritage, tranquillity and wildness, both directly and indirectly, due to construction activity including limited vegetation loss, that indirect effects	

Table 75.9 Applicant’s Comments on Natural England Deadline 6 Submission [REP6-248] - Appendix H6 Additional Comments on the Suffolk LVIA – Annex 1
Natural England’s additional narrative around the LVIA outstanding issues provided ahead of Deadline 6

Advice	Narrative	Information Required	Applicant’s Comments
Table 1: Summary of outstanding concerns and advice			
<u>6 ha area:</u> We continue to advise that additional evidence is required regarding the baseline habitat type of this area (a portion of which appears to be deciduous woodland priority habitat). Information regarding soil pH and influencing factors such the adjacent agricultural land use, have not been evidenced.	Our advice relates to the feasibility of restoring acid grassland to the intended condition given the presence of the nearby pig farm and agricultural operations, and the requirement to provide suitable baseline evidence. The influencing factors of the pig farm and land use (on the pH of the soil for example, chemical drift, nutrient runoff) may restrict the project’s ability to retore acid grassland as stated. This is therefore a risk to stated outcomes. The fact that the management is limited to 10 years is a further limiting factor. In addition, it is unclear if the rotation regime will include movement of the pigs in closer proximity to the 6ha area during the 10-year period. We advise that the influencing factors of the pig farm and land use (on the Ph of the soil for example) may restrict the project’s ability to retore acid grassland as stated. This is therefore a risk to stated outcomes. The fact that the	The risks regarding the location of the proposed enhancement should be acknowledged and incorporated. They remain an unmitigated risk. Acknowledgement of existing biodiversity value of the area and how this will be maintained. Understanding the pH of the soil would help understand likely success of acid grassland restoration	Evidence regarding the baseline habitat type is presented within Table 15.1 at References 3 and 4 (pages 48-51) contained in Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]. This states that there is an area of woodland at the south of the parcel for enhancement, but the Applicant will not be affecting this habitat. The 6 ha area the Applicant will be enhancing is low quality as can be seen from structure of the vegetation (dense and tussocky) and gorse and bracken encroachment. The grassland to be restored/enhanced is primarily currently degraded acid grassland community U1b Festuca ovina-Agrostis capillaris-Rumex acetosella grassland. It is heavily bracken, gorse and scrub invaded in areas. Characteristic species are Agrostis capillaris (dominant)), Dactylis glomerata, Senecio jacobea, Galium aparine, Stellaria media, Montia, Rumex acetosella, and Pteridium aquilinum. The currently degraded nature is very clear from photos (in Table 15.1) (taken in winter but the degraded state is clear). Evidence regarding the soil pH is presented within Table 15.1 (Reference 1 on page 47) contained in Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]. This states that the Applicant is proposing

Advice	Narrative	Information Required	Applicant's Comments
	management is limited to 10 years is a further limiting factor as below.		restoration of 6 ha of existing degraded acid grassland (identified as such due to its botanical characteristics e.g. relict acid grassland species) within that parcel. Since this is already identified as acid grassland (albeit degraded) the pH of this area does not require testing, and we can confirm that the land has not been recently cultivated. The ability of this area to support acid grassland of a higher quality than the baseline does not require any further pH or soil analysis. Evidence regarding the adjacent agricultural land use should be referred to within Table 15.1 (Reference 2 on pages 47-48) contained in Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064] and within AP44 (page 34) contained in Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]. This states that some movement of nutrients may occur but the refined area for habitat restoration is existing degraded acid grassland, and most is approximately 200 m south of the pig farm. Given the under-managed and bracken and gorse invaded nature of the degraded acid grassland there is considerable opportunity for enhancement in quality by introducing appropriate management. Given that reversion of former arable land is no longer proposed but instead existing degraded acid grassland, generally further from the pig farm, will be restored by improved management and invasive species removal, it is considered that further information on soil fertility status or pig farm management is not required. It also states that the Applicant understands that the fields between the pig sheds to the north and the degraded acid grassland to the south are already used as part of the pig farm operations during a standard farming rotation, alternating with the cultivation of high value crops. Therefore, no change in farming practice is expected. The fact the acid grassland has been able to persist despite these operations, and that its degraded state is clearly due primarily to lack of management (e.g. bracken and gorse encroachment and a tall tussocky sward) indicates that the current farming operations to the north will not hinder ecological improvement of the sward through reintroduction of good management. It is possible the pigs will be moved into the fields north of the degraded acid grassland during the 10-year management period. However, in addition to the above comments that the currently degraded state of this grassland is primarily due to absence of management, since fields to the north of the acid grassland are already used to grow high value crops on a rotation. It should also be noted there is no slope from the fields to the acid grassland, and some parts of this grassland sit at a slightly higher elevation than

Advice	Narrative	Information Required	Applicant's Comments
			the fields to the north. Likelihood of significant runoff into the acid grassland is therefore low. However the Suffolk oLEMP submitted at D7 has included (in Section 5) a commitment to confirming the pH of the enhancement area, a discussion of the baseline situation and how the management proposals will enhance opportunities for wildlife including that already present, and to discuss the way in which the adjacent farming operation has been taken into account in devising the management measures and how the enhancement can be delivered despite the adjacent farming operation. Reasoning for the 10-year commitment should be referred to within Table 15.1 at Reference 5 (page 51) contained in Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]. This states that the impact is temporary because for most of the affected area, there will be a closed sward after 1-2 growing seasons, with perhaps 5 years (rather than 10 years) to match the existing grassland given even the small area of priority habitat is semi-improved. In the meantime, the Applicant will start restoring the degraded grassland before the existing grassland is lost to the Proposed Project. These timelines are set out in Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120].
<u>10 year management plan:</u> It is not clear how the 10 year management plan would be sufficient to provide the stated gains either on ecological grounds or Landscape and Visual. This is a clear risk to the efficacy of compensation. Furthermore, the pre-commencement management of this area does not appear to be substantiated in the LEMP or Plate 3.2 within Document 9.47	In addition it is unclear if the rotation regime will include movement of the pigs in closer proximity to the 6ha area during the 10 year period. When considering the time taken for directly affected habitats to establish and the limitations of the proposed area it is not clear how this area can be considered as enhancement. We again advise that employing trenchless techniques to avoid habitats should be adopted We note that the timescales involved in HDD and small area of acid grassland have been cited as a reason not to employ this technique. This does not reflect the loss of 7.5 ha of acid grassland within the Protected Landscape. We have advised that we do not agree that the term small scale is appropriate and that the impact to the special qualities of the Protected Landscape as whole is appropriate. It is not clear how the time taken for the acid grassland to recover with risks involved, compared with the extended	We again advise that employing trenchless techniques to avoid impacts to sensitive habitats should be adopted. This advice is in line with the mitigation hierarchy.	Regarding the comments around the pig rotation and adequacy of the 10-year management, this is addressed in the comments above relating to the matter '6 ha area' as this has been repeated. The Suffolk oLEMP submitted at D7 has included (in Section 5) a commitment to confirming the pH of the enhancement area, a discussion of the baseline situation and how the managemet proposals will enhance opportunities for wildlife including that already present, and to discuss the way in which the adjacent farming operation has been taken into account in devising the management measures and how the enhancement can be delivered despite the adjacent farming operation. Regarding the comments relating to timeframes, the responses to 'Temporary Nature' should be referred to below due to repetition. The Suffolk oLEMP (Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk [REP6-078]) states that the objective for this area will be to secure well-structured acid grassland with an increase in acid grassland indicator species over the baseline. The fact the acid grassland has been able to persist despite the presence of intensive agriculture to the north, and that its degraded state is clearly primarily due to lack of management (e.g. bracken and gorse encroachment and a tall tussocky sward) indicates that the current farming operations to the north will not hinder ecological improvement of the sward through

Advice	Narrative	Information Required	Applicant's Comments
	works time to avoid impact is substantiated.		reintroduction of good management. Simply controlling bracken and gorse encroachment and restoring a less tall and thick tussocky sward by introducing appropriate management will itself be an enhancement and can be accomplished within the first few years. The reasoning for open trenching should be referred to within Table 15.1 at Reference 13 (page 54) contained in Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]. This states that to HDD the small area of priority habitat acid grassland would involve extending the duration of works close to Sandlings SPA and Leiston-Aldeburgh SSSI. This was considered less desirable than the much shorter timescale of open trenching through the acid grassland. Trenchless methods are not appropriate for this location. Firstly, to adopt a trenchless method to avoid directly disturbing any acid grassland would involve prolonging the duration of the HDD and other works adjacent to Sandlings SPA and Leiston-Aldeburgh SSSI, both of which are disturbance-sensitive due to their nesting and wintering bird interest. This is not considered desirable or appropriate given the degraded semi-improved nature of the vast majority of the acid grassland to be affected by open trenching and the short total duration (several months) of the open trenching work. Secondly, in deciding whether a trenchless crossing methodology should be used to install the cables the following factors were considered: • Temporary land take – for high voltage cables, trenchless methods need much more land than open cut trenching due to the need for drive and receptor compounds and laydown areas. The Suffolk HDD compound provides an example of size; while any hedgerow HDD compound would be smaller, it would not be a great deal smaller. • Larger permanent easement - trenchless methods need to be installed at greater depths than open cut, which requires cables to be separated further from each other to avoid affecting electrical capacity. A wider easement is also needed to allow for any variation in the alignment during the installation process. • Longer programme – for high voltage cables, it generally takes much longer to HDD under a hedge than to open trench through it. Open cut trenching may take days to a week; HDD may take a month or more in each case, including compound set up and demobilisation. • Increased need for lighting - once an HDD drill starts it must continue until it is finished, meaning greater potential for night working than with open trenching.

Advice	Narrative	Information Required	Applicant's Comments
			Greater vehicle movements – trenchless construction requires additional vehicle movements due to the specialist plant and the need to service the drilling. These factors were all considered by the project ecologists. It was determined that the shorter disruption provided by open trenching was preferable and less disturbing overall to wildlife. Regarding pre-commencement management this should be referred to within Table 15.5 at Reference 2 (page 106) contained in Application Document 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-132]. This states that the oLEMP (Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk [REP6-078]) states within section 5.3 that the acid grassland enhancement land management would commence delivery prior to the loss of acid grassland east of Leiston Road. The Landscape and Ecological Management Plan (LEMP) must be substantially in accordance with the Outline LEMP – Suffolk, which is secured by Requirement 6 within Application Document 3.1 (G) draft Development Consent Order [REP4-217]. Regarding the use of the term ‘small-scale’ this should be referred to within Table 15.5 at Reference 3 (page 107) contained in Application Document 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-132]. This states that the Applicant notes that the sections of acid grassland that would be temporarily impacted to facilitate the construction activity of the Proposed Project within the SECHNL are described as being ‘small-scale’ within Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]. The description of 'small' relates to the proportion of acid grassland when considering the acid grassland cover within the SECHNL as a whole. The coverage of acid grassland within the SECHNL has been estimated to be 442.91 ha using a combination of project survey data (acid grassland on the Phase 1 Mapping) and ‘Priority Habitat Inventory – Lowland Dry Acid Grassland (England)’ layer on MAGIC.gov.uk. Whilst 7.61 hectares (ha) of acid grassland would be affected (equating to 1.72 % of the total area within the SECHNL), only 0.3 ha of this is priority habitat acid grassland. Further information on the application of the mitigation hierarchy has been referred to within the response to 3GEN1 contained within Appendix A of Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112].
<u>Multifunctional enhancements:</u> Clarification is required of the term multifunctional enhancements for this	The 6 ha acid grassland enhancement appears to be compensation for acid grassland loss (albeit less than that	Further information required: Detail regarding the targeted function of the 6ha area This should consider the existing	The existing biodiversity value will be enhanced by the improved management, as acknowledged (for example) by RSPB in their submissions into the DCO Examination. The Suffolk oLEMP

Advice	Narrative	Information Required	Applicant's Comments
area. This should be evidenced by a clear audit trail of impact, mitigation and as a last resort compensation with quantum provided for each impact. This is a requirement of the mitigation hierarchy. Enhancement is provided in addition to mitigation and compensation. We consider open trenching is a direct impact requiring compensation and reiterate that this area would not be able to be considered for BNG as this must be secured for 30 years.	being impacted, 7.5 ha with associated biodiversity loss). In addition, the area does not provide additional acid grassland as the area is already acid grassland habitat. The same 6ha area is also described as enhancement and also to further the purpose of the Protected Landscape.	biodiversity value of the site and how this will be conserved, alongside risks of establishment of acid grassland and how this is mitigated. This area is described as compensation (required for impacts to 7.5 ha of acid grassland). An audit trail is required to demonstrate how the 6ha area will also provide enhancement and, in addition an explanation of how it is considered that the area of land which is provided to compensate for an impact to the habitats within the National Landscape can also further the purpose of the National Landscape.	submitted at D7 has included (in Section 5) a discussion of the baseline situation and how the management proposals will enhance opportunities for wildlife including that already present. As per the Suffolk oLEMP (Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk [REP6-078]) the restoration of good structure alone will provide nesting habitat for skylarks and foraging (and potentially nesting) habitat for woodlarks. The southern part of the parcel contains woodland; acid grassland adjacent to woodland can be particularly suitable for woodlarks. Regarding multifunctional enhancements and the targeted function of the 6 ha enhancement area this should be referred to within Table 3.2 (page 12) contained in Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120], Table 3.5 Reference 5 (page 37) contained in Application Document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241] and Table 15.5 at Reference 2 (page 106) contained in Application Document 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-132]. This details the relevance of the acid grassland enhancement works to each of the Natural Beauty Indicators. Whilst biodiversity is noted as part of the multifunctional enhancement within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120], this is considered separate to calculations of Biodiversity Net Gain which require 30 years. This states that since there will be a two-year lag-time following reinstatement before functional acid grassland is restored, and possibly a slightly longer time-period before all the grassland matures, a parcel of land has been identified in the Order Limits in which a 6 ha area of acid grassland would be enhanced and subsequently maintained for a 10 year period. This would provide a net enhancement of at least 6 ha with a further 4.05 ha of acid grassland which would be restored to a higher quality than its current condition. This also states that the Applicant during a meeting with Natural England on 22 January 2026 requested further clarity on what additional information was required regarding the multifunctional enhancement. This remains an outstanding action point for Natural England to address. Regarding compensation measures this should be referred to with reference to the ‘Compensation’ matter below as this comment has been repeated.

Advice	Narrative	Information Required	Applicant's Comments
			Further information on the application of the mitigation hierarchy has been referred to within the response to 3GEN1 contained within Appendix A of Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112] .
<u>Assessment of impact on each Special Quality remains outstanding:</u> Table A.1 does not address each defining feature of the Protected Landscape and instead provides an overall assessment of impact. Narrative is not substantiated with audit/evidence for each feature.	Although the sub- factors have been acknowledged in Table A.1 (REP3-070.) (which we welcome) each subfactor remains within an overall assessment which lacks clarity for the reader on how each subfactor has been considered For example, Relative wildness includes a lack of human influence sub factor: It remains unclear how machinery/lighting traffic/personnel associated with the construction works has been considered within This sub factor. The project therefore appears to impact this special quality but it is not clear how this will be mitigated or how consideration of this impact has led to the assessment conclusions. This is because the specific impacts are not clearly substantiated/assessed against sub factors with accompanying evidence used to reach conclusions.	Further information: Clear audit trail regarding how sub factors have been considered and any mitigation employed ton address impacts. The term “overall” does not provide clear narrative of how each factor has been considered and mitigated.	Regarding effects arising from the Proposed Project, Appendix A 1LVIA9 Natural Beauty Indicators and their Sub-Factors contained within Application Document 9.73.1 Applicant's Responses to First Written Questions – Appendices [REP3-070] and within Table 6.1 of Application Document 9.94 (A) Planning Statement Addendum [REP4-092] provides further detail on how the sub factors of the Natural Beauty and Special Quality Indicators have the potential to be affected by the Proposed Project. Further information can be found within Table 3.5 Reference 7 (page 38) contained in Application Document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241]. Regarding the Natural Beauty Indicators this states that this is a combination of information from Table 2.1 within Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097] with further clarity provided on the potential effects arising from the Suffolk Onshore Scheme for each of the sub factors listed within the LDA Design Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators V1.8 2016 document. This demonstrates that the non-significant effects reported within Table 2.1 of Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097] at construction and operation (and maintenance) remain justified. Regarding the Special Qualities Indicators, this states that the non-significant effects reported at construction and operation within the Environmental Statement for the SECHNL remains justified. Regarding inter-project cumulative effects, Appendix A 2LVIA10 Inter-project Cumulative Effects on the Sub-Factors of the Natural Beauty and Special Qualities Indicators of the National Landscape contained within Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendices [REP5-136] should be referred to. Further information can be found in relation to the answer to 2LVIA10 on page 21 within Application Document 9.123 Applicant's Responses to Second Written Question [REP5-135]. This states that this assessment on the sub-factors provides a greater level of detail and should be read in conjunction with the assessment on the Indicators provided within Tables 4.1 and 4.2 within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]. To note that this has been undertaken for the construction phase of the Proposed Project as once operational the Suffolk Onshore Scheme landfall and HVDC cable corridors would be fully reinstated thereby not giving rise to potential cumulative effects.

Advice	Narrative	Information Required	Applicant's Comments
			Regarding compensation measures this should be referred to with reference to the 'Compensation' matter below as this comment has been repeated. Further information on the application of the mitigation hierarchy has been referred to within the response to 3GEN1 contained within Appendix A of Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112].
<u>Small Scale Impact:</u> The assessment cites the impact as small scale which is not appropriate. The impact must be considered on the Special Qualities of the National Landscape	The small scale of impact is frequently cited alongside the quantum of the area affected compared to the Protected landscape as whole. We have advised that the impact should be considered on the Special Qualities of the receiving landscape i.e. considered as an impact to the Protected Landscape and how this first can be avoided.		Regarding the use of the term 'small-scale', this is addressed in the comments above in relation to the '10 year management plan' matter as this has been repeated. Further information on the application of the mitigation hierarchy has been referred to within the response to 3GEN1 contained within Appendix A of Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112].
<u>Temporary Nature:</u> Conclusions rely on the temporary nature of impact which is not clearly justified.	The assessment in Table A.1 (REP3-070.) continues to rely on the temporary nature of the impact to lessen significance (which may extend into beyond the stated short-term) , and the small scale of impact which is not appropriate as we have advised. For example, Visual Impacts in patterns of land cover he cable trench and associated vegetation removal will introduce a severing/scaring activity into the National Landscape and its setting. Reinstatement of the various habitats will take time as the habitats mature and therefore the impact will be experienced for both landscape character and visual impacts within the Protected Landscape and its setting until the habitats reinstate.	Clarity on timescales of construction and operation considering how long habitats will take to recover.	Regarding the timeframes for construction and reinstatement and the habitats affected by the route, these points are responded to within Application Document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241]. Regarding securing successful implementation, timing of the HVDC cable route and Suffolk landfall works within the SECHNL and timing considered in the assessment, this should be referred to with reference to H6 contained in Application Document 9.121.1 Applicant's Comments on Other Submissions Received at Deadline 4 - Appendix A [REP5-133]. Regarding the timing of works within the SECHNL, this is demonstrated in Plate 3.1 (page 9) relating to 'acid grassland within AONB temporarily affected for construction at Suffolk landfall and HVDC corridor' within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]. The proposed six-month Suffolk landfall works is also shown on Table 4.10 (page 29) within Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]. This states that regarding the timing considered in the assessment, the reinstatement of acid grassland is noted as taking comparatively longer to re-establish in the operational assessment (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]). As noted within the response to Appendix H3 Natural England's Advice on Suffolk LVIA [REP3-120] submission is provided in Application Document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241], the proposed process if reinstatement appears to be failing, is set out in

Advice	Narrative	Information Required	Applicant's Comments
			the Suffolk oLEMP (Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk [REP6-078]). There is a 5-year aftercare period during which it will become clear if reinstatement is failing. If it is, this would be rectified. The construction timeframes are set out within Table 4.10 in Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [AS-093]. This sets out that the HVDC cable route works for the entire Suffolk Onshore Scheme would last for approximately 2.75 years. However, the open cut cable installation typically requires long sections of trenching (typically 800 m – 1000 m) which can progress in good soils at +100 m per day, dropping to 10 m per day or less in challenging areas such as rock (Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [AS-093]). The enabling works and installation works for the Suffolk Landfall would last for a duration of approximately 6 months. These are considered to be the works of the Proposed Project related to the SECHNL and its setting. With regard to soil reinstatement, as noted in LV05 in the Register of Environmental Actions and Commitments (REAC) (Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]), subsoil and topsoil will be separated and stored to ensure no degradation in quality and reinstatement undertaken as soon as possible after completion of construction of each section/area of works. With regard to hedgerow reinstatement, the outline Landscape and Ecological Management Plan (oLEMP) (Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk [REP6-078]) notes that hedgerow reinstatement would commence within the first available planting season post construction and could be phased depending on the programme of HVDC construction. The influence of this on the magnitude of effect is acknowledged within the assessment of effects as this refers to hedgerow reinstatement which would take comparatively longer to re-establish than areas of agricultural land. Regarding reinstatement of other habitats, such as acid grassland, measures should be referred to within the oLEMP and Plate 3.1 within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120] which sets out the restoration timeframe relating to the acid grassland proposals. It should also be noted that the reinstatement would be subject to adaptive management as secured in 7.3 of the oLEMP (Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk [REP6-078]). The great majority of tree and woodland planting would be managed for the lifetime of the Proposed Project as all mitigation planting associated with the permanent access road, River Fromus bridge, Saxmundham

Advice	Narrative	Information Required	Applicant's Comments
			Converter Station and Friston Substation under Scenario 2 (substation is built as part of the Proposed Project) will be maintained for the lifetime of the asset.
<u>Heritage Coast:</u> It is not clear how impacts to the Heritage Coast have been considered.	The applicant refers 1LVIA11 within Application Document 9.73 Applicant's Responses to First Written Question [REP3-069] for reference however this does not reference Heritage coasts. Natural England have noted the reference AP46 and AP47 within Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]. Natural England have noted the reference AP46 and AP47 within Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1).	It would be helpful to provide a conclusion of effect on the Heritage Coast from impacts to the landfall area and associated works with specific regard to Heritage Coasts. We note that AP47 includes a conclusion and that this is based on short term impacts but it would be helpful to cite the specific assessment material and evidence relating to this.	Regarding the effects on the Suffolk Heritage Coast, the response to 1LVIA11 within Application Document 9.73 Applicant's Responses to First Written Question [REP3-069] should be referred to. AP46 and AP47 within Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086] should also be referred to. Regarding the short-term reference within AP47, this is demonstrated in Plate 3.1 (page 9) relating to 'acid grassland within AONB temporarily affected for construction at Suffolk landfall and HVDC corridor' within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]. This is also shown on Table 4.10 (page 29) within Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]. This states that The Suffolk Heritage Coast is defined and not designated. As set out in Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096], Heritage Coasts are protected and promoted by Natural England in association with local authorities. A proportion of the SECHNL is also defined as Suffolk Heritage Coast within the landscape and visual study area and the Suffolk Heritage Coast extends offshore. Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096] also sets out the additional objectives of the defined Heritage Coast, including "<i>conserving the environmental health and biodiversity of inshore waters and beaches, and to extend opportunities for recreational, educational, sporting and tourist activities that draw on, and are consistent with, the conservation of their natural beauty and the protection of their heritage features</i>". The adopted approach to the separate assessment of effects where differences on the Suffolk Heritage Coast and SECHNL was discussed in detail and agreed during pre-application thematic meetings with the Suffolk & Essex Coast & Heaths National Landscape Partnership as noted within Application Document 9.42 Draft Statement of Common Ground Between National Grid Electricity Transmission and the Suffolk & Essex Coast & Heaths National Landscape Partnership [REP1A-034]. This approach was also agreed with Suffolk County Council and East Suffolk Council (see Application Document 9.15 () Statement of Common Ground East Suffolk Council and Application Document 9.23 (B) Statement of Commond Ground Suffolk County Council [APP-329] respectively). Albeit noting that the Suffolk Heritage Coast is not designated, it was agreed as a worst case scenario to present the effects as those associated with the SECHNL due to the similarities in the baseline

Advice	Narrative	Information Required	Applicant's Comments
			conditions between the SECHNL and the Suffolk Heritage Coast and to identify separately where there would be differences in effect. Such differences comprise the area offshore due to direct effects at construction including from vessels. This is clearly explained within Section 2.1.2 - 2.1.4 in Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]. The rationale is provided within Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003] where the marine elements of the Proposed Project are detailed. The nearshore vessels and equipment are set out within Table 4.11. This includes consideration of effects on recreational activities and visual relationship during construction. The methodology adopted follows the approach for all other receptors in the landscape assessment (contained within Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]) and the evidence base is contained within paragraphs 1.1.8 to 1.1.11 within Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096]. There are no published documents which specifically identify the special character or qualities of the Suffolk Heritage Coast. Consequently, the Applicant has referred to the various landscape and seascape character documents that cover the area defined by the Suffolk Heritage Coast. These are set out in Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096] and include Suffolk Coastal Landscape Character Area D4: Thorpeness to Aldeburgh, Regional Seascape Character Type SCT 03: Nearshore Waters and Touching the Tide District Level Coastal Character Area Thorpeness to Aldeburgh Coast as well as relevant Natural Beauty Indicators for the National Landscape. There is no permanent infrastructure sited within the Heritage Coast or its setting. The only effects are associated with the construction of the landfall and HVDC cable corridor, which along with their reinstatement would result in short term, temporary and minor adverse, not significant effects. The Applicant therefore considers that the temporary nature of the Proposed Project's interface with the Heritage Coast is compatible with the special character.
<u>National Landscape:</u> Impacts on the setting of the National Landscape have not been included.	Table 2.1 APP097 is referenced for this assessment and that setting, as an indirect effect, is addressed for each Natural Beauty Indicator where relevant. However Natural England are unclear on how the assessment on impacts to setting has been approached, where this has been	Evidence base and audit trail including the justification for omitting impacts on the setting of the Natural Beauty indicators has not been included, and it would be helpful to include the full list of special qualities and subsets in this assessment, alongside the location of the evidence supporting the conclusions.	Regarding effects on the setting of the National Landscape this should be referred to within Table 15.5 at Reference 3 (page 107) contained in Application Document 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-132] and Table 3.5 Reference 8 (page 39) contained in Application Document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241]. This states that the Landscape and Visual chapter (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and

Advice	Narrative	Information Required	Applicant's Comments
	presented, and where the conclusions are presented.		Visual [APP-048]) refers to the ‘Development in the setting of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Position Statement’ document published by the Suffolk and Essex Coast and Heaths National Landscape Partnership (SECH Partnership) in 2015. This notes that the setting of the SECHNL is not fixed and it is specific to the development as to whether it would influence the Natural Beauty and Special Qualities Indicators of the SECHNL. Part of the Proposed Project is located within the SECHNL and the potential for significant adverse effects on the setting is very limited due to the temporary nature of the construction activity and the positioning of the Suffolk Converter Station site located away from the SECHNL to limit potential effects on the setting. The assessment therefore focuses on the direct effects with consideration of the setting with respect to indirect effects. As noted within the assessment contained within Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097] setting, as an indirect effect, is addressed for each Natural Beauty Indicator where relevant. The effects on the setting of the SECHNL are limited, especially at operation. During construction, effects on the setting would be restricted to intervisibility with the cable laying vessels at sea within the seaward setting to the east of the SECHNL and to the northwest of the SECHNL, where the open trench construction of the HVDC cable corridor would take place through the agricultural landscape. Effects on the natural beauty indicators which influence the setting include: A temporary effect on the scenic quality of the SECHNL related to offshore views from the coastline; A temporary effect on the relative wildness of the SECHNL relating to the introduction of elements of uncharacteristic machinery and noise; and A temporary effect on the relative tranquillity of the SECHNL relating to additional human activity, increased traffic along local roads and machinery. It should be noted that a request to separate out the assessment of the setting of the SECHNL has not been raised during the pre-application stage from any stakeholders, including Natural England and the National Landscape Partnership. It should also be noted that the site selected for the proposed Saxmundham Converter Station site was influenced by Scoping comments from Natural England to avoid effects on the setting of the SECHNL (Application Document 6.15 Scoping Opinion 2022 [APP-300]). It is noted in the assessment that construction activity associated with the Saxmundham Converter Station or Friston Substation (under Friston Scenario 2) is not likely to be perceptible from the SECHNL other than in a very localised area of the SECHNL (refer to representative viewpoint 18 assessment within Application

Advice	Narrative	Information Required	Applicant's Comments
			Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098] . It should also be noted that at 6.3.1.2 of the Local Impact Report <i>[REP1-128]</i> from East Suffolk Council, it is stated that "the <i>proposed converter station site lies to the east of the town and is detached from the setting of the National Landscape</i> ".
<u>Compensation:</u> It is not clear where compensation for significant cumulative impacts has been provided.		As above clear audit trail to show avoidance/mitigation and compensation measures	Regarding compensation this should be referred to within Table 15.5 at Reference 3 (page 108) contained in Application Document 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-132]. This states that the acid grassland enhancement measures are considered to compensate for the short term and temporary cumulative effects and provide further enhancement for the SECHNL within the operational phase of the Proposed Project (as set out in Plate 3.1 within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]). As a result of the ongoing dialogue between the Applicant, the Suffolk & Essex Coast & Heaths National Landscape Partnership (SECHNLP) and SCC the Applicant has drafted a s106 Unilateral Undertaking which outlines the Furthering The Purposes Compensation Fund which the Applicant has agreed to provide for the purpose of funding and delivering projects within the National Landscape. This was first issued to SECHNLP and SCC on 24 March 2026 and re-issued on 30 March 2026 incorporating comments received from SECHNLP. The Unilateral Undertaking will be submitted at Deadline 7. Further information on the application of the mitigation hierarchy has been referred to within the response to 3GEN1 contained within Appendix A of Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112].
75.1.10	Table 75.10 summarises the Applicant's comments on Natural England Deadline 6 Response [REP6-241 & REP6-250] – Comments on the Report on the Implications for European Sites (REIS). A further response is also provided within Application Document 9.153 Applicant's Response to Examining Authority Rule 17 Letter submitted at Deadline 7.		
75.1.11	Table 75.11 summarises the Applicant's comments on Natural England Deadline 6 Response [REP6-241 & REP6-250] - Comments on the Report on the Implications for European Sites (RIES) [PD-022] - ANNEX 1: EXA'S UNDERSTANDING OF POSITIONS AT POINT OF RIES PUBLICATION		
75.1.12	The Applicant's has responded to Natural England Deadline 6 Response [REP6-249] in Application Document 9.150 Applicant's Comments on Responses to Third Written Questions .		
75.1.13	The Applicant has responded to Natural England's Risk & Issues Log [REP-258] within Application Document 9.149.1 Applicant's Comments on Other Submissions Received at Deadline 6 - Appendix A and to Natural England's submitted at Deadline 7		

Table 75.1 Applicant's Comments on Natural England Deadline 6 Submission [REP6-251] – Cover Letter

Reference	Matter	Point Raised	Applicant's Comments
Cover Letter			

Reference	Matter	Point Raised	Applicant's Comments
Natural England's Deadline 6 Submissions	Appendix J at Deadline 6	Please note that we have not provided an Appendix J at Deadline 6 covering the issues raised for the Kent Intertidal. Despite reviewing all relevant/new information provided by the Applicant, no changes can be made to our previous advice and position as no material changes have been made to the application in line with our previous advice. Therefore, the remaining concerns in relation to the Kent Intertidal continue to be carried forward in the Risk and Issue Log (Tab J) submitted at Deadline 6. However, it is anticipated that our position on some issues may change following a meeting with the Applicant on 16th April 2026.	Please refer to Application Document 9.149.1 Applicant's Comments on Other Submissions Received at Deadline 6 - Appendix A
1	Further Engagement with the Applicant	Alongside our regular monthly meetings with the Applicant, we have also arranged a series of topic specific meetings with our relevant specialists throughout the beginning of April. These are to ensure engagement and opportunities for discussions around issue resolution and final positions as we approach the end of the examination period. However, this is predicated on provision of requested outstanding information/analysis. The meetings will centre around the keys topics where there is value in discussions and outstanding concerns including offshore ornithology, physical processes, benthic and intertidal ecology and LVIA. On the 26th of February 2026 Natural England had a general project update meeting with the Applicant to discuss outstanding issues. In our Cover Letter at Deadline 5 [REP5-214] we provided confirmation to the Applicant via email on the 6th March that Natural England would not expect further sediment modelling to be provided at this stage in Examination but provided some caveats to highlight the uncertainties around the lack of analysis. This advice was reiterated in our Deadline 5 response for completeness and to ensure transparency. We note from the Deadline 5 submission from the Applicant that they have decided to undertake the further sediment modelling which we welcome and will endeavour to review as soon as the information is available, recognising time constraints around the final deadline for the Examination timetable. For transparency, Natural England offered to assist the Applicant on 26th of February 2026 in acquiring the Reach et al 2013 paper to aid in providing the assessments that have been requested throughout examination. Unfortunately, due to the paper not being within the public domain we were unable to send the paper directly. We met with the Applicant to discuss offshore ornithological matters on the 1st April to aid the resolution of final outstanding issues. Updates on our position regarding marine ornithology matters can be found in Appendix G6. In addition to our submission to Deadline 6 Natural England has also provided a further narrative to the Applicant around our position regarding LVIA to aid understanding. This was sent ahead of the	The Applicant confirms that thematic meetings have been held during April, including a meeting on Offshore Ornithology on 1 April, a meeting on Physical Process on 14 April, a meeting on Intertidal & Benthic Ecology on 16 April and a meeting on Landscape and Visual on 21 April 2026. The results of these discussions have informed the Applicant detailed responses in the tables below.

Reference	Matter	Point Raised	Applicant's Comments
		Deadline via email to the Applicant on the 2nd April and can also be found as an Annex to Appendix H6 for completeness.	
2	Future commitments and wording within the DCO/DMLs	In terms of commitments to future consultation with the relevant SNCBs for various commitments, we wish to raise that the conditions within the DCO/DMLs should be concise and clear to avoid ambiguity. It is noted that in places it is stated that future consultation with the relevant SNCB's will be agreed "as appropriate". We wish to highlight that it is not appropriate for such commitments to be vague. (For example, please see [REP4-241] which suggests that contractor(s) would prepare a HDD landfall Method Statement and Drilling Fluid Management Plan in consultation with NE, KWT and the RSPB "as appropriate".)	The Applicant would again re-iterate that the following Condition in the dML secures Natural England as a consultee for all Offshore Outline Plans: <i>"4.—(1) The licensed activities or any part of those activities under Work No. 6, save for trial trenching, must not commence until the following plans in respect of those activities have been submitted to and approved in writing by the MMO, such approval to be within a period of six months from submission (in consultation with Natural England, the JNCC, MCA, the Environment Agency, PLA, Trinity House and Cefas)—"</i> The Applicant will however review the REAC commitments to strengthen where needed for Deadline 7.
2.1	Wording of the DCO	Natural England wishes to raise concern that the definition of "commence" has been amended and trial trenching has been specifically excluded from this definition on Page 6 Article 1 of the DCO and Page 189, Schedule 16 (Deemed Marine Licence (dML)), Condition 1 of REP5-006. We note from the schedule of changes that this change was made following discussion with marine stakeholders. We have no record of being consulted on this change. However, we have concerns that excluding trial trenching from the definition of commence could allow some impactful activities to be taken within the intertidal area without the need to submit the required mitigation plans and with no need for approvals. This is of particular concern to the works in the Pegwell Bay area. We note that without understanding of what is involved in trial-trenching it is difficult to advise on the full risk and potential for impact. Natural England also notes the further change to Schedule 16 Part 2 Condition 4 which confirms trial trenching will be excluded from the Cable Specification and Installation Plan. Natural England does not support the exclusion of trail trenches from the definition of commence. However, we do welcome the removal of offshore preparation works from the definition of commence and note this addresses our original concerns with this definition.	Due to Natural England's availability, the first thematic call for the Offshore Scheme during Examination was the 14 April 2026 where Trial Trenching was discussed. The Applicant confirms that a definition of Trial Trenching has been included within the dML at Deadline 7 and also within the Outline Cable Specification and Installation Plan, including its exclusion of use in Marine Protected Areas for benthic features at the request of Natural England.
2.2	Wording of the Register of Environmental Actions and Commitments (REAC)	Reference is made throughout Table 3.4 of REP5-118 to commitments being secured through Requirement 6 and the need to submit an Offshore Environmental Management Plan. However, Requirement 6 has no such plan listed, and it is Natural England's advice that as these matters relate to offshore works the appropriate enforcing body would be the MMO and therefore, they should be secured through condition within Schedule 16, of the dML. Additionally Natural England has raised concerns regarding the detailed mitigations within the REAC please see further detail in Appendices, D6 and E6. Natural England also notes that REP5-118 links to Requirement 5 and the Red-Throated Diver protocol in Requirement 5. While this	The Applicant confirms that the Securing Mechanism column in the Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 7 has been amended accordingly.

Reference	Matter	Point Raised	Applicant's Comments
		requirement and plan do exist; we again advise that that these mitigations should be located within Schedule 16 as it is an offshore mitigation plan.	
3	ISH Queries	Action Point 1 for all parties to “<i>Submit any suggested drafting (whether relating to matters raised in ExQ3 or not) which you consider should be included in the draft Development Consent Order (dDCO), with reasons why you consider it is necessary.</i>”: Natural England has provided a commentary on our outstanding issues within the draft DCO and associated documents. We have endeavoured to point to relevant examples of wording within existing DCOs. However, we defer to the MMO on the drafting of conditions within the dML and note that condition drafting is out with our statutory remit and responsibility.	Comment noted.
	ISH Queries	Action point 71 for the Applicant to “<i>Confirm with Natural England whether effects identified as likely to give rise to Adverse Effects on Integrity (AEol) can be ruled out before close of examination, or provide relevant information to inform a derogation case (for example, in respect of impacts on RTD due to emergency cable breaks/repairs) as required by NPS EN-1.</i>”: We note this action point and have agreed to a series of meetings with the Applicant where much of this may be covered. However, we also note that our response to the RIES Appendix A6 has further detail on our current position with regards to all designated sites (particularly within Annex 1 of Appendix A6).	This is noted by the Applicant. Please refer to detailed response to Appendix A6 below.
4	Minor Comments	Natural England also wishes to highlight that when using tracked changes in the updated versions of documents, that using a bright contrasting colour is best to ensure easy identification of changes. In the REAC [REP5-116] the colour of the tracked changes is a subtle green/grey that is easy to miss, particularly when reviewing the large volumes included within Examination.	This is noted by the Applicant

Table 75.2 Applicant’s Comments on Natural England Deadline 6 Submission [REP6-242] - Appendix A6 Additional Comments on Suffolk Onshore Ecology

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
Table 1: Natural England's advice on Suffolk Onshore Ecology Document reviewed: [REP6-078] 7.5.7.1 (D) Outline Landscape and Ecological Management Plan - Suffolk (Tracked Changes)			
5.3.1	Natural England notes the applicant has amended the text to state that acid grassland not being good quality does not meet the definition of Priority Habitat. We advise that if acid grassland is under-managed or		Noted. However, there are botanical criteria that separate priority habitat acid grassland from other types. For example, the UKHab survey manual explicitly separates the priority habitat acid grassland, which it classifies as ‘g1a lowland dry acid grassland’ from other acid grassland, which it classifies as ‘g1d other lowland acid grassland’. This is reflected in Natural England’s previous questions to the Applicant. For example, Natural England had previously stated to the Applicant that, ‘It is unclear what the quality of individual parcels are and

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
	inappropriately managed this will affect the quality of priority habitats, but they remain priority habitats		whether they are semi-improved acid grassland or priority habitat.' The Applicant submitted information to clarify that only 0.3 ha meets the botanical criteria for Priority Habitat. However, all acid grassland (irrespective of whether it meets the criteria for priority habitat) has been deemed a resource the temporary loss of which requires mitigation.

Table 2: Natural England's advice on Suffolk Onshore Ecology

Document reviewed: [REP6-050] 6.6 (H) Habitats Regulations Assessment Report (Tracked Changes)

5.2.7 & 5.2.8	Natural England notes the updated conclusions based on new information submitted by the Lion Link project for their Preliminary Environmental Impact Report.	n/a	Noted.
8.2	Natural England notes that Lion Link has been removed from the Suffolk Onshore Scheme in combination discussion due to the conclusions in section 5.2.8.	We advise that further information should be provided as above before cumulative onshore impacts between Sea Link and Lion Link can be ruled out. For example, potential impacts on Functionally Linked Land (FLL) between the projects has not been assessed.	Potential 'in combination' loss of functionally linked land between Sea Link and Lion Link has been assessed in paragraph 5.8 of Application Document 6.6 (H) Habitats Regulations Assessment Report [REP6-050] . Paragraphs 4.2.3 to 4.2.5 of the HRA notes that Natural England 2019 guidance on 'Impact Risk Zones for Sites of Special Scientific Interest Notified for Birds. Version 1.1' cites a maximum foraging distance of 2km beyond the SSSI boundary for heathland birds. LionLink has been screened out for 'in combination' effects with Sea Link because the LionLink scheme as amended for their Statutory Consultation is situated between 2.4 km and 11.4 km from Sandlings SPA. This is beyond the functionally-linked land zone around the SPA identified in Natural England guidance. Moreover, in the closest part of the Lion Link scheme footprint (where Sea Link and Lion Link overlap) the Proposed Project (Sea Link) has not recorded any evidence of SPA birds in two seasons of survey. Lion Link is approximately 1.6 km west (at its closest) of the fields outside the SPA that have been identified as being suitable for woodlark or nightjar due to their thin acid soils. Therefore, there is no longer any potential for 'in combination' effects between Sea Link and Lion Link on Sandlings SPA. While there is an interaction between Sea Link and Lion Link near Saxmundham, this is beyond the functionally-linked land around Sandlings SPA.
8.24	Natural England notes there is conflicting data regarding mitigation. The Applicant has stated that it is not relying on the 6ha of acid grassland in order to conclude no AEOL for Sandlings SPA, however this remains in the HRA and appears to support reasoning for the conclusion of No AEOL as follows: <i>"Moreover, aside from any value it may have for SPA birds, acid grassland is an important and scarce habitat in itself. Therefore, as part of the broader habitat mitigation proposals for the Proposed</i>	It is Natural England's understanding that the Applicant is not relying on the 6Ha grassland proposals in order to reach a conclusion of no AEOL. We advise that this should be removed in order to clarify what is being included as mitigation for direct and indirect impacts to FLL. Clarity regarding mitigation proposals as it is not how the proposals in 8.24 relates to impact pathways for FLL and the applicant's conclusions regarding acid grassland enhancement. These do not appear to be included in the commitments register. Does this refer to the 6ha acid grassland restoration area?	Reference to the enhancement of acid grassland was removed from the Application Document 6.6 (H) Habitats Regulations Assessment Report [REP6-050] to avoid confusion. Paragraphs 7.2.4 to 7.2.10 of the Application Document 6.6 (H) Habitats Regulations Assessment Report [REP6-050] regarding loss of functionally-linked land have been rewritten and further information added to make this clearer.

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
	<i>Project approximately 6 ha of acid grassland will be restored, enhanced and maintained for 10 years following creation/restoration.</i> <i>Research indicates that vegetation that is kept suitably short and open, particularly if bare areas are created within the sward, is likely to be used for foraging by both species and may be used by nesting by woodlark. Ex1.5.7Ex1.4.15 Therefore, it is considered that no AEoSI on the qualifying features of Sandlings SPA would arise from this impact pathway.</i> <i>In addition, we would welcome clarification on the following statement: "Temporary loss of functionally linked land for Sandlings SPA would arise from the Proposed Project through removal of acid grassland close to Sandlings SPA to enable the trenchless installation to be undertaken. This field would be occupied by surface construction infrastructure for approximately 6 months which would include the nightjar and woodlark nesting season. For the temporary duration of works this will be offset by leaving an area of arable land on sandy soils fallow and/or seeding it as acid grassland to be maintained for 10 years".</i>		
Ex1.4.13 7.2.5	FLL Extent of impact The quantity and location of acid grassland affected differs within the HRA. For example, Ex1.4.13 states that approximately 3.5 ha of acid grassland would be temporarily lost, whereas 7.2.5 reiterates that 3.5 ha of acid grassland and in addition: "a further area	The total of FLL lost should be 7.5. We continue to advise that clarity is required regarding the nature, location, quantity, timing and duration of all possible impacts to acid grassland FLL. Lack of clarity and inconsistency requires attention, and we wish to draw the ExA attention to an error in the REIS. Section 3.3.11states that "<u><i>The HRA Report [APP-090] acknowledged temporary loss of 3.5ha of acid grassland adjacent to Sandlings SPA</i></u>". It is Natural England's understanding that 7.5 Ha of FLL will be directly affected. We note and welcome that the ExA has requested additional Information	The Applicant can confirm that the correct areas were present in earlier versions of the HRA (REP4-057) but were inadvertently deleted from later versions. Application Document 6.6 (I) Habitats Regulations Assessment Report, submitted Deadline 7, has been updated to correctly cite the areas of affected functionally linked land (3.5ha east of Leiston Road and 4ha north of the golf course, totalling 7.5ha). This is also true of the Executive Summary of the HRA.

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
	(totalling approximately 4 ha) of acid grassland north of the golf course would also be temporarily removed while it is traversed by the cable trench". Therefore, the total should be 7.5 ha of FLL directly affected and consistently reported through the HRA. We continue to advise that clarity is required regarding the nature, location, quantity, timing and duration of all possible impacts to acid grassland FLL.	regarding impacts to FLL for the Sandlings SPA within Section 3.3.11	

Table 3: Natural England's advice on Suffolk Onshore Ecology

Document reviewed: [REP5-135] 9.123 Applicant's Responses to Second Written Questions

2LVIA5	The applicant states “The cable route in this area will be restored to the existing condition which will include restoration of acid grassland to a higher quality than its current quality, some scrub species and occasional trees.” Natural England advises that this sentence is not clear. Where the applicant states ‘restoration of acid grassland to a higher quality than its current quality’ does this refer to the 6ha mitigation/compensation land?If not then the sentence appears to contradict what has been stated elsewhere, for example, we note that 6.7.3 of the oLEMP states that, “<i>The success criteria for the restored areas of acid grassland will take account of the baseline condition.</i>”	The Applicant should clarify what is meant by restoration of acid grassland to a higher quality than its current quality. Furthermore, the commitments register should include contingency measures should reinstatement plans fail, or should reinstatement not be achievable within the timeframes stated. This is particularly important for acid grassland, and for this habitat, the commitments register should reflect the contingency measures described in 6.7.3 of the oLEMP	The Suffolk oLEMP (Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan- Suffolk [REP6-078]) states that the objective for this area will be to secure well-structured acid grassland with an increase in acid grassland indicator species over the baseline. The fact the acid grassland has been able to persist despite the presence of intensive agriculture to the north, and that its degraded state is clearly primarily due primarily to lack of management (e.g. bracken and gorse encroachment and a tall tussocky sward) indicates that the current farming operations to the north will not hinder ecological improvement of the sward through reintroduction of good management. Simply controlling bracken and gorse encroachment and restoring a less tall and thick tussocky sward by introducing appropriate management will itself be an enhancement and can be accomplished within the first few years. Since contingency measures are already referenced in the oLEMP and the oLEMP is secured by requirement with the final LEMP being in conformity with it, it is considered they don’t need specifically adding to the Application Document 9.84 Register of Environmental Actions and Commitments (REAC).

Table 4: Natural England's advice on Suffolk Onshore Ecology

Document reviewed: [REP5-131] 9.119 Applicant's Comments on Late Responses to ExA First Written Questions

1ECOL65	Natural England notes the applicant states there is no requirement for pH testing or fertility assessment on the area of land proposed for acid grassland restoration because there is already acid grassland present, albeit in a degraded	Natural England continues to advise that further information is needed to evidence the feasibility of successful restoration of acid grassland in the proposed location at the timescales suggested by the applicant. A clear Management Plan including baseline status and objectives should be provided. It appears that the 6ha contains deciduous	See ‘Applicant's Comments on Additional Narrative on LVIA and outstanding concerns from Natural England’. A separate management plan to the Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan- Suffolk [REP6-078] (and subsequently the LEMP) is not considered necessary.

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
	condition. We wish to clarify that our advice relates to the feasibility of restoring acid grassland to the intended condition given the presence of the nearby pig farm. We advise that the influencing factors of the pig farm and land use (on the pH of the soil for example) may restrict the project's ability to retore acid grassland as stated. This is therefore a risk to stated outcomes. The fact that the management is limited to 10 years is a further limiting factor. In addition, it is unclear if the rotation regime will include movement of the pigs in closer proximity to the 6ha area during the 10- year period. It remains unclear why the acid grassland reinstatement cannot be secured for the lifetime of the project and what the intended use of this area of land will be post the ten-year period. We advise that the influencing factors of the pig farm and land use may restrict the project's ability to retore acid grassland as stated. This is therefore a risk to stated outcomes. The fact that the management is limited to 10 years is a further limiting factor.	woodland and additional habitat of biodiversity value, which should not be deleteriously impacted by the proposals.	

Table 75.3 Applicant’s Comments on Natural England Deadline 6 Submission [REP6-243] - Appendix B6 Additional Comments on the Kent Onshore Aspects

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
Table 1. Natural England’s Advice On: [REP5-116] 9.84 (C) Register of Environmental Actions and Commitments (REAC) (Tracked Changes) Document reviewed: [REP6-135] 9.84 (D) Register of Environmental Actions and Commitments (REAC) (Tracked Changes)			
1 (B45, B50, B65)	Natural England notes that for B45, regarding “Any works causing noise levels above 60dB Lamax at the boundary of the SSSI”, the bird	It remains Natural England’s advice that the bird breeding season should be March to September inclusive, and that any works which are likely to disturb breeding birds should be timed to avoid these months	Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134] measure B50

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
	breeding season has been stated as March to August, excluding September. We note that for B50, regarding “Any activities relating to construction of the Minster Converter Station and Substation, that are calculated, following detailed design, to be above 60dB LAmax at the boundary of the SSSI”, the bird breeding season has been stated as March to June, excluding July, August and September. We note that for B65, regarding “tree height reduction required in Sandwich Bay to Hackling Marshes SSSI”, the bird breeding season has been stated as March to August, excluding September. We acknowledge that this appears to be an improvement on the previous version, which stated March to June, excluding July, August and September.	wherever practicable. However, where this is not practicable, Natural England advise that an Ecological Clerk of Works (ECoW) is appointed to undertake a thorough check of all vegetation for any signs of breeding activity before works proceed, and that works stop if necessary to avoid disturbance to breeding birds. We ask that the Register of Environmental Actions and Commitments (REAC) is updated to include reference to these measures under B45, B50 and B65 (similarly to how commitment B02 has been worded, for example). Provided that works are timed to avoid the breeding bird season wherever practicable, and an ECoW is appointed to oversee all relevant works, Natural England will be satisfied that there will be no significant impact upon Sandwich Bay to Hacklinge Marshes SSSI due to construction disturbance or routine tree height reduction. Following further correspondence with the Applicant at the end of March it is Natural England’s understanding that some proposed and agreed wording will be included to cover these concerns at Deadline 6 within the Applicant’s Submission. Assuming this commitment with agreed wording is included Natural England will consider this issue resolved in due course.	submitted at Deadline 6 has been amended with the agreed wording. Measure B45 has been amended to add ‘Where works are to be undertaken during September, a suitably qualified ornithologist will check the area of SSSI within which the activities are forecast to be subject to noise levels above 60dBLAmax to confirm the absence of qualifying nesting bird features of the SSSI. The relevant works will only occur if no active nests of SSSI qualifying birds are identified’. Measure B65 has been amended as follows: ‘Any tree height reduction required in Sandwich Bay to Hackling Marshes SSSI to ensure no interference with the new overhead line during operation, will not take place during March to September inclusive’.

Table 2. Natural England’s advice on [REP5-131] 9.119 Applicant’s Comments on Late Responses to ExA First Written Questions

Document reviewed: [REP5-131] 9.119 Applicant's Comments on Late Responses to ExA First Written Questions

1 (1ECOL23)	REAC provision B45 – impacts on breeding birds from OHL and pylon installation: We note that this comment explains why the bird breeding season has been stated as March to August under this REAC commitment.	We refer to our advice provided in Table 1 regarding avoiding construction during the breeding bird season where practicable, securing an ECoW to oversee all relevant works and recommend that the Applicant updates the REAC measures to reflect this.	Measure B45 has been amended to add ‘Where works are to be undertaken during September, a suitably qualified ornithologist will check the area of SSSI within which the activities are forecast to be subject to noise levels above 60dBLAmax to confirm the absence of qualifying nesting bird features of the SSSI. The relevant works will only occur if no active nests of SSSI qualifying birds are identified’.
2 (1ECOL25)	REAC provision B50 – disturbance to breeding birds: We note that this comment explains why the bird breeding season has been stated as March to June under this REAC commitment.	We refer to our advice provided in Table 1 regarding avoiding construction during the breeding bird season where practicable, securing an ECoW to oversee all relevant works and recommend that the Applicant updates the REAC measures to reflect this.	Commitment B65 has been amended to prohibit any tree reduction in the SSSI during March to September inclusive.

Table 3. Natural England’s advice on [REP5-133] 9.121.1 Applicant’s Comments on Other Submissions Received at Deadline 4 - Appendix A

Document reviewed: [REP5-133] 9.121.1 Applicant's Comments on Other Submissions Received at Deadline 4 - Appendix A

1 (R&I Log Point 7)	Natural England previously advised that percussive and disturbing works (e.g. piling) should be undertaken outside of the breeding bird season to avoid a significant impact upon Sandwich Bay to Hacklinge Marshes SSSI. The Applicant has commented that an absolute	Natural England has suggested a way forward for this in Table 1 and in Appendix B5 [REP5-216]. Provided this suggested addition is accepted by the Applicant, and an ECoW is secured for all relevant REAC commitments, we would consider this issue resolved	Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134] measure B50 submitted at Deadline 6 has been amended with the agreed wording.

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
	prohibition through the entire nesting season is considered disproportionate.		
2 (R&I Point 14)	Natural England has previously requested that confirmation be provided that the written scheme of decommissioning will consider impacts to ecological receptors (including designated sites) in consultation with relevant stakeholders and statutory bodies. The Applicant has requested that Natural England be explicit over what is missing from the responses already submitted.	Natural England has accepted the changes made for REAC commitment GG31 in our latest Deadline 5 response and consider this issue resolved	Noted.
3 (R&I Point 15)	Natural England has previously advised that nationally designated sites should be considered a highly sensitive receptor to dust impacts, given their national importance. The Applicant has requested that Natural England be explicit over what is missing from the responses already submitted.	Natural England note that the required information was addressed in REP2-014, REF A9. This was potentially missed by the Kent Onshore team due to the documents appearing to relate to Suffolk. Provided the same reasoning is applied to the Kent sites, Natural England consider this issue resolved.	Noted
4 (R&I Point 22)	Natural England previously advised that the in-combination assessment for the Kent Onshore Scheme is checked by the Applicant to ensure that all appreciable effects that are not significant alone have been taken into consideration. The Applicant seeks clarification from Natural England on which aspects of the assessment are still considered outstanding.	Natural England note that this appears to be a technicality point, and that the Applicant intends to retain the text. We advise that this can be considered as an informative advisory note only as it does not materially change Natural England's advice and can progress to a yellow RAG rating	Noted
5 (R&I Point 25)	Natural England previously advised that we were currently unable to agree with the Applicant that there is unlikely to be a significant impact upon Sandwich Bay & Hacklinge Marshes SSSI, due to the concerns regarding timing tree height maintenance works during breeding bird season. The Applicant has commented that an absolute prohibition through the entire nesting season is considered disproportionate.	Natural England has suggested a resolution in Table 1 and in Appendix B5 [REP5-216]. Provided this suggested addition is accepted, with an ECoW secured for all relevant REAC commitments, we would consider this issue resolved.	Commitment B65 now prohibits any tree reduction during March to September inclusive.
6 (R&I Point 26)	Natural England previously advised that we had been made aware by the Applicant's ecologist that no Letters of No Impediment will be required. We recommend that should this change, the Applicant make available draft protected species licences for our wildlife licencing team to review. The Applicant note that this appears to be purely advisory.	Natural England acknowledges that this is an advisory comment with no further actions required at this time.	Noted
7 (R&I Point 27)	Natural England previously advised that the final BNG assessment should incorporate separate accounting lines to ensure a 10% net gain is being achieved. The Applicant seeks clarification from Natural England on which aspects of the assessment are still considered outstanding.	Natural England notes that this matter is resolved, following review of document [REP2-014] and further signposting provided by Applicant.	Noted

Table 75.4 Applicant’s Comments on Natural England Deadline 6 Submission [REP6-244] - Appendix D6 Additional Comments on Marine Physical Environment

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
Table 1: Natural England’s Advice On: Marine Physical Environment			
Document reviewed: [REP6-027] 6.2.4.1 (G) Environmental Statement Part 4 Marine Chapter 1 Physical Environment (Tracked)			
1 (1.7.64-1.7.65 & MPE02) And Point 2 of Tab D of our R&I Log	Natural England welcomes the Applicant’s recognition of the potential for the River Stour low water channel to migrate north towards the Sea Link buried cable alignment during the lifetime of the Proposed Project. However, we remain concerned that the current target Depth of Lowering (DOL) of 1.5m may not be sufficient to avoid being impacted by the migration of the low flow river channel and the requirement for remedial intervention and subsequent additional environmental impacts.	We advise that further detailed analysis is needed to increase understanding of firstly the current and future river mouth/channel elevation level relative to cable route and secondly the likely depth of the buried cable. Additional mitigation measures also need to be explored such as a deeper burial depth and/or moving the cable route further North	The Applicant confirms that Requirement 18 was included at Deadline 6 in Application Document 3.1 (I) draft Development Consent Order [REP6-004] and Application Document 7.5.2 (D) Outline Offshore Construction Environmental Management Plan [REP6-072] , which secure in more detail the requirements for monitoring at the River Stour. This has been drafted by the Environment Agency. The Applicant acknowledges the comments received during the meeting with Natural England on the 14 April and relevant Statutory Nature Conservation Bodies will be included as a consultee on this Requirement.
2 (1.7.132)	Natural England notes that the sediment chemistry results have been provided for the original pre-sweeping section of the Offshore Scheme (KP96.32-KP113.883]. However, we note in [REP5-118] Cable Specification and Installation Plan (CSIP), that pre-sweeping may now also be required at KP38.7-KP44.4 and there are no sediment chemistry analysis results for this section of the Offshore Scheme	We advise that the Applicant should provide sediment chemistry analysis results for the proposed additional section of pre-sweeping (i.e. KP38.7-KP44.4).	The Applicant confirms that Condition 4(7) has been included in the dML for post consent sediment samples to be collected prior to pre-sweeping activities starting. This condition has been developed with the MMO to ensure that samples are analysed by an MMO validated laboratory. The Applicant does advise that existing 2021 data is available within Application Document 6.3.4.2.A ES Appendix 4.2A Benthic Characterisation Report (Original Report) [APP-196] .
3 (1.8.4/MPE02) And Point 2 of tab D of our R&I Log	Natural England notes that the target depth of lowering (DOL) for the Kent landfall is 1.5m to allow for the potential future lowering of intertidal bed levels. However, we remain concerned that this depth of burial may not be sufficient to protect the able from exposure due to migration of the River Stour low water channel northwards towards the cable route during the lifetime of the Project	Please see our advice to Point 1 above.	See response to Point 1 above.
4 (1.8.4/MPE060 And Point 28 in Tab D and Points RI_J2, and RI_J10 of our R&I Log	Natural England notes and welcomes the Applicant’s commitment (MPE06) to monitor beach profile and erosion rates at both Suffolk and Kent landfall sites. However, the wording is unclear because it suggests that monitoring will only occur at the location where rock bags are planned to be placed.’ We advise that, particularly for the Kent landfall, that this monitoring should cover the full extent of the intertidal/seabed affected by cable installation activities.	We advise that the Applicant should provide more specific details on the proposed monitoring and the wording made clearer. For example, whether it will include the full extent of the intertidal affected by cable installation. Such details of commitments should be captured within a named plan/document.	The Applicant confirms that the final detail on landfall monitoring will be secured within the Final Monitoring Plan to be approved by the MMO. This has been included as a Condition in the dML at Deadline 7 once the ‘as built’ location is identified.
5 (1.8.4/MPE09) And	Natural England notes and welcomes the Applicant’s commitment (MPE09) to monitor the River Stour channel in Pegwell Bay. This commitment includes	Natural England welcomes the monitoring proposed for the River Stour low water channel in Pegwell Bay. However, we advise that the	The Applicant confirms that alongside Requirement 18, this monitoring is already secured within Application Document 9.140 Outline In-Principle Monitoring Plan [REP6-116] .

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
Point 2 of Tab D of our R&I Log	annual monitoring for the first 5 years, with a review of monitoring frequency after 5 years. While we welcome this commitment, there are no details regarding the scope or nature of the monitoring. Similarly, the aim of the monitoring and thresholds of change triggering intervention have also not been detailed.	proposed monitoring should be captured in an In Principle Monitoring Plan (IPMP) and further details provided and captured regarding its scope, aims, threshold of change, triggers for intervention etc.	
6 (1.8.4/MPE10) And Point 11 of Tab D and Points RI_J10 and RI_J31 of Tab J of our R&I Log	Natural England notes and welcomes the Applicant's commitment (MPE10) to reinstate the intertidal mudflats at the Kent landfall, through natural and, if needed, mechanical backfill, following removal of the cofferdams at the Horizontal Directional Drilling (HDD) entry/exit points. However, we note that this measure does not include monitoring to verify that impacts to the intertidal do not persist.	We welcome the commitment to reinstate the intertidal mudflats at the Kent landfall following removal of the cofferdams at the HDD entry/exit points. However, we advise that monitoring should be carried out to verify that impacts to the intertidal do not persist. This should also consider requirements for intervention should the monitoring reveal impacts to the intertidal that persist. Such commitments should be captured within a named plan/document.	The Applicant confirms that the final detail on landfall monitoring will be secured within the Final Monitoring Plan to be approved by the MMO. This has been included as a Condition in the dML at Deadline 7 once the 'as built' location is identified. The Benthic Ecology assessment for the Proposed Project considers all impacts on the intertidal mudflats in Pegwell Bay and provides substantial evidence on its recovery based on surveys undertaken on previous projects and existing baseline knowledge of the area.
7 (1.8.4/W37) And Point 34 of Tab D and Point RI_J31 of Tab J of our R&I Log	Natural England notes and welcomes the Applicant's commitment (W37) to prepare a hoverport condition monitoring plan post consent to monitor the condition of the hoverport during construction. Whilst we note the intention is to include measures for identifying and managing any potential contamination risk and will be prepared in consultation with the EA, NE, KWT and TDC for approval by TDC, we are concerned that containment will involve maintaining integrity of hoverport through the use of cement to stop leeching which is impactful in its own right.	Natural England advises that further investigation of containment options are required as part of the consent to ensure that this feasible without increasing environmental impacts.	The Applicant confirms that a Requirement has been included within the DCO following the ExA Schedule of Changes. Additionally, Application Document 9.92 (D) Outline Cable Specification and Installation Plan has been updated in light of the new Requirement to further outline mitigation with regards to the hoverport.
8 (Table 1.19 & 1.9.22-1.9.45) And Points 20 & 31 of Tab D and RI_J8, RI_J11, RI_J16 and RI_J27 of Tab J of our R&I Log	Natural England welcomes the detailed breakdown of Maximum Design Scenario (MDS) for construction-related impacts to inshore seabed morphology and designated coastal feature receptors at the Kent landfall. However, we note landfall construction will involve a number of phases, as follows: Q1-Q3 2027 - Phase 1A: Establish temporary access route between the former hoverport and the HDD exit pits (located in the intertidal zone) - Phase 1B: HDD exit pit cofferdam construction and working area - Phase 2: HDD drilling and duct installation Q2-Q3 2029 - Phase 3: Marine cable pull-in - Phase 4: Marine cable burial - Phase 5: Removal of access It is stated that most of these phases will occur sequentially, but certain activities may occur in parallel or temporally overlap. The MDS for each of these	We advise that the MDS for landfall construction activities needs to be clarified, in particular with regards to the different phases. All landfall construction activities that may lead to seabed/intertidal disturbance need to be identified, considered, and assessed.	The Applicant confirms that following a discussion with Natural England on the 14 and 16 April, it has revisited the Application Document 6.2.4.1 (G) Part 4 Marine Chapter 1 Physical Environment [REP6-026] and Application Document 6.2.4.2 (F) Environmental Statement Part 4 Marine Chapter 2 Benthic Ecology [REP6-028] , in particular in relation to Pegwell Bay ready for Deadline 7.

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
	phases remains unclear. It is also unclear where the overlap lies. There also appears to be a number of landfall construction activities which have not been included in the MDS, for example: • use of rollers for duct pull-in (for pulled duct installation) e.g. MDS 10m width x 1km length, gravity base or piled bases • construction access route from the hoverport across the intertidal, including potential use of ground protection mats • advance pre-construction activities e.g. archaeological trial trenching, geotechnical investigation etc.		
9 (Table 1.19/Page 86 & Section 1.9.4) And Point 32 of Tab D of Our R&I Log	Natural England notes that the MDS for sandwave lowering/pre-sweeping in Table 1.19 does not include the additional section of the offshore scheme i.e. KP38.7-KP44.4, as detailed in the updated CSIP [REP5-118]. In [REP5-118], and as per deemed Marine Licence (dML) Part 2, Condition 1, the total pre-sweeping volume of sediment to be removed is 325,000m3, whereas in the Environmental Statement (ES) Chapter 1 Marine Physical Environment (MPE), this MDS is 250,000m3. Therefore, there is disagreement between the ES chapter and CSIP.	We advise that the MDS pre-sweeping sediment removal parameters need to be clarified, based on the latest information. The MDS sediment removal parameters should also be presented per trench and for all trenches, i.e. overall total. The assessment should then be updated accordingly	The Applicant confirms that the project consists of one single trench. The additional assessment for Pre-sweeping required at the at the Sunk is considered in full within Application Document 9.126 Areas of Safeguarded Water Depth – Consideration of Additional Installation Requirements [REP5-139] and a cross reference to this assessment included within the Benthic Ecology Chapter and MCZ Assessment. The total volume is secured within the dML in Application Document 3.1 (I) draft Development Consent Order [REP6-004] .
10 (Table 1.19/Page 86) And Point 32 of Tab D of our R&I Log	In Table 1.19 of MPE Chapter [REP5-020] the MDS pre-sweeping sediment disposal volume is 250,000m3, based only on pre-sweeping of KP96.32 to KP113.883. However, we note in the updated CSIP [REP5-118] that there is an additional section of pre-sweeping at KP38.7 to KP44.4 which has not been considered in [REP5-020]. It is also unclear if the MDS volume presented is per trench, or the overall volume across all trenches. In Table 1.19 [REP5-020], we note that the pre-sweeping sediment disposal volume assumes that '<i>up to 3 m of sand may require to be pre-swept above the non-mobile reference level. Due to the high energy environment and expectation that the mobile bedforms would migrate at each storm event, a realistic assumption of 2 m sand removal is made along the interval designated for pre-sweeping (KP96.32 to KP113.883).</i>' This suggests that the MDS height of sandwave removal may be up to 3m, but that 2m has	We advise clarification is needed on the following: • MDS pre-sweeping sediment disposal volume needs to be clarified • MDS sediment disposal volume should be provided per trench and the overall total for all trenches, for the MDS width, length, and height • MDS height of sandwave removal (i.e. is this 2m or 3m?)	The additional assessment for Pre-sweeping required at the at the Sunk is considered in full within Application Document 9.126 Areas of Safeguarded Water Depth - Consideration of Additional Installation Requirements [REP5-139]. The commitments to sediment disposal are located within Application Document 9.92 (C) Outline Cable Specification and Installation Plan [REP6-136].

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
	been used to calculate the MDS volume of sediment to be removed/disposed. This is unclear		
11 (Table 1.19, Page 860 And Point 16 of Tab D of our R&I Log	Natural England notes that sand removed through sandwave levelling (pre-sweeping) would be deposited within the Order Limits within the area of pre-sweeping in such a way that the local currents would not backfill the pre-sweep area prior to cable installation and protection. The mechanism to infill the rock trench and allow the seabed to revert to natural bedforms is by natural backfill and sediment circulation / deposition.	Our advice is that material removed through pre-sweeping should remain within the same sedimentary system and be 'intelligently' placed so that excavated material quickly infills the excavated depression. This will ensure restoration of natural processes and form as soon as possible – this is particularly important on/near designated sites and in the vicinity of sandbanks.	The Applicant has included this in Application Document 9.92 (D) Outline Cable Specification and Installation Plan , submitted at Deadline 7.
12 (1.9.28-1.9.31) And Point 11 of Tab D and RI_J31 of Tab J of our R&I Log	Natural England notes and welcomes the Applicant's assessment of scour potential around the cofferdams at the Kent landfall. We also note that the Applicant anticipates that any scour around the cofferdams would be localised, most likely around the cofferdam corners. Furthermore, the Applicant proposes to monitor seabed levels during these works. The Applicant also states that wave stirring combined with tidal currents will encourage recovery of the seabed without further intervention. This is welcome. However, it is not stated where this commitment has been captured	we advise that monitoring should be secured as a commitment in a named plan/document preferably the In Principle Monitoring Plan (IPMP) and evidence be presented to demonstrate that the impacts due to the presence of cofferdams at the Kent landfall are as predicted (i.e. localised, very limited in extent, short-lived, and fully recoverable). Should monitoring demonstrate that impacts are greater than predicted then the need for remediation should be secured and delivered	The Applicant has included this in Application Document 9.140 (B) Outline In-Principal Monitoring Plan , submitted at Deadline 7. Additional modelling of the cofferdam has also been provided at Deadline 6 further confirming the Applicants position that scour and disruption to location sediment processes is limited.
13 (1.9.29) And Point 2020 of Tab D and Points RI_J8, and RI_J29 of Tab J of our R&I Log.	Natural England notes that it is predicted that seabed sediments mobilised due to scouring around the cofferdams (in Pegwell Bay) would be transported only short distances, typically up to around 100 m. We are concerned that this could lead to deposition of sediments on the saltmarsh, given that the minimum distance between the seaward edge of the saltmarsh and the HDD exit pits is 105m	We advise estimation of the potential extent and thickness of sediment deposition at/near the saltmarsh edge due to the interaction of seabed/intertidal sediments with the cofferdams during the construction phase. Although, we note that the Applicant aims to provide updated suspended sediment modelling [APP-195] for ISH3 which may help to resolve this issue.	Updated modelling has been provided at Deadline 6 by the Applicant and was presented to Natural England on the 14 th April 2026.
14 (1.9.920) And Point 20 in Tab D and Point RI_J8 R&I Log	Natural England notes that it is suggested that the geomorphology of the intertidal and subtidal areas of Pegwell Bay are expected to remain relatively stable over time with no notable change. We would advise that this does not agree with the conclusions of [PDA-038] which states that "Appropriate consideration will also need to be given to the potential effects of climatechange which is expected to lead to mean sea level rise and potentially increased rates of erosion and shoreline retreat."	We would advise that, as highlighted in [PDA-038], there is uncertainty regarding the future stability of the saltmarsh, intertidal and subtidal areas of Pegwell Bay with regards to climate change effects. For example, the morphological and shoreline response to: sea level rise, increased storminess, increased nearshore wave energy, coastal squeeze etc. Therefore, we would advise that this needs to be clarified.	The Applicant includes commitment MPE08 to account for the uncertainties associated with climate-change driven coastal change: <i>Further analysis will be undertaken to consider the potential for coastal erosion over the lifetime of the project in line with the Final Offshore Construction and Environmental Management Plan (CEMP). This information will be used to inform the detailed design of the Proposed Project, to ensure that the risk of future exposure of the intertidal and offshore buried cables is as reduced as far as practicable.</i>
15 (1.9.96) And Point 17 of Tab D of our R&I Log.	Natural England notes from the proposed embedded design measure that there will be no infrastructure at the surface in the intertidal and coastal zones over the operational lifetime of the project. Meaning that there will be no interaction of the Proposed Development with coastal/ intertidal physical processes during the	We advise that the Applicant should signpost to the relevant plan/document where this commitment can be found. It is also unclear whether this embedded measure includes cable protection. This should be clarified.	The Applicant has outlined in a number of documents that lowering and burial of the cables is the primary form of protection. The only auxiliary works which have the potential to be constructed on the seabed surface is external cable protection (remedial or at in-service cable crossings).

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
	operational phase. While this is welcomed, it is unclear where this commitment has been secured.		
16 (1.9.98) And Point 2 of Tab D of our R&I Log.	Natural England notes and welcomes Commitment MPE09 (in 7.5.2 Outline Offshore Construction Environmental Management Plan (CEMP) and 7.5.3.2 CEMP Appendix B Commitments (REAC)) to monitor River Stour low water channel northerly migration towards the Sea Link buried cables. However, we advise that this misses a step with regards to first establishing baseline conditions to inform understanding and the impact assessment.	We advise that prior to implementing the monitoring of the River Stour low water channel, further evidence should be gathered regarding the present-day low water channel depth/level relative to the surrounding seabed level and proposed cable alignment and marine limit of deviation. This will help inform the detailed assessment of cable burial depth and minimise the risk of cable exposure during the operational phase.	This is noted by the Applicant. Revised wording either within Requirement 18 or Application Document 9.140 Outline In-Principle Monitoring Plan will be included at Deadline 7.
17 (1.9.103-1.9.107) And Point 1 of Tab D of our R&I Log.	Natural England notes the Applicant have provided Stage 2 Site Assessment on Goodwin Sands MPA and reference to the report for the High Court of Justice (2019) (Thomson v Marine Management Organisation & Others, 2019 EWHC 2368). We also welcome the Applicant's further clarification on the position of cable crossings relative to Cross Ledge Sandbank and Goodwin Sands MCZ. However, these do not address our concerns regarding the potential for morphological and sedimentary change due to the placement of cable protection measures within/near Cross Ledge sandbank or adjacent to Goodwin Sands MCZ. As we have indicated previously, currently the evidence presented is not sufficient to support the conclusions. Therefore, we remain concerned that the presence of cable protection measures directly adjacent to the MCZ and at/near Cross Ledge could result in interruption of seabed sediment transport and lead to changes to the morphology of the sandbanks, and/or their sediment composition, through the operational phase of the project.	Natural England advises that the Applicant should consider undertaking monitoring, and using available evidence, to help increase understanding and potentially resolve concerns with the following: • Geomorphology (including bedform characterisation, migration direction and rate) • Metocean conditions, sediment transport processes, and effects of climate change. • Morphodynamics prior to installation, during operation • Scour potential due to presence of cable protection.	Further detail has been added to Application Document 6.4.4.1 (E) Environmental Statement Figures Marine Physical Environment [REP6-044]: Goodwin Sands possess substantial morphological and ecological resilience, allowing them to accommodate small-scale impacts without affecting their overall form or long-term development (Thomson v Marine Management Organisation & Others, 2019 EWHC 2368 (Admin)). Figure 6.4.4.1.16 Bedload transport at the Goodwin Sands MCZ and the Goodwin sands shows that the cable and therefore the long axis of the protection associated with the cable crossing points shown in the figure, is aligned to the direction of sediment transport and bedform migration, thus further reducing any potential blockage effect. The crests of the mapped bedforms in Pegwell Bay (Cross Ledge Sandbanks) are mainly aligned north/northwest to southeast, indicating the direction of bedload transport at the time of the survey is east-southeast – west-northwest. The long axis of the cable is aligned to the direction of sediment transport and bedform migration (east-southeast – west-northwest). Should cable protection measures be needed, this alignment further reduces any potential blockage effect of bedload sediment transport. This results in a minor effect which is not significant.

Table 2: Natural England's Advice On: Marine Physical Environment

Document reviewed: [REP5-118 9.92] (B) Outline Cable Specification and Installation Plan (Tracked)

1 (3.3.9)	Natural England notes an additional area of pre-sweeping at KP38.7-KP44.4 has been included in the updated CSIP. This is in addition to the original provision for pre-sweeping at KP96.32-KP113.883. However, we also note that this additional section and increased MDS for pre-sweeping have not been updated in all relevant plans/documents.	We advise that all relevant plans/documents should be updated to include the additional pre-sweeping allowance and increased MDS. All relevant assessments should also be updated accordingly.	This has been updated in Application Document 9.92 (D) Outline Cable Specification and Installation Plan , submitted at Deadline 7.
2 (4.3.8)	Natural England notes that backhoe dredging has been included to support with pre-installation trenching. However, this burial tool has not been	We advise that backhoe dredging should be included in the relevant plans/documents, along with the MDS.	This has been assessed in full within Application Document 9.126 Areas of Safeguarded Water Depth - Consideration of

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
	included in the assessment for marine physical processes [REP5-020].		Additional Installation Requirements [REP5-139] . All plans were updated at Deadline 5 to reflect this amendment.
3 (5.1.4)	Natural England notes that the 'high risk' areas requiring rock backfill along the offshore route are identified in the CSIP as KP 38 to KP 58, and KP 81.5 to KP 96.5. However, these do not quite align with the offshore route rock backfill sections presented in, for example, [REP5-020] which are KP 35 to KP 58; KP 81.5 to KP 96.5. It is also unclear whether these sections of rock backfill will be continuous or not. Furthermore, in [REP5-020] rock backfill is included only for the operational phase of the Project, but this is not stated in the CSIP.	We advise that clarification is needed regarding the high-risk areas requiring rock backfill should be updated, as needed, across all relevant plans/documents, including the MDS. Further clarity is also required regarding the nature of the proposed backfill sections, if they are continuous or not, and whether the rock backfill allowance in the CSIP is for the operational phase only. This should also be clarified for the other types of external cable protection proposed in the CSIP	The need for rock backfill for the areas identified in Application Document 9.92 (C) Outline Cable Specification and Installation Plan [REP6-136] is to mitigate any third-party interactions with the cable, mainly vessels. At this identified KP range, the cable trench will be backfilled using rock (below the original seabed level so as not to overtop the trench and impact sedimentary processes or cause a snagging risk) along its entire length. The rock backfill will be completed during construction of the cable. The only other areas of planned rock protection are at cable crossings. Further information on remedial rock is presented in the Application Document 9.92 (C) Outline Cable Specification and Installation Plan [REP6-136].
4 (5.1.6)	Natural England welcomes the Applicant's willingness to 'factor in' the removability of cable protection for the Proposed Project. However, it is not clear what this entails.	We advise that the Applicant should clarify what 'factor in' means with regards to removable cable protection to advise on the effectiveness of this mitigation measure.	The Applicant will factor in the removability of cable protection when identifying the external cable protection for the Proposed Project dependent on its use (i.e. at landfall, cable crossings or during rock back fill areas). As mentioned previously, the Applicant must ensure the project is fit for purpose in maintaining maritime safety when using external cable protection alongside the removability of the rock at decommissioning. The Applicant acknowledges that new forms of cable protection as being developed globally to meet both environmental and engineering needs, both of which will be a 'factor' at detailed design. The Applicant will ensure it uses all available best practice guidance for cable decommissioning in its decision making prior to construction and at the time of decommissioning. .
5 (Section 6)	Natural England welcomes the addition of a section on 'Maintenance' in the updated CSIP. However, we note that the MDS for maintenance activities have not been included.	We advise that the MDS, and details of, maintenance activities should be included. If not, then we advise these must be included in a separate marine licence.	Application Document 9.92 (C) Outline Cable Specification and Installation Plan [REP6-136] sets out the principles with which the final CSIP must substantially accord. It is not an assessment document. All assessments are contained within the individual EIA topic Chapters which do include maintenance activities in their relevant Maximum Design Scenarios.

Table 2: Natural England's Advice On: Marine Physical Environment

Document reviewed: [REP6-017] 6.11 (E) Environmental Statement Marine Conservation Zone Assessment (Tracked)

1.5.31-1.5.34 And Point 1 of Tab D of our R&I Log	Natural England notes the inclusion of the reference to the report for the High Court of Justice (2019) (Thomson v Marine Management Organisation & Others, 2019 EWHC 2368). However, as indicated previously, currently there is insufficient evidence to support the conclusions regarding cable protection impacts on Goodwin Sands MCZ. We remain concerned that the presence of cable protection measures directly adjacent to the MCZ could result in interruption of seabed sediment	Please see our advice in Point 15 of Table 1 above.	As above: Further detail added to Application Document 6.4.4.1 (E) Environmental Statement Figures Marine Physical Environment [REP6-044]: Goodwin Sands possess substantial morphological and ecological resilience, allowing them to accommodate small-scale impacts without affecting their overall form or long-term development (Thomson v Marine Management Organisation & Others, 2019 EWHC 2368 (Admin).). Figure 6.4.4.1.16 Bedload transport at the Goodwin Sands MCZ and the Goodwin sands shows that the cable

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
	transport and lead to changes to the morphology of the sandbanks, or their sediment composition, through the operational phase of the project.		and therefore the long axis of the protection associated with the cable crossing points shown in the figure, is aligned to the direction of sediment transport and bedform migration, thus further reducing any potential blockage effect. The crests of the mapped bedforms in Pegwell Bay (Cross Ledge Sandbanks) are mainly aligned north/northwest to southeast, indicating the direction of bedload transport at the time of the survey is east-southeast – west-northwest. The long axis of the cable is aligned to the direction of sediment transport and bedform migration (east-southeast – west-northwest). Should cable protection measures be needed, this alignment further reduces any potential blockage effect of bedload sediment transport. This results in a minor effect which is not significant.

Table 75.5 Applicant’s Comments on Natural England Deadline 6 Submission [REP6-245] - Appendix E6 Additional Comments on Intertidal and Benthic Ecology Advice

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
Table 1: Natural England’s Advice On: Benthic Ecology			
Document reviewed: [REP6-137] 9.92 (C) Outline Cable Specification and Installation Plan (Tracked Changes)			
1 (2.2.4)	Natural England welcomes the exclusion of cofferdams from the Suffolk Coast landfall. However, this needs to be secured in the REAC.	Natural England advises that once this is secured in the REAC this issue would be considered resolved.	The Applicant confirms that this commitment is already secured in the CSIP and has been added (commitment MPE11) to Application Document 7.5.2 (E) Outline Offshore Construction Environmental Management Plan and Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) , submitted at Deadline 7.
2 (3.3.4)	Natural England notes the Unexploded Ordinance (UXO) surveys in April -June 2026 will not feed into examination.	N/A	Noted.
3 (3.3.9 and 6.1.1.)	Natural England notes that prior to cable installation significant lengths of sandwave levelling is proposed e.g. 6km and 17km. We highlight that this is not insignificant. We also highlight that sand wave levelling is proposed during the operational phase of the project to maintain Depth of Lowering. This is not something that has been proposed on any other project, highlighting cable integrity risks.	Natural England is concerned about the scale of the sandwave levelling proposed in specific locations and implications this may have marine processes and sandwave recovery. We seek further clarification from the Applicant on the adoption of the mitigation measures we have advised in previous submissions to ensure sandwave recoverability, especially given the case specific proposal to sandwave level throughout the operational phase.	The Applicant confirms that the mitigation listed in Sea Link Energy Cable Appendix E5 - Natural England's Advice on Benthic Ecology [REP5-218] has been incorporated in the Application Document 9.92 (C) Outline Cable Specification and Installation Plan [REP6-136] under Section 8 Sediment Disposal Management.. The Applicant can also confirm that sandwave levelling is a pre-construction activity only. No proposals have been included for sandwave levelling during routine operation.
4 (4.3.8)	Natural England notes the proposed addition of a backhoe dredger. Natural England is not supportive of their use within benthic Marine Protected Areas (MPAs) or intertidal supporting habitats for Special Protection Areas (SPAs) due to the resulting leg depressions from jack-up legs and changes to	Natural England would be content for a barge to bottom out in intertidal areas to avoid the use of jack-up vessels. If this were committed to by the Applicant, and the use of jack-up vessels within benthic MPAs avoided, this issue would be resolved.	The backhoe dredger is for use at the Suffolk landfall location and the North East Spit Area of Safeguarded Water Depth only, which is in the subtidal environment. Thus, the backhoe dredger would remain afloat at all times and would not therefore, be used within any benthic MPA or intertidal habitats.

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
	intertidal and benthic communities. This is greater than faunal mortality raised at ExQ 3BE9. We also highlight that in [REP5-135] ExQ 2BE2 that the Applicant has concluded a small magnitude of impact from these vessels but has not provided any assessment of depth and footprint of the leg depressions within particular habitats or evidence of duration of impact other than <2 years. Natural England notes that evidence from Dudgeon OWF, Lincs OWF and Triton Knoll OWF has demonstrated that jack-up leg depressions have persisted and impacts have occurred for 2-10 years		The JUB that could be used at Pegwell Bay would be significantly smaller than those used in the offshore environment, such as the examples provided by Natural England for Dudgeon OWF, Lincs OWF and Triton Knoll OWF. To illustrate the difference in scale of JUB the first image below shows the type of JUB that would be used for the Offshore Scheme at Pegwell Bay and the second is the scale of barge required for offshore windfarm installations. Plate 1. JUB type for Sea Link Offshore Scheme Installation at Pegwell Bay



Plate 2. JUB type for installation of WTG in offshore environments



Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
			Thus, the size of the disturbance at Pegwell Bay, will be, as described in Application Document 6.2.4.2 Benthic Ecology, from the spudlegs of a JUB that is very limited in extent and number. The JUB will be in place for a maximum of 120 days in. Any effects will be short-term as any imprints or depressions left when the JUB is removed can easily be backfilled by the excavators on site. Thus, any impact of a JUB, which is the MDS in relation to mudflat disturbance at the HDD exit location, is very small in scale and temporary. Evidence presented in Application Document 6.2.4.2 (G) Part 4 Marine Chapter 2 Benthic Ecology shows that intertidal communities recover rapidly from such temporary disturbance.
5 (5.1.4)	Natural England highlights that considerable lengths of cable protection are proposed, e.g. 20km between KP38 and 58 and 15km between KP81.5 and 96.5. It is not clear if these will be continuous lengths of projection or not. It is also noted that this is greater than required for other projects.	Natural England advises that further clarity is required on the proposals and if this is just during construction. Until we have this clarification it is difficult to assess benthic and marine processes impacts.	The Applicant confirms that rock backfill between KP38 and 58 and between KP81.5 and 96.5 will be installed as part of cable installation (construction) and within the trench, ie, not at seabed level, but will remain for the lifetime of the project (operation). Potential impacts of rock backfill (in additional remedial rock protection and cable crossings) during operation of the Offshore Scheme have been assessed in Application Document 6.2.4.2 (G) Environmental Statement Part 4 Marine Chapter 2 Benthic Ecology and Application Document 6.6 (I) Habitats Regulations Assessment Report. Rock backfill is required specifically in the locations identified to reduce the risk of third-party vessel interactions with the cable, to further ensure safety for other users given the vessel activity around the Sunk. Rock backfill differs from remedial cable protection in that the rock will be contained entirely within the cable trench (below the original seabed level so as not to overtop the trench and impact sedimentary processes, benthic habitats or cause a snagging risk). Further information on rock backfill was provided in Application Document 9.92 (C) Outline Cable Specification and Installation Plan [REP6-136].
6 (5.1.5 and 5.16)	Natural England notes the requirement to avoid microplastic entering the marine environment. Whilst this is welcomed it is worth noting that when considering cable protection this may not be possible at all locations. Where removability of cable protection within designated sites is paramount, in order to avoid increasing impacts during decommissioning this would currently require the use of concrete mattresses with hoops and/or rock bags. However, we do note there is now technology to make rock bags out of rock and not be reliant on bags manufactured from plastic.	Natural England advises that this is considered further in the final Cable Specification and Installation Plan (CSIP) prior to construction and that commitments to considered this then are included within the REAC.	This is noted by the Applicant and confirm that the Final CSIP will be delivered in Consultation with Natural England and MMO approval as outlined within Condition 4 of the dML. The Applicant can also confirm that the following commitments have also been added to Application Document 7.5.2 (E) Outline Offshore Construction Environmental Management Plan and Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 7: • GM07 - The Applicant will ensure that the contractor considers measures to avoid use of microplastics where possible. • GM08 - The Applicant will factor in the removability of cable protection when identifying the external cable protection for

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
			the Proposed Project. The Applicant will ensure it uses all available best practice guidance for cable decommissioning in its decision making.
7 (Section 6)	Natural England notes that there is no assessment of the activities and impacts during the operational and maintenance phase of the project. Reference is made to a repair preparedness plan/s, but these have not been provided.	Natural England advises that if operations and maintenance (O&M) activities are not included and assessed in the CSIP please could the Applicant signpost to where this is provided. Or alternatively, we advise that a separate O&M licence will be required.	The Applicant would like to clarify that the Application Document 9.92 (C) Outline Cable Specification and Installation Plan [REP6-136] is not an assessment document. It is an Outline Plan. The Outline CSIP sets out the principles with which the final CSIP must substantially accord. All assessments for operation and maintenance activities are contained within Application Document 6.2.4.2 (G) Environmental Statement Part 4 Marine Chapter 2 Benthic Ecology under the heading ‘Assessment of Impacts and Likely Significant Effects’. Maximum Design Scenarios for operation and maintenance activities are clearly set out under the heading ‘Proposed Project Design and Embedded Mitigation’. The Application Document 9.92 (C) Outline Cable Specification and Installation Plan [REP6-136] does outline relevant offshore maintenance activities associated with the Proposed Project, although it is worth noting that these are substantially different to OWF project which would include much more maintenance activities within their respective CSIP. During operation the HVDC link would transmit electricity from the proposed Friston Substation to the existing network in Kent and vice versa depending on the supply and demand at the time. The cable system installation is designed such that a regular maintenance regime is not required to maintain the integrity of the link. A list of maintenance activities for the CSIP is presented in Section 6 of the CSIP. The Applicant therefore considers that the outline information within Application Document 9.92 (C) Outline Cable Specification and Installation Plan [REP6-136] is accurate and representative of what information needs to be secured within this document.
8 (Section 9)	Pollution and Waste Management: This links to the HDD management plan. We suggest that this section of the CSIP is insufficient to sign off any management of HDD related impacts.	Natural England advises sign posting to the HDD management plan rather than summarising here and creating ambiguity as to the requirements relating to this matter.	The Applicant confirms that it has signposted back to Application Document 7.5.2 (D) Outline Offshore Construction Environmental Management Plan [REP6-072] which includes intertidal activities.
Table 2: Natural England’s Advice On: Benthic Ecology Document reviewed: [REP6-016] – 6.11 (E) Marine Conservation Zone Assessment (Tracked Changes)			
1 (1.5.25 and 1.5.28)	Natural England continues to have concerns in relation to the disruption of sediment transport and changes to marine processes associated with Goodwin Sands Marine Conservation Zone (MCZ).	Please refer to Appendix D6 and Natural England’s response to ExQ 3PE2 in Appendix K6 to our Deadline 6 submission in relation to sediment transportation and conclusions in relation to Goodwin Sands MCZ.	The Applicant can confirm that the following commitments have been added to Application Document 7.5.2 (E) Outline Offshore Construction Environmental Management Plan and Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 7:

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
			• MPE13 - The Applicant does not anticipate the need for continuous external cable protection adjacent to the Goodwin Sands MCZ, on the basis of confidence in achieving the required depth of cable lowering. However, if external cable protection is required locally, the Applicant commits to limiting its use to no more than 500 metres in total, whether continuous or cumulative, within sections of the offshore cable corridor adjacent to the Goodwin Sands MCZ (unless otherwise agreed with the MMO, in consultation with Natural England and the MCA). In such circumstances, the installed height of any external cable protection will be limited to a maximum of 1 metre above the surrounding seabed. Furthermore, where reasonably practicable, and in line with the Applicant’s commitment to sensitive routing, the offshore cable corridor will be micro routed to maintain a separation distance of at least 100 metres from the boundary of the Goodwin Sands MCZ. • BE06 (<i>note this is a new commitment. Original commitment BE06 was deleted from Application Document 7.5.2 (D) Outline Offshore Construction Environmental Management Plan (Tracked) [REP6-073] and Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) (Tracked) [REP6-135]</i>) -- All phases of the cable routing and design will seek to minimise impacts on habitats of principal importance (qualifying as Habitats Regulations Annex I habitats; Natural Environment and Rural Communities (NERC) Section 41 habitats and species), including micro siting and consideration of the use, type and location of cable protection.

Table 3: Natural England’s Advice On: Benthic Ecology

Document reviewed: [REP6-072] – 7.5.2 (D) Outline Offshore Construction Environmental Management Plan (Tracked Changes)

1 (NEW Section on Env. Monitoring)	Natural England highlights that the commitments should be included in a separate Offshore In Principle Monitoring Plan (IPMP).		This requested plan was submitted (see Application Document 9.140 Outline In-Principal Monitoring Plan [REP6-116]). A final Application Document 9.140 (B) Outline In-Principal Monitoring Plan , will be submitted at Deadline 7.
2 (NEW Section on Env. Monitoring)	Natural England highlights the difference between residual effect and residual concern due to uncertainties and therefore the need to monitoring residual concerns to demonstrate the predictions of the ES. Natural England has advised multiple times in our previous responses where further monitoring and post construction monitoring is required.	Please see our response to ExQ3 3BE2 in Appendix K6 to our Deadline 6 submissions.	As referred to by Natural England in their response to ExQ3 3BE2 in [REP6-249] The Applicant as re-reviewed Natural England’s Deadline 3A [REP3A-027] and Deadline 5 response [REP5-218] which requests an In Principle Monitoring Plan. This has now been submitted by the Applicant at Deadline 6 (Application Document 9.140 Outline In-Principal Monitoring Plan [REP6-116]) and has been updated for Deadline 7 (Application Document 9.140 (B) Outline In-Principal Monitoring Plan) following calls with Natural England on the 14th and 16th April. The Applicant has also included a specific monitoring Condition within the dML at Deadline 7.

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
			The Applicant considers that post-construction monitoring, if required, is suitably secured.
3 (BE06)	Natural England notes that the ‘when’ is missing from the commitment and as currently written, this is not enforceable.	Natural England advises that this REAC is strengthened to set out when the In-Principle Monitoring Plan (IPMP) will be submitted and agreed with the MMO in consultation with the relevant SNCBs. The aim of monitoring is not to verify the accuracy of predicted residual impacts on these habitats, but to demonstrate the successfulness of mitigation measures.	The Applicant confirms that, as stated above, having re-reviewed Natural England’s Deadline 3A [REP3A-027] and Deadline 5 responses [REP5-218] which requests an In Principle Monitoring Plan, an Outline In-Principle Monitoring Plan was submitted at Deadline 6 (Application Document 9.140 Outline In-Principle Monitoring Plan [REP6-116]) and has been updated for Deadline 7 (Application Document 9.140 (B) Outline In-Principle Monitoring Plan) following calls with Natural England on the 14th and 16th April. REAC commitment BE06 was deleted at Deadline 6 Application Document 7.5.2 (D) Outline Offshore Construction Environmental Management Plan (Tracked) [REP6-073] and Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) (Tracked) [REP6-135]) and has been replaced with a new commitment. REAC commitment BE05 was also updated at Deadline 6 to include specific reference to the Outline In-Principle Monitoring Plan [REP6-116]). BE05 has subsequently been further updated in Application Document 7.5.2 (E) Outline Offshore Construction Environmental Management Plan and Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC) submitted at Deadline 7: • In accordance with the Environmental Principles set out in the Outline Cable Specification and Installation Plan, where benthic habitats of principal importance (qualifying as Habitats Regulations Annex I habitats; Natural Environment and Rural Communities or (NERC) Section 41 habitats and species) are identified during pre-construction surveys and additional mitigation is required to avoid or reduce impacts on these habitats, National Grid must prepare a Benthic Mitigation Plan. Any necessary Benthic Mitigation Plan(s) must be submitted to and approved in writing by the MMO prior to Work 6 in the dML commencing and should include a timetable for implementation of the mitigation and details of any necessary monitoring. Any agreed mitigation and/or

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
			monitoring must be implemented in accordance with the agreed timetable. A monitoring plan, in substantial accordance with the outline In-Principle Monitoring Plan will be submitted to the MMO (unless otherwise agreed in writing by the MMO) within three months of the 'as-built survey'
4 (BE05)	Natural England notes that as written this REAC doesn’t commit to avoiding NERC habitats where possible and where not possible what the mitigation measures will be to minimise impacts.	Natural England advises that this REAC is updated in line with commitments made on other marine NSIPs.	The Applicant confirms that a new commitment (BE06) has been added to the Application Document 9.84 (E) Register of Environmental Actions and Commitments (REAC), submitted at Deadline 7 regarding NERC habitats: • BE06: All phases of the cable routing and design will seek to minimise impacts on habitats of principal importance (qualifying as Habitats Regulations Annex I habitats; Natural Environment and Rural Communities (NERC) Section 41 habitats and species), including microsiniting and consideration of the use, type and location of cable protection.
5 (1.10.16)	Natural England notes that a Drilling Fluid Management Plan will be developed post consent.	Natural England continues to advise that an outline HDD plan is provided at the time of consent. E.g. North Falls	The Applicant confirms this plan is secured within Application Document 7.5.2 (D) Outline Offshore Construction Environmental Management Plan [REP6-072] (Condition 4 of the dML) and would be available following detailed design.
6 (1.10.19)	Natural England advises against the use of sandbags to contain drilling fluid on saltmarsh as they compact the sediment and damage vegetation where they are placed and through transportation to the frac-out location. Thus, they cause impacts in their own right. Containment is also likely to result in increased smothering depths which is likely to result in increased damage to saltmarsh vegetation.	Natural England advises that no containment is likely to be the best solution within saltmarsh habitat. However, as with North Falls, a decision tree of action is required to demonstrate the decision making process.	The Applicant notes Natural England’s preference for not using sandbags in the saltmarsh in the unexpected event of frac out within the saltmarsh. Detailed methodology for mitigation of any frac out will form part of the Drilling Fluid Management Plan; NE will be a consultee on this document, as provided in Measure B59 of Application Document 9.84 (B) Register of Environmental Commitments (REAC) [REP6-134]
7 (1.10.19)	Natural England continues to be concerned about the placement of drilling fluid directly on the seabed within the curtilage of the cofferdam.	Natural England advises that further information is required with regards to any remaining drilling fluids i.e. amounts, area, depth and likely recovery time of supporting habitat for SPA birds.	As previously stated in the Applicant’s response to Reference 2.4.8.F of Application Document 9.34.1 (B) Applicant's Detailed Responses to the Relevant Representations identified by the ExA [REP2-014] , “ <i>Before removal of the cofferdam, the drilling fluid will be removed from within the dam as far as practicable.</i> ” The term “as practicable” is intended to convey that there may be up to perhaps 0.2 m ³ of fluid dispersed throughout the cofferdam that cannot be separated from soil within the cofferdam before the cofferdam is removed. This bentonite fluid will either gel and consolidate with the surrounding ground if it is subsurface or be broken down by seawater and flushed from the location by the tides if it is at or very close to the remediated surface. The volumes are not considered significant given the 75 m ² area covered coffer dams, the inert nature of bentonite clay, and the total 40 m ³ of fluid assessed as the potential losses at Pegwell Bay in Application Document 6.6 (H) Habitats Regulations Assessment Report [REP6-050] .

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
8 (Table 8)	GH10 – Drilling Fluid Management plan/HDD management plan.	Natural England advises that an outline plan is provided now.	The Applicant confirms this plan is secured within Application Document 7.5.2 (D) Outline Offshore Construction Environmental Management Plan [REP6-072] (Condition 4 of the dML) and would be available following detailed design.
9 (Table 8)	B59 – same issues as before.	Please see previous Natural England advice in Appendix E5 [REP5-218], Table 7, NE Ref: E5.25	Natural 'England's response in Application Document Sea Link Energy Cable Appendix E5 - Natural England's Advice on Benthic Ecology [REP5-218], Table 7, NE Ref: E5.25 appears to state two separate requests; 1. <i>That modifications to Landfall Method Statements and Drilling Fluid Management Plans are included within final plans agreed with MMO in consultation with NE prior to construction.</i> The applicant believes that this is secured in B59 of Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134] because the approved LMS and DFMP will be the documents used for construction. 2. <i>That Hydrofracture modelling should be included within and used to inform the LMS and DFMP.</i> The Applicant believes that this is secured in B59 of Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134] where it states the hydrofracture modelling will be shared with NE. To provide background, hydrofracture modelling is a separate document from the LMS and DFMP. The hydrofracture modelling is first used to refine HDD designs to ensure sufficient factor of safety against frac out at key locations (e.g. saltmarsh, RSPB land etc) and then later referenced in the LMS and DFMP, when they are developed, to provide allowable drilling fluid pressure limits when conducting the drills.
10 (Table 8)	B09 – Natural England advises that within intertidal habitats we do not want cementitious grout filling to seal fractures as until demonstrated otherwise this could create an area of sediment which over time will erode differently to the surrounding habitats.	Natural England advises that this requirement is removed unless evidence can be provided to demonstrate that this will not become a resistant area.	Any cementitious grout used for the HDD works will be designed with a set strength equivalent to surrounding ground and will be emplaced in the immediate vicinity of the bore, so subsurface. Therefore, grout will not be exposed at surface and, in the unlikely event that grout became exposed by erosion of the surface, it would not be a resistant area. Proposals for the use of grout as a potential mitigation of drilling fluid losses will form part of the Drilling Fluid Management Plan; NE will be a consultee on this document, as provided in Measure B59 of Application Document 9.84 (B) Register of Environmental Commitments (REAC) [REP6-134]. Therefore, Natural England will have input in the methodology to ensure their concerns regarding erosion resistant zones are mitigated.
11 (Table 8)	MPE10 – Natural England advises that mechanical backfill and what is meant by this is not permitted until further clarity is provided to understand what exactly is meant by this. Currently this is too ambiguous.	Natural England requires further details on what is meant by mechanical backfill before we can agree that this is an effective mitigation measure.	For MPE10, mechanical backfill relates to using the same equipment which was used excavate in the first place to move the extracted sediment back into depressions. This is to avoid leaving large depressions in the intertidal prior to natural backfill occurring.
12 (1.12.5)	Natural England notes that the IPMP is proposed to be provided post consent, which is effectively a post construction monitoring plan. An IPMP is used to set	Natural England advises that an IPMP is provided as part of the consent. We have included examples of other IPMPs to support	The Applicant has submitted Application Document 9.140 Outline In-Principal Monitoring Plan [REP6-116] .

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
	out hypothesis to be tested and outcomes to be demonstrated. Not specifically survey design etc.	the Applicant: EN010119-001756-7.10 Offshore In-Principle Monitoring Plan Rev 5 (Clean).pdf Offshore In Principle Monitoring Plan.	
13 (1.13.2)	Natural England notes that in relation to when the placement of cable protection can occur in Sandwich Bay Special Area of Conservation (SAC), but no other designated site.	Natural England requests that the text is amended to relate to all benthic MPAs and supporting habitats for SPA.	The Applicant confirms that this text in the dML was updated at Deadline 5 in response to the MMO's Deadline 4 submission in response to 1GEN60 [REP4-126] . The Application can confirm that potential requirements for, and impacts associated with, cable protection in all benthic MPAs and supporting habitat for SPAs has been included Application Document 6.2.4.2 (G) Environmental Statement Part 4 Marine Chapter 2 Benthic Ecology and Application Document 6.6 (I) Habitats Regulations Assessment Report .

Table 4: Natural England's Advice On: Benthic Ecology

Document reviewed: [REP6-135] – 9.84 (D) Register of Environmental Actions and Commitments (REAC) (Tracked Changes)

1	Please see comments on the OCEMP which also related to this document		This is noted by the Applicant.
2 (MPE09)	While we welcome the monitoring proposed for the River Stour low water channel in Pegwell Bay, but advise the proposed monitoring should be captured in an IPMP and further details provided regarding its scope, aims, threshold of change, triggers for intervention etc.	Natural England refer to Appendix D6 to our Deadline 6 Submission for further information on this	This is noted by the Applicant. See responses above.

Table 5: Natural England's Advice On: Benthic Ecology

Document reviewed: [REP5-139] – 9.126 Areas of Safeguarded Water Depth - Consideration of Additional Installation Requirements

Table 2.1	Natural England is concerned that sediment from sandwave levelling will be re-distributed to ensure no backfill of swept areas.	Please see Table 1 Point 3 above on sandwave levelling mitigation and Natural England's position on this. Please also see comments included in Appendix D6 to our Deadline 6 submissions in relation to indirect impacts to designated sites from proposed activities which are also relevant to this document.	The Applicant confirms that the requested commitments were secured within Application Document 9.92 (C) Outline Cable Specification and Installation Plan [REP6-136] .

Table 75.6 Applicant's Comments on Natural England Deadline 6 Submission [REP6-246] - Appendix F6 Additional Comments on Marine Mammals

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
Table 1: Natural England's detailed comments on Marine Mammals Documents reviewed: [REP5-024] 6.2.4.4 (H) Part 4 Marine Chapter 4 Marine Mammals [REP5-037] 6.6 (G) Habitats Regulations Assessment Report			
1	Natural England notes that assessment is updated to reference the current Effective Deterrent Range (EDR)	R&I F3 and F2: Whilst this is resolved for cetaceans; the same information is still required	This was provided by the Applicant in Application Document 6.2.4.4 (H) Part 4 Marine Chapter 4 Marine Mammals [REP6-051]

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
	guidance, disturbance figures for cetaceans to reflect the reduced EDR figure of 3km have been included.	for both seal species as stated in Appendix F5. To resolve the Applicant needs to provide the calculation for total number disturbed and the percentage of management unit population impacted.	noting that EDRs are provided in the JNCC guidance in relation to harbour porpoise only but has been used as a precautionary estimate of disturbance for other cetacean species and seals. Thus, calculated estimates given are conservative.
2	Natural England notes that assessment is updated to reference the most recent National Marine Fisheries Service (NMFS) sound exposure criteria.	We welcome the update to the more recent criteria. Natural England is concerned about changes to approach (Marine mammal chapter version H) in Table 19 [REP5-024] removing Permanent Threshold Shift (PTS) and the addition in Table 20 of a reduced sound level for SBP. This does not follow the standard approach and would normally require further discussion. However, we note for this project (only) that the outcome is not affected as the JNCC standard mitigation will still be in place and so F14 from the R&I log can be considered closed.	This is noted by the Applicant.
3	Natural England notes that additional detail has been provided on noise modelling.	Natural England has reduced the risk rating of this issue (F15) to yellow. This reflects the stage of the examination and a case specific risk review and does not represent a change in Natural England's view on importance of empirical noise modelling. Our Advice has taken into consideration that further assessment will be required for the UXO works after consent and advise the empirical underwater noise modelling should be undertaken to inform that future assessment. This issue is considered to be resolved.	This is noted by the Applicant.

Table 2: Natural England’s detailed comments on the Habitats Regulations Assessment Report

Documents reviewed: [REP5-037] 6.6 (G) Habitats Regulations Assessment Report

4	Natural England notes the HRA has been updated to include specific disturbance figure for Lion Link.	R&I F31, F33 Progressed- Natural England welcomes that updated figures for Lionlink have been provided and agrees that OWF’s will make up the majority of impacts. However, we advise that all projects which have noise impacts that may overlap should be included in the in-combination assessment.	The Applicant confirms that an update was made to Application Document 6.6 (H) Habitats Regulations Assessment Report (Tracked) [REP6-051] submitted at Deadline 6 to include ALL projects with potential in-combination effects from underwater sound in relation to the Southern North Sea SAC. The assessment, which considered the WCS with EDR values of 20 km for offshore windfarm projects undertaking impact piling, found the daily threshold for the SNS SAC was exceeded, but the seasonal was not. A copy of the updated HRA was also emailed directly to Natural England on 12 April 2026 for their review and JNCC. A response from NE was received on 27th April with a JNCC/NE Joint Position and request for an additional mitigation to ensure that no AEoSI for the SNS SAC would occur and thus this matter is now resolved.

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
			The Applicant confirms that a commitment (MM03) has been included in the REAC (see Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) (Tracked) [REP6-135]) which states: <i>The Applicant will participate as required in the Southern North Sea (SNS) SAC Development Coordination Forum (DCF) to coordinate survey activities to minimise potential for in-combination effects with other offshore wind farm projects in the Winter Region of the SNS SAC.</i> This is included in the following plans: • Application Document 7.5.2 (D) Outline Offshore Construction Environmental Management Plan [REP6-072]; and • Application Document 7.5.11 (D) Outline Marine Mammal Mitigation Plan [REP6-070]. This commitment is secured via Condition 4(1)(b) of the DMLDCO Schedule 3, Requirement 6 Offshore Construction Environmental Management Plan and DCO Schedule 3 and Requirement 6 Marine Mammal Mitigation Plan.
5	Natural England notes the HRA has been updated to information on 5 Estuaries	Natural England advises that a finding of no AEol does not mean there are no residual impacts, rather that alone they don’t affect site integrity. Therefore, the percentage disturbance figures must be included in the in-combination assessment.	The Applicant confirms that an update was made to Application Document 6.6 (H) Habitats Regulations Assessment Report (Tracked) [REP6-051] submitted at Deadline 6 to include ALL projects with potential in-combination effects from underwater sound in relation to the Southern North Sea SAC. The assessment, which considered the WCS with EDR values of 20 km for offshore windfarm projects undertaking impact piling, found the daily threshold for the SNS SAC was exceeded, but the seasonal was not. A copy of the updated Application Document 6.6 (H) Habitats Regulations Assessment Report (Tracked) [REP6-051] was also emailed directly to Natural England on 12 April 2026 for their review.

Table 3: Natural England’s comments on the In-combination Assessment

Documents reviewed:
[REP6-050] 6.6 (H) Habitats Regulations Assessment Report
[REP5-133] 9.121.1 Applicant's Comments on Other Submissions Received at Deadline 4 - Appendix A
[REP5-135] 9.123 Applicant's Responses to Second Written Questions

6	Natural England notes that additional information on in combination assessment have been provided.	Natural England is NOT satisfied that an AEol of the Southern North Sea SAC can be excluded from in-combination effects of underwater noise to harbour porpoise. Whilst we welcome the updated figures for this project and LionLink and agree that OWF’s will make up the majority of the in-combination impact we do not agree that OWFs can be disregarded. HRAs require that all projects, that include noise generating activities which could overlap,	The Applicant confirms that an update was made to Application Document 6.6 (H) Habitats Regulations Assessment Report (Tracked) [REP6-050] submitted at Deadline 6 to include ALL projects with potential in-combination effects from underwater sound in relation to the Southern North Sea SAC. The assessment, which considered the WCS with EDR values of 20 km for offshore windfarm projects undertaking impact piling, found the daily threshold for the SNS SAC was exceeded, but the seasonal was not.

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
		regardless of scale are included in the in-combination assessment. While the Applicant may contend that Sea Link’s contribution is of limited significance, the obligation to undertake a full assessment persists.	A copy of the updated Application Document 6.6 (H) Habitats Regulations Assessment Report (Tracked) [REP6-050] was also emailed directly to Natural England on 12 April 2026 for their review. The Applicant confirms that a commitment (MM03) has been included in the REAC (see Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) (Tracked) [REP6-135]) which states: <i>The Applicant will participate as required in the Southern North Sea (SNS) SAC Development Coordination Forum (DCF) to coordinate survey activities to minimise potential for in-combination effects with other offshore wind farm projects in the Winter Region of the SNS SAC.</i> This is included in the following plans: • Application Document 7.5.2 (D) Outline Offshore Construction Environmental Management Plan [REP6-072]; and • Application Document 7.5.11 (D) Outline Marine Mammal Mitigation Plan. [REP6-070] This commitment is secured via Condition 4(1)(b) of the DMLDCO Schedule 3, Requirement 6 in Application Document 6.6 (H) Habitats Regulations Assessment Report (Tracked) [REP6-050] and DCO Schedule 3 and Requirement 6 Application Document 7.5.11 (D) Outline Marine Mammal Mitigation Plan [REP6-070].
7	After review of the Applicant’s response in relation to R&I log F1, F2, F6 and F8 [REP5-133] Natural England considers these issues resolved.	N/A	This is noted by the Applicant.

Table 4: Natural England’s detailed comments on Noise Modelling

Documents reviewed:

- [REP6-030] 6.2.4.4 (I) Part 4 Marine Chapter 4 Marine Mammals
- [REP6-050] 6.6 (H) Habitats Regulations Assessment Report
- [REP5-131] 9.119 Applicant’s Comments on Late Responses to ExA First Written Questions
- [REP5-132] 9.121 Applicant’s Comments on Other Submissions Received at Deadline 4

8	Natural England notes that additional detail has been provided on noise modelling.	Natural England has reduced the risk rating on issue F15 to yellow. This reflects the stage of the examination and a case specific risk review and does not represent a change in Natural England’s view on importance of empirical noise modelling. Our Advice has taken into consideration that further assessment will be required for the UXO works after consent and advise the empirical underwater noise modelling should be undertaken to inform that future assessment. This issue is now closed.	This is noted by the Applicant.

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
Table 5: Natural England’s detailed comments on other issues			
Documents reviewed:			
[REP5-133] 9.121.1 Applicant's Comments on Other Submissions Received at Deadline 4 - Appendix A			
[REP5-135] 9.123 Applicant's Responses to Second Written Questions			
9	After review of the Applicant’s response in relation to R&I log F1, F2, F6 and F8 [REP5-133] Natural England considered these issues resolved	N/A	This is noted by the Applicant.

Table 75.7 Applicant’s Comments on Natural England Deadline 6 Submission [REP6-247] - Appendix G6 Additional Comments on Offshore Ornithology

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
Summary			
1	As previously advised at Deadline 4, Appendix G4 [REP4-193], Natural England’s primary concern for marine ornithology is potential vessel-related disturbance impacts to red- throated diver (RTD) a feature of the Outer Thames Estuary (OTE) Special Protection Area (SPA). Natural England is becoming increasingly concerned in relation to disturbance of red-throated divers from the more persistent presence of OWF-related vessels and Sea Link could make a meaningful contribution to in-combination effects on the OTE SPA. Our advice remains that the RTD Best Practice Protocol for Vessel Movements should be adhered to for all activities. Following review of the Issue Specific Hearing (ISH) recordings from 26th March [EV9-009] and further confirmation from the Applicant during a meeting on the 1st April, Natural England acknowledges and welcomes the inclusion of the 2km buffer for the proposed mitigation for RTD in the OTE SPA. Provided that this is confirmed and secured within named plans/documents within the Applicants submission at Deadline 6 Natural England would consider this issue resolved. In addition, at the meeting with the Applicant on 1st April, we discussed a series of conditions and potential mitigation measures and commitments to address the outstanding risks and issues associated with Operations and Maintenance (O&M) activities and emergency works. While we acknowledge that maintaining energy transmission is paramount to British energy security, and that unforeseen emergency works, although extremely rare, must proceed without delay, we also consider that appropriate commitments can and should be made to ensure the continued protection of the natural environment. Providing/assuming the following conditions/commitments are included within the Applicants’ submissions at Deadline 6, we will be content that every effort will be made to mitigate impacts to the SPA and should currently unknown impacts arise then there will be a process to address an AEoI of the OTE SPA RTDs at that time. As discussed, Natural England feel that the remaining issues are readily resolvable, depending upon commitments being agreed. For transparency the conditions discussed are as follows: 1) No planned Construction and /or Operation and Maintenance works will be undertaken during the sensitive overwintering period. 2) A commitment to agree with the MMO a definition of Emergency works to be included in the final Construction Method Statement (and/or other relevant named plans) submitted and agreed with the MMO in consultation with the relevant SNCB/s prior to construction. 3) A commitment to apply the RTD protocol during emergency works to be secured in the CSIP/CSEMP (and/or other relevant named plans) to minimise the impacts as much as possible. In addition to the		The Applicant welcomes Natural England’s confirmation in Appendix G6 to its Deadline 6 submission – Natural England’s Additional Comments on Offshore Ornithology [REP6-247] that it raises no concerns in respect of impacts from emergency works on red-throated diver (RTD) in the Outer Thames Estuary Special Protection Area (SPA) subject to appropriate commitments being agreed. The Applicant agrees with that position, for the following reasons. <u>Emergency repairs - risk</u> Submarine power cables are highly reliable and the risk of emergency works being required is remote. CIGRE is a global, non-profit community of power system experts and is the foremost source of technical reference information on the power system. CIGRE Technical Brochures cover the full spectrum of the power system and are factually robust, with each undergoing a rigorous peer review process. CIGRE have published information about the service record of high voltage submarine cables in 2020 (Technical Brochure 815) and 2009 (Technical Brochure 379). This information includes a survey of reliability for approximately 6000 route km of submarine cables. As such, this is the most reliable service data for DC submarine cables available. Failure rates are expressed as the number of faults per 100 route-kilometres per year and reported as either internal (equipment) failures or external failures arising from third-party damage. The data from Table 28 in CIGRE Technical Brochure 815 “Number of cable faults and failure rates for submarine cables 2006 to 2015” for submarine cable failures (both AC and DC) suggests a failure rate of 0.0361 faults / year / 100 km, equivalent to an event with a statistical return period of approximately 28 years. If only DC submarine cable failures are considered the failure rate reduces to 0.0175 faults / year / 100 km, equivalent to an event with a statistical return period of approximately 57 years. The CIGRE report also states that “Extruded DC submarine cables seem to

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
	RTD protocol for emergency works we advise that a log should be submitted to the MMO no more than 4 weeks post conclusion of the emergency works highlighting activity, location and duration etc. 4) In addition, it would be helpful to have the acknowledgement and a process to be secured within a named plan that, depending on the duration and intensity of emergency works within the SPA any additional requirement to compensated for impacts is appropriately considered and where the MMO consider necessary implemented. Again, this condition needs to be captured within a named plan/document (such as the Commitments Registers or as discussed, the RTD protocol) and adequately signposted to.		have a much lower failure rate than [other types of] DC submarine cables”. The CIGRE data described above has been adopted by Ofgem as the basis of their availability assessment for electricity interconnectors. The most recent Ofgem model is for a project named NeuConnect which will interconnect electricity markets in Great Britain and Germany using submarine power cables. In recent years, taking different project specific factors into consideration, Ofgem have published estimated failure rates for submarine DC cables for various projects (Nemo, North Sea Link, IFA2, Greenlink and NeuConnect). Nemo Link provides the most useful direct point of comparison which supports a failure rate of 0.0361 faults / year / 100 km, equivalent to an event with a statistical return period of approximately 28 years. It should be noted that these figures represent industry-wide experience and include many different types of cable, installed at different times, including cables installed to potentially less robust design standards than the Proposed Project. The Proposed Project is being progressed in accordance with the latest accepted industry guidance (CTC835, February 2015), application of this standard mitigates the risk of external cable failure by adopting, through the Cable Burial Risk Assessment (CBRA), a conservative design acceptance criterion for third party damage. This sets a target annual probability of failure of 1×10^{-4} (one in every 10,000 years) in line with DNV guidance for very high consequence events, thereby reducing the residual risk of anchor strike or similar external mechanical damage to a level that is demonstrably as low as reasonably practicable (ALARP) with a strong focus on human and environmental safety. On this basis, over the 40-year operational life of Sea Link, it may be reasonable to consider an average expectation of approximately one marine cable fault. It is important to note, however, that it does not follow that any such fault would necessitate immediate emergency repair activity. In the context of Sea Link, emergency cable repair works are only required in response to situations that threatens danger to persons or property (including risks to marine navigation and other sea users), and/or threatens the proper functioning of the offshore HVDC cable asset in circumstances where a prolonged outage would adversely affect the stability and security of the national transmission network. Some faults may be internal or develop progressively, allowing time for investigation, monitoring or planned intervention and therefore fall within routine maintenance rather than emergency repair. Emergency offshore repair activity is consequently limited to a narrower subset of fault scenarios, and as such, while a very low number of marine cable faults may be expected statistically over the asset life, the likelihood of these translating into emergency cable repair works remains significantly lower. In conclusion, a marine cable failure that would necessitate immediate emergency repair activity is low likelihood scenario which

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
			may never happen and has been specifically considered and addressed through mitigation and design. <u>Emergency repairs – inability to assess</u> Any such emergency works are entirely unpredictable in scope, time or location. In light of this unpredictability, they are not capable of meaningful assessment. Noting that the majority of the Sea Link cable route is located outside the OTE SPA, and greater than half of any calendar year is outside the wintering season. In the (highly unlikely) scenario where the cable required a degree of remediation activity in the SPA during the RTD wintering season, there would be no way of knowing in advance what the location, timing, scale, scope, and impacts of any fault and associated emergency repair might be. The scope of any emergency submarine cable repair cannot be defined through a simple aggregation of individual assumptions or inputs. Rather, the nature and scale of any emergency repair response would depend on a particular and interdependent combination of factors that would only become known at the time of an event. These include the fault location and the need to confirm it, the requirement for any immediate make-safe measures such as guard vessels, the scope of any pre-repair survey and the need to reduce UXO risk to ALARP prior to repair. The response would also be influenced by local seabed conditions, geology and installed protection, water depth, tidal regime and currents, the timing of the cable failure within restricted period, the availability of suitable weather windows, requirements relating to the ports and Areas of Safeguarded Water Depth, requirements relating to any environmental commitments, concurrent activity with other marine projects, the availability and type of suitable repair vessels, and the implications of fault location for vessel transit distances, port calls, and mobilisation logistics. Furthermore, when considering an arbitrary future moment in the lifetime of the Proposed Project, it is not possible to anticipate the distribution of RTD and the wider condition of the SPA, the other baseline conditions (including the amount of third party shipping that contribute to the in-combination effects), or indeed the positions of other third party maritime stakeholders (for example the ports and shipping stakeholders) which influence the methodology for any repair activity (for example whether guard vessels would be required). These factors demonstrate the inherent inability to foresee the circumstances of any emergency repair or the implications on the environment, meaning that it would be impossible to assess other than on the basis of an arbitrary and hypothetical set of assumptions. The outputs of any such assessment would be meaningless, including in the context of identifying compensation. In a situation where it is impossible to establish what the impacts on the SPA might be in any meaningful way, it is similarly impossible to identify

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
			whether any derogation would be required and whether any compensation would be required and, if so, what that compensation would be as it would have to be related to the impacts (at an unspecified point in the future) which are unknowable at this time. It is understood that NE strongly agrees. <u>The Sea Link ‘project’</u> The Conservation of Habitats and Species Regulations 2017 (the Habitats Regulations) provide that a competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and (b) is not directly connected with or necessary to the management of that site, must make an appropriate assessment of the implications of the plan or project for that site in view of that site's conservation objectives. Emergency cable repair works as described above are not part of the Sea Link “project”, within the meaning of the Habitats Regulations. They therefore do not require assessment at this stage. Such works are not an inherent part of the project. As set out above, they: • would only be required due to external factors wholly outside of the control of NGET; • are extremely unlikely; • are entirely unpredictable in scope, time or location; • are incapable of meaningful assessment. The position is further supported by the fact that such works are not being licensed by the Development Consent Order: they are not licensable activities within the Deemed Marine Licence in Schedule 16 to the Development Consent Order. Emergency cable repair works are exempt from needing a licence by reason of art. 34 (“Cables and pipelines – authorised emergency inspection and repair”) of the Marine Licensing (Exempted Activities) Order 2011. The Habitats Regulations are not intended to operate in a wholly impractical way. Treating emergency works of this sort as part of the project would be wholly impractical due to the inability to meaningfully assess them or identify any compensation (if required) at this stage. It should also be noted that the Applicant, National Grid Electricity Transmission, is a competent authority for the purposes of the Habitats Regulations by reason of being a statutory undertaker (reg. 7 of the Habitats Regulations). The Applicant is therefore itself subject to duties under the Habitats Regulations (including under reg. 9 and 63 of the Habitats Regulations). In the unlikely event that any exempt emergency cable repair works are ever needed and require an appropriate assessment under the Habitats Regulations,

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
			the obligation to assess would fall on the Applicant as competent authority at that future point in time. That would be the appropriate time for any assessment. The existence of these legislative duties further emphasises the absence of need for assessment now. For context, the Applicant has previously carried out its duties as a Competent Authority under the Habitats Regulations as part of other National Grid projects. Notwithstanding these legislative duties to which the Applicant would be subject, the Applicant has also provided the commitments sought by Natural England and secured them in the Red-Throated Diver Protocol, as follows: • The Red Throated Diver Protocol describes an emergency repair work as follows: that “it should be noted that unplanned and time-critical ‘emergency’ repair work is not a routine operational and maintenance activity and does not form part of the Proposed Project. An emergency may mean a serious, unexpected, often dangerous situation requiring time-critical action. Unlike routine operational and maintenance activities, including routine planned repairs, the scope of any damage or associated repair cannot be effectively anticipated in advance. An emergency is inherently unpredictable, is very improbable, and the Proposed Project is specifically designed to avoid such occurrences”. • It states that “In addition to the duties of the Applicant as a Competent Authority, following any emergency operation and maintenance activities within the Outer Thames Estuary SPA (and 2 km buffer) during the period of the 1st November – 31st March, a report would be provided to Natural England detailing the nature of the event and the specific location, duration and extent of works undertaken, including associated vessel transits and submitted to the MMO not more than four weeks post conclusion of the emergency works. The MMO in consultation with Natural England, will provide confirmation in writing. The purpose of this report would be to provide a record of activities to help quantify potential impacts for future assessments of cumulative/in-combination effects for other similar projects. • Consultation will be undertaken with the MMO and Natural England as appropriate during this period to ensure the timely repair of any infrastructure whilst minimising disturbance to red-throated diver as far as practicable. Following emergency works within the Outer Thames Estuary SPA (and 2 km buffer), any requirement for compensation post repair for impacts to the SPA will be discussed with the MMO if they conclude adverse effects on the Outer Thames Estuary SPA following submission of the above report”

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
			Conclusion Emergency works, which are entirely unpredictable and uncertain, as well as being highly unlikely, are not part of the project for which consent is sought. Therefore, as agreed with Natural England, they do not need to be subject to assessment under the Habitats Regulations now. The safeguards sought by Natural England have been secured in the Red-Throated Diver Protocol.
	Natural England previously welcomed (D4, Appendix G4 [REP4-193]) the Applicant’s proposed seasonal restriction (Nov 1–Mar 31) to avoid impacts. However, we raised our concerns that this has not been fully applied, specifically, the pre-laying grapnel run (PLGR) occurring from Jan 1 - Mar 31, overlapping with RTD presence and risking displacement. Following a meeting with the Applicant on the 1st April Natural England understands that the Applicant has undertaken further modelling that will be included within their Deadline 6 submission regarding the ‘bird days lost’ methodology. Natural England welcomes the additional effort National Grid have gone to, to provide meaningful data to inform more robust conclusions and it is useful to have calculations provided rather than just a narrative around the impacts. However, Natural England confirmed at the meeting that even the small contribution to the in-combination impact, as identified by the Applicant, will have an AEoSI to an already pressured site and we would therefore maintain our previous position.		The Applicant confirms it has accepted a Seasonal Restriction for PLGR at Deadline 6.
	Risk and Issues associated with construction. Subsequent correspondence from the Applicant confirmed on the 2nd April that they will be applying the seasonal restrictions to all construction activities, including Pre-Lay Grapnel Run (PLGR). Assuming this position is confirmed by the Applicant at Deadline 6, Natural England would be content that an AEoSI will be avoided during construction by fully adhering to the RTD protocol and we would therefore consider this issue resolved.		This is noted by the Applicant.

Table 1: Natural England’s detailed comments on Offshore Ornithology

Document reviewed: [REP6-072] 7.5.2 (D) Outline Offshore Construction Environmental Management Plan

1 (Table 1-12, pg. 36)	Regarding the proposed mitigation for Likely Significant Effect (LSE) on RTD of the OTE SPA, the full seasonal restriction in cable laying activities still excludes the pre-lay grapnel run (PLGR). Therefore, it remains unclear if the project will cause Adverse Effect on Site Integrity (AEoSI) in-combination with other projects.	Following a meeting with the Applicant on the 1st April Natural England understands that the Applicant has undertaken further modelling that will be included within their Deadline 6 submission regarding the ‘bird days lost’. Natural England welcomes the additional effort National Grid have gone to, to provide meaningful data to inform more robust conclusions and the narrative around the impacts. However, Natural England confirmed at the meeting that even with the small contribution of Sea Link to the existing AEoI in-combination impact, identified by the Applicant, we would maintain our previous position. Subsequent correspondence the Applicant has confirmed that they will be adhering to the seasonal restrictions for all activities, including PLGR. Assuming this position is confirmed by the Applicant at Deadline 6, Natural England would be content that an AEoSI will be avoided	The Applicant confirms it has accepted a Seasonal Restriction for PLGR at Deadline 6.

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
		through impacts from all construction activities by fully adhering to the RTD protocol and we would therefore consider this issue resolved. For transparency, please refer to Natural England’s submission at Deadline 4 Appendix G4 [REP4-193], Table 1, NE Ref 1 for our continued/current position (until written confirmation from National Grid at Deadline 6).	
Table 2: Natural England’s detailed comments on Offshore Ornithology Document reviewed: [REP4-242] 9.86 (B) Applicant’s Comments on Other Submissions Received at Deadlines 3 and 3A			
1 (Table 3.7, pg. 58)	The Applicant is reviewing the definition of ‘offshore preparation works’, to provide clarity on what that entails but re-iterates their position that the PLGR is not included in construction activities time limited by the seasonal restriction for RTD.	As above at Table 1 Point 1 – Natural England would consider this issue resolved providing the above commitment is submitted at Deadline 6 and secured in a named plan/document.	The Applicant confirms it has accepted a Seasonal Restriction for PLGR at Deadline 6.
Table 3: Natural England’s detailed comments on Offshore Ornithology Document reviewed: [REP5-037] 6.6 (G) Habitats Regulations Assessment Report			
1 (8.3.68-71)	The Applicant regards London Array Offshore Wind Farm (OWF) as part of the baseline environment and disregards its impact on the RTD population and its distribution within the OTE SPA.	Natural England does not agree, as the London Array OWF was not present when classification distribution and abundance figures for the proposed SPA were set. Therefore, it cannot be regarded as part of the baseline. Only the smaller OWFs, Gunfleet, Thanet and Kentish Flats pre-date the SPA’s classification in 2010. It is also clear that the impacts on RTD numbers and distribution in the SPA from the existing OWF such as London Array, marine aggregates, shipping and other anthropogenic activities including several sub-cable operations remain on-going and limit the birds use of the protected area (Nelson et al in prep). Therefore, it remains our view that any new activity in the OTE SPA prone to displacing RTD risks AEoSI in-combination with these OWF projects and other anthropogenic activities.	The Applicant notes NE’s position and has accepted a seasonal restriction on PLGR, as well as routine operation and maintenance activities. As such, the Project will not generate any new activities within the OTE SPA which could risk displacing RTD.
2 (8.3.14-17)	In the amended HRA there remains no consideration of potential in-combination impacts on RTD from vessel disturbance related to simultaneous or protracted cable laying for the North falls OWF. These impacts have been considered for the other OWFs in the in-combination assessment e.g. Five Estuaries and the East Anglia 1N, 2 and 3 projects, and so should include North Falls OWF too. It is unclear why North Falls OWF has been omitted, particularly as much of the export cable corridor will follow the same route as Five Estuaries OWF.	Natural England advises that the Applicant should include North Falls OWF cable laying impacts in their in-combination assessment or explain why they think it can be excluded and treated differently than Five Estuaries and the East Anglia OWF projects.	North Falls OWF cable laying activities have been considered in the Application Document 6.6 (H) Habitats Regulations Assessment Report [REP6-050] . However, with the inclusion of a seasonal restriction on PLGR, as well as routine operation and maintenance activities, there are no shared impact pathways which could act in-combination to generate significant effects on RTD.

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
3 (8.3.68-71)	Natural England note the Tarchon Energy interconnector cable project has not been included in the amended Habitats Regulation Assessment (HRA) but acknowledge the Applicants comments in REP5-132 (Table 2.38, G11) that there is insufficient data available yet to include it in the in-combination or cumulative assessment.	Natural England agrees that in the absence of sufficient data within the public domain, the omission of the Tarchon Energy project from the in-combination assessment is acceptable (see comment below on REP5-132).	This is noted by the Applicant.

Table 4: Natural England’s detailed comments on Offshore Ornithology

Document reviewed: [REP5-081] 7.8 (B) Red Throated Diver Protocol

1 (1.5.3-11)	Natural England welcomes the commitment to mirror the mitigation imposed for the construction phase during normal operations and maintenance and the decommissioning phase. We also welcome the commitment to consult MMO and NE if emergency work is required during the seasonally restricted period and provide appropriate reporting.	Please see summary text to this Appendix	This is noted by the Applicant.

Table 5: Natural England’s detailed comments on Offshore Ornithology

Document reviewed: [REP5-132] 9.121 Applicant's Comments on Other Submissions Received at Deadline 4

1 (Table 2.38, G2)	The Applicant continues to exclude the PLGR from the cable laying activities bound by a full seasonal restriction to mitigate impacts on RTD.	Natural England welcomes the additional information provided on the likely number of vessels associated with the PLGR, its likely duration through the SPA and the vessels approximate speed of travel. This info goes some way to address our concerns regarding the level of disturbance that may occur to the RTD population. However, we welcome the forth coming assessment of the impacts (using the proposed ‘bird days lost’ approach). We anticipate this will provide evidence to better determine the likely scale of impact and judge this project’s impact in-combination with other projects. Verbal communications on 1st April with the Applicant identified a small percentage contribution of Sea Link to the in-combination assessment. However, despite the small percentage, Natural England maintains the position that such an impact would add to an area already highly pressured by anthropogenic activities, which will contribute further to hindering Conservation Objectives of the OTE SPA. As above at Table 1 Point 1, subsequent correspondence with the Applicant confirmed on the 2nd April that they will be applying the seasonal restrictions to all activities, including PLGR. Assuming this position is confirmed by the Applicant at Deadline 6 and secured in a named plan/document, Natural England would be content that an AEoSI will be avoided through impacts from all activities at the	The Applicant confirms it has accepted a Seasonal Restriction for PLGR at Deadline 6.

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
		construction by adhering to the RTD protocol and we would therefore consider this issue resolved.	
2 (Table 2.38, G11)	The Applicant indicates there are no data on the Tarchon Energy project that can be usefully applied to the in-combination assessment.	Natural England acknowledges the Applicants comment that there is insufficient data available to include it in the in-combination or cumulative assessment. We accept its omission from the in-combination assessment until relevant data becomes available	This is noted by the Applicant.

Table 6: Natural England’s detailed comments on Offshore Ornithology
Document reviewed: [REP5-135] 9.123 Applicant's Responses to Second Written Questions

1 (Table 18.1, ref. 2MO1-4 pg. 87-88)	Natural England looks forward to receiving the assessment of impacts on RTD in-combination using the ‘bird days lost’ approach outlined in Reach et al. 2013. We acknowledge the Applicant’s comments on the amended RTD protocol and welcome the changes i.e. confirmation of the need to limit non-emergency operations and maintenance activities by the full seasonal restriction and a commitment to apply appropriate mitigation for decommissioning in line with that used during the construction phase. We also acknowledge the Applicant is still reviewing our request to add the proposed mitigation for RTD in the OTE SPA to its seaward 2km buffer and look forward to their response.	Following the meeting with the Applicant on the 1st April Natural England has agreed conditions to cover the O&M activities and emergency works. Providing these conditions are included within the Applicants’ submissions at Deadline 6, we will be content that the emergency works will be adequately secured. As discussed in the overarching comments, it is our view that the remaining issues are readily resolvable depending upon such commitments being agreed and adequately secured in named plans/documents.	The Applicant defers to the response above in Table 75.7, Item 1.

Table 75.8 Applicant’s Comments on Natural England Deadline 6 Submission [REP6-248] - Appendix H6 Additional Comments on the Suffolk LVIA

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
Table 1: Natural England’s Advice On: LVIA Document reviewed: [REP5-137] 9.124 Landscape and Visual Nighttime Assessment			
	Natural England notes that the viewpoints included do not include viewpoints within the Suffolk and Essex Heaths Protected Landscape and therefore does not fall within Natural England’s remit. Should viewpoint regarding impact within the National Landscape or its setting be submitted we would be pleased to comment.		Comment acknowledged.
Table 2: Natural England’s Advice on LVIA Document reviewed: [REP5-135] 9.123 Applicant's Responses to Second Written Questions			
	Natural England notes that the responses from the Applicant regarding Landscape Matters largely reiterate comments made in REP5-132 9.121		The latest position on Landscape and Visual matters is contained within Table 1.9 of this document.

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
	Applicant's Comments on Other Submissions Received at Deadline 4. Natural England have provided detailed comments for REP5-132 included below and consider these are equally applicable to Landscape and Visual matters within REP5-135. Natural England provided a detailed response at Deadline 4, Appendix H4 [REP4-194]. We confirm that we have thoroughly reviewed the numerous references to prior documents in forming our conclusions, that the matter remains unresolved.		

Table 3: Natural England’s Advice on LVIA

Documents reviewed: [REP5-131] 9.119 Applicant's Comments on Late Responses to ExA First Written Questions

1 – 1LVIA 7	National Landscape (NL) duty Provide your comments on Document 9.47 NL Duty Section 85 Duty Technical Note [REP1 120], including the approach to the s85 duty, the natural beauty indicators in table 3.2 and the special qualities indicators in table 3.3 and the cumulative effects on the NL in section 4 and tables 4.1 and 4.2. In your response include consideration of whether the extent and nature of the preferred area of acid grassland on plate 3.2 of [REP1-120] is sufficient and the appropriateness of the maintenance period of 10 years.	Natural England notes that the Applicant has not provided a specific response to LVIA matters in this submission and refers to REP5-132 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 for this issue. Please see our detailed comments to REP5-132 below	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document.

Table 4: Natural England’s Advice on LVIA

Documents reviewed: [REP5-132] 9.121 Applicant's Comments on Other Submissions Received at Deadline 4

1 (Table 5.1)	Natural England advise that information to understand the fertility status of the 6ha area is needed, in addition to any further necessary mitigation. It is not clear how our comments have been addressed. The Applicant refers back to REP2-014 (section 2.3), REP3-064 (Table 15.1, points 9–15), with additional information provided in REP4-241 (Table 3.1, point 6). These documents affirm the Applicants position thatproviding the additional information is not needed . <i>. 'Some movement of nutrients may occur but the refined area for habitat restoration is existing degraded acid grassland, and most is approximately 200 m south of the pig farm. Given the under-managed and bracken and gorse invaded nature of the degraded acid grassland there is considerable opportunity for enhancement in quality by introducing appropriate management. Given that reversion of former arable land is no longer proposed but instead existing degraded acid grassland, generally, further from the pig farm, will be restored by improved management</i>	Natural England continues to advise that understanding the soil pH is needed to provide a robust evidence base to support the proposals for 6ha acid grassland enhancement. The project is relying on acid grassland enhancement to compensate for loss of 7.5ha of grassland through open trenching. Natural England notes the Applicant states there is no requirement for pH testing or fertility assessment on the area of land proposed for acid grassland restoration because there is already acid grassland present, albeit in a degraded condition. For clarity our advice relates to the feasibility of restoring acid grassland to the intended condition given the presence of the nearby pig farm and agricultural operations, and the requirement to provide suitable baseline evidence. We advise that the influencing factors of the pig farm and land use (on the Ph of the soil for	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document and in Application Document 9.153 Applicant’s Response to the ExA’s Rule 17 Letter submitted at Deadline 7. Moreover, the Suffolk oLEMP submitted at Deadline 7 has included (in Section 5) a commitment to confirming the pH of the enhancement area, a discussion of the baseline situation and how the management proposals will enhance opportunities for wildlife including that already present, and to discuss the way in which the adjacent farming operation has been taken into account in devising the management measures and how the enhancement can be delivered despite the adjacent farming operation.

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
		example) may restrict the project's ability to restore acid grassland as stated. This is therefore a risk to stated outcomes. The fact that the management is limited to 10 years is a further limiting factor. In addition, it is unclear if the rotation regime will include movement of the pigs in closer proximity to the 6ha area during the 10-year period. It remains unclear why the acid grassland enhancement cannot be secured for the lifetime of the project and what the intended use of this area of land will be post the ten-year period. A clear management plan including baseline status and objectives should be provided and secured in the oLEMP with contingency measures should acid grassland enhancement not proceed as expected. Furthermore, it appears that the 6ha contains deciduous woodland and additional habitat of biodiversity value, which should not be carefully considered by the proposals.	
2 (Table 15.5 Ref 2)	The following is included as a key issue as the project is relying on the success of restored acid grassland for direct impacts to acid grassland habitats within the Protected Landscape. Natural England continue to advise that additional evidence is required regarding the baseline habitat type of this area (a portion of which appears to be deciduous woodland priority habitat). Information regarding soil pH and influencing factors such as the adjacent agricultural land use have not been evidenced. The applicant refers back to Evidence regarding the baseline habitat type, soil pH, the adjacent agricultural land use and reasoning for the 10-year commitment should be referred to within Table 15.1 contained in Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]. Further information on the adjacent agricultural land use is also referred to within AP44 contained in Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4 086].	Please see comments above (ref table 15.1) for Natural England advice on this matter In addition, AP44 is referenced which again does not provide further clarification on the influencing factors of the adjacent pig farm and agricultural practices.	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document.
3 (Table 15.5 Ref 2 (cont'd))	It is not clear how the 10-year management plan would be sufficient to provide the stated gains, either on ecological grounds or Landscape and Visual. This is a clear risk to the efficacy of compensation.	This matter has not been addressed in the document	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document.

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
	Furthermore, the pre-commencement management of this area does not appear to be substantiated in the LEMP or Plate 3.2 within Document 9.47 [REP1120].		
4 (Table 15.5 Ref 2 (cont'd))	The table appears to contain conflicting advice as follows: <i>resulting in no significant adverse effects on the SECHNL at any project stage for the Proposed Project alone or at operation cumulatively. A temporary significant adverse cumulative effect is reported, and all mitigation options have been explored.</i>	Clarification as a temporary significant effect has been identified. The first stage of the mitigation Hierarchy is avoidance, and we continue to advise that the applicant has not provided a clear justification as to why sensitive habitats within the Protected landscape cannot be traversed via trenchless techniques. This would demonstrate compliance with the mitigation hierarchy and mitigate in itself remaining concerns regarding the temporary nature of the landscape and visual impact extending into the operational stage should reinstatement in the location of the trenches fail, or contingency measures needed should the 6ha of acid grassland fail. Furthermore, this would be in line with the LURA duty for which the mitigation hierarchy should be applied at each stage. In addition, trenchless techniques would mitigate impacts to FLL associated with the Sandlings SPA.	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document. Further information on the application of the mitigation hierarchy has been referred to within the response to 3GEN1 contained within Appendix A of Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112] .
5 (Table 15.5 Ref 2 (cont'd))	Clarification is required of the term “multifunctional enhancements” for this area. This should be evidenced by a clear audit trail of impact, mitigation and as a last resort compensation with quantum provided for each impact. This is a requirement of the mitigation hierarchy. Enhancement is provided in addition to mitigation and compensation. Natural England consider open trenching to be a direct impact requiring compensation and we reiterate that this area would not be able to be considered for BNG as this must be secured for 30 years.	An explanation for the term multifunctional benefits does not appear to have been addressed by the applicant. <i>The acid grassland enhancement measures are considered to compensate for the short term and temporary cumulative effects and provide further enhancement for the SECHNLP within the operational phase of the Proposed Project (as set out in Plate 3.1 within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]).</i> Natural England reiterates that if the 6ha of land appears to be included to compensate for direct impacts to c.7.5 ha of acid grassland within the Protected Landscape then it is not clear how this can also be considered as an enhancement in particular as the duration of works is limited to 10 years. In addition, we note that the Applicant reaffirms their position that the acid grassland enhancement proposals are appropriate and proportionate to demonstrate compliance with the Section 85 duty.	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document.

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
		Therefore, the acid grassland appears to be compensation for acid grassland loss (albeit less than that being impacted ,7.5 ha with associated biodiversity loss). In addition, the area does not provide additional acid grassland as the area is already acid grassland habitat. Natural England advise that the audit trail explanation detailing how the 6ha area is also enhancement and demonstrates compliance with the Section 85 LURA remains outstanding. We reiterate that in order to conserve the acid grassland trenchless techniques should be adopted. <i>Regarding this the applicant Refers to Table 15.1 of Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]. To use a trenchless technique along the small area of priority habitat acid grassland would involve extending the duration of works close to Sandlings SPA and Leiston-Aldeburgh SSSI. This is considered less desirable than the much shorter timescale of open trenching through the acid grassland.</i> This does not reflect the loss of 7.5 ha of acid grassland within the Protected Landscape, we have advised that we do not agree that the term small scale is appropriate and that the impact to the special qualities of the Protected Landscape as whole is appropriate. It is not clear how the time taken for the acid grassland to recover and risks involved compared with the extended works time to avoid impact is substantiated, in particular as HDD compound setup is to occur outside the breeding season.	
6 (Table 15.5, 3)	Natural England continues to advise that further evidence is required to support the assessment conclusions regarding significance of effect during construction. We have provided the following comments which should be clarified as part of the provision of further/updated evidence. A clear Assessment of impact on each Special Quality remains outstanding. Table A.1 (Appendix A Document 9.73.1) does not address each defining feature of the National Landscape and instead provides an overall assessment of impact. Narrative is not substantiated with audit/evidence for each feature.	The applicant refers to Application Document 9.94 (A) Planning Statement Addendum [REP4-092] provides the Special Qualities Indicators baseline and further detail relating to the assessment of the sub-factors. The applicant also refers to Application Document 9.73.1 Applicant's Responses to First Written Questions – Appendices [REP3 070] for detail on how the sub-factors of the Natural Beauty Indicators have the potential to be affected by the Proposed Project.	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document.

Reference	Key Concern and/or Update	Natural England's Advice to Resolve Issue	Applicant's Comments
	For example, the presence of the barge, landing operations, lighting, do not appear to have been considered within the assessment.	We note that the applicant maintains that the additional narrative demonstrates that the non-significant effects reported at construction and operation within the Environmental Statement for the SECHNL remains justified. We advise that although the sub- factors have been acknowledged (which we welcome) each subfactor remains within an overall assessment which lacks clarity on how each subfactor may be impacted. For example, Relative wildness includes a lack of human influence sub factor: It remains unclear how machinery/lighting traffic/personnel associated with the construction works has been considered within this sub factor. The assessment continues to rely on the temporary nature of the impact to lessen significance (which may extend into operation) and the small scale of impact which is not appropriate as we have advised. We continue to advise that trenchless crossings should be further assessed. With regards to duration, it is Natural England's understanding that short term impacts include impacts up to one-year, medium term up to 5 years, with long term beyond 5 years. This needs to be clearly considered within the receiving landscape, considering how long habitats will take to recover, wider impacts within the affected area of the PL and how these can be minimised and how effective compensation is on the special qualities of the Protected Landscape	
7	It is not clear how impacts to the Heritage Coast have been considered. • Impacts on the setting of the National Landscape via open trenching have not been included. • The assessment cites the impact as small scale which is not appropriate. The impact must be considered on the special qualities of the National Landscape. • The assessment conclusions rely on the temporary nature of impact. The impact of open trenching may extend into the longer term. The conclusion requires justification and in addition how avoidance of impact has been considered. • It is not clear where compensation for significant cumulative impacts has been provided.	Regarding Heritage Coast The applicant refers 1LVIA11 within Application Document 9.73 Applicant's Responses to First Written Question [REP3-069] for reference however this does not reference Heritage coasts Natural England have noted the reference AP46 and AP47 within Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]. It would be helpful to provide a conclusion of effect on the Heritage Coast from impacts to the landfall area and associated works with specific regard to Heritage Coasts. We note that AP47 includes a conclusion and that this is based on short term impacts, but it	The latest position on Landscape and Visual matters is contained within Table 1.9 of this document.

Reference	Key Concern and/or Update	Natural England’s Advice to Resolve Issue	Applicant’s Comments
		would be helpful to cite the specific assessment material and evidence relating to this. Regarding setting the applicant refers to document Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097] and that setting, as an indirect effect, is addressed for each Natural Beauty Indicator where relevant. The justification for omitting impacts on the setting of the Natural Beauty indicators has not been included, and it would be helpful to include the full of special qualities and subsets in this assessment, alongside the location of the evidence supporting the conclusions. The setting does not appear to be considered in Special Quality terms and indeed the conclusion is that: The construction activity affecting the AONB and its setting would be localised and the main activity of the laying of the HVDC cable is not considered to be dissimilar to typical agricultural machinery on arable fields and the seasonal disturbance of soils which is characteristic of arable land. There would be highly localised temporary adverse effects on scenic quality, natural heritage, tranquillity and wildness, both directly and indirectly, due to construction activity including limited vegetation loss, that indirect effects	

Table 75.9 Applicant’s Comments on Natural England Deadline 6 Submission [REP6-248] - Appendix H6 Additional Comments on the Suffolk LVIA – Annex 1
Natural England’s additional narrative around the LVIA outstanding issues provided ahead of Deadline 6

Advice	Narrative	Information Required	Applicant’s Comments
Table 1: Summary of outstanding concerns and advice			
<u>6 ha area:</u> We continue to advise that additional evidence is required regarding the baseline habitat type of this area (a portion of which appears to be deciduous woodland priority habitat). Information regarding soil pH and influencing factors such the adjacent agricultural land use, have not been evidenced.	Our advice relates to the feasibility of restoring acid grassland to the intended condition given the presence of the nearby pig farm and agricultural operations, and the requirement to provide suitable baseline evidence. The influencing factors of the pig farm and land use (on the pH of the soil for example, chemical drift, nutrient runoff) may restrict the project’s ability to retore acid grassland as stated. This is therefore a risk to stated outcomes. The fact that the management is limited	The risks regarding the location of the proposed enhancement should be acknowledged and incorporated. They remain an unmitigated risk. Acknowledgement of existing biodiversity value of the area and how this will be maintained. Understanding the pH of the soil would help understand likely success of acid grassland restoration	Evidence regarding the baseline habitat type is presented within Table 15.1 at References 3 and 4 (pages 48-51) contained in Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]. This states that there is an area of woodland at the south of the parcel for enhancement, but the Applicant will not be affecting this habitat. The 6 ha area the Applicant will be enhancing is low quality as can be seen from structure of the vegetation (dense and tussocky) and gorse and bracken encroachment. The grassland to be restored/enhanced is primarily currently degraded acid grassland community U1b Festuca ovina-Agrostis capillaris-Rumex acetosella

Advice	Narrative	Information Required	Applicant's Comments
	to 10 years is a further limiting factor. In addition, it is unclear if the rotation regime will include movement of the pigs in closer proximity to the 6ha area during the 10-year period. We advise that the influencing factors of the pig farm and land use (on the Ph of the soil for example) may restrict the project's ability to restore acid grassland as stated. This is therefore a risk to stated outcomes. The fact that the management is limited to 10 years is a further limiting factor as below.		grassland. It is heavily bracken, gorse and scrub invaded in areas. Characteristic species are <i>Agrostis capillaris</i> (dominant)), <i>Dactylis glomerata</i>, <i>Senecio jacobea</i>, <i>Galium aparine</i>, <i>Stellaria media</i>, <i>Montia</i>, <i>Rumex acetosella</i>, and <i>Pteridium aquilinum</i>. The currently degraded nature is very clear from photos (in Table 15.1) (taken in winter but the degraded state is clear). Evidence regarding the soil pH is presented within Table 15.1 (Reference 1 on page 47) contained in Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]. This states that the Applicant is proposing restoration of 6 ha of existing degraded acid grassland (identified as such due to its botanical characteristics e.g. relict acid grassland species) within that parcel. Since this is already identified as acid grassland (albeit degraded) the pH of this area does not require testing, and we can confirm that the land has not been recently cultivated. The ability of this area to support acid grassland of a higher quality than the baseline does not require any further pH or soil analysis. Evidence regarding the adjacent agricultural land use should be referred to within Table 15.1 (Reference 2 on pages 47-48) contained in Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064] and within AP44 (page 34) contained in Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]. This states that some movement of nutrients may occur but the refined area for habitat restoration is existing degraded acid grassland, and most is approximately 200 m south of the pig farm. Given the under-managed and bracken and gorse invaded nature of the degraded acid grassland there is considerable opportunity for enhancement in quality by introducing appropriate management. Given that reversion of former arable land is no longer proposed but instead existing degraded acid grassland, generally further from the pig farm, will be restored by improved management and invasive species removal, it is considered that further information on soil fertility status or pig farm management is not required. It also states that the Applicant understands that the fields between the pig sheds to the north and the degraded acid grassland to the south are already used as part of the pig farm operations during a standard farming rotation, alternating with the cultivation of high value crops. Therefore, no change in farming practice is expected. The fact the acid grassland has been able to persist despite these operations, and that its degraded state is clearly due primarily to lack of management (e.g. bracken and gorse encroachment and a tall tussocky sward) indicates that the current farming operations to

Advice	Narrative	Information Required	Applicant's Comments
			the north will not hinder ecological improvement of the sward through reintroduction of good management. It is possible the pigs will be moved into the fields north of the degraded acid grassland during the 10-year management period. However, in addition to the above comments that the currently degraded state of this grassland is primarily due to absence of management, since fields to the north of the acid grassland are already used to grow high value crops on a rotation. It should also be noted there is no slope from the fields to the acid grassland, and some parts of this grassland sit at a slightly higher elevation than the fields to the north. Likelihood of significant runoff into the acid grassland is therefore low. However the Suffolk oLEMP submitted at D7 has included (in Section 5) a commitment to confirming the pH of the enhancement area, a discussion of the baseline situation and how the management proposals will enhance opportunities for wildlife including that already present, and to discuss the way in which the adjacent farming operation has been taken into account in devising the management measures and how the enhancement can be delivered despite the adjacent farming operation. Reasoning for the 10-year commitment should be referred to within Table 15.1 at Reference 5 (page 51) contained in Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]. This states that the impact is temporary because for most of the affected area, there will be a closed sward after 1-2 growing seasons, with perhaps 5 years (rather than 10 years) to match the existing grassland given even the small area of priority habitat is semi-improved. In the meantime, the Applicant will start restoring the degraded grassland before the existing grassland is lost to the Proposed Project. These timelines are set out in Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120].
<u>10 year management plan:</u> It is not clear how the 10 year management plan would be sufficient to provide the stated gains either on ecological grounds or Landscape and Visual. This is a clear risk to the efficacy of compensation. Furthermore, the pre-commencement management of this area does not appear to be substantiated in the LEMP or Plate 3.2 within Document 9.47	In addition it is unclear if the rotation regime will include movement of the pigs in closer proximity to the 6ha area during the 10 year period. When considering the time taken for directly affected habitats to establish and the limitations of the proposed area it is not clear how this area can be considered as enhancement. We again advise that employing trenchless techniques to avoid habitats should be adopted We note that the timescales involved in HDD and small area of acid grassland have been cited as a reason not to employ this technique. This does not	We again advise that employing trenchless techniques to avoid impacts to sensitive habitats should be adopted. This advice is in line with the mitigation hierarchy.	Regarding the comments around the pig rotation and adequacy of the 10-year management, this is addressed in the comments above relating to the matter '6 ha area' as this has been repeated. The Suffolk oLEMP submitted at D7 has included (in Section 5) a commitment to confirming the pH of the enhancement area, a discussion of the baseline situation and how the managemet proposals will enhance opportunities for wildlife including that already present, and to discuss the way in which the adjacent farming operation has been taken into account in devising the management measures and how the enhancement can be delivered despite the adjacent farming operation. Regarding the comments relating to timeframes, the responses to 'Temporary Nature' should be referred to below due to repetition.

Advice	Narrative	Information Required	Applicant's Comments
	reflect the loss of 7.5 ha of acid grassland within the Protected Landscape. We have advised that we do not agree that the term small scale is appropriate and that the impact to the special qualities of the Protected Landscape as whole is appropriate. It is not clear how the time taken for the acid grassland to recover with risks involved, compared with the extended works time to avoid impact is substantiated.		The Suffolk oLEMP (Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk [REP6-078]) states that the objective for this area will be to secure well-structured acid grassland with an increase in acid grassland indicator species over the baseline. The fact the acid grassland has been able to persist despite the presence of intensive agriculture to the north, and that its degraded state is clearly primarily due to lack of management (e.g. bracken and gorse encroachment and a tall tussocky sward) indicates that the current farming operations to the north will not hinder ecological improvement of the sward through reintroduction of good management. Simply controlling bracken and gorse encroachment and restoring a less tall and thick tussocky sward by introducing appropriate management will itself be an enhancement and can be accomplished within the first few years. The reasoning for open trenching should be referred to within Table 15.1 at Reference 13 (page 54) contained in Application Document 9.36 Applicant's Comments on Other Submissions Received at Deadline 2 [REP3-064]. This states that to HDD the small area of priority habitat acid grassland would involve extending the duration of works close to Sandlings SPA and Leiston-Aldeburgh SSSI. This was considered less desirable than the much shorter timescale of open trenching through the acid grassland. Trenchless methods are not appropriate for this location. Firstly, to adopt a trenchless method to avoid directly disturbing any acid grassland would involve prolonging the duration of the HDD and other works adjacent to Sandlings SPA and Leiston-Aldeburgh SSSI, both of which are disturbance-sensitive due to their nesting and wintering bird interest. This is not considered desirable or appropriate given the degraded semi-improved nature of the vast majority of the acid grassland to be affected by open trenching and the short total duration (several months) of the open trenching work. Secondly, in deciding whether a trenchless crossing methodology should be used to install the cables the following factors were considered: • Temporary land take – for high voltage cables, trenchless methods need much more land than open cut trenching due to the need for drive and receptor compounds and laydown areas. The Suffolk HDD compound provides an example of size; while any hedgerow HDD compound would be smaller, it would not be a great deal smaller. • Larger permanent easement - trenchless methods need to be installed at greater depths than open cut, which requires cables to be separated further from each other to avoid affecting electrical capacity. A wider easement

Advice	Narrative	Information Required	Applicant's Comments
			is also needed to allow for any variation in the alignment during the installation process. • Longer programme – for high voltage cables, it generally takes much longer to HDD under a hedge than to open trench through it. Open cut trenching may take days to a week; HDD may take a month or more in each case, including compound set up and demobilisation. • Increased need for lighting - once an HDD drill starts it must continue until it is finished, meaning greater potential for night working than with open trenching. • Greater vehicle movements – trenchless construction requires additional vehicle movements due to the specialist plant and the need to service the drilling. These factors were all considered by the project ecologists. It was determined that the shorter disruption provided by open trenching was preferable and less disturbing overall to wildlife. Regarding pre-commencement management this should be referred to within Table 15.5 at Reference 2 (page 106) contained in Application Document 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-132]. This states that the oLEMP (Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk [REP6-078]) states within section 5.3 that the acid grassland enhancement land management would commence delivery prior to the loss of acid grassland east of Leiston Road. The Landscape and Ecological Management Plan (LEMP) must be substantially in accordance with the Outline LEMP – Suffolk, which is secured by Requirement 6 within Application Document 3.1 (G) draft Development Consent Order [REP4-217]. Regarding the use of the term ‘small-scale’ this should be referred to within Table 15.5 at Reference 3 (page 107) contained in Application Document 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-132]. This states that the Applicant notes that the sections of acid grassland that would be temporarily impacted to facilitate the construction activity of the Proposed Project within the SECHNL are described as being ‘small-scale’ within Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]. The description of ‘small’ relates to the proportion of acid grassland when considering the acid grassland cover within the SECHNL as a whole. The coverage of acid grassland within the SECHNL has been estimated to be 442.91 ha using a combination of project survey data (acid grassland on the Phase 1 Mapping) and ‘Priority Habitat Inventory – Lowland Dry Acid Grassland (England)’ layer on MAGIC.gov.uk. Whilst 7.61

Advice	Narrative	Information Required	Applicant's Comments
			hectares (ha) of acid grassland would be affected (equating to 1.72 % of the total area within the SECHNL), only 0.3 ha of this is priority habitat acid grassland. Further information on the application of the mitigation hierarchy has been referred to within the response to 3GEN1 contained within Appendix A of Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112].
<u>Multifunctional enhancements:</u> Clarification is required of the term multifunctional enhancements for this area. This should be evidenced by a clear audit trail of impact, mitigation and as a last resort compensation with quantum provided for each impact. This is a requirement of the mitigation hierarchy. Enhancement is provided in addition to mitigation and compensation. We consider open trenching is a direct impact requiring compensation and reiterate that this area would not be able to be considered for BNG as this must be secured for 30 years.	The 6 ha acid grassland enhancement appears to be compensation for acid grassland loss (albeit less than that being impacted, 7.5 ha with associated biodiversity loss). In addition, the area does not provide additional acid grassland as the area is already acid grassland habitat. The same 6ha area is also described as enhancement and also to further the purpose of the Protected Landscape.	Further information required: Detail regarding the targeted function of the 6ha area This should consider the existing biodiversity value of the site and how this will be conserved, alongside risks of establishment of acid grassland and how this is mitigated. This area is described as compensation (required for impacts to 7.5 ha of acid grassland). An audit trail is required to demonstrate how the 6ha area will also provide enhancement and, in addition an explanation of how it is considered that the area of land which is provided to compensate for an impact to the habitats within the National Landscape can also further the purpose of the National Landscape.	The existing biodiversity value will be enhanced by the improved management, as acknowledged (for example) by RSPB in their submissions into the DCO Examination. The Suffolk oLEMP submitted at D7 has included (in Section 5) a discussion of the baseline situation and how the management proposals will enhance opportunities for wildlife including that already present. As per the Suffolk oLEMP (Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk [REP6-078]) the restoration of good structure alone will provide nesting habitat for skylarks and foraging (and potentially nesting) habitat for woodlarks. The southern part of the parcel contains woodland; acid grassland adjacent to woodland can be particularly suitable for woodlarks. Regarding multifunctional enhancements and the targeted function of the 6 ha enhancement area this should be referred to within Table 3.2 (page 12) contained in Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120], Table 3.5 Reference 5 (page 37) contained in Application Document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241] and Table 15.5 at Reference 2 (page 106) contained in Application Document 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-132]. This details the relevance of the acid grassland enhancement works to each of the Natural Beauty Indicators. Whilst biodiversity is noted as part of the multifunctional enhancement within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120], this is considered separate to calculations of Biodiversity Net Gain which require 30 years. This states that since there will be a two-year lag-time following reinstatement before functional acid grassland is restored, and possibly a slightly longer time-period before all the grassland matures, a parcel of land has been identified in the Order Limits in which a 6 ha area of acid grassland would be enhanced and subsequently maintained for a 10 year period. This would provide a net enhancement of at least 6 ha with a further 4.05 ha of acid grassland which would be restored to a higher quality than its current condition.

Advice	Narrative	Information Required	Applicant's Comments
			This also states that the Applicant during a meeting with Natural England on 22 January 2026 requested further clarity on what additional information was required regarding the multifunctional enhancement. This remains an outstanding action point for Natural England to address. Regarding compensation measures this should be referred to with reference to the 'Compensation' matter below as this comment has been repeated. Further information on the application of the mitigation hierarchy has been referred to within the response to 3GEN1 contained within Appendix A of Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112].
<u>Assessment of impact on each Special Quality remains outstanding:</u> Table A.1 does not address each defining feature of the Protected Landscape and instead provides an overall assessment of impact. Narrative is not substantiated with audit/evidence for each feature.	Although the sub- factors have been acknowledged in Table A.1 (REP3-070.) (which we welcome) each subfactor remains within an overall assessment which lacks clarity for the reader on how each subfactor has been considered For example, Relative wildness includes a lack of human influence sub factor: It remains unclear how machinery/lighting traffic/personnel associated with the construction works has been considered within This sub factor. The project therefore appears to impact this special quality but it is not clear how this will be mitigated or how consideration of this impact has led to the assessment conclusions. This is because the specific impacts are not clearly substantiated/assessed against sub factors with accompanying evidence used to reach conclusions.	Further information: Clear audit trail regarding how sub factors have been considered and any mitigation employed ton address impacts. The term “overall” does not provide clear narrative of how each factor has been considered and mitigated.	Regarding effects arising from the Proposed Project, Appendix A 1LVIA9 Natural Beauty Indicators and their Sub-Factors contained within Application Document 9.73.1 Applicant's Responses to First Written Questions – Appendices [REP3-070] and within Table 6.1 of Application Document 9.94 (A) Planning Statement Addendum [REP4-092] provides further detail on how the sub factors of the Natural Beauty and Special Quality Indicators have the potential to be affected by the Proposed Project. Further information can be found within Table 3.5 Reference 7 (page 38) contained in Application Document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241]. Regarding the Natural Beauty Indicators this states that this is a combination of information from Table 2.1 within Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097] with further clarity provided on the potential effects arising from the Suffolk Onshore Scheme for each of the sub factors listed within the LDA Design Suffolk Coast and Heaths Area of Outstanding Natural Beauty (AONB) Natural Beauty and Special Qualities Indicators V1.8 2016 document. This demonstrates that the non-significant effects reported within Table 2.1 of Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097] at construction and operation (and maintenance) remain justified. Regarding the Special Qualities Indicators, this states that the non-significant effects reported at construction and operation within the Environmental Statement for the SECHNL remains justified. Regarding inter-project cumulative effects, Appendix A 2LVIA10 Inter-project Cumulative Effects on the Sub-Factors of the Natural Beauty and Special Qualities Indicators of the National Landscape contained within Application Document 9.123.1 Applicant's Responses to Second Written Questions – Appendices [REP5-136] should be referred to. Further information can be found in relation to the answer to 2LVIA10 on page 21 within Application Document 9.123 Applicant's Responses to Second Written

Advice	Narrative	Information Required	Applicant's Comments
			Question [REP5-135]. This states that this assessment on the sub-factors provides a greater level of detail and should be read in conjunction with the assessment on the Indicators provided within Tables 4.1 and 4.2 within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]. To note that this has been undertaken for the construction phase of the Proposed Project as once operational the Suffolk Onshore Scheme landfall and HVDC cable corridors would be fully reinstated thereby not giving rise to potential cumulative effects. Regarding compensation measures this should be referred to with reference to the 'Compensation' matter below as this comment has been repeated. Further information on the application of the mitigation hierarchy has been referred to within the response to 3GEN1 contained within Appendix A of Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112].
<u>Small Scale Impact:</u> The assessment cites the impact as small scale which is not appropriate. The impact must be considered on the Special Qualities of the National Landscape	The small scale of impact is frequently cited alongside the quantum of the area affected compared to the Protected landscape as whole. We have advised that the impact should be considered on the Special Qualities of the receiving landscape i.e. considered as an impact to the Protected Landscape and how this first can be avoided.		Regarding the use of the term 'small-scale', this is addressed in the comments above in relation to the '10 year management plan' matter as this has been repeated. Further information on the application of the mitigation hierarchy has been referred to within the response to 3GEN1 contained within Appendix A of Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112].
<u>Temporary Nature:</u> Conclusions rely on the temporary nature of impact which is not clearly justified.	The assessment in Table A.1 (REP3-070.) continues to rely on the temporary nature of the impact to lessen significance (which may extend into beyond the stated short-term) , and the small scale of impact which is not appropriate as we have advised. For example, Visual Impacts in patterns of land cover he cable trench and associated vegetation removal will introduce a severing/scaring activity into the National Landscape and its setting. Reinstatement of the various habitats will take time as the habitats mature and therefore the impact will be experienced for both landscape character and visual impacts within the Protected Landscape and its setting until the habitats reinstate.	Clarity on timescales of construction and operation considering how long habitats will take to recover.	Regarding the timeframes for construction and reinstatement and the habitats affected by the route, these points are responded to within Application Document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241]. Regarding securing successful implementation, timing of the HVDC cable route and Suffolk landfall works within the SECHNL and timing considered in the assessment, this should be referred to with reference to H6 contained in Application Document 9.121.1 Applicant's Comments on Other Submissions Received at Deadline 4 - Appendix A [REP5-133]. Regarding the timing of works within the SECHNL, this is demonstrated in Plate 3.1 (page 9) relating to 'acid grassland within AONB temporarily affected for construction at Suffolk landfall and HVDC corridor' within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]. The proposed six-month Suffolk landfall works is also shown on Table 4.10 (page 29) within Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]. This states that regarding the timing considered in the assessment, the

Advice	Narrative	Information Required	Applicant's Comments
			reinstatement of acid grassland is noted as taking comparatively longer to re-establish in the operational assessment (Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]). As noted within the response to Appendix H3 Natural England's Advice on Suffolk LVIA [REP3-120] submission is provided in Application Document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241], the proposed process if reinstatement appears to be failing, is set out in the Suffolk oLEMP (Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk [REP6-078]). There is a 5-year aftercare period during which it will become clear if reinstatement is failing. If it is, this would be rectified. The construction timeframes are set out within Table 4.10 in Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [AS-093]. This sets out that the HVDC cable route works for the entire Suffolk Onshore Scheme would last for approximately 2.75 years. However, the open cut cable installation typically requires long sections of trenching (typically 800 m – 1000 m) which can progress in good soils at +100 m per day, dropping to 10 m per day or less in challenging areas such as rock (Application Document 6.2.1.4 (C) Part 1 Introduction Chapter 4 Description of the Proposed Project (Clean) [AS-093]). The enabling works and installation works for the Suffolk Landfall would last for a duration of approximately 6 months. These are considered to be the works of the Proposed Project related to the SECHNL and its setting. With regard to soil reinstatement, as noted in LV05 in the Register of Environmental Actions and Commitments (REAC) (Application Document 7.5.3.2 (B) CEMP Appendix B Register of Environmental Actions and Commitments (REAC) [REP1-102]), subsoil and topsoil will be separated and stored to ensure no degradation in quality and reinstatement undertaken as soon as possible after completion of construction of each section/area of works. With regard to hedgerow reinstatement, the outline Landscape and Ecological Management Plan (oLEMP) (Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk [REP6-078]) notes that hedgerow reinstatement would commence within the first available planting season post construction and could be phased depending on the programme of HVDC construction. The influence of this on the magnitude of effect is acknowledged within the assessment of effects as this refers to hedgerow reinstatement which would take comparatively longer to re-establish than areas of agricultural land.

Advice	Narrative	Information Required	Applicant's Comments
			Regarding reinstatement of other habitats, such as acid grassland, measures should be referred to within the oLEMP and Plate 3.1 within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120] which sets out the restoration timeframe relating to the acid grassland proposals. It should also be noted that the reinstatement would be subject to adaptive management as secured in 7.3 of the oLEMP (Application Document 7.5.7.1 (D) Outline Landscape and Ecological Management Plan – Suffolk [REP6-078]). The great majority of tree and woodland planting would be managed for the lifetime of the Proposed Project as all mitigation planting associated with the permanent access road, River Fromus bridge, Saxmundham Converter Station and Friston Substation under Scenario 2 (substation is built as part of the Proposed Project) will be maintained for the lifetime of the asset.
<u>Heritage Coast:</u> It is not clear how impacts to the Heritage Coast have been considered.	The applicant refers 1LVIA11 within Application Document 9.73 Applicant's Responses to First Written Question [REP3-069] for reference however this does not reference Heritage coasts. Natural England have noted the reference AP46 and AP47 within Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086]. Natural England have noted the reference AP46 and AP47 within Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1).	It would be helpful to provide a conclusion of effect on the Heritage Coast from impacts to the landfall area and associated works with specific regard to Heritage Coasts. We note that AP47 includes a conclusion and that this is based on short term impacts but it would be helpful to cite the specific assessment material and evidence relating to this.	Regarding the effects on the Suffolk Heritage Coast, the response to 1LVIA11 within Application Document 9.73 Applicant's Responses to First Written Question [REP3-069] should be referred to. AP46 and AP47 within Application Document 9.90 (A) Applicant's Response to Action Points from Compulsory Acquisition Hearing 1 (CAH1) and Issue Specific Hearing 2 (ISH2) [REP4-086] should also be referred to. Regarding the short-term reference within AP47, this is demonstrated in Plate 3.1 (page 9) relating to 'acid grassland within AONB temporarily affected for construction at Suffolk landfall and HVDC corridor' within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]. This is also shown on Table 4.10 (page 29) within Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003]. This states that The Suffolk Heritage Coast is defined and not designated. As set out in Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096], Heritage Coasts are protected and promoted by Natural England in association with local authorities. A proportion of the SECHNL is also defined as Suffolk Heritage Coast within the landscape and visual study area and the Suffolk Heritage Coast extends offshore. Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096] also sets out the additional objectives of the defined Heritage Coast, including “<i>conserving the environmental health and biodiversity of inshore waters and beaches, and to extend opportunities for recreational, educational, sporting and tourist activities that draw on, and are consistent with, the conservation of their natural beauty and the protection of their heritage features</i>”. The adopted approach to the separate assessment of effects where differences on the Suffolk Heritage Coast and SECHNL was discussed in detail and agreed during pre-application thematic meetings with the Suffolk & Essex Coast & Heaths National Landscape Partnership as noted within Application Document 9.42 Draft Statement of Common Ground Between National

Advice	Narrative	Information Required	Applicant's Comments
			Grid Electricity Transmission and the Suffolk & Essex Coast & Heaths National Landscape Partnership [REP1A-034]. This approach was also agreed with Suffolk County Council and East Suffolk Council (see Application Document 9.15 () Statement of Common Ground East Suffolk Council and Application Document 9.23 (B) Statement of Commond Ground Suffolk County Council [APP-329] respectively). Albeit noting that the Suffolk Heritage Coast is not designated, it was agreed as a worst case scenario to present the effects as those associated with the SECHNL due to the similarities in the baseline conditions between the SECHNL and the Suffolk Heritage Coast and to identify separately where there would be differences in effect. Such differences comprise the area offshore due to direct effects at construction including from vessels. This is clearly explained within Section 2.1.2 - 2.1.4 in Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097]. The rationale is provided within Application Document 6.2.1.4 (D) Part 1 Introduction Chapter 4 Description of the Proposed Project [REP1A-003] where the marine elements of the Proposed Project are detailed. The nearshore vessels and equipment are set out within Table 4.11. This includes consideration of effects on recreational activities and visual relationship during construction. The methodology adopted follows the approach for all other receptors in the landscape assessment (contained within Application Document 6.3.2.1.A ES Appendix 2.1.A Landscape and Visual Impact Assessment and Photomontage Methodology [APP-095]) and the evidence base is contained within paragraphs 1.1.8 to 1.1.11 within Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096]. There are no published documents which specifically identify the special character or qualities of the Suffolk Heritage Coast. Consequently, the Applicant has referred to the various landscape and seascape character documents that cover the area defined by the Suffolk Heritage Coast. These are set out in Application Document 6.3.2.1.B ES Appendix 2.1.B Landscape Baseline [APP-096] and include Suffolk Coastal Landscape Character Area D4: Thorpeness to Aldeburgh, Regional Seascape Character Type SCT 03: Nearshore Waters and Touching the Tide District Level Coastal Character Area Thorpeness to Aldeburgh Coast as well as relevant Natural Beauty Indicators for the National Landscape. There is no permanent infrastructure sited within the Heritage Coast or its setting. The only effects are associated with the construction of the landfall and HVDC cable corridor, which along with their reinstatement would result in short term, temporary and minor adverse, not significant effects. The Applicant therefore considers

Advice	Narrative	Information Required	Applicant's Comments
			that the temporary nature of the Proposed Project's interface with the Heritage Coast is compatible with the special character.
<u>National Landscape:</u> Impacts on the setting of the National Landscape have not been included.	Table 2.1 APP097 is referenced for this assessment and that setting, as an indirect effect, is addressed for each Natural Beauty Indicator where relevant. However Natural England are unclear on how the assessment on impacts to setting has been approached, where this has been presented, and where the conclusions are presented.	Evidence base and audit trail including the justification for omitting impacts on the setting of the Natural Beauty indicators has not been included, and it would be helpful to include the full list of special qualities and subsets in this assessment, alongside the location of the evidence supporting the conclusions.	Regarding effects on the setting of the National Landscape this should be referred to within Table 15.5 at Reference 3 (page 107) contained in Application Document 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-132] and Table 3.5 Reference 8 (page 39) contained in Application Document 9.86 (B) Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241]. This states that the Landscape and Visual chapter (Application Document 6.2.2.1 Part 2 Suffolk Chapter 1 Landscape and Visual [APP-048]) refers to the 'Development in the setting of the Suffolk Coast & Heaths Area of Outstanding Natural Beauty (AONB) Position Statement' document published by the Suffolk and Essex Coast and Heaths National Landscape Partnership (SECH Partnership) in 2015. This notes that the setting of the SECHNL is not fixed and it is specific to the development as to whether it would influence the Natural Beauty and Special Qualities Indicators of the SECHNL. Part of the Proposed Project is located within the SECHNL and the potential for significant adverse effects on the setting is very limited due to the temporary nature of the construction activity and the positioning of the Suffolk Converter Station site located away from the SECHNL to limit potential effects on the setting. The assessment therefore focuses on the direct effects with consideration of the setting with respect to indirect effects. As noted within the assessment contained within Application Document 6.3.2.1.C ES Appendix 2.1.C Landscape Designation and Landscape Character Assessment [APP-097] setting, as an indirect effect, is addressed for each Natural Beauty Indicator where relevant. The effects on the setting of the SECHNL are limited, especially at operation. During construction, effects on the setting would be restricted to intervisibility with the cable laying vessels at sea within the seaward setting to the east of the SECHNL and to the northwest of the SECHNL, where the open trench construction of the HVDC cable corridor would take place through the agricultural landscape. Effects on the natural beauty indicators which influence the setting include: A temporary effect on the scenic quality of the SECHNL related to offshore views from the coastline; A temporary effect on the relative wildness of the SECHNL relating to the introduction of elements of uncharacteristic machinery and noise; and A temporary effect on the relative tranquillity of the SECHNL relating to additional human activity, increased traffic along local roads and machinery. It should be noted that a request to separate out the assessment of the setting of the SECHNL has not been raised during the pre-application stage from any stakeholders, including Natural England

Advice	Narrative	Information Required	Applicant's Comments
			and the National Landscape Partnership. It should also be noted that the site selected for the proposed Saxmundham Converter Station site was influenced by Scoping comments from Natural England to avoid effects on the setting of the SECHNL (Application Document 6.15 Scoping Opinion 2022 [APP-300]). It is noted in the assessment that construction activity associated with the Saxmundham Converter Station or Friston Substation (under Friston Scenario 2) is not likely to be perceptible from the SECHNL other than in a very localised area of the SECHNL (refer to representative viewpoint 18 assessment within Application Document 6.3.2.1.D Appendix 2.1.D Visual Amenity Baseline and Assessment [APP-098]). It should also be noted that at 6.3.1.2 of the Local Impact Report [<i>REP1-128</i>] from East Suffolk Council, it is stated that "<i>the proposed converter station site lies to the east of the town and is detached from the setting of the National Landscape</i>".
<u>Compensation:</u> It is not clear where compensation for significant cumulative impacts has been provided.		As above clear audit trail to show avoidance/mitigation and compensation measures	Regarding compensation this should be referred to within Table 15.5 at Reference 3 (page 108) contained in Application Document 9.121 Applicant's Comments on Other Submissions Received at Deadline 4 [REP5-132]. This states that the acid grassland enhancement measures are considered to compensate for the short term and temporary cumulative effects and provide further enhancement for the SECHNL within the operational phase of the Proposed Project (as set out in Plate 3.1 within Application Document 9.47 National Landscape Section 85 Duty Technical Note [REP1-120]). As a result of the ongoing dialogue between the Applicant, the Suffolk & Essex Coast & Heaths National Landscape Partnership (SECHNLP) and SCC the Applicant has drafted a s106 Unilateral Undertaking which outlines the Furthering The Purposes Compensation Fund which the Applicant has agreed to provide for the purpose of funding and delivering projects within the National Landscape. This was first issued to SECHNLP and SCC on 24 March 2026 and re-issued on 30 March 2026 incorporating comments received from SECHNLP. The Unilateral Undertaking will be submitted at Deadline 7. Further information on the application of the mitigation hierarchy has been referred to within the response to 3GEN1 contained within Appendix A of Application Document 9.136.1 Applicants Responses to Third Written Questions Appendices [REP6-112].

Table 75.10 Applicant’s Comments on Natural England Deadline 6 Submission [REP6-241 & REP6-250] - Comments on the Report on the Implications for European Sites (RIES) [PD-022]

ID	Potential impact pathway	Details of issue	ExA observations/question	NE Response	Applicant’s Comments
Table 2.3: Issues raised in the examination to date by the ExA and IPs in relation to the Applicant’s screening of LSEs (alone and in-combination)					
Methodological Issues					
2.3.2	Benthic receptor sensitivity to direct habitat loss	NE (E27, [RR-3290]) disagreed with the Applicant’s statement in [APP-075] that placement of hard substrates on the seabed would have a temporary impact resulting in benthic habitats having a medium sensitivity to direct loss. It advised the Applicant to update the HRA Report with a more appropriate evidenced evaluation. The Applicant [REP2-014] confirmed that the offshore scheme did not pass through any European sites designated for benthic habitats and did not consider changes to the HRA where needed. NE (E27, [REP3A-025] [REP4-197]) and [REP3A-027] recorded this matter as partially resolved but retained outstanding concerns, which primarily related to s41 habitats of principal importance.	The ExA notes the comments of the Applicant and NE, and considers this matter resolved for the HRA	Natural England notes that all direct habitat loss from the placement of cable protection will be outside of the Sandwich Bay SAC and therefore not a material consideration for the RIES. E27 of our Risk and Issues log relate to avoiding indirect impacts from sandwave levelling for all MPAs and NERC habitats. The mention of cable protection at Deadline 5 point 27 in Tab E is in relation to why sandwave levelling is required i.e. to avoid the use of cable protection	Noted.
Annex I Habitat SACs					
2.3.7	Sandwich Bay SAC Trenchless landfall techniques	As described above at ID 2.3.5, the Applicant stated that it would only use a trenchless landfall technique for cable installation. It did not assess use of trenchless landfall techniques as a mitigation method and screened out LSE arising from direct habitat loss. The Applicant’s HRA Report (paragraph 2.2.4, [REP5-036]) stated that case law qualified when measures could be taken into account at screening, including where these were properly characterised as integral features of the project.	RIESQ4 - To NE. Provide any comments you have on the Applicant’s approach and LSE conclusion in the HRA Report.	Natural England has no ecological concerns with the Applicant’s screening out of LSE for direct habitat loss as long as cable protection at the HDD exit pits remains buried. Furthermore, if trenchless landfall techniques are found not to be viable post consent, then a material change request to the DCO/dML would need to be made to the Secretary of State at that time and impacts to designated site features appropriately assessed as part of that consultation	Noted
ANNEX I HABITAT SACs AND TERRESTRIAL ORNITHOLOGY (SPAs and RAMSAR SITES)					
2.3.11	THANET COAST SAC and THANET COAST & SANDWICH BAY SPA AND RAMSAR Changes to marine water quality from release of contaminants and debris at the hoverport site	NE [REP4-189] raised a new issue of release of contaminants and debris from use of the hoverport for access to the intertidal area. It elaborated its concerns in (point 2 [REP4-191]) (J31, [REP4-197]). It stated that evidence from Vattenfall Wind Power’s Thanet OWF and Thanet OWF Extension projects indicated a risk of groundwater contamination discharging into coastal waters and affecting qualifying features of the designated sites. NE (2ECOL26, [REP5-199]) [REP5-217] stated that it was	RIESQ6 – To NE: Does the Applicant’s commitment to further assessment and monitoring address your concerns about this impact pathway? If not, advise what further	Natural England notes and welcomes the Applicant’s commitment (W37) to prepare a hoverport condition monitoring plan post consent to monitor the condition of the hoverport during construction. Whilst we note the intention is to include measures for identifying and managing any	The mechanism for any colliery spoil present to pose a potential contamination risk results from oxidative weathering which occurs when the material is exposed to air. On its own, the trafficking of plant and machinery across the hardstanding at the hoverport does not constitute a significant risk of creating contamination

ID	Potential impact pathway	Details of issue	ExA observations/question	NE Response	Applicant's Comments
		unclear how the structural integrity of the hoverpad would be affected by vehicular traffic. It advised that heavy plant and vehicle movement could result in release of contaminants, which required further investigation. It stated that coal contamination could affect water acidity and that there was risk of releasing toxic heavy metal that could affect features of the Thanet Coast SAC and Thanet Coast & Sandwich Bay SPA and Ramsar site. KWT [REP4-124] echoed these concerns. The Applicant (2ECOL26, [REP5-135]) explained that the Thanet OWF Extension identified the former hoverport as a potential contamination source due to the presence of colliery spoil used to raise site levels, and historic fuel storage. It stated that Kent Onshore Geology and Hydrogeology ES chapter [APP-065] acknowledges the potential contamination source but concludes that it does not represent a LSE as the site would only be used for access and there would be no ground disturbance. It committed to a structural integrity assessment of the hardstanding to ensure suitability for the access, which it proposed to include in a future iteration of the Outline Construction Traffic Management and Travel Plan – Kent [APP-338]. It inserted a commitment to monitor the condition of the hoverport during construction in the Outline Onshore CEMP (oCEMP) (W37, [REP5-068]).	information you consider is needed.	potential contamination risk and will be prepared in consultation with the EA, NE, KWT and TDC for approval by TDC, we are concerned that containment will involve maintaining integrity of hoverport through the use of cement to stop leeching which is impactful in its own right. Natural England advises that further investigation of containment options are required as part of the consent to ensure that this is feasible without increasing environmental impacts.	from heavy metals. Where the hardstanding is intact there is no mechanism for oxidative weathering. Where the hardstanding at the former hoverport is already degraded sufficiently to expose any colliery spoil, there is a risk of oxidative weathering of the material and therefore a risk of mobilisation of heavy metals. The Applicant has a responsibility not to exacerbate this issue. Any mobilisation of contamination will be avoided by: The suitability and integrity of the hardstanding at the former hoverport will be assessed through a pre-construction survey (visual inspection then bearing test), a commitment to which is included in the Application Document 7.5.1.1 (E) Construction Traffic Management and Travel Plan [REP6-062]. Related to this, Application Document 9.84 (D) Register of Environmental Actions and Commitments [REP6-134] commitment W37 states that the Applicant will prepare a hoverport condition monitoring plan post consent to monitor the condition of the hoverport during construction. This will include measures for identifying and managing any potential contamination risk and will be prepared in consultation with the Environment Agency, Natural England, Kent Wildlife Trust and Thanet District Council for approval by Thanet District Council. Where any broken concrete with risk of contaminant mobilisation is identified it will be avoided so that vehicles do not track over it or repaired and trackway or other methods will be used to ensure its integrity is not damaged. The Applicant regularly uses methods to track vehicles and equipment over sensitive

ID	Potential impact pathway	Details of issue	ExA observations/question	NE Response	Applicant's Comments
					ground, using metal or plastic trackway, bog mats or low-pressure vehicles with rubber tracks and/or balloon tyres. On the National Grid Stalybridge to Woodhead tower replacement scheme the Applicant used plastic trackway to site 150 – 250 tonne cranes on 2 m deep peat bogs without damage.
TERRESTRIAL ORNITHOLOGY (SPAs and RAMSAR SITES)					
2.3.15	STODMARSH SPA AND RAMSAR SITE Loss of FLL for hen harrier	The RSPB [REP1-158] considered there to be insufficient clarity to exclude potential for impacts to hen harrier due to habitat loss as a result of inconsistencies of the interpretation of species records. It [REP5-092] considered that surveys should have been carried out. The Applicant (table 2.10, [REP2-034]) considered that given the 6.9km distance between the SPA and the Order Limits and as hen harriers are not purely found in SPAs, there was a low likelihood these birds were from Stodmarsh SPA.	RIESQ7 – To NE: Does NE agree with the Applicant's conclusion of no LSE for loss of FLL for hen harrier from Stodmarsh SPA?	On the basis of the information provided, including the wintering bird surveys, Natural England agrees with the Applicant's conclusion of no likely significant effect for loss of functionally linked land for Stodmarsh SPA hen harrier	The Applicant noted this comment
2.3.18	THANET COAST & SANDWICH BAY SPA/ RAMSAR SITE Coastal and marine process impacts during operation	The Applicant committed to a target cable depth of lowering (DoL) of 1.5m at Kent landfall (MPE02, [REP4-235]) to allow for potential future lowering of intertidal bed levels. The REAC securing mechanism would be the Outline Offshore Construction Environmental Management Plan (oOCEMP) [REP5-066] and Requirement 6 of the dDCO [REP5-005]. NE [REP3-118] highlighted risks to cable burial from migration of the River Stour channel towards the cable route, coastline erosion, changes to sediment transport and climate change. It sought assurance that landfall activities would not be affected by morphological change or lead to interruption of coastal processes. It confirmed (2PE4, [REP5-199]) that its concerns related primarily to impacts on intertidal /shallow subtidal mudflats and saltmarsh providing supporting habitat to the Thanet Coast & Sandwich Bay SPA and Ramsar. It requested [REP5-217] monitoring of the cable route through Pegwell Bay over the project lifetime. The Environment Agency (EA) [REP4-185] [REP5-088] retained concerns about cable burial depth not being sufficient to avoid exposure from the northwards migration of the River Stour. It requested the Applicant to further update its commitments in the REAC (MPE02, [REP5-115]) for the depth to be deeper than the mouth of the low flow Stour channel. Alternatively, it stated [REP5-173] that a commitment to ongoing maintenance dredging in combination with the port authority would be a suitably low	RIESQ8 – To NE: Are the Applicant's commitments to DoL of 1.5m at the Kent landfall and monitoring of the River Stour channel migration and coastal erosion sufficient to address your concerns about this matter?		is currently secured as a Requirement to the DCO. The monitoring programme will allow early identification of any risk of the cable being exposed, providing sufficient time for design and planning of mitigation. Mitigation will be primarily by cable lowering with no use of sheet piling or dredging. Measures will be agreed with the EA prior to mitigation works. These actions are secured in Application Document 3.1 (I) draft Development Consent Order [REP6-004] and Application Document 7.5.2 (D) Outline Offshore Construction Environmental Management Plan [REP6-072] , secures in more detail the requirements for monitoring at the River Stour.

ID	Potential impact pathway	Details of issue	ExA observations/question	NE Response	Applicant's Comments
		impact method to control movement of the mouth. The Applicant [REP4-241] provided further interpretation of its Landfall Sediment Modelling Report [PDA-038] to support its position that future variability would not pose a problem to the cable. It stated that remedial action would be carried out if the cable was exposed to avoid wider scale effects. The Applicant (AP75, [REP4-086]) provided details of the proposed remedial measures. It stated that a preliminary inspection, maintenance and repair (IMR) programme for preventative maintenance would involve bathymetric surveys to identify any localised exposed lengths of cable including in Pegwell Bay. The REAC (MPE08, [REP5-115]) included a commitment to analysis of potential coastal erosion in line with the final Offshore CEMP. The oOCEMP [REP5-066] and Outline Cable Specification and Installation Plan (oCSIP) [REP5-117] included provision for an IMR programme with baseline as-built DoL survey followed by initial monitoring survey after 12 months and regular monitoring every 12 to 24 months, potentially reducing to every 5 years, where DoL hotspots may develop. The Applicant updated the Marine Chapter 1, Physical Environment (paragraph 1.7.65, [REP5-019]) to further explain the uncertainty regarding future migration of the river channel and stated that this could not be reduced by additional modelling or surveys of present-day conditions. In response to the ExA [EV6-033], the Applicant (AP74 [REP4-086]) confirmed that a 3m cable burial depth below the River Stour bed level (to between 6.5m and 3.7m beneath the seabed) (rather than the target 1.5m DoL) would result in an increased magnitude of disturbance that could have implications for the HRA. It stated that for these reasons and given the findings of the Landfall Sediment Modelling Report [PDA-038], a 1.5m cable depth below seabed was reasonable. The ExA (2ECOL25, [PD-021]) asked the Applicant to explain how remedial actions were considered in its HRA work, or if not considered justify why it was not required. The Applicant [REP5-135] confirmed that it had updated the DML in the dDCO [REP5-005] to follow the advice from the MMO and NE, and secure that no cable protection would be deployed within the SAC after construction has ended. It (2ECOL25, [REP5-135]) stated that a separate marine licence would be sought for any additional rock protection in the SAC if required and that no assessment was required in the HRA as this did not form part of the proposed development. The EA [REP5-088] welcomed MPE08 but asked if this would include survey for erosion where cables make landfall. NE (NE11, [REP5-222]) also welcomed MPE08 but stated that cable exposure risk, including risk associated with climate change, required consideration in shoreline management plans. The			

ID	Potential impact pathway	Details of issue	ExA observations/question	NE Response	Applicant's Comments
		Applicant inserted MPE09 in the REAC [REP5-115] to include a commitment to annual monitoring for the first 5 years from installation to detect northerly migration towards the cable. MPE09 would be secured through the oOCEMP [REP5-066].			
MARINE ORNITHOLOGY					
IN-COMBINATION ASSESSMENT					
2.3.20	Approach to LSE in-combination assessment	The HRA Report [APP-290] stated that in-combination LSEs could arise from the LSE pathways identified for the proposed development alone. However, NE (B25, [RR-3920]) advised that only appreciable effects that are not significant alone should be included in the in-combination assessment. The Applicant (B25, [REP2-014]) considered its approach would not meaningfully affect the HRA. It explained that it had thought it useful to discuss the other projects that may also lead to losses of FLL, so that the context of the losses is clear.	The ExA notes the Applicant's response.	Natural England draws the ExA attention to our Appendix G6 to our Deadline 6 submission where we advise further on the risk of AEoI of the Outer Thames SPA in-combination.	In their response (B25, [REP2-014]) the Applicant stated, ‘<i>This comment appears to relate to the fact that the Applicant did not need to assess loss of functionally-linked land for golden plover “in combination” because the Applicant had already concluded an adverse effect on integrity alone. However, we consider it is useful to discuss the other projects that may also lead to losses of functionally linked land, so that the context of the losses are clear (i.e. it is not just from the Proposed Project). Since the comment relates to an effect which would arise alone (and will therefore by definition also arise in combination) it would not meaningfully affect the HRA (Application Document 6.6 Habitats Regulations Assessment Report [AS-007]) to delete the assessment of “in combination” losses of functionally linked habitat in Kent. We therefore intend to retain that text for completeness.</i> As the loss of FLL is not an impact pathway associated with the OTE Estuary SPA, the Applicant believes the NE response is in error.
3 ADVERSE EFFECTS ON INTEGRITY					
Mitigation for Bats					
3.2/25	-	NE (2ECOL27, [REP5-199]) requested mitigation measures to reduce disturbance to bats that may be using coastal areas from lighting of the cofferdams in Pegwell Bay between April and October. It did not specify if this related to bat qualifying features of a European site.	RIESQ9 - Confirm if your response (2ECOL27. [REP5-199] relates to bat qualifying features of a European site, and if so which site.	Our advice does not relate to bat features of any European site but recognises that they are EPS which are known to forage in the area.	The Applicant provided a specific analysis of effects of cofferdam lighting on the SPA in Application Document 6.2.3.2 (G) Part 3 Kent Chapter 2 Ecology and Biodiversity [REP6-024] submitted at D6. It should also be noted that lighting is only required during cofferdam construction which will last 28 days only.

ID	Potential impact pathway	Details of issue	ExA observations/question	NE Response	Applicant's Comments
Table 3.1: Annex I habitat SACs - Issues raised in the examination to date by the ExA and IPs in relation to the Applicant's assessment of effects on integrity (alone and in-combination)					
SOUTHERN NORTH SEA SAC					
3.2.11	In-combination effects	The JNCC [RR-2635] [REP1-210] stated, in respect of the Southern North Sea SAC, that it could not provide advice on in-combination effects as the HRA Report [APP-090] only provided a holistic review of all European sites assessed. It noted [REP3-090] that the assessment considers each project individually and does not consider the sum total of potential impacts. NE [REP3A-025] similarly advised that for harbour porpoise displacement the Applicant should calculate the total area from which the harbour porpoise would be displaced using the latest EDRs. NE [REP5-219] recommended that the Applicant provide a table listing each project with the worst-case percentage disturbance (daily and seasonally) from respective HRAs, which should be added with the proposed development to give a total. The Applicant (2MM8, [REP5-135]) stated that it had updated the HRA Report (section 8.3, [REP5-036]) to consider updated JNCC guidance for SBP and 2024 NMFS underwater sound thresholds. It stated that the area of the Southern North Sea SAC that could be affected by the proposed development is 1.14% of the total SAC and the number of harbour porpoise affected by disturbance is 0.4% of the UK portion of the North Sea Management Unit (MU), equating to 2.18% of the SAC population. The Applicant reviewed other projects including Five Estuaries and North Falls OWFs. It noted that proposed measures such as noise mitigation systems (NMS) would ensure that the daily 20% and seasonal 10% JNCC noise disturbance thresholds would not be exceeded by these projects. As the area of disturbance was not specified for Five Estuaries, the Applicant stated it was not possible to undertake a summation. It did sum the disturbance areas for the proposed development, Gridlink and Lionlink, stating a total area of 2.6% would be affected, which is below the JNCC thresholds. The Applicant considered it would be disproportionate to undertake the requested calculations for an interconnector as underwater sound (from SBP as the worst element) is minor compared to OWF (such as piling) and provided precedent where this had not been requested on other DCO projects (Eastern Green Link 1 and 2). The Applicant (AP107, [REP5-126]) and (appendix C, [REP5-127]) carried out a review of its in-combination assessment for the Southern North Sea SAC following publication of the LionLink interconnector project PEIR. It confirmed that there was no change to the assessment conclusions.	RIESQ13 – To NE and the JNCC: Comment on the Applicant's updates to the in-combination assessment. Are you satisfied that AEol of the Southern North Sea SAC can be excluded from in-combination effects of underwater noise to harbour porpoise.	Natural England is not satisfied that AEol of the Southern North Sea SAC can be excluded from in-combination effects of underwater noise to harbour porpoise. Whilst we welcome the updated figures for this project, and LionLink, and agree that OWF's will make up the majority of the in-combination impact we do not agree that plans/projects can be disregarded. HRAs require that all plans/projects, which include noise generating activities that could overlap, regardless of scale are included in the in-combination assessment. A full assessment is still required to demonstrate The Applicant's conclusion that Sea Link's contribution to the in-combination assessment is minimal.	The Applicant confirms that an update was made to Application Document 6.6 (H) Habitats Regulations Assessment Report (Tracked) [REP6-051] submitted at Deadline 6 to include ALL projects with potential in-combination effects from underwater sound in relation to the Southern North Sea SAC. The assessment, which considered the WCS with EDR values of 20 km for offshore windfarm projects undertaking impact piling, found the daily threshold for the SNS SAC was exceeded, but the seasonal was not. A copy of the updated HRA was also emailed directly to Natural England on 12 April 2026 for their review. The Applicant confirms that a commitment (MM03) has been included in the REAC (see Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) (Tracked) [REP6-135]) which states: <i>The Applicant will participate as required in the Southern North Sea (SNS) SAC Development Coordination Forum (DCF) to coordinate survey activities to minimise potential for in-combination effects with other offshore wind farm projects in the Winter Region of the SNS SAC.</i> This is included in the following plans: • Application Document 7.5.2 (D) Outline Offshore Construction Environmental Management Plan [REP6-072]; and • Application Document 7.5.11 (D) Outline Marine Mammal Mitigation Plan [REP6-070]. This commitment is secured via Condition 4(1)(b) of the DMLDCO

ID	Potential impact pathway	Details of issue	ExA observations/question	NE Response	Applicant's Comments
					Schedule 3, Requirement 6 Offshore Construction Environmental Management Plan and DCO Schedule 3 and Requirement 6 Marine Mammal Mitigation Plan. The Applicant concludes no AEoL on the Southern North Sea SAC.
MINSMERE-WALBERSWICK SPA AND RAMSAR SITE					
3.3.8	Impacts on marsh harrier	The RSPB [REP1-158] raised concerns regarding marsh harriers utilising the north of the RSPB North Warren Reserve; specifically, the impacts of construction noise on auditory cues used to detect prey. This matter was not specifically addressed in the draft SoCG with RSPB at DL5 [REP5-092].	RIESQ18 – To NE: What is NE's view on the RSPB's comment that construction noise could affect auditory cues of marsh harrier? Is NE content that the Applicant's assessment accounts for such impacts?	Natural England agrees that marsh harriers use auditory cues for hunting and so could be susceptible to noise disturbance. From the information provided, Natural England does not consider that noise disturbance to marsh harriers associated with Minsmere-Walberswick SPA would be adversely affected.	Noted
SANDLINGS SPA					
3.3.10	Surveys	SEAS [RR-5210] [REP4-154] noted that limitations of breeding bird surveys had been acknowledged by the Applicant. Whilst not specifically referring to the HRA, it considered the woodlark surveys were inadequate to inform a proper assessment as a large proportion of cable route was unsurveyed. It also considered that the Applicant's survey effort to determine the foraging areas of nightjars from the Sandlings SPA was not adequate as there had not been any use of automated acoustic detectors. It noted that nightjar routinely forage over the draft Order limits. The Applicant did not respond to the suggestion of the use of automated acoustic detectors. However, it was confident it had good survey coverage and noted that NE did not raise any concerns in its relevant representation (tables 2.31 and 2.5.2, [REP1A-043]).	RIESQ19 – To NE: Provide any observations you have on the concerns raised by SEAS about the Applicant's survey coverage for woodlark and nightjar.	Natural England's comments regarding nightjar and woodlark relate to impacts of the project on the Sandlings SPA itself and any impacts to FLL. Regarding this we have advised that the area and quantity of affected FLL remains inconsistently reported in the HRA and that mitigation for impacts to FLL remains unclear. Please note that ID 3.1.11 regarding extent of FLL lost reads 3.5Ha however it is Natural England's understanding that this figure is 7.5 Ha.	The Applicant can confirm paragraph 7.2.5 of the Application Document 6.6 (H) Habitat Regulation Assessment [REP6-050] does correctly cite the areas of affected functionally linked land (3.5 ha east of Leiston Road and 4 ha north of the golf course, totalling 7.5 ha). However, we agree the ExA has misread the numbers in the paragraph and that the Executive Summary of the HRA only cites the 3.5 ha figure. This will be updated for Deadline 7. No mitigation for loss of FLL in Suffolk is required. The reference to the acid grassland enhancement has been deleted from Application Document 6.6 (H) Habitat Regulation Assessment [REP6-050] to avoid confusion. Paragraphs 7.2.4 to 7.2.10 of the D6 Application Document 6.6 (H) Habitat Regulation Assessment [REP6-050] regarding loss of functionally-linked land have been rewritten and further

ID	Potential impact pathway	Details of issue	ExA observations/question	NE Response	Applicant's Comments
					information added to make the assessment clearer.
3.3.13	Visual Impacts	NE [REP1-154] requested an assessment of light spill from the Suffolk construction compound on the Sandling SPA and surrounding areas used by nightjar and woodlark, noting that the compounds would be in operation during the breeding season. The RSPB [REP1-158] considered that the acoustic and visual screening around the compound could have limited effects on light spill and would not screen activities taking place at night, nor would it screen activities taking place at height. It sought mapping of areas affected by visual disturbance. The Applicant (tables 2.8 and 2.10, [REP2-034]) responded that the noise fence would also act as a visual screen. It explained that the use of cranes for the HDD landfall would typically be for up to a total of 8 days. It noted that equipment that could be visible above site fencing or screening would normally be the tops of the HDD rig, the recycling system and excavator boom. Lighting on the booms would be directed at the working area in front of the excavator. The Applicant did not consider mapping necessary given the existing treeline and the former railway embankment separating the Sandlings SPA from the HDD compound, as well as the commitment to visually screen the works. The Applicant (1ECOL57, [REP3-069]) noted the close board fencing is expected to be 3m in height. It stated that illumination above the height of the fencing would be controlled through cowling and other appropriate measures (REAC B38 and GG21). Lighting would be monitored and modified if required by the Ecological Clerk of Works. The RSPB [REP4-142] agreed that committing to a 3m high close-board acoustic fence around the HDD compound would reduce noise and light spill and visual disturbance more generally. The Applicant updated B23 of the REAC [REP4-235] to commit to fencing of a minimum height of 3m at the trenchless compound. NE [REP5-215] acknowledged that an assessment of construction lighting from the compound was provided but did not consider it to be robust and requested more evidence to demonstrate the mitigation would be sufficient.	RIESQ22 – To NE: What further evidence do you consider is needed in the assessment to demonstrate that the committed mitigation would be sufficient to exclude AEol? What specific concerns do you have that the proposed mitigation would not be sufficient?	Natural England notes the proposed mitigation is to install a 3m fence to mitigate light and noise reaching the Sandlings SPA itself. However, it remains unclear how impacts to FLL have been considered and inconsistencies remain in the HRA regarding location, impact and mitigation. Natural England cannot comment on any specific mitigation that may be required as we are not yet satisfied that the assessment of impacts on functionally linked land is adequate.	Note that no mitigation for loss of FLL in Suffolk is required. The reference to the acid grassland enhancement has been deleted from the HRA to avoid confusion. Paragraphs 7.2.4 to 7.2.10 of the D6 Application Document 6.6 (H) Habitat Regulation Assessment [REP6-050] regarding loss of functionally-linked land have been rewritten and further information added to make this clearer. With regard to disturbance of the SPA and functionally linked land, including from lighting In the D6 HRA report Application Document 6.6 (H) Habitat Regulation Assessment [REP6-050] paragraphs 7.2.18 to 7.2.20 contain a fuller discussion of lighting disturbance on the SPA and impacts on FLL including more reference to nightjar. In addition, lighting plans for the HDD compound have been submitted in Appendix C of the Applicant's response to the ExAs Third Written Questions (Application Document 9.136.1 Applicant's Responses to Third Written Questions - Appendices [REP6-112]). These show the 1 lux contour does not approach Sandlings SPA, being confined within the compound boundary. This is relevant because 1 lux is roughly equivalent to the illumination experienced at 1 m from a candle.

Table 3.2: Marine mammal SACs - Issues raised in the examination to date by the ExA and IPs in relation to the Applicant's assessment of effects on integrity (alone and in-combination)

ALL IDENTIFIED SITES WITH MARINE MAMMAL QUALIFYING FEATURES

3.2.1	Underwater noise modelling methodology	NE (F15, [RR-3920) [REP4-197] noted an absence of information on the underwater noise modelling and requested further details as the outputs inform the predicted impact ranges. The Applicant (F15, [REP2-014]) confirmed that modelling used the standard National	The ExA understands that NE's outstanding concerns relate to the modelling methodology used in the Marine	Natural England agrees the ExA understanding is correct that we are satisfied with the EDR approach. In addition to this, on review of further submissions by	Noted.

ID	Potential impact pathway	Details of issue	ExA observations/question	NE Response	Applicant's Comments
		Marine Fisheries Service (NMFS) acoustic tools, as detailed in [APP-077] [AS-049]. It considered [REP5-132] its approach proportionate to the nature of the proposed development and its likely underwater effects. It stated that an interconnector would generate underwater sound, but that it would be significantly less intense than an OWF. NE (2MM4, [REP5-199]) stated that use of the NMFS Use Spreadsheet Tool was not a robust substitute for empirical modelling but advised that the effective deterrent range (EDR) approach used in the HRA Report [REP5-036] is the most appropriate method for designated sites. However, NE was not clear which activities had been assessed.	Mammals ES chapter and that it is satisfied with the EDR approach used in the HRA Report.	the Applicant at Deadline 5, R&I F15 has been reduced to a yellow risk issue. This reflects the stage of the examination and a case specific risk review and does not represent a change in Natural England's view on importance of empirical noise modelling. Our advice has taken into consideration that further assessment will be required for the UXO works after consent and advise the empirical underwater noise modelling should be undertaken to inform that future assessment.	

Table 3.3: Terrestrial ornithology (SPAs and Ramsar sites) - Issues raised in the examination to date by the ExA and IPs in relation to the Applicant's assessment of effects on integrity (alone and in-combination)

THANET COAST & SANDWICH BAY SPA AND RAMSAR SITE

3.3.20	HDD activities - stuck drilling equipment	NE (B1 and B28, [RR-3920]) advised that the likely impacts of equipment becoming stuck and requiring excavation needed to be considered and detailed in a contingency plan. The RSPB [REP1-158] was not clear how the Applicant's estimate of a small risk of excavating the intertidal area for stuck equipment was derived, or if other projects were comparable. ESC [REP1-128] queried that measures would be employed to avoid equipment getting stuck, noting the REAC does not include any details. The Applicant updated paragraph 7.4.4 of the HRA Report [REP5-036] with a common method for retrieving equipment, comprising a second drilling string pulled out by the HDD rig. Alternatively, it would be left in situ. NE (B1 and B28, [REP3A-025]) confirmed it was satisfied with the Applicant's response, noting that no excavations would be carried out beneath saltmarsh or shallow lagoon. The Applicant updated B22 and B43 of the REAC [REP5-115] to confirm in general, no excavation would be undertaken to remove stuck drilling equipment. This matter remained under discussion as reported in the draft SoCG with the RSPB [REP5-092].	RIESQ23 – To NE: NE has confirmed it was satisfied with the Applicant's response on the basis that no excavations would be carried out beneath saltmarsh or shallow lagoon. Noting the Applicant's update to the REAC [REP5-115] that no excavations would take place 'in general', are you satisfied this matter can be resolved?	At the time of writing [REP3A-35] Natural England was content with the Applicant's proposal to us a second drilling string or to leave in situ. However, B22 and B43 in [REP5-115] now undermines this position opening back up the option to excavate something that we would not support and have reflected in our Risk and Issue log at Deadline 6.	These Application Document 9.84 (D) Register of Environmental Actions and Commitments (REAC) [REP6-134]measures are proposed for amendment as follows: - B22 - (addition in red, deletion struck through): 'Measures will be adopted to avoid the trenchless drilling equipment getting stuck. ~~In general, no excavation will be undertaken to remove stuck drilling equipment.~~ No excavation will be undertaken to remove stuck drilling equipment within Leiston-Aldeburgh SSSI, and even outside the SSSI excavation would only be undertaken within 35m of the entry or exit point where the drill is at shallow depth (<5m)'. - B43 - (addition in red, deletion struck through): 'Measures will be adopted to avoid the trenchless drilling equipment getting stuck. ~~There will generally be no~~

ID	Potential impact pathway	Details of issue	ExA observations/question	NE Response	Applicant's Comments
					excavation to retrieve a stuck drill head. No excavation will be undertaken to remove stuck drilling equipment except within 40m of the entry or exit point, where the drill is at shallow depth (<5m), and outside any areas of saltmarsh'.
3.3.25	Disturbance – vehicle movements	NE (table 2, [REP3A-028]) noted that no consideration had been given to disturbance to SPA birds from vehicle movements within the intertidal area. The PBCMTN [REP4-229] stated that there may up to 40 vehicle movements across the mudflats per day at peak times. It provided noise contours in figures 6.4.4.5.7 and 6.4.4.5.8 [REP4-051] depicting predicted maximum noise levels along an illustrative access route corridor. The Applicant (table 3.6, [REP4-241]) confirmed that amendments had been made to the HRA Report (version D) [REP2-009], providing clarification on such effects. In response to the ExA [PD-021], the Applicant (2ECOL28, [REP5-135]) confirmed that vehicle movements, including noise generated, are considered as part of the airborne sounds and visual disturbance assessment in paragraphs 7.3.41 to 7.3.48 of the HRA Report [REP5-036]	RIESQ26 - To NE: Is NE satisfied that disturbance from vehicle movements within the intertidal area has been sufficiently assessed and that a conclusion of no AEol can be reached?	Natural England position remains that AEol from disturbance to SPA and Ramsar birds from vehicle movements in the intertidal can't be excluded. Please see R&I log Tab J RI-J18 where at Deadline 5 we highlight the following 'Natural England advises that further assessment of the potential for disturbance of intertidal mud/sand flats due to the movement of heavy construction vehicles/plant across the access route from the former hoverport to the HDD working area (see Appendix D5 point 6 for detailed advice). And also, ExQ2 GEN3, ExQ2 MO5 and ExQ2 PE4 in our Appendix K5 to our Deadline 5 submission'.	Further detail on the potential for disturbance of intertidal mud/sand flats due to the movement of heavy construction vehicles/plant across the access route from the former hoverport to the HDD working area was included within the Application Document 6.6 (H) Habitats Regulations Assessment Report [REP6-050] .
3.3.27	Disturbance – lighting of the cofferdams	NE (table 6, [REP3A-028]) noted that lighting of the cofferdams in the intertidal area was proposed. It requested further assessment of disturbance impacts to Annex I birds. The Applicant (table 3.1, [REP4-082]) responded that lighting would be required during construction of the cofferdams which would be directed inwards to the 21,600m2 working area, with no impacts to birds in the intertidal area and no light spill to terrestrial habitats.	RIESQ28 - To NE: Is NE satisfied that disturbance to qualifying features of Thanet Coast & Sandwich Bay SPA and Ramsar site from lighting of the cofferdams has been sufficiently assessed and that a conclusion of no AEol can be reached?	Natural England highlights that our concerns have not been addressed as 21,600m2 is a considerable area. But with the expectation that works will be occurring, within this area disturbance impacts to SPA birds can't be excluded. Where intertidal works have occurred with other SPA the works have been undertaken outside of the sensitive period and therefore this issue has been avoided.	The Applicant has assessed the impact of the 21,600 m ² working area on waterbirds occurring within Pegwell Bay, in the context of the physical presence of the workforce, machinery/vehicles and works themselves through the impact pathways of visual and noise disturbance. This also includes any disturbance from lighting of working areas, the zone of influence of which, is far less than zone of influence for wider construction visual and noise disturbance, i.e., lighting will be on the working area itself, whereas, other visual and noise disturbance will occur within the working area and radiate beyond this.

ID	Potential impact pathway	Details of issue	ExA observations/question	NE Response	Applicant's Comments
Table 3.4: Marine ornithology (SPAs) - Issues raised in the examination to date by the ExA and IPs in relation to the Applicant's assessment of effects on integrity (alone and in-combination)					
Outer Thames Estuary SPA					
3.4.2	Disturbance and displacement effects to red-throated diver – seasonal restriction	The Applicant (1ECOL54, [REP3-069]) confirmed its objective was to install sections of the cable route passing through the Outer Thames Estuary SPA within a single season (April to October). To mitigate the potential for disturbance effects on red-throated diver, the Applicant proposed a seasonal restriction for offshore cable burial activities (excluding pre-lay grapnel run activities) in the Outer Thames Estuary SPA from 1 November to 31 March. This is secured in the Red-Throated Diver Protocol [REP5-080]. Buffer zone Natural England (G2, G3 and G10, [RR-3920]) considered that red-throated diver displacement occurs out to 2km in all directions from vessels and vessel movements. Natural England [REP4-189] [REP4-193] advised the seasonal restriction should be applied to the SPA plus a 2km buffer from its seaward boundary. It provided evidence in annex 1 of [REP5-199], including studies showing displacement can occur at different rates within 2km and potentially extending to 5km. It stated that 100% displacement at 2km represents a pragmatic approach to uncertainty for displacement gradients for OWF. It advised that in the absence of a 2km buffer zone around the SPA it would, in all likelihood, not be able to rule out an AEol in-combination. The RSPB [REP1-158] [REP5-092] advised the assessment should be based on a 5km buffer around vessel routes and related activity. The Applicant [REP5-132] stated it was continuing to engage with Natural England on this matter. Exclusions from the seasonal restriction The HRA Report [APP-290] stated that pre-lay grapnel activities were not included within the seasonal restriction as they have a lower disturbance profile than installation work. Paragraph 5.9.72 of Marine Chapter 5, Ornithology [REP2-003] also stated that maintenance and surveying activities during operation would be avoided between January and March 'where practicable'. The application version of the Red-Throated Diver Protocol [APP-361] noted that if essential emergency work is required between January and March, consultation would be undertaken with the MMO and NE to ensure timely repair whilst minimising disturbance to red-throated diver as far as practicable. Natural England (G2, [RR-3920]) advised that this was not a sufficient commitment to avoid disturbance/displacement	RIESQ29 – To NE: Studies referenced in annex 1 to (2MO3, [REP5-199]) refer to displacement gradients for OWF. Explain why these are also applicable to subsea cables. RIESQ30 – To NE: The Applicant has stated that there are high levels of existing vessel traffic present along most of the cable corridor and the studies referenced in annex 1 to (2MO3, [REP5-199]) suggest that frequency/ number of movements is a factor in the displacement of Red-Throated Diver. Can NE provide evidence that	RIESQ29 - The studies referenced in REP5-199, Annex 1 (2MO3) refer to displacement by shipping, vessels and in some cases also OWF. They are relevant to subsea cables as the laying of subsea cables during their construction involves vessel activity at sea that can be a significant source of disturbance depending on its location and duration. Various studies have suggested different displacement distances for red-throated divers in response to vessels at sea. Several suggest displacement can occur at different rates within 2 km (Percival 2009; Schwemmer et al. 2011; Fleissbach et al. 2019; Burt et al. 2022), one suggests displacement effects can extend out to 3 km (Burger et al. 2019), and one suggests they may extend to 5 km (Mendel et al. 2019). But it is not yet possible to determine different rates of displacement at different distances from vessel sources of disturbance, 100% displacement at 2 km represents a pragmatic approach to uncertainty aligned with the approach taken to displacement gradients for offshore wind farms. RIESQ30 – Natural England regards the single vessel used for the PLGR to be large enough to cause a visual disturbance alone and likely more so when aggregated with a support vessel. This is because disturbance caused by vessels can be scaled according to the size, speed and frequency of passage (Burt et al.	The Applicant has included non-emergency operation and maintenance activities, as well as the pre-lay grapnel run, within the seasonal restriction, and this was reflected in the Application Document 7.8 (C) Red-throated Diver Protocol [REP6-090] and Application Document 6.6 (H) Habitats Regulations Assessment Report [REP6-050].

ID	Potential impact pathway	Details of issue	ExA observations/question	NE Response	Applicant's Comments
		effects during the winter period, which is sensitive for red-throated diver. It recommended that the proposed seasonal restriction be widened to include the pre-lay grapnel run, operation and maintenance activities (including surveying), and decommissioning phases of the development. It also sought more information about the activities (including frequency, duration and extent as detailed in G9) to inform a more detailed assessment and determine the level of mitigation. Natural England (table 1, [REP4-193]) considered that these activities would remain unmitigated during the first half of winter and their impacts in-combination with other projects have the potential to contribute to an in-combination AEoI on the Outer Thames Estuary SPA. The JNCC [REP1-210] considered it unclear whether other pre-laying activities were excluded from the restriction. The Applicant (table 2.23, [REP2-034]) responded that pre-construction activities such as geophysical surveys would be avoided between January and March where practicable. <u>Pre-construction activities</u> The Applicant (table 2.23 [REP2-034]) (1ECOL54, [REP3-069]) (AP22, [REP4-086]) stated that cable installation activities would need to commence promptly at the start of the unrestricted period and that pre-lay grapnel runs would need to be conducted immediately prior to cable installation. It explained that the duration of the pre-lay grapnel run within the Outer Thames Estuary SPA would be approximately seven days with one vessel towing a 'grapnel' and potentially a support vessel/guard vessel (working as a single cluster) continuously moving at approximately 1 to 1.5 knots. It likened the activities to commercial fisheries activities which occur within the SPA. The Applicant considered that including pre-lay grapnel activities in the seasonal restriction would restrict the time available outside of the restriction to complete cable installation. Natural England (table 1, [REP4-193]) advised that pre-lay grapnel run vessels are not small (range 40 to 70m length) and may still cause sufficient audio/visual disturbance to displace red-throated divers. It highlighted a comparatively higher diver density along and within 2km of the cable corridor. It sought further analysis from Applicant to evidence that pre-lay grapnel run would not cause (or materially contribute to) significant levels of disturbance. The Applicant (AP22, [REP4-086]) highlighted existing high levels of vessel traffic present along most of the cable corridor (hundreds of vessels per day including large cargo ships). It maintained that the additional one-off, short duration or pre-lay grapnel runs and geophysical activities which involve one, slow moving, operation vessel and	displacement could occur from the small number of vessels which would arise from pre-lay grapnel movements to such an extent that would result in AEoI? RIESQ31 – To the JNCC and NE: The Applicant has extended the seasonal restriction to include non-emergency operation and maintenance activities and secured this in the Red-Throated Diver Protocol. Subject to discussion on extending the restriction to the 2km buffer, does this address your concerns on this matter. If not, explain what further measures you consider are needed.	2022). For example, Burt et al. 2022 found 'length of the nearest ship' indicated a significant negative relationship with red-throated diver and common scoter numbers and the predicted average number of birds per observed segment decreased as length of nearest ship increased. Furthermore, although studies on the effects of vessels typically record the response of birds to individual ships or shipping density and have not differentiated impacts from aggregations of vessels e.g. Bellebaum et al. 2006, Burger et al 2019, Jarrett et al 2022 and Mendel et al 2019, can clearly still state single vessels cause disturbance and fairly presume aggregations (creating a larger visual impact) likely cause more disturbance (as disturbance scales with size of vessel). Consequently, we cannot discount disturbance from the PLGR just because it comprises one or two vessels. Please see Appendix G6 to our Deadline 6 submission where the risk of an AEoI are discussed further. and any likely AEoSI. RIESQ31 – Please see Appendix G6 to our Deadline 6 submission where we confirm that adoption of the 2km buffer addresses our concerns.	

ID	Potential impact pathway	Details of issue	ExA observations/question	NE Response	Applicant's Comments
		support or guard vessel would not result in AEoI either alone or in-combination with other plans or projects. <u>Operation and maintenance activities (including surveying)</u> The JNCC [REP1-210] sought clarity on the expected vessel movements required for regular monitoring surveys during operation. The Applicant (table 2.3, G2, [REP2-014]) (1MO7, [REP4-08]) (AP23, [REP4-086]) noted that the cables are designed for minimal maintenance such that a regular regime is not required and that repairs would only be required in the event of unforeseen damage or remedial works to maintain depth of burial. It identified the potential for five repairs over the 40-to-60-year lifespan of the proposed development. Some cable repairs could require immediate action which would typically take two months but could take up to six months with both a guard vessel and a cable lay vessel. It considered (table 2.3, G10, [REP2-014]) (table 2.23, [REP2-034]) that maintenance activities would not result in significant increases of vessel traffic or disturbance to red-throated diver. The Applicant explained (table 2.3, G2 [REP2-014]) that monitoring surveys could be carried out by autonomous surface vehicles and/ or autonomous underwater vehicles, and potentially remotely operated vehicles with smaller support vessel and manning levels. It stated the frequency of surveys could not be stated now and that maintenance requirements would be based on survey results. The Applicant (1ECOL55, [REP3-069]) noted that January to March coincides with periods of highest risk for completing offshore surveys and it would generally aim to complete surveys during optimum weather conditions. However, it subsequently stated (1MO7, [REP4-083]) (AP23, [REP4-086]) that there would not be a requirement for offshore vessel to undertake regular monitoring, with a focus on the reliance of land based Digital Temperature and Acoustic Sensing (DTAS) monitoring. The JNCC [REP3-090] noted no certainty autonomous vessels would be used, no details of support vessels required and what the resultant reduction in disturbance would be. It sought information on the frequency of maintenance for similar transmission assets. Furthermore, it noted that maintenance could occur for two-thirds of the most sensitive period identified by the Applicant if for two months (January to March), or for two-thirds of an entire non-breeding season if for six months (October to May). It noted the Applicant's assessment was not qualitative (as it had requested) and had been made relative to the impacts of construction activities. It did not consider that the Applicant had taken account of the conservation objectives. Natural England (table 1, [REP4-193]) acknowledged the essential need for a rapid			

ID	Potential impact pathway	Details of issue	ExA observations/question	NE Response	Applicant's Comments
		response time for emergency repairs precludes the possibility of applying a seasonal restriction. It advised the Applicant to provide an Outline Operations and Maintenance Plan (OOMP) to make clear which activities are covered by the DCO and which would require a new consent. It (2MO2, [REP5-199]) responded to ExQ2 [PD-021] stating it assumed non-emergency operational and maintenance activities would be subject to the full seasonal restriction unless otherwise agreed with the MMO in consultation with the SNCB. It requested the Red-Throated Diver Protocol be clarified to cover the full restriction period. The MMO (2MO2, [REP5-175]) agreed that the restriction should apply but considered it could be caveated to “unless otherwise agreed in writing by the MMO (in consultation with the SNCB).” The Applicant (2MO2 and 2MO4, [REP5-135]) accepted the restriction to non-emergency operational and maintenance activities during 1 November to 31 March and updated the Red-Throated Diver Protocol [REP5-080] accordingly. Quantification exercise. The Applicant (table 3.1, [REP4-085]) confirmed that a quantification exercise is underway to assess the implications of vessel movements on red-throated diver of the Outer Thames Estuary SPA. It aimed (2MO1, [REP5-135]) to provide an updated HRA Report incorporating the exercise at DL6 as by DL5 it had not been able to source the method requested by Natural England. Decommissioning The Applicant (table 2.3, G2, [REP2-014]) explained the predicted operational life of the cables is between 40 and 60 years, during which regulatory requirements and industry best practice could change. It did not know whether the cable would be decommissioned or if options for extending the life would be explored. The Applicant confirmed a decommissioning plan would be prepared post-consent and a programme submitted to the MMO for approval at least six months prior to decommissioning works. It confirmed that all phases of work would adhere to NE’s best practice protocol, as noted in the Red-Throated Diver Protocol [REP5-080]. This was welcomed by Natural England (table 1, [REP4-193]) who agreed the WCS for decommissioning could be like construction and requested the Red-Throated Diver Protocol be updated to confirm mitigation for these works. The Applicant (2MO2 [REP5-135]) confirmed that the approach to decommissioning would be detailed within the final Offshore Decommissioning Plan submitted to the Secretary of State for approval approximately 2 years prior to decommissioning commencing. Extended restriction			

ID	Potential impact pathway	Details of issue	ExA observations/question	NE Response	Applicant's Comments
		The RSPB [REP1-158] welcomed the proposed seasonal cable laying restriction. However, referencing NE's Advice on Seasonality for the Outer Thames Estuary SPA, it noted that red-throated divers are likely to be present in significant numbers from October to May and considered that any project-related vessel movements avoid this period. It considered that should any project-related vessel movements be required between October and May, they should be subject to clearly detailed and practical bird avoidance measures to be set out in a detailed vessel management plan. It did not agree an AEol could be excluded from the proposed development in-combination with other plans or projects. The Applicant (table 2.10, [REP2-034]) acknowledged red-throated diver may be present in the months outside of its proposed seasonal restriction, however it considered November to March to be the core period when numbers are greatest and environmental conditions the toughest and therefore the period when disturbance would have a greater effect on individuals. It confirmed that a vessel management plan would be developed post-consent, in consultation with NE in accordance with requirements of the DML. The draft SoCG with the RSPB [REP5-092] recorded that this matter remained under discussion. In-combination effects Paragraph 5.9.10 of the application version of the ES Chapter 5 Marine Ornithology [APP-078] proposed that the restriction may not be necessary if the projects assessed for in-combination effects did not take place. NE (G1 and G7, [RR-3920]) advised that the timing restriction on cable construction works is required irrespective of whether in-combination projects proceed. The Applicant (table 2.3, G1, [REP2-014]) subsequently accepted it was highly unlikely the other developments would not proceed and confirmed that the seasonal restriction would be adhered to regardless of other projects. It amended the ES Chapter [REP2-003] to remove paragraph 5.9.10.			
3.4.3	Emergency operation and maintenance activities between November and March	NE (G3, [RR-3920]) (ECOL62, [REP4-196]) advised that if operation and maintenance activities were required between November and March in the SPA and the 2km buffer, a report to quantify potential impacts and for assessment of future in-combination effects from similar projects assessing these (including potential in-combination effects) may be required by NE. It noted that the application version of the Red-Throated Diver Protocol [APP-361] only proposed reporting between 1 January to 31 March. The Applicant (table 2.3, G10, [REP2-014]) confirmed it could provide NE with a report on the event (i.e. an operation and maintenance activity taking place	RIESQ32 – To NE: Confirm if your advice is that AEol of the SPA arising from vessel disturbance undertaking emergency operation and maintenance activities during the wintering period can be excluded based on the Applicant's commitments to reporting.	RIESQ32 – Natural England confirm our advice is that AEol of the SPA arising from vessel disturbance undertaking emergency operation and maintenance activities during the wintering period may not be excluded but could be appropriately assessed based on the Applicant's commitments to mitigation, reporting and consultation with the MMO and	The Applicant notes NE's comment that any impacts arising from future unforeseen emergency repairs can be appropriately dealt with through the commitments to mitigation, reporting and consultation with the MMO and Natural England set out in the Application Document 7.8 (C) Red-throated Diver Protocol [REP6-090] submitted at Deadline 6.

ID	Potential impact pathway	Details of issue	ExA observations/question	NE Response	Applicant's Comments
		between November and March) to inform future consenting of similar projects and updated the Red-Throated Diver Protocol [REP5-080] accordingly for activities taking place within the SPA. It stated [REP5-132] that the measures that might be addressed in an outline operations and maintenance plan are described in the oCSIP [REP5-117]. NE (G3 and G10, [REP5-222]) suggested that emergency works during the sensitive season would be subject to a separate permission and that the Applicant's commitment to reporting may be sufficient to address its concerns.	RIESQ33 – To NE: The Applicant has updated paragraph 1.5.9 of the Red-Throated Diver Protocol [REP5-080] to provide a report to NE regarding emergency operation and maintenance activities within the Outer Thames Estuary SPA. Should this commitment be extended to a 2km buffer of the SPA?	Natural England. We note the outcomes from our meeting with the Applicant of 1st April regarding emergency works. Please see our Appendix G6 for further detail. RIESQ33 – Natural England confirms that it should be extended to the 2km buffer of the SPA as activity in this area could still impact the RTD within the SPA.	

Table 75.11 Applicant’s Comments on the Natural England Deadline 6 Submission [REP6-241 & REP6-250] - Comments on the Report on the Implications for European Sites (RIES) [PD-022] - ANNEX 1: EXA’S UNDERSTANDING OF POSITIONS AT POINT OF RIES PUBLICATION

RIESQ35. The Applicant, NE and the JNCC are requested to confirm whether the ExA’s understanding of their positions is correct and to provide clarifications where requested with a question mark (‘?’).

European site / qualifying feature	Potential impact (C, O, D unless otherwise stated)	LSE?		AEol?		Applicant's Comments
		Applicant's conclusion (alone or in combination)	Agreement with NE?	Applicant's conclusion (alone or in combination)	Agreement with NE?	
DESIGNATED SITE (LIST)						
Alde-Ore & Butley Estuaries SAC	Pollution (terrestrial - changes in water quality) (C,O, D)	N/A – not assessed by Applicant in HRA Report.	No [REP5-215] (appendix A5) See section 2.6 of RIES	n/a	Natural England is unable to rule out AEol without further information, as the assessment of impacts has not yet been included in the HRA report by the Applicant.	Application Document 6.6 (H) Habitats Regulations Assessment Report [REP6-050] submitted at D6 includes an assessment of pollution on the SAC which addresses this issue.
Alde-Ore Estuary SPA	Pollution (terrestrial - changes in water quality) (C, O, D)	✗ (paras 4.2.36, 4.2.38, 4.2.49 and 4.2.50)	No See ID 2.3.14 of RIES	n/a	Natural England is unable to rule out AEol without further information, as the assessment of impacts has not yet been included in the HRA report by the Applicant.	Application Document 6.6 (H) Habitats Regulations Assessment Report [REP6-050] submitted at D6 includes an assessment of pollution on the SPA which addresses this issue.
Alde-Ore Estuary Ramsar	Pollution (terrestrial - changes in water quality) (C, O, D)	✗ (paras 4.2.36, 4.2.38, 4.2.49 and 4.2.50)	No See ID 2.3.14 of RIES	n/a	Natural England is unable to rule out AEol without further information, as the assessment of impacts has not yet been included in the HRA report by the Applicant.	Application Document 6.6 (H) Habitats Regulations Assessment Report [REP6-050] submitted at D6 includes an assessment of pollution on the Ramsar site which addresses this issue.

Sandlings SPA Nightjar (Caprimulgus europaeus) Woodlark (Lullula arborea)	Loss of FLL (C, D)	✓ (paras 4.2.5 and 4.2.50)	✗ (paras 7.2.8 and 7.2.20)	Natural England agrees with the ExAs summary. We wish to clarify that 3.1.11 states that The HRA Report [APP-090] acknowledged temporary loss of 3.5ha of acid grassland adjacent to Sandlings SPA due to the trenchless crossing construction compound and an associated section of cable trench. The figure of FLL loss in the HRA is inconsistently reported but it is our understanding that this should be 7.5 ha This reflects the remaining uncertainty regarding impacts to FLL as stated in our response to D6	The Applicant can confirm paragraph 7.2.5 of Application Document 6.6 (H) Habitats Regulations Assessment Report [REP6-050] does correctly cite the areas of affected functionally linked land (3.5 ha east of Leiston Road and 4ha north of the golf course, totalling 7.5 ha). However, we agree the ExA has misread the numbers in the paragraph and that the Executive Summary of Application Document 6.6 (H) Habitats Regulations Assessment Report [REP6-050] only cites the 3.5 ha figure. This will be updated for D7.

76. Applicant’s Comments on the Submission from Royal Society for the Protection of Birds (RSPB)

76.1 Introduction

- 76.1.1
- Table 76.1 summarises the Applicant’s comments on RSPB Deadline 6 Response [REP6-252] on questions in the Report on the Implications for European Sites Issued on 18 March 2026.
- 76.1.2
- The Applicant’s has responded to RSPB Deadline 6 Response [REP6-271] in **Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions**.

Table 76.1 Applicant’s Comments on Royal Society for the Protection of Birds (RSPB) Deadline 6 Submission [REP6-252]

Reference	Matter	Point Raised	Applicant’s Comments
Questions in the Report on the Implications for European Sites Received at Deadline 6			
RIESQ16	To the RSPB: Noting that the draft SoCG records agreement on use of the 60dB disturbance threshold, clarify your outstanding concerns about chronic noise.	We have welcomed the proposals to include acoustic fencing of a minimum of 3m high around the construction compound adjacent to RSPB North Warren (within the Leiston Aldeburgh SSSI) and the Sandlings SPA and to carry out noise monitoring to inform any further mitigation required during construction. With regard outstanding concerns about noise, we have noted that it would be helpful for noise contour mapping to be supplemented by larger scale maps of the noise contours where they overlap designated sites, to aid identification of areas and species which may potentially be impacted by noise (including chronic noise). This would help us to determine whether any additional noise control measures are needed to protect the Leiston-Aldeburgh SSSI or the Sandlings SPA. We understand that more detailed maps will be submitted by the Applicant at Deadline 6. We will therefore review any additional information and update our position accordingly via our SoCG with the Applicant.	Noted
RIESQ17	To the RSPB: Noting the applicant’s confirmation regarding the noise disturbance threshold and commitment to avoid illumination of boundary features, confirm if you agree that AEoI can be excluded. If not, what further mitigation do you consider is required?	Please refer to our answer to the above question regarding noise impacts. With regard to lighting and visual disturbance, we acknowledge that the commitment to fencing of a minimum of 3m and the existing screening of the site through trees and the railway embankment, that some reduction of impacts is likely. However, we understand that some equipment will be visible above the height of the fence, including the top of the HDD rig, the recycling system, an excavator boom, and on occasion, cranes. We therefore request clarity around any lighting of these that may be visible above the fence line from RSPB North Warren (within the Leiston-Aldeburgh SSSI) or the Sandlings SPA and whether any mitigation of such effects is proposed.	Any lighting on these features would be targeted task lighting controlled by REAC measures B38 and GG21. If the lighting columns themselves are required to be above 3 m in height, this would be captured by B23 which stipulates the barrier must be a minimum of 3 m height. Specific shields and additional barriers could therefore be added if needed. Lighting plans for the HDD compound were submitted at D6 in response to the ExAs third written questions and these show the 1 lux contour will not extend beyond the compound itself.
RIESQ24	To the RSPB: Noting the applicant’s commitments and NE’s position, confirm if you are satisfied that this matter	We have recently discussed concerns around stuck drilling equipment with the Applicant and were reassured that this issue appears to be of low risk within designated sites in both Suffolk and Kent. However, we request that the rationale described to us	Measures B43 and B22 have been updated for D7. Measure B43 has not been updated to provide an absolute prohibition on excavation of stuck drilling equipment within Thanet Coast &

Reference	Matter	Point Raised	Applicant's Comments
	is resolved. If not, advise what further information you consider is needed to address your concerns.	and the areas where the drill is too deep for excavation to be possible are clarified in writing by the Applicant. For Kent, we also request that REAC measure B43 is updated to state that: <i>Measures will be adopted to avoid the trenchless drilling equipment getting stuck. There will generally be no excavation to retrieve a stuck drill head <u>within Pegwell Bay SPA/SAC/Ramsar site/SSSI</u>.</i> Whilst we understand that the RIES does not formally cover SSSIs and that the landfall in Suffolk is within land that is designated as SSSI only (although in close proximity to the Sandlings SPA), for completeness we also note here our request that the REAC commitment for the Suffolk landfall (B22) is updated to state that: <i>Measures will be adopted to avoid the trenchless drilling equipment getting stuck. ~~In general~~, No excavation will be undertaken to remove stuck drilling equipment <u>within the Leiston-Aldeburgh SSSI</u>.</i>	Sandwich Bay SPA/Ramsar and Sandwich Bay SAC but it does state that ‘<i>No excavation will be undertaken to remove stuck drilling equipment except within 40m of the entry or exit point, where the drill is at shallow depth (<5m), and outside any areas of saltmarsh</i>’. Measure B22 has been updated to exclude excavation within the SSSI as requested.
3.3.16	Potential for open-cut trenching at landfall	We wish to clarify that, whilst we have welcomed the Applicant's commitments to using trenchless techniques within the dDCO (as recorded in line 3.3.2 of our SoCG), as yet there is no mechanism to give confidence that any DCO would not subsequently be amended to enable open trenching via a Change application. This is covered in lines 3.3.1 and 3.10.1 of our SoCG with the Applicant for Suffolk and Kent respectively and at present remains ‘under discussion’. Additional text to explain that there is no intention to revert to open trenching through a Change application would give significant further reassurance regarding this matter and discussions regarding this are ongoing.	Refer to the Applicant's response to AP52 of Application Document 9.135 Applicants Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110]. The Applicant will continue to give consideration to the appropriate form of wording of a requirement or commitment to be submitted at D7.

77. Applicant’s Comments on the Submission from Aldringham-cum-Thorpe Energy Action

77.1 Introduction

77.1.1 Table 77.1 summarises the Applicant’s comments on Aldringham-cum-Thorpe Energy Action Deadline 6 Response [REP6-253].

Table 77.1 Applicant’s Comments on Aldringham-cum-Thorpe Energy Action Deadline 6 Submission [REP6-253]

Reference	Matter	Point Raised	Applicant’s Comments
ACTEA Comments regarding National Grid Electricity Transmission Document 9.121 [REP5132] Applicant's Comments on Other Submissions Received at Deadline 4, Table 2.1: Applicant Comments on the Aldringham-cum-Thorpe Energy Action Deadline 4 Submission [REP4-105]			
		The Applicant has once again expressed its confidence that B1353 Aldringham Lane is suitable for cable drum movements, although having also acknowledged tight road junction geometry at AC10 / S-RJ13 B1069 through Knodishall and AC11 / S-RJ12 Aldringham Lane/ Aldeburgh Road junction that may necessitate junction widening at one or both junctions. The Applicant's latest comments do not rule out the risk that junction widening may be required. It is conceivable that such widening could impact negatively on nearby dwellings. Therefore evidence is required in support of the Applicant's conclusions prior to ExA's final report to the Secretary of State, given that no alternative route has been proposed. The Applicant posits that detailed assessments cannot be undertaken at this stage since vehicle type and load will need first to be determined by the Contractor who would then carry out a detailed assessment. That argument is not consistent with the details previously supplied by the Applicant with respect to the type of vehicle that would be used for Cable Drum deliveries. Cable drum delivery vehicle length was clearly stated as being 25.440m in 6.4.1 of 7.5.1.1: Outline Construction Traffic and Management and Travel Plan – Suffolk. More detailed dimensions were specified in [APP-037] 2.13.1 Design and Layout Plans – Suffolk: 'Overall Length 25.440m, Overall Width 4.500m, Overall Body Height 3.695m, Min Body Ground Clearance 0.332m, Track Width 2.500m, Lock to lock time 6.00s, Kerb to Kerb Turning Radius 14.500'. The Applicant has also previously supplied detailed indicative bell mouth design diagrams for Cable Drum deliveries to site elsewhere within its DCO application. ExA is referred to Sea Link Volume 2: Plans and Drawings Document 2.13: Design and Layout	The Applicant maintains that it is not possible to undertake a more detailed assessment of AIL access constraints at this stage, which will be dependent on confirmation of vehicle load and type. As such, it is not considered appropriate or necessary to provide swept path diagrams for the specific junctions (AC10 and AC11) requested. Contrary to what is suggested, there is no inconsistency with the Applicant’s submission of vehicle swept paths under Application Document 2.13: Design and Layout Plans [APP-037]. The drawings referred to assume <u>typical</u>, rather than actual, vehicle dimensions, which are relied upon for the purpose of providing <u>indicative</u> access arrangements. The information contained in APP-037 says nothing about the final AIL vehicle loads and types that the contractor will use and on which the assessments will be based.

Plans [APP-037] on pages 26 and 27: INDICATIVE BELLMOUTH ACCESS ARRANGEMENT S-BM01 (S-AP-2), S-BM02 (S-AP-3), S-BM03 (S-AP-5) AND S-BM04 (S-AP-6), National Grid Drawing References DCO/S/DE/SS/1223 and DCO/S/DE/SS/1224

This matter has been raised repeatedly with ExA in writing throughout the examination. It now seems that it may best be resolved through ExA requiring of the Applicant that it submits the equivalent indicative swept path diagrams illustrating cable drum carrier paths at AC10 / S-RJ13 B1069/B1353 junction) and at AC11 / S-RJ12 (B1353/B1122 junction) superimposed over existing road and roadside features in those localities.

78. Applicant’s Comments on the Submission from Pippa Southorn

78.1 Introduction

78.1.1 Table 78.1 summarises the Applicant’s comments on Pippa Southorn Deadline 6 Response [REP6-257].

Table 78.1 Applicant’s Comments on Pippa Southorn Deadline 6 Submission [REP6-257]

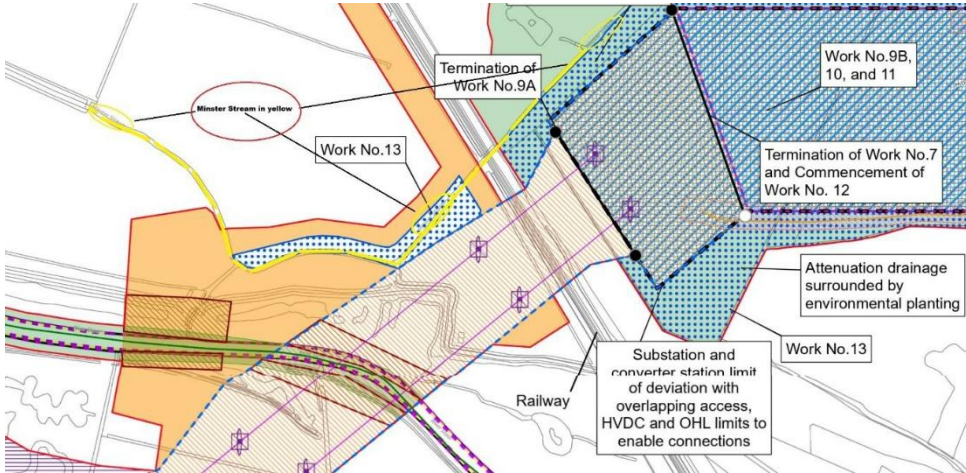
Reference	Matter	Point Raised	Applicant’s Comments
	Generic protection standards for unprecedented development	The Outline Soil Management Plan, Kent (7.5.10.2) and the Applicant’s responses treat sensitive marsh soils of the former Wantsum Sea Channel in a generic manner. Development on a former sea channel that is now fresh water is unprecedented globally. We have farmed this land using min-till methods for 15 years, which has built and preserved soil structure, organic matter and biodiversity. The current generic approach does not reflect this or the unique alluvial marsh soil characteristics. The temporary haul road is designed to support heavy construction traffic for up to 5 years. To prevent heavy vehicles from sinking into the soft soil, National Grid proposes a layered "floating" road design: • Depth: The road profile is approximately 0.2m to 0.7m deep • Layers: 1. Geotextile Membrane: A heavy-duty fabric laid directly on the arable soil to separate the stone from the clay. 2. Geogrid Reinforcement: A plastic grid to distribute the weight of heavy loads. 3. Aggregate Base: 400mm–600mm of compacted stone (Type 1 MOT) to form the running surface. • Drainage Implication: This road is impermeable. Rainwater will not soak through it; it will sheet off the sides immediately. 2. Temporary Drainage Ponds Because the road sheds water rapidly, National Grid proposes digging temporary ponds alongside the haul road in the arable fields. • Design: The attenuation ponds, typically 1m–1.5m deep, lined with a synthetic liner to prevent groundwater ingress from below. • Capture: Runoff from the road is directed into these ponds. • Settlement: The water sits for a set period to allow silt to settle. • Discharge: A small pipe (flow control device) releases the "clean" surface water into local ditches at a "greenfield runoff rate" (approx. 2–5 litres per second per hectare).	The results of the recent Agricultural Land Classification (ALC) survey are detailed in Application Document 9.31 (C) Agricultural Land Classification (ALC) Survey Results – Kent (update submitted at Deadline 7), and have been accounted for in Application Document 7.5.10.2 (B) Outline Soil Management Plan – Kent [REP6-068]. The Outline Soil Management Plan provides the structure and the principles which will be detailed out when the final Soil Management Plan is produced. Development of the final Soil Management Plan will require the detailed design and the actual construction approach and will be developed in partnership with the appointed contractor(s). The submission has made it clear that the current plan is ‘outline’; Section 1.1 of the Outline Soil Management Plan provides key commitments that further survey work will be undertaken and that the final Soil Management Plan will be developed prior to any soil stripping works commencing and that it will require acceptance by National Grid. Application Document 7.5.10.2 (B) Outline Soil Management Plan – Kent [REP6-068] has also been updated to include more detail on the requirements for an Aftercare Management Plan (Section 8.7), which includes a requirement for monitoring and remedial measures to be set out in the final plan along with success criteria to be set out. These steps will deliver the requirements as set out in the points raised.

Failure Point	Technical Issue	Practical Consequence
Groundwater Hydraulic Lock	The high water table (as seen in Feb 2026 floods) exerts upward pressure.	If you dig a pond, it fills with groundwater from below before it can take any road runoff. If you line it, the pressure can "pop" the liner (hydrostatic uplift).
Discharge Blockage	The receiving ditches (Minster Stream network) are often full during winter.	The ponds cannot discharge their water because the stream level is higher than the pond outlet. The ponds act as "storage tanks with no drain," often full during winter. eventually overflowing back onto the haul road or fields.
Soil "Pudding"	The clay soil loses structure when wet and trafficked.	Construction vibration on wet clay turns the soil next to the road into liquid mud ("thixotropy"). This mud slides into the drainage swales, blocking them and forcing water to pool on the arable land, destroying crops and soil structure.

Requirements:

An ALS soil survey has only recently been conducted. I request that the results of this survey (together with any further intrusive ground investigations under REAC GH01) are applied to produce a detailed, site-specific reinstatement plan. This plan must be submitted, consulted on and secured in the final CEMP, updated Outline Soil Management Plan before the end of the DCO process (and before any works commence)

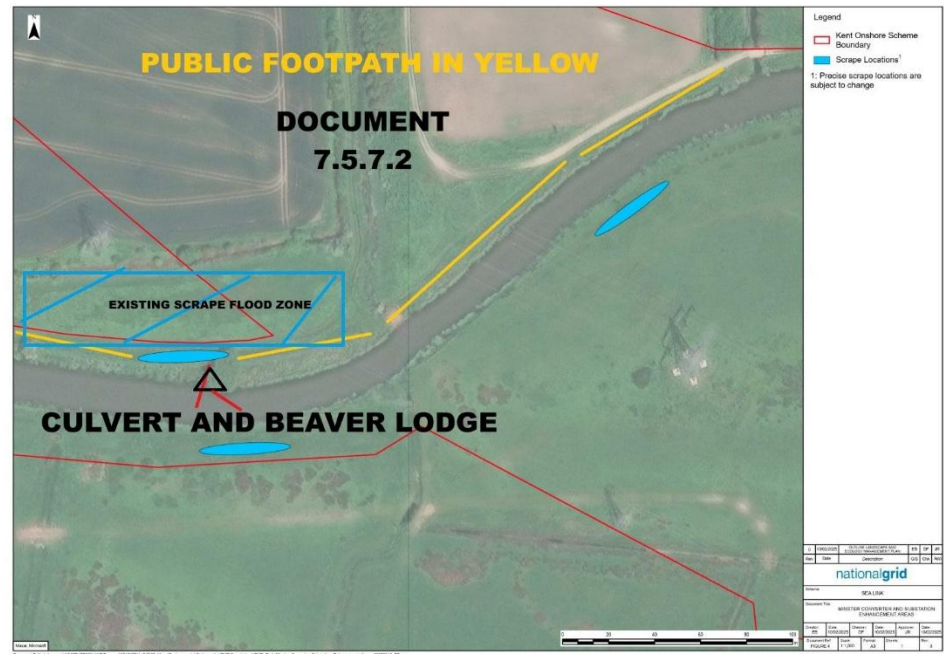
It should include: pre- and post-construction soil testing and monitoring specific to min-till practices; tailored handling, storage and reinstatement methods to protect soil structure; full

	reinstatement of field drainage and avoidance of compaction or salination; and independent verification that the reinstated soil meets or exceeds its pre construction condition.	
Attenuation pond sits directly over the Minster Stream	The Kent Drainage Strategy (9.17.2) and indicative plans (CR1-025) show permanent attenuation basins (including PC-09-ATPN and PC-11-ATPN) directly over the Minster Stream. This of course will not be possible to install, and there does not appear to be a practical place for the ponds to go. 	The Applicant confirms that there are no attenuation basins proposed over the Minster Stream, the overlap in layers allows for the outfall connection from the basins to the stream. The Applicant has worked with the LLFA and River Stour Internal Drainage Board to agree a SuDs approach to the drainage for this scheme.
	Requirements: Full details on how the drainage is proposed without collapsing banks of Minstr Stream. Reinstatement of soft alluvial soil that has been in min-till for 15 years will be returned to original condition following deep compression of water in anaerobic conditions? How water will be removed from ponds when full to prevent flooding? SuDS was refused on adjacent BESS applications due to high water table.	
Higher Level Stewardship and Sustainable Farming Incentive	Higher Level Stewardship and Sustainable Farming Incentive Existing wetland scrapes adjacent to the River Stour and temporary bridge crossing My HLS/SFI agreements include wetland scrapes north of the River Stour (Abbey Farm Wetland) that we actively manage for biodiversity in an agreement with Natural England. The temporary clear-span bridge over the River Stour, associated haul roads and construction traffic will directly affect these scrapes. The Applicant's response (9.36 Table 19.1, point WR-REP2-101.05) states that schemes "will not be impacted" or will be covered by the Compensation Code, but provides no site-specific plan for protection of my existing scrapes wildlife during bridge works, pre- and post construction monitoring. Requirements: I request a site specific Construction Method Statement for the bridge crossing (with measures to avoid damage to existing scrapes and river bank (Nemo Link left lasting damage)), updated REAC entries for monitoring and reinstatement of scrapes to the same or better condition.	An Outline Construction Method Statement for the Stour temporary bridge is provided as Appendix E of 6.8 (B) Flood Risk Assessment [REP6-052] submitted by the Applicant at deadline 6.

Proposed new wetland scrapes (600 m² with riparian planting) mapped on a public footpath

The oLEMP, Kent (7.5.7.2(C), Section 5.3 and Figure 4) proposes three new shallow scrapes (total ~600 m²) along the River Stour (grid references TR 30665 62754 to TR 31176 62863) as BNG enhancement (REAC B52). These have been mapped directly overlapping a public footpath (PRoW TE26 north bank and/or EE42 south bank). The proposed scrape is also too close to existing scrapes which flood the whole area when the River Stour is at high levels. The wetland was specifically designed to be optimal for biodiversity by Natural England – any addition to it is not a biodiversity increase.

The scrapes are not being formally taken into account in the Biodiversity Net Gain assessment for the Proposed Project. The scrape shape and location shown in Figure 4 of the Kent oLEMP are illustrative. As it notes on Figure 4 ‘precise scrape locations are subject to change’. The actual location (within the order limits) and shapes of the scrape, including proximity to the path and the bank top and flood areas, will be amended during detailed design by the contractor. Note that as per section 5.3.1 of the Kent oLEMP, these scrapes will not be significant engineered features, they will be shallow (maximum 30cm is the intention although that is also subject to detailed design) and are simply intended to pool water at certain times of the year.



Requirement: Relocation of the new scrapes off the public footpath (and away from conflict with my existing HLS scrapes).

Salt contamination and reservoir protection, request for direct notification

In my REP2-101 (points .02, .04, .06) and earlier representations I raised risks of salt mobilisation and heavy-metal contamination from the buried salt layer in Wantsum Sea Channel soils, boreholes, dewatering and excavation, with potential permanent impacts on my irrigation reservoirs and fresh-produce water supply.

Geological register Borehole Reference: TR26SE8 West Stourmouth (within Wantsum Channel) shows how salt can intrude into fresh water on the marshes: Page 29 (Conclusions on resource availability and risks):

“It has been shown that the groundwater resource available at West Stourmouth is very much less than that had been previously supposed. An underflow from the Wingham and Little Stour outcrop areas of no more than 2.5 Ml/d could be utilised. Any abstraction in excess of this amount would derogate river flows at the southern edge of the marshes. Furthermore, the highly saline groundwater at Plucks Gutter would be rapidly drawn in, and there might even be the risk of sea water intrusion from the east coast. At 2.5 Ml/d, it is unlikely that river flows would be derogated, but

A preliminary ground investigation has already been undertaken for the Proposed Project which did not identify the presence of a buried salt layer. A further ground investigation will be undertaken to inform the detailed design of the Proposed Project in accordance with commitment GH01 included within Document 9.83 Outline Code of Construction Practice [REP4-232].

A groundwater risk assessment has also been undertaken for the Proposed Project and is presented in Application Document 6.3.3.5.B Appendix 3.5.B Qualitative Groundwater Risk Assessment [APP-170] which concluded that significant dewatering within the Kent Onshore Scheme is unlikely to be required to facilitate the construction of the Proposed Project. The assessment utilises groundwater level information from the preliminary site specific ground investigation (Application Document 6.3.3.5.C Appendix 3.5.C Ground Investigation Report [APP-171],

In accordance with commitment GH07 within Document 9.83 Outline Code of Construction Practice [REP4-232], any temporary

the quality problem would remain to some extent. The abstraction borehole is located only a couple of kilometres west of Plucks Gutter, and its cone of drawdown would undoubtedly induce flow from that direction (a fissure connection between the two locations was proved by geophysical logging)."

Any construction activities, dewatering, piling, cable trenching, or changes in groundwater pressure associated with the Sea Link project could reduce this protective underflow and trigger the exact saline intrusion risks identified in the 1975–1980 BGS study. Once saline water is drawn in, it is extremely difficult to reverse. It also shows how complex the connection of fissures are belowground.



The Applicant's responses rely on generic REAC commitment GH08 (unexpected contamination protocol), the Qualitative Groundwater Risk Assessment and general CEMP pollution controls, but contain no site specific risks and no commitment to notify me (or other affected marsh landowners) directly. Requirement: I request a new REAC entry (or amendment to GH08) requiring the Applicant to notify me immediately of any suspected contamination event, saline material encounter or dewatering that could affect water quality. Timely notification will prevent damage to reservoirs and agricultural land as we can switch off pumps.

dewatering activities during the construction of the Proposed Project will be undertaken in accordance with Environment Agency guidance and if required, an abstraction licence and environmental permit would be obtained. Commitment GH09 also requires a Hydrogeological Risk Assessment to be undertaken if dewatering is found to be required following detailed design that wasn't anticipated, to assess the specific risks to groundwater and groundwater receptors.

Commitment GH09 requires that the nature and scope of any remediation or mitigation (based on the Hydrogeological Risk Assessment) is agreed with the Environment Agency or other stakeholders.

The Applicant has secured, through inclusion within Application Document 9.83 Outline Code of Construction Practice [REP4-232], several commitments to ensure control of pollution of the water environment e.g. GG04, GG05, GG24, W09, W24). These measures will contribute to avoiding pollution risks to reservoirs

Water for irrigation

Claim in 9.17.2(B), Paragraph 6.3.5 (Section 6.3 Runoff Destination):

"The Applicant has also held early discussions with interested parties who may benefit from the water being used as a source of irrigation for agricultural land in the near vicinity to the project."

The Applicant has committed to reusing water attenuated on site where practicable within the Drainage Strategy. The detail on these proposals will be developed within the Drainage Management Plans produced at detailed design.

Requirement: Please confirm how water will be available for irrigation and if at all possible as this point has not be raised with farmers.

79. Applicant’s Comments on the Submission from Dover District Council

79.1 Introduction

79.1.1 Table 79.1 summarises the Applicant’s comments on Dover District Councils responses to Action Points from ISH3 from their Deadline 6 Response [REP6-260]. The Applicant has responded to Dover District Council’s responses to the Examiner’s Third Written Questions from REP6-260 in **Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions**.

Table 79.1 Applicant’s Comments on Dover District Council Deadline 6 Submission [REP6-260]

Reference	Matter	Point Raised	Applicant’s Comments
Dover District Council’s (DDC) responses to the Inspector Examination Questions ExQ3			
The Applicant has responded to Dover District Council’s responses to ExQ3 in Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions .			
Dover District Council’s (DDC) responses to Action Points from ISH3.			
AP1	Submit any suggested drafting (whether relating to matters raised in ExQ3 or not) which you consider should be included in the draft Development Consent Order (dDCO), with reasons why you consider it is necessary.	Comments are included above in the response to ExA Q3, however the Council has no other comments to make.	Noted.
AP18	If there are traffic delays due to proposed development construction traffic, either alone or in combination with other developments, is it likely that alternative routes would be taken by the public in their vehicles, potentially having an impact on more minor highways? If so, has this been assessed and is there actions needed to avoid this?	In relation to the onshore element of the development in Kent (particularly in relation to the Dover District), the Council could see that some residents of Richborough Road may be tempted to use alternative accesses (e.g. via Cooper Street Drove, Cop Street Road or Lower Goldstone) to access properties/agricultural land to the west of Whitehouse Drove (rather than accessing Richborough Road via Ash Road to the east). Visitors to Richborough Roman Fort and Amphitheatre would however be more likely to use the Ash Road/Richborough Road junction following published routes and directional signage. Given the relatively limited number of HGVs that would be accessing White House Drove and period of time this work would occur, this is likely to result in temporary disruption. In terms of vehicle movements on Ramsgate Road, there are a limited number of alternative routes drivers could take which would avoid this route. The Council would however defer to KCC as local highway authority.	Noted. The Applicant notes that KCC as local highway authority has not raised any representations in relation to traffic delays under AP18 in its response to the ExA’s Action Points. The measures requested by KCC are captured fully under its response to AP19 [REP6-168].
AP25	The ExA require that the Councils work together and provide wording for a requirement within the DCO, if the Councils considered it necessary, for the monitoring and possible adaptive management in regards to tourism impacts.	The Council will defer to SCC, ESC and TDC on this matter as ESC have an agreed scheme in place (discussed at ISH3) in relation to other NSIP developments which could use similar wording for the requirement.	Noted.

Reference	Matter	Point Raised	Applicant's Comments
AP27	If there was to be a Skills and Employment Plan submitted by the applicant which would be considered acceptable by the Councils, would this be sufficient to overcome any remaining concerns relating to economic impacts?	The Council was sent a draft skills and employment plan on 19th March 2026 and attended a Teams Meeting with the Applicant and representatives of KCC and TDC to discuss the draft plan. It is understood the applicant intends to submit this plan at Deadline 6. The Council has sent the applicant comments on the plan and echoed those of KCC and TDC at the meeting so would expect to see points discussed at the meeting incorporated within the document. Subject to the content of the report, it is considered likely this would address remaining concerns relating to economic impacts.	The Applicant has submitted Application Document 9.120 Detailed Skills, Supply Chain and Employment Plan [REP6-101] at Deadline 6 .
AP28	Are there remaining concerns with regard to the potential displacement of tourists by workers of the proposed development (or in combination with other workers of other developments in the area) in tourist accommodation?	The Council would defer to TDC on this matter, noting they commented on this at ISH3 and may be providing further detail in their post-hearing submission.	Noted.
AP32	With regard to the proposed exceptions included in requirement 7, are there any that the Council considers as should be omitted or amended?	The Council has no comments on this, noting that point (6) (definition of severe weather conditions) was discussed at ISH3 and a further response is expected from the applicant.	Noted. The Applicant has provided further commentary to this under AP31 in Application Document 9.135 Applicant's Response to March Hearing (CAH2 and ISH3) Action Points [REP6-110] .
AP34	All councils to work together to submit alternative wording with respect to core working hours including any restrictions and exceptions required, if the councils consider this necessary.	The Council defers to SCC, ESC, KCC and TDC on this suggested wording and understands this will be submitted by SCC.	Noted.
AP39	Does there need to be any changes to the draft DCO or the support documents submitted by the applicant in relation to cultural heritage? If so, please set this out with alternative or additional wording.	The Council has no comments on this matter.	Noted.
AP44	The applicant and the Councils to work together and provide a document which provides the reasonings of the parties and DCO (and/or if appropriate REAC) wording to secure the measures identified in responding to 2WQ 2CEIntra3 should the Secretary of State deem this to be necessary.	The Council will defer to SCC and ESC who have dealt with a number of DCO's and will be more familiar with wording used on other projects which could be suggested.	Noted.

80. Applicant’s Comments on the Submission from Marine Management Organisation

80.1 Introduction

- 80.1.1
- Table 80.1 summarises the Applicant’s comments on Marine Management Organisation Deadline 6 Response [REP6-268].
- 80.1.2
- The Applicant has responded to Marine Management Organisation’s responses to the Examiner’s Third Written Questions from REP6-268 in **Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions**.

Table 80.1 Applicant’s Comments on Marine Management Organisation Deadline 6 Submission [REP6-268]

Reference	Matter	Point Raised	Applicant’s Comments
Deadline 6 Submission			
		On 23 April 2025, the Marine Management Organisation (the MMO) received notice under section 56 of the Planning Act 2008 (the PA 2008) that the Planning Inspectorate (PINS) had accepted an application made by National Grid Electricity Transmission, (the Applicant) for determination of a development consent order (DCO) for the construction, maintenance and operation of the proposed Sea Link Project (the DCO Application), (MMO ref: DCO/2022/00008 PINS ref: EN020026). The DCO includes a Deemed Marine Licence (DML) in Schedule 16. The Applicant seeks authorisation for the construction, operation, and maintenance of the Sea Link interconnector, comprising of approximately 122 kilometres (km) High Voltage Alternating Current (HVAC) cable between the Suffolk landfall location (between Aldeburgh and Thorpeness) and the Kent landfall location at Pegwell Bay (the Project). This document comprises the MMO’s submission for Deadline 6. This written representation is submitted without prejudice to any future representation the MMO may make about the Application throughout the examination process. This representation is also submitted without prejudice to any decision the MMO may make on any associated application for consent, permission, approval, or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.	This is noted by the Applicant.
Responses to ExQ3			
The Applicant has responded to Marine Management Organisation’s responses to ExQ3 in Application Document 9.150 Applicant’s Comments on Responses to Third Written Questions .			
Comments on any Further information / Submissions received by Deadline 5			
2.1 Comments relating to the Draft DCO and DML			
	Main DCO Definitions	2.1.1. The MMO notes that the definition of “commence” has changed within the DML and that it now omits ‘trial trenching’ from the definition. The MMO is not aware of any rationale behind this	The Applicant confirms that a separate definition of Trial Trenching has been added to the dML for Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
		change and is concerned that by omitting trial trenching from the definition, this can be carried out in areas such as Pegwell Bay with the mitigation and monitoring requirements no longer being adhered to. The MMO requests that this change be removed from both the main list of definitions and the list within Schedule 16 (Deemed Marine Licence).	Furthermore, the Applicant has committed to not undertaking these activities within the Ports Areas of Safeguarded Water Depths or within any designated sites for the protection of benthic habitats. This includes Pegwell Bay.
	Part 2 Principal Powers	6. Benefits of the Order & 7. Consent to Transfer benefit of the Order 2.1.2. The MMO notes that section 6 and 7 remain within the DCO. The MMO reiterated its position at point 3.3 in its Deadline 3 Submission [REP3-094]. The MMO will not duplicate our previously stated reasoning for this position within this response, however in summary the MMO raises objection in relation to: a) The procedure seeking to duplicate the existing statutory regime set out in s72 of the 2009 Act b) The proposed procedure being cumbersome, more administratively burdensome, slower and less reliable than the existing statutory regime set out in s72 of the 2009 Act; c) The power for an undertaker to grant a DML; d) The basis for disapplication of the need for Secretary of State's consent to a transfer/grant for DML is unrelated to any matters relating to marine licensing. e) The overall effect on the ability of the MMO to enforce the marine licensing regime in respect of any transferred or granted DML.	The Applicant confirms that the Draft DCO has been updated for Deadline 7 and that that document comprises the Applicant's position in this matter.
	Schedule 16 Deemed Marine Licence Part 1 Licenced Marine Activities	2.1.3. The MMO notes that Section 9 of Part 1 refers to the benefit of the Order, for the reasons set out in 2.1.2 the MMO continues to strongly object to the inclusion of this. 2.1.4. The MMO notes the use of the word "unlikely" in Section 11: <i>"Any amendments to the details, plan or scheme must be in accordance with the principles and assessments set out in the environmental statement, and approval for an amendment may be given only where it has been demonstrated to the satisfaction of the MMO that the amendment is unlikely to give rise to any materially new or materially different environmental effects from those assessed in the environmental statement."</i> The MMO considers the word "unlikely" to be too broad and introduces an unacceptable level of uncertainty regarding the potential for new or materially different environmental effects. The MMO, in order to ensure that any amendments are assessed against a robust threshold, requests that "unlikely" be replaced with "will not". This also ensures consistency with the existing terminology used on Marine Licences.	
	Part 2 Conditions - Pre construction plans and documentation.	2.1.5. The MMO notes in Section 4 (a) that "in general accordance" has now been replaced with "in substantial accordance". Section 4 of the MMO's Deadline 4 response [REP4-126] for Issue Specific Hearing additional questions noted that:	The Applicant confirms that Section 4 (1)(a)(iv) has been amended at Deadline 7 following MMO and ExA Comments.

Reference	Matter	Point Raised	Applicant's Comments
		<i>“The MMO’s position is that “in general accordance” allows for there to be a margin of difference and we therefore request that the wording of this condition be changed to “in accordance with”.</i> <i>The MMO therefore again requests that the wording be updated to “in accordance with”.</i> 2.1.6. With regard to Section 4 (1)(a)(iv) the MMO requests that “intertidal” should be defined as “The area between mean high-water springs and low water springs”. 2.1.7. The MMO notes that for 4 (2) Historic England is referred to as “the Historic England”. The MMO considers that “the” can be removed. 2.1.8. The MMO notes the inclusion of Section 4 (6) and (7). The MMO provided comments around the terminology of these areas in Deadline 5 [REP5-175]. The MMO notes that the wording in 4 (7) of “Sunk Pilot Boarding area Area of interest” is somewhat poor and recommends that alternate wording be provided for clarity.	The Applicant confirms that ‘the’ has been removed from Section 4 (2). The Applicant has clarified the Sunk Pilot Boarding Area to that identified within the relevant Certified Plan.
	Part 2 Conditions - Reporting of engaged agents, contractors and vessels	2.1.9. The MMO requests that “any licensed activity” be amended to “any part of any licensed activity”. 2.1.10. The MMO notes that due to the examination timetable, changes previously requested in the previous deadline may not be reflected in any updated documents at the subsequent one. However the MMO wishes to make sure the Applicant is aware of the change requested in Deadline 5 [REP5-175] regarding the requested change to Condition 7 (3) (a)-(c), for reference this was that subsection 3 be amended to state: <i>“(3) The undertaker must during the whole period from the commencement of construction of the authorised project to the completion of decommissioning keep Trinity House and the MMO informed of progress of the authorised project including;”</i> This inclusion will align the condition with other DMLs previously consented and allow the MMO to ensure the Applicant is complying with the conditions.	The Applicant confirms this has been updated for Deadline 7.
	Part 2 Conditions - Chemical, drilling and debris	2.1.11. The MMO has reviewed Condition 8 in relation to the chemical conditions and notes the proposed changes to Condition 4 (Pre-construction plans and documentation). The MMO proposes the following wording for both Condition 4 and Condition 8: Condition 4: 4. (1) The licensed activities or any part of those activities under Work No. 6, save for trial trenching, must not commence until the following plans in respect of those activities have been submitted to and approved in writing by the MMO, such approval to be within a period of six months from submission (in consultation with Natural England, the JNCC, MCA, Environment Agency, PLA, Trinity House, UKHO and Cefas): ... (l) Unless otherwise agreed in writing by the MMO, a chemical risk assessment, including (but not limited to) information regarding how and when chemicals are to be used, stored and transported in	The Applicant confirms that the requested edits were already added at Deadline 6.

Reference	Matter	Point Raised	Applicant's Comments
		accordance with recognised best practice guidance and standards, and in accordance with the conditions of this licence. (m) Unless otherwise agreed in writing by the MMO, a site specific chemical risk assessment for any chemicals used for the licensed activities (outside the course of normal navigation) with a pathway to the marine environment, submissions should include; i.the function of the chemical, the quantities being used, the frequency of use, the location, and the estimated discharge; ii. the management measures preventing the release into the marine environment; and iii. the physical, chemical, and ecotoxicological properties of the chemical. iv. Chemicals present on the OSPAR List of Substances Used and Discharged Offshore which Are Considered to Pose Little or No Risk to the Environment (PLONOR), or chemicals where the MMO agree in writing that the management measures are sufficient to ensure no release into the marine environment, are exempt from (iii). Submissions for approval must take place no later than ten weeks prior to use. Condition 8: (1) The undertaker must ensure that any coatings/treatments are suitable for use in the marine environment and are used in accordance with relevant guidelines approved by Health and Safety Executive and the Environment Agency. (2) All chemicals used for the licensed activities should be selected with regard to their environmental impact, and approved for use by the MMO. Where less hazardous or non-toxic substitutes are available, these must be used in preference to more harmful substances. (3) The storage, handling, transport and use of fuels, lubricants, chemicals and other substances must be undertaken so as to prevent releases into the marine environment, including substances released by design or by degradation. This should include bunding of 110% of the total volume of all reservoirs and containers, unless otherwise agreed by the MMO in writing. (4) The undertaker must ensure that only inert material of natural origin, drilling mud and dredged material, produced during the landfall installation or seabed preparation works is disposed of within the disposal site reference(s) to be provided by the MMO within the extent of the Order limits seaward of MHWS. (5) The undertaker must inform the MMO of the location and quantities of material disposed of each month under the Order, by submission of a disposal return by 15th February each year for the months August to January inclusive, and by 15th August each year for the months February to July inclusive. (6) The undertaker must ensure that any rock material used in the construction of the authorised scheme is from a recognised source free from contaminants and containing minimal fines.	

Reference	Matter	Point Raised	Applicant's Comments
		(7) The undertaker must ensure that any oil, fuel or chemical spill within the marine environment is reported to the MMO, Marine Pollution Response Team within 12 hours. (8) All dropped objects must be reported to the MMO using the dropped object procedure form as soon as reasonably practicable and in any event within 6 hours of the undertaker becoming aware of an incident. Immediate notification must be made to HMCG via telephone where there is a perceived danger or hazard to navigation. On receipt of the dropped object procedure form, the MMO may require relevant surveys to be carried out by the undertaker (such as side scan sonar) if reasonable to do so and the MMO may require obstructions to be removed from the seabed at the undertaker's expense if reasonable to do so. The MMO has also requested the following definitions be added: "pathway to the marine environment" open systems or closed systems that require top up. "chemicals" comprise both substances and preparations (a mixture or solution composed of two or more substances). "substance" means a chemical element and its compounds in the natural state or obtained by any manufacturing process, including any additive necessary to preserve its stability and any impurity deriving from the process used, but excluding any solvent which may be separated without affecting the stability of the substance or changing its composition. This wording has been shared with the Applicant outside the Examination process and the MMO understands that it will be included in the updated DCO to be submitted at Deadline 6.	
	Part 2 Conditions – Force Majeure	2.1.12. The MMO notes that Condition 9 remains within the DCO. The MMO reiterated its position at point 3.6 in its Deadline 3 Submission [REP3-094]. The MMO will not duplicate our previously stated reasoning for this position within this response, however in summary the MMO continues to object to condition 9 as Section 86 of Marine and Coastal Access Act 2009 (MCAA) provides a defence for action taken in an emergency in breach of any licence conditions. The MMO refers the ExA to the previously identified Deadline 3 response.	This is noted by the Applicant. The inclusion of Condition 9 follows the same precedent as recently submitted DCO applications.
	Part 2 Conditions – Red Throated Diver Protocol	2.1.13. The MMO has reviewed the Red Throated Diver Protocol submitted by the Applicant at Deadline 5 [REP5-080]. The MMO notes the provision under 1.5.9 that would require the Applicant to submit a report in the event that emergency Operation and Maintenance (O&M) activities are required. While the MMO defers to Natural England on the suitability of the Protocol with regards to mitigation against impacts on Divers, the MMO would request that 1.5.9 be amended to state that the document will be provided to the MMO who in consultation with NE will provide confirmation in writing.	The Applicant confirms this has been updated at Deadline 7.
	Part 2 Conditions – Post construction	2.1.14. The MMO requests that the words "in writing" be added after "unless otherwise agreed with the MMO" in condition 14 (3).	The Applicant confirms this has been updated at Deadline 7.

Reference	Matter	Point Raised	Applicant's Comments
	Additional Points	2.1.15. The MMO has noted in the review of the DML that the format of references to timescales in particular days are inconsistent with some written numerically and others fully. The MMO requests that the formatting be amended to ensure consistency throughout the document.	The Applicant confirms this has been updated at Deadline 7.
2.2. Suspended Sediments and Contamination			
		2.2.1. As noted in Paragraph 1.11. of our Deadline 5 response [REP5-175] the MMO has reviewed the updated sample templates which it requested at Deadline 4. The MMO has reviewed the sample analysis and has liaised with the Applicant outside of the examination process to resolve further issues which were identified. 2.2.2. Following previous concerns raised by the MMO in regard to the sample results, we note that the Applicant has now provided an updated MMO Results template for MAR02534 with sample sites A to K and another with sample sites K to L. These have addressed the previous comments with the Marine Licence information appropriately filled out, and the location information updated to decimal degrees. 2.2.3. However, the MMO notes that the Applicant has not filled in the dredge area tonnages box which requires the estimated maximum tonnage in wet tonnes anticipated as a result of the works as requested. The MMO believes the maximum dredge volume to be 1,8000,000 m3, however the Applicant should confirm if this is not correct. Additionally, the Applicant has provided the sampling depths as water depth (m) at each location, however these should be the depths at which the samples were collected relative to the sediment surface (0 m). The MMO requests that this be amended and resubmitted as we have been unable to locate any further details regarding the sample depths, other than references to the samples having been collected at the surface, mid and max depths in each sample location. At present this is insufficient to be able to determine whether the samples are fully representative of the proposed cable area. It would be helpful if the Applicant is also able to please provide signposting to the design depths for the proposed sandwave clearance along the cable corridor with the requested sample depths. 2.2.4. The Applicant has completed the MMO templates with the laboratory which undertook the Particle Size Analysis (PSA), which confirms these were undertaken by Benthic Solutions Ltd., who are validated by the MMO to undertake this analysis in support of marine licences. The Applicant has also provided the relevant certificates of analysis for review to be able to have confidence in the results provided. We welcome this information and have no further comments on the PSA results at this time. 2.2.5. Upon reviewing the sample locations provided in the updated MMO Results templates for MAR02534, it appears the Applicant has only provided the 2024 sample results for a select number of vibrocore samples located off the Kent coast. Previous	This is noted by the Applicant. To date no further questions on the Sediment Sample Templates have been received. This Applicant is however happy to any further questions post Examination if any further arise from the MMO/Cefas on this matter. The Applicant would like to clarify that the Cable Specification and Installation Plan incorporates a Sediment Disposal Management Plan. This document needs to be approved in consultation with relevant stakeholders prior to construction under Condition 4 of the dML.

Reference	Matter	Point Raised	Applicant's Comments
		advice requested that the 2022 and 2024 physiochemical sample results (including any grab and vibrocore samples) should be provided in the correct format (i.e., the standard MMO template) for review. It is not clear why only the vibrocore results from only Area 5 have been provided in the MMO template, or why these samples in particular have been included within a separate report. The MMO requests that this is clarified. 2.2.6. Notwithstanding the comments above, it is possible that the sample results provided for the application overall are representative of the cable corridor. Although please note the MMO does not believe the 2024 vibrocore sample results provided are sufficiently representative of the cable corridor. Given the complex case history, it is not clear as to the chronology of which sediment sample data has been reviewed (and when) or if all major concerns have been adequately addressed. 2.2.7. The MMO has passed these comments onto the Applicant ahead of Deadline 6, and we have since received updated documents addressing the points above. The MMO is currently reviewing these, alongside our scientific advisors at Cefas, and will continue to liaise with the Applicant following our review. 2.2.8. With regard to the need for a designated disposal site, this is standard practice for dredge disposal and sandwave clearance activities in the marine environment and is to fulfil UK signatory obligations for OSPAR and London Protocol. The MMO confirms that in areas of pre-sweeping, these should be designated as disposal sites. The MMO is currently reviewing which areas will need designating as a disposal site in consultation with our advisors at Cefas, and we will continue to liaise with the Applicant regarding this.	
2.3. Register of Environmental Actions and Commitments (REAC) [REP5-115]			
		2.3.1. The MMO has reviewed the REAC [REP5-115]. Notwithstanding the issues raised in our answer to 3PE6 and within the MMO's Deadline 5 response [REP5-175] the MMO notes the repeated references to the securing mechanism under DCO Schedule 3, requirement 6: "DCO Schedule 3, Requirement 6 Offshore Construction Environmental Management Plan" (CEMP). 2.3.2. The MMO notes that the CEMP is not a document listed within Schedule 6 requirement 6 but is a document identified in the dDML under Condition 4 (1) (b) as a pre-construction document. The MMO requests that this reference within the REAC be updated to signpost to this condition.	The Applicant confirms that has been addressed for Deadline 7.

References

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