

John Wheadon
Head of Energy Infrastructure Planning Delivery
Department for Energy Security and Net Zero
3-8 Whitehall Place
London
SW1A 2AW

PINS reference: EN020026

16 October 2026

Submitted by email only: SouthEastAngliaLink@planninginspectorate.gov.uk

Dear Mr Wheadon,

Planning Act 2008 and The Infrastructure Planning (Examination Procedure) Rules 2010

Application by National Grid Electricity Transmission plc (“the Applicant”) for an Order granting Development Consent for the Sea Link Project

Applicant’s Response to Request for Information dated 9 October 2026 and Further Comments from the Applicant

This letter has been prepared by National Grid (the Applicant) to provide:

- General updates where relevant
- A response to the Request for Information issued by the Secretary of State on 9 October 2026
- Comments on responses submitted by Interested Parties in response to the questions raised by the Secretary of State in the letter dated 28 September 2026, where the Applicant considers a response may be useful for decision making.

Table 1.1 lists the documents submitted by the Applicant alongside this letter and Table 1.2 provides the Applicant’s comments on documents submitted by Interested Parties.

Table 1.1: Documents submitted to accompany response on 16 October.

Ref	Document Title	Rev	Reason for Submission
3.1	Draft Development Consent Order	L	Updated to reflect amendments made to the Protective Provisions and to Requirement 23.
3.2	Explanatory Memorandum	K	Updated to explain changes to the draft Development Consent Order.
3.3	Validation Report	D	Validation Report for the updated Draft Development Consent Order.
7.5.2	Outline Offshore Construction Environmental Management Plan	G	Updates in response to Natural England's submission published 21 September.
7.5.3	Outline Onshore Construction Environmental Management Plan (Tracked and Clean)	G	Updates to align with changes to the Register of Environmental Actions and Commitments and in response to Natural England's submission published 21 September.
9.7	Applicant's Schedule of Changes to the Draft Development Consent Order	J	Updates to reflect changes to the draft Development Consent Order
9.84	Register of Environmental Actions and Commitments (REAC) (Tracked and Clean)	H	In response to the Secretary of State's request of 9 October 2026 and in response to Natural England's submission published 21 September.
9.92	Outline Cable Specification and Installation Plan (CSIP) (Tracked and Clean)	E	Updates in response to Natural England's submission published 21 September.
9.159	Applicant's Response to Request for Information dated 9 October 2026 and Further Comments from the Applicant	A	This letter.

All updated documents are labelled as Revision (B), Revision (C) etc as applicable, and supersede the documents previously submitted by the Applicant.

Where applicable, these documents are provided in clean and tracked versions as requested in the Examining Authority's Rule 6 Letter [PD-010].

General Updates

Update in Relation to the Crown Estate

The Applicant is pleased to confirm that the terms of the option agreement for the offshore lease for the Project have been agreed with the Crown Estate and engrossments are being prepared by The Crown Estate for execution by both parties.

The Crown Estate has also issued the signed and dated S135 consent letter to the Secretary of State.

Coordination with Scottish Power Renewables on Landscaping at Friston (Kiln Lane) Substation

The Applicant has been working closely with Scottish Power Renewables and National Grid Ventures on a coordinated landscape masterplan for the site of Kiln Lane Substation. This process has included joint working on cable alignments and landscaping proposals to develop a revised version of the landscape masterplan developed by Scottish Power Renewables to discharge requirements on the East Anglia Two project. As part of this work, a meeting was held with the nearest residents to the site in August 2026, attended by representatives from both National Grid Electricity Transmission and Scottish Power Renewables, to discuss changes to the plan.

In August 2026 Scottish Power Renewables submitted an application under Requirement 40 of the East Anglia ONE North and East Anglia TWO Offshore Wind Farm Development Consent Orders to amend the landscaping masterplan to show how the landscaping of the site would be developed in a way that provides landscape and visual mitigation and enhancement, whilst avoiding planting of trees over the proposed location of cables for the Sea Link project. This resolves a previous minor conflict between the applications. Appendix A provides the consent for the change to the Approved Landscape Masterplan issued by East Suffolk Council on 6 October 2026.

Protective Provisions with Highways Authorities

The Applicant has been working with Kent County Council and Suffolk County Council to agree the Protective Provisions in Part 5 of Schedule 15 of the draft Development Consent Order. Amendments have been made to the latest version in response to the latest comments and incorporated into the draft Development Consent Order submitted with this letter.

The Applicant understands that the Protective Provisions are now fully agreed with Kent County Council. Amendments have also been made in response to comments from Suffolk County Council, but the Protective Provisions were not fully agreed between the parties at the time of writing.

Response to Secretary of State's Letter Dated 9 October

The Secretary of State issued a letter on 9 October requesting changes to commitments in the Register of Environmental Actions and Commitments (REAC). In response to the request, the Applicant has updated the REAC, together with the associated control documents, to incorporate amendments requested by the Secretary of State in relation to commitments BE07, MPE13 and B65 with minor amendments.

The principle of amendments proposed to B45 and B50 were incorporated, but with minor changes to the wording because no noisy works would occur at the SSSI during March to August under commitment B45 and no noisy works would occur during March to June at the SSSI under commitment B50. Therefore, no reports would be required or produced during these periods. This amendment to the wording proposed was made primarily to provide Natural England and other environmental bodies with reassurance that the changes would not permit noisy works in the periods previously excluded.

Where relevant, the corresponding updates have also been made to the Outline Onshore Construction Environmental Management Plan, Outline Offshore Construction Environmental Management Plan and Outline Cable Specification and Installation Plan.

Applicant Comments on Interested Party Responses to the Secretary of State Letter Dated 28 August 2026

On 22 September 2026 the Secretary of State invited all Interested Parties to comment on responses published on the Sea Link Project Page in response to her information request dated 28 August 2026. This letter did not request responses from the Applicant so the Applicant has not responded to all points raised; many of which have been explored in depth during the Examination period. However, the Applicant has provided responses to a number of comments where it is considered that it may be useful to the Secretary of State for the Applicant to do so.

Table 1.2, below, comprises the Applicant's responses to points raised in the SoS letter. For ease of reference, we have responded to the relevant points in the August 2026 Request for Information, quoting the relevant paragraph numbers.

Table 1.2 Applicant’s Comments on Responses to SoS letter

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant’s Response
East Anglia TWO Limited, East Anglia ONE North Limited and ScottishPower Renewables (UK) Limited	Paragraph 48, 49	Protective Provisions	The Applicant continues to negotiate the side agreement which is intended to cover off any remaining concerns around Compulsory Acquisition. The parties are nearing agreement and expect that these objections will be withdrawn subject to agreement on the final amendments to the side agreement.
East Suffolk Council	Paragraph 42, 45, 53, 55, Appendix A	Heads of Terms	The Applicant is pleased to note ESC’s confirmation that the Heads of Terms are acceptable, subject to agreeing the financial compensation, and will progress the voluntary agreement. Comments on interpretation of Requirement 7 of the draft DCO (Appendix A) National Grid does not agree that further amendments to Requirement 7(9) are necessary. The construction noise control framework secured through the draft DCO, including the Noise and Vibration Management Plan (NVMP) and the requirement to obtain approvals under section 61 of the Control of Pollution Act 1974, already provides a clear and comprehensive mechanism for controlling construction activities undertaken outside core working hours, including "essential" activities. Detailed contractor-specific noise assessments will be subject to local planning authority approval through the section 61 process before works can commence, ensuring that the nature, timing and extent of any out-of-hours activities are appropriately assessed and controlled. Accordingly, the DCO and certified documents already secure the outcomes sought by East Suffolk Council and provide sufficient oversight of essential activities without the need for further amendment to Requirement 7(9).
Kent County Council	Paragraph 51 [C1-112]		The Protective Provisions on highways works for Kent County Council (KCC) are now understood to be agreed, following a meeting between the Applicant and KCC to agree final changes on 13 October 2026. The final version was circulated to KCC on 15 October 2026 so formal written agreement had not yet been received at the time of writing.
Kent Wildlife Trust	Paragraph 3, 4,	Benthic Ecology	The Applicant confirms that it has already updated Condition 15(3) of the Deemed Marine Licence in line with the SoS requested updates at the previous deadline with regards to a Benthic Mitigation Plan. Additionally, for completeness and to ensure consistency, BE05 of the REAC has also been updated to mirror this Condition and ensure clarity. Additionally, to provide further confidence in the Applicant’s commitments to the benthic environment, Condition 15(5) also secures an Adaptive Management Plan in the very unlikely event that the information provided to the MMO identifies impacts in Pegwell Bay which are unanticipated, and in the view of the MMO, in consultation with the relevant statutory nature conservation body, are significantly beyond those predicted within the Environmental Statement, Habitats Regulations Assessment, or Marine Conservation Zone Assessment. The plan shall identify measures to reduce effects to ensure that these impacts are no worse than was predicted within the Environmental Statement, Habitats Regulations Assessment, or Marine Conservation Zone Assessment, unless otherwise agreed by the MMO in writing in consultation with the relevant statutory nature conservation bodies. This plan must be agreed by the MMO in consultation with the relevant statutory nature conservation bodies to reduce effects to an agreed suitable level for this development. Condition 15(5) mirrors that applied to other offshore projects in the region and goes over and above that which was secured in the Nemo Link Marine Licence application submitted by National Grid Ventures.
	Paragraph 3, 4	Intertidal benthic features of Sandwich Bay and Hacklinge Marshes SSSI	The Applicant confirms that the baseline surveys undertaken at Pegwell Bay in 2023 as presented in Application Document 6.3.4.2.C ES Appendix 4.2.C Intertidal Surveys 2023 [APP-198] were conducted post Nemo Link installation. The baseline characteristics of Pegwell Bay post impact from Nemo Link have therefore already been used to inform the assessment for the Proposed Project.

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
			Throughout this application process, the Applicant has committed to <u>avoiding</u> the sensitive saltmarsh and maintaining works buffers both in the REAC but also on the face of the DCO/DML in Condition 10. The Applicant has also strengthened its commitment B67 that pre-construction saltmarsh surveys include the access and egress routes and will also cover the final trenchless crossing alignment. The Applicant would also highlight Natural England's most recent submission which states '<i>We highlight (and as stated in [REP7-147]) that these maximum design parameters are based on the use of Horizontal Directional Drilling (HDD) and have, in turn, been used to inform the maximum design scenarios that form the basis of the receptor specific impact assessments. Therefore, if HDD proves not to be feasible then we advise it may be necessary to revisit the impact assessments</i>'. The Applicant agrees with this position and has assessed HDD as the appropriate worst-case scenario. The Applicant would again reiterate that, unlike Nemo Link, it is not requesting consent for open-cut trenching through the saltmarsh as part of the Proposed Project. Condition 15(5) of the Deemed Marine Licence also secures an Adaptive Management Plan in the very unlikely event that the reports provided to the MMO identify impacts from the Offshore Scheme (including Pegwell Bay) which are unanticipated, and in the view of the MMO, in consultation with the relevant statutory nature conservation body, are significantly beyond those predicted within the Environmental Statement, Habitats Regulations Assessment, or Marine Conservation Zone Assessment. With regards to Monitoring of the Offshore Scheme, the Applicant considers that the proposed monitoring and mitigation framework already secured under Condition 15(4) of the DML is appropriate and proportionate for a subsea cable project. The Applicant will consult with the MMO and relevant Statutory Nature Conservation Bodies on the final Monitoring Plan and the scope of surveys necessary to inform it in order to discharge it appropriately. The Applicant has updated the REAC, Outline CSIP and Outline Offshore CEMP (all of which are secured under Condition 4 of the DML) to fully commit to its intention to consult with the MMO and relevant Statutory Nature Conservation Bodies on this Plan to ensure the appropriate pre-construction survey scopes and subsequent monitoring are in place.
	Paragraph 5	Chalk habitat	The Applicant refers KWT to C1-178 Responses to Secretary of State's Consultation 1 – 9.158. The habitat referred to in Application Document 6.2.4.2 Environmental Statement Part 4 Marine Chapter 2 Benthic Ecology [REP7-099] is Subtidal chalk (covered by the sea at all times) and is not included in the NPS EN-1 list. As recognised by KWT, the Marine Irreplaceable Habitat (MIH) definition and scoring system used in this report does not define a legal threshold or statutory designation but provides further evidence to highlight areas where restoration is most likely to be very difficult, slow, or unfeasible. As outlined in the 2023 report by Natural England, this MIH work is not statutory guidance and not policy. It is also currently independent from terrestrial Irreplaceable Habitats statutory guidance which the 2023 NPS EN1 paragraph 5.4.53 refers to. Therefore, as the term 'irreplaceable' used in the marine chapters is based on the 2023 Natural England report for marine habitats and not NPS EN-1, paragraph 5.4.53 is not relevant in this instance. The MIH definition and scores in the 2023 report are used to inform strategic planning decisions only and has been referenced within REP7-099 following discussions with Natural England. The assessment conclusions within REP7-099 for subtidal chalk remain minor. The area of subtidal chalk offshore mapped within the cable corridor during baseline surveys was estimated to be less than 250 m² and is completely outside of any type of designated or protected sites. A figure of the Offshore Scheme overlaid on the spatial distribution of subtidal chalk reef habitats was submitted during the Examination Phase, in response to a question on this issue from Natural England, which can be found in Application Document 9.86 Applicant's Comments on Other Submissions Received at Deadlines 3 and 3A [REP4-241]. The habitat mapping from the Water Framework Directive (WFD) High Sensitivity Habitat data layer on magic.gov.uk shows the very significant extent of this habitat and its avoidance by the Offshore Scheme. For clarity a copy of this figure is also provided below. However, this habitat was given a high sensitivity rating in the assessment, on a precautionary basis, despite the offshore baseline surveys providing no evidence that this area of habitat supports biological communities to indicate these were high-quality examples, particularly as much of the chalk was found to be below the surface. Due to the localised nature of installation activities and the small-scale installation footprint compared to the much wider available area of subtidal chalk habitat in the Southern North Sea, that is protected by both Special Area of Conservation (SAC)

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
---------------	---	---------------	----------------------

and Marine Conservation Zones (MCZ) designations on the Thanet Coast (avoided by the Proposed Project), the physical disturbance, and hence permanent loss, to this habitat, it is predicted to be of small magnitude and not significant.

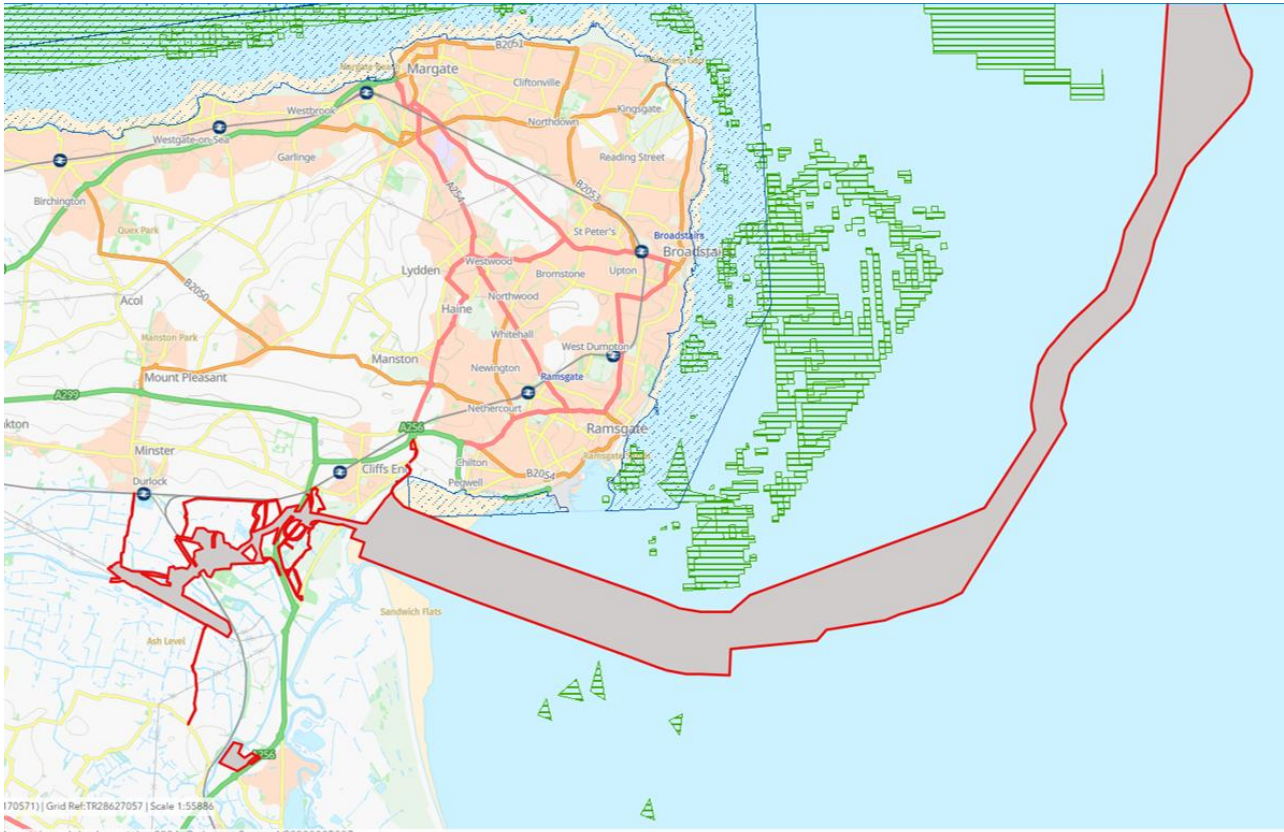


Figure showing Offshore Scheme (red) and subtidal chalk habitat (green)

Paragraph 6,7	Hovercraft at Pegwell Bay	The Applicant confirms that commitment GG45 in the REAC has already been updated in response to the SoS request at the previous deadline. Furthermore, to strengthen our commitments, the Applicant has updated the Outline Cable Specification and Installation Plan to outline its approach to using best practice guidance for the emergency use of the hovercraft in Pegwell Bay following advice from Natural England. These updates include the need for consultation prior to commencement of landfall activities regarding hovercraft access locations to the intertidal and indicative routes which could be taken in the event of an emergency. These will be presented within the intertidal works methodology and mitigation plan for Pegwell Bay as secured within Condition 4 of the DML. Additionally, the Applicant has also engaged with the MMO on 08/10/2026 with regards to its definition of emergency at Pegwell Bay. The MMO has confirmed they are happy with the current wording within GG45. A seasonal restriction from November to February for construction activities in Pegwell Bay has already been committed to in the REAC (B59) and the Offshore Construction Environmental Management Plan at the last deadline in line with the SoS request to avoid impacts to overwintering birds using the intertidal mudflats.
Paragraph 19	Collision monitoring	The Applicant has already committed to the installation of bird diverters on new sections of overhead line through REAC measure B55 and therefore considers this element of KWT's request to be addressed. In relation to collision monitoring, the SoS requested that post-construction monitoring be incorporated into the mitigation commitments and the Applicant has responded by including a two-year monitoring programme within the Outline Landscape and Ecology Management Plan – Kent [C1-205] and updating REAC measure B55 accordingly [C1-215]. The Applicant considers that a two-year monitoring period is proportionate and sufficient to identify whether collision mortality associated with the new overhead line section differs material from that predicted in the assessment. Evidence of any significant mortality, were it to occur, would be expected to become apparent within this monitoring period and there is no established technical basis or standard practice that requires monitoring to be undertaken for five years in these circumstances.

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
			The Applicant's assessment, informed by both historical evidence and project-specific surveys, identified that bird collision occasionally occur within the wider wires cape, as is commonly the case for overhead line infrastructure. However, the numbers and species involved were not considered significant and the assessment did not identify a risk of significant adverse effects arising from the relatively short new section of overhead line proposed as part of the Proposed Project. Consequently, the assessment does not support the need for a longer monitoring period. The Applicant also considers that the proposed monitoring and mitigation framework is appropriate. Monitoring will provide an evidence-based mechanism to determine whether the observed level of collision mortality is consistent with assessment predictions and whether any additional mitigation measures should be considered. The Applicant therefore considers that the commitments already secured through the OLEMP and REAC measure B55 are proportionate and sufficient to address the potential for bird collision effects.
	Paragraph 55	Control of operational noise	The Applicant notes KWT's request for operational noise monitoring and associated provisions following commissioning of the development. The operational noise assessment has been undertaken based on the design information, plant specification, layout and operating conditions available at the time of assessment. To provide certainty that the development is constructed and operated in accordance with the assumptions and mitigation identified through the assessment process, the Applicant introduced Requirement 23 into the draft DCO submitted in response to the Secretary of State's letter of 28 August 2026 [C1-180]. This replaced commitments previously contained in the REAC. The Applicant confirms that all operational noise mitigation identified as necessary within the Environmental Statement and subsequent assessment updates will be implemented prior to operation of the relevant plant and equipment and maintained throughout the operational life of the development. The development must be operated in accordance with the approved operational noise assessment and any associated mitigation measures secured through Requirement 23. Should the Applicant not comply with these noise limits, the Applicant would be in breach of the DCO, which is a criminal offence. In response to comments from KWT on the need to specify monitoring of noise limits, the Applicant has provided additional text into Requirement 23 committing to production of details setting out how monitoring would be carried out in the unlikely event that a complaint alleges that noise levels are higher than secured. These details would be produced prior to the relevant works being brought into operation. The Applicant has updated the wording of Requirement 23 accordingly to read as follows: <i>23.—(1) No part of Work Nos. 3B, 9B and 11 shall come into operation until an operational noise assessment has been submitted to and approved in writing by the relevant planning authority. The assessment shall—</i> <i>(a) be based on the final specification and layout of plant and equipment;</i> <i>(b) demonstrate compliance with the rating levels set out in sub paragraph (5); and</i> <i>(c) identify any mitigation measures required to achieve compliance with those rating levels.</i> <i>(2) No part of Work Nos. 3B, 9B and 11 may be brought into operation until a scheme for monitoring compliance with the rating levels specified in paragraph (6) in the event of a complaint, has been submitted to and approved in writing by the relevant planning authority. The scheme must be based on the principles set out in BS4142:2014+A1:2019.</i> <i>(3) The development shall be operated in accordance with the approved assessment and any mitigation measures therein, which shall be implemented prior to operation and maintained for the lifetime of the development.</i> <i>(4) The undertaker must undertake monitoring in accordance with the approved scheme in the event of a complaint and submit the results of the monitoring to the relevant planning authority.</i> <i>(5) Where the monitoring undertaken pursuant to paragraph (4) demonstrates that the rating levels specified in paragraph (6) are exceeded, the undertaker must submit to the relevant planning authority for approval details of any further mitigation measures necessary to secure compliance with those rating levels. The approved mitigation measures must be implemented in accordance with the approved details.</i> <i>(6) The rating level (LAr) of noise from the normal operation of the authorised development shall not exceed—</i> <i>(a) 34 dB LAr for any fifteen-minute period between 23:00 and 07:00;</i>

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
			<i>(b) 34 dB LAr for any one-hour period between 07:00 and 23:00 determined one metre free field external to any window or door of any existing permanent residential premises using the definitions and methods described in BS4142:2014+A1:2019.</i>
Natural England	All	General	The Applicant has used best endeavours to arrange topic specific calls with Natural England prior to submission of the application, during Examination and post-Examination. In the latest correspondence, the Applicant requested an up-to-date Risk and Issues Log from Natural England on 29 September to gain clarity on outstanding concerns following its Deadline 7 submissions. The current entries in the log remain unclear for a number of topics. However, at the time of writing, Natural England has not been able to fulfil this request or progress discussions.
	Paragraph 3, 4, 6, 7	Benthic Ecology & Hovercraft	Benthic Ecology In the absence of the opportunity to get further understanding from Natural England on their outstanding concerns, the Applicant confirms it has reviewed the recent Risk and Issues Log for Benthic Ecology submitted by Natural England at the last deadline, and has updated the following documents submitted to the SoS at this deadline to further strengthen and/or clarify commitments regarding sediment disposal, offshore monitoring, Goodwin Sands MCZ and emergency use of hovercraft based on its current understanding: - 7.5.2 Outline Offshore Construction Environmental Management Plan. - 7.5.3 Outline Onshore Construction Environmental Management Plan. - 9.84 Register of Environmental Actions and Commitments (REAC). - 9.92 Outline Cable Specification and Installation Plan. The updates to the above documents do not change the conclusions made within Marine Chapter 2, Benthic Ecology [REP7-099] (or any other marine chapters), but have been undertaken to provide Natural England further confidence in the Proposed Project's environmental commitments. Hovercraft The Applicant would reiterate that the use of hovercraft in Pegwell Bay is not a planned activity as part of the Proposed Project and would only be available for emergencies only. Commitment GG45 in the REAC has already been updated in response to the SoS request at the previous deadline. Furthermore, to strengthen its commitments, the Applicant has updated the Outline Cable Specification and Installation Plan to outline its approach to using best practice guidance for the emergency use of the hovercraft in Pegwell Bay following advice from Natural England. These updates include the need for consultation prior to commencement of landfall activities regarding hovercraft access locations to the intertidal and indicative routes which could be taken in the event of an emergency. These will be presented within the intertidal works methodology and mitigation plan for Pegwell Bay as secured within Condition 4 of the DML. Additionally, the Applicant has also engaged with the MMO on 08/10/2026 with regards to its definition of emergency at Pegwell Bay. The MMO have confirmed they are happy with the current wording within GG45. A seasonal restriction from November to February for construction activities in Pegwell Bay has already been committed in the REAC (B59) and the Offshore Construction Environmental Management Plan in line with the SoS request to avoid impacts to overwintering birds using the intertidal mudflats.
	Paragraph 12	Agriculture and Soils	<u>NE's Comment:</u> <i>"In Suffolk, a material area remains reliant on predictive modelling, including a majority of the reported Grade 2 land."</i> <i>"iii. For Suffolk, explain the implications of 38.5 ha of Grade 2 remaining predictively classified, including whether further survey is possible before construction."</i> <u>Applicant's Response:</u> Approximately 38.5 ha of Grade 2 land in Suffolk remains classified using predictive data. The area was omitted as access could not be secured at the time of survey, owing to ongoing third-party construction activities within the area [REP7-150].

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
			Where those third-party construction activities have concluded and access can be secured, the Applicant commits to undertaking pre-construction soil and Agricultural Land Classification surveys to obtain the outstanding field data. The resulting detailed survey information will replace the predictive classification for this area and will supplement the information used to develop the final Soil Management Plan (as secured by item AS01 in the Register of Environmental Actions and Commitments (REAC) [C1-215]). This additional survey information would not alter the assessment of effects presented in the Environmental Statement [PDA-019] as explained in Appendix E of REP7-150. <u>NE's Comment:</u> <i>“The comparison between the predictive and updated datasets is also affected by changes to the Order Limits and should be repeated on a like-for-like spatial basis.”</i> <i>“i. Provide field-surveys and predictive areas separately, rather than presenting the combined output as wholly detailed survey information.”</i> <i>“ii. For Suffolk, provide a like-for-like spatial comparison using the same Order Limits for both datasets.”</i> <u>Applicant's Response:</u> The predictive Agricultural Land Classification mapping was used to inform the initial assessment. It was not intended to replace the need for field survey, which has subsequently been undertaken across the majority of the Proposed Project where access was available. The detailed field-survey results supersede the predictive mapping and are presented within Agricultural Land Classification Survey Results- Suffolk [REP7-150]. These results were then used to validate and update where required the assessment presented in the Environmental Statement [PDA-019]. The figures accompanying the updated ALC survey results [REP7-150] distinguish between areas informed by detailed field survey and those that remain predictively classified. A comparison and reassessment of likely significant effects is presented in Appendix E of Agricultural Land Classification Survey Results- Suffolk [REP7-150], but as noted above the survey data supersedes the predictive mapping originally presented and the comparison presented is for information and clarity, rather than to inform the assessment presented. As such the Applicant therefore does not consider that a further like-for-like comparison is necessary to support or validate the assessment and that all information on this matter is available. However, the Applicant recognises that comparison of the predictive mapping against the subsequent detailed survey results may be of wider technical interest in understanding and developing predictive ALC methodologies. The Applicant would therefore be willing to share the relevant information separately with Natural England to support its ongoing development and refinement of predictive ALC mapping. This would be separate from the assessment of the Proposed Project and would not alter the conclusions presented in the Environmental Statement [PDA-019]. <u>NE's Comment:</u> <i>“In Kent, the survey coverage is substantially more complete, but further justification is required for the assignment of Grade 3b solely by reference to Flood Zone 3.”</i> <i>“iv. For Kent, justify the flood-risk grading using evidence relevant to the ALC flooding criteria rather than Flood Zone 3 designation alone.”</i> <u>Applicant's Response:</u> A proportion of the land surveyed in Kent was classified as Grade 3b due to flood risk. This classification was not assigned solely by reference to the Flood Zone 3 designation. Flood Zone 3 was used as the best available desk-study information when preparing the earlier predictive mapping, whereas the detailed ALC classification was informed by the evidence collected during the field survey. The field evidence included soil profile characteristics, gleyed horizons, evidence of waterlogging and wetland-adapted vegetation, together with the local topography and hydrological conditions (see Appendix A Auger Bore Log and ALC Mapping, Agricultural Land Classification Survey Results- Kent [REP7-152]). This was supported by site observations of waterlogged

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
---------------	---	---------------	----------------------

conditions (see below for example images from the survey team) and local knowledge confirming that the marsh and wetland areas are very wet during the winter and subject to periodic flooding. Collectively, this evidence supported the identification of flood risk as the overriding ALC limitation and the classification of the affected land as Grade 3b.



Image 1: Kent ALC Survey, 11th December 2025

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
---------------	---	---------------	----------------------



Image 2: Kent ALC Survey, 11th December 2025

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
---------------	---	---------------	----------------------



Image 3: Kent ALC Survey, 11th December 2025



Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
---------------	---	---------------	----------------------

Image 4: Kent ALC Survey, 11th December 2025



Image 5: Kent ALC Survey, 11th December 2025

NE's Comment:

“Natural England also advises that the ALC and soil information should be expressly linked to the latest Soil Management Plan. The secured plan should show how mapped soil types and ALC grades will inform avoidance, stripping, storage, reinstatement, target restoration profiles, specialist supervision, monitoring and aftercare. The objective should be to return temporarily disturbed best and most versatile (BMV) land to its pre-construction agricultural quality, as far as practicable, and all other soils to a condition suitable for the intended after-use.”

“viii Cross-reference the ALC information to the Soil Management Plan, including maps of soil handling units and restoration specifications.”

Applicant's Response:

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
			The Applicant does not consider that an update to the Outline Soil Management Plans is required at this stage. The existing commitments already establish how the Agricultural Land Classification and soil information will inform the final Soil Management Plans and the management, reinstatement and aftercare of affected soils. REAC commitment AS01, as reported in the Environmental Statement, requires the Outline Soil Management Plans to be updated to final Soil Management Plans before construction [C1-215]. The final plans will incorporate the available soil and ALC survey information and will define the measures for soil stripping, segregation, storage, handling and reinstatement. AS01 also requires pre-construction surveys, undertaken in accordance with published guidance, to confirm ALC grade and soil type where further information is required. The detailed cross-referencing requested by Natural England will be undertaken through the development of the final Soil Management Plans. This is the appropriate stage because the detailed construction methods, working areas and disturbance footprints will then be known, allowing the extent and depth of soil stripping, the quantities and suitability of soil resources, and the locations and specifications of soil handling units to be defined. The final plans will use the ALC and soil survey information to inform site-specific soil handling measures and the restoration requirements for the affected land. The Outline Soil Management Plans also require an aftercare period where soils are reinstated, with the objective of returning soils to their previous condition or to the condition required for their intended end use [REP6-066] and [REP6-068]. Returning soils to their previous condition provides a broader restoration benchmark than ALC grade alone; however, the ALC information will also be incorporated into the final Soil Management Plans to inform the restoration requirements for agricultural land. Accordingly, the Applicant considers that the existing Outline Soil Management Plans and REAC commitment AS01 provide an appropriate and secured framework. The more detailed maps of soil handling units, restoration specifications and links to the completed ALC information will be developed through the final Soil Management Plans when the necessary detailed design and construction information is available. The final Soil Management Plans will be submitted for approval by the relevant Local Planning Authorities as secured by Requirement 6 of the Draft Development Consent Order [REP7-085]. <u>NE's Comment:</u> <i>“v. Confirm that all land subject to disturbance has been surveyed, and secure pre-construction survey requirements for any currently scoped-out area that later becomes subject to disturbance.”</i> <u>Applicant's Response:</u> The ALC survey coverage has been developed with reference to the land currently identified as being subject to disturbance. Where access was available, detailed soil and ALC surveys have been undertaken and are reported in [REP7-150] and [REP7-152]. Where access could not be secured, including the approximately 38.5 ha in Suffolk affected by ongoing third-party construction activities, predictive data have been used as the best available evidence. Where land not covered by the completed field surveys is subsequently identified as being subject to disturbance, including as a result of detailed design or a change to the construction footprint, the Applicant will undertake the necessary pre-construction soil and ALC surveys. The resulting information will be incorporated into the relevant final Soil Management Plan and used to inform the soil handling, storage, reinstatement and restoration measures for the affected area. This approach is already secured through REAC measure AS01 and the requirement to prepare the final Soil Management Plans prior to construction [C1-215]. The Applicant therefore does not consider that an amendment to the current Outline Soil Management Plans [REP6-066] and REP6-068] is necessary at this stage. <u>NE's Comment:</u>

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
			<i>“vi. Provide a breakdown of temporary and permanent land take by component and ALC grade. With totals that can be independently reconciled.”</i> <u>Applicant's Response:</u> A breakdown of temporary and permanent land take by ALC grade is already provided in Appendix E Comparison and Reassessment of Likely Significant Effects of the ALC Survey Results- Suffolk [REP7-150], and Kent [REP7-152]. These tables distinguish between temporary and permanent land take and provide the affected areas by ALC grade, enabling the totals used in the assessment to be independently reconciled. <u>NE's Comment:</u> <i>“vii. Demonstrate avoidance and micro-siting, particularly in relation to the newly identified Grade 1 land in Kent.”</i> <u>Applicant's Response:</u> The detailed ALC survey identified Grade 1 agricultural land within the Kent Onshore Scheme. This land is primarily affected by temporary works, including access and associated working areas. The scope for avoiding the Grade 1 land through micro-siting is constrained because the Grade 1 classification extends across the wider field, meaning that relocating temporary works within the field would not necessarily avoid land of the same agricultural quality. The Applicant will nevertheless seek to minimise the extent and duration of temporary disturbance to Grade 1 land through detailed design, where practicable. Where temporary disturbance cannot be avoided, the detailed ALC and soil survey information will inform the final Soil Management Plan and the soil handling measures for these areas. The affected soils will be appropriately stripped, segregated, stored and reinstated, with the objective of returning the land to its pre-construction condition. The final Soil Management Plan will also set out the applicable restoration and aftercare requirements. <u>NE's Comment:</u> <i>“ix. Secure competent soil-specialist supervision, monitoring and reporting, together with measurable restoration and aftercare criteria.”</i> <u>Applicant's Response:</u> Competent soil-specialist input has already been provided during the planning and implementation of the ground investigation and archaeological works. The Applicant will continue to ensure that appropriate soil-specialist input is provided during detailed design and construction, including during the development and implementation of the final Soil Management Plans. The Outline Soil Management Plans already establish requirements for soil handling, reinstatement, monitoring, reporting, corrective action and aftercare, [REP6-066] and [REP6-068]. These requirements will be developed on a site-specific basis through the final Soil Management Plans, using the completed soil and ALC survey information together with the confirmed construction and restoration proposals. Competent soil-specialist supervision will be provided during relevant soil-handling and reinstatement activities. Monitoring and reporting will be undertaken to assess whether the required restoration outcomes have been achieved and to identify any corrective measures required. The applicable restoration and aftercare criteria will be set out in the final Soil Management Plans, with the objective of returning reinstated soils to their previous condition or to the condition required for their intended end use [C1-215]. The Applicant therefore considers that competent soil-specialist supervision, monitoring, reporting, restoration and aftercare are appropriately addressed through the Roles and Responsibilities outlined in the existing Outline Soil Management Plans and will be further detailed as part of their subsequent development into final Soil Management Plans. An update to the Outline Soil Management Plans is therefore not considered necessary at this stage. <u>NE's Comment:</u>

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
			<i>“x. Clarify the basis for the decommissioning assessment, including whether reinstatement represents reversal of an adverse effect rather than a net beneficial effect.”</i> <u>Applicant's Response:</u> The beneficial effect identified at decommissioning reflects the baseline against which the decommissioning assessment is undertaken. The baseline for the decommissioning assessment is the land use and agricultural condition immediately prior to decommissioning, at which point the Proposed Project would form part of the existing environment. Decommissioning would involve the removal of relevant permanent infrastructure and the subsequent reinstatement of land that had been taken out of agricultural use during operation. The reinstatement of this land would therefore represent an improvement relative to the pre-decommissioning baseline, through the return of land to agricultural use. It is on this basis that the reinstatement associated with the removal of permanent infrastructure has been identified as a beneficial effect, rather than simply the reversal of the adverse effect assessed during construction. Please refer to item 2AS1 in the Applicant's Responses to Second Written Questions [REP5-135].
	Paragraph 16, 21, 22, 26	Ecology, Biodiversity and Ornithology	<u>Breeding bird season and ecological supervision commitments (REAC Commitment B45)</u> As noted in Application Document 9.158 Applicant's Response to SoS Request for Further Information Letter dated 18 September 2026 [C1-178], the Applicant recognised that the previous wording of B45 suggested that the bird breeding season is limited to March to August rather than March to September and, as such, the wording of B45 was updated in version G of the REAC [C1-215] submitted on 18 September 2026. Furthermore, the wording of REAC measure B45 has been further updated following the request in the SoS letter dated 9 October 2026 (see version H of the REAC submitted on 16 October 2026). <u>Dormice Survey methodology</u> <u>NE's comment:</u> <i>“The Applicant references the Dormouse Conservation Handbook (second edition), the current version at the time surveys were undertaken. There have since been two updated documents published (Hazel Dormouse Mitigation Handbook 2025, and Hazel Dormouse Conservation Handbook – Third edition 2025) which include some deviations from the survey recommendations of the Dormouse Conservation Handbook (second edition). The main differences in the updated documents comprise the separation of survey recommendations depending on habitat quality. For good habitat, surveys should include a minimum of 50 nest tubes checked on a monthly basis (Table 3.2 of the Hazel Dormouse Mitigation Handbook 2025 sets out the recommended number of visits), and 100 tubes for poor or fair quality habitat, checked on a monthly basis for the full season.</i> <i>Natural England advises that even though the habitat quality across the scheme is unclear; the absence of monthly checks means it is unlikely that the scheme would reach the required survey effort as stipulated under the current dormouse Handbooks. Therefore, we are unable to agree that the Applicant's survey meets standard best practice guidance. Therefore, the scale and significance of impacts, and sufficiency of any proposed mitigation is in doubt”.</i> <u>Applicant's response:</u> The dormice surveys were completed in 2023-2024 in accordance with the standard best practice survey guidelines at the timethe surveys were undertaken, which was a points-based system in line with the second edition Dormouse Conservation Handbook (hereafter referred to as the 2006 Guidelines). The publication of the new guidelines has introduced a habitat quality assessment stage prior to survey design; however, this guidance was issued in 2025 after completion of the surveys (hereafter referred to as the 2025 Guidelines) and DCO submission. Clearly, it is only reasonable to judge the surveys based on compliance with guidance that existed (and was deemed robust) at the time the surveys were undertaken, not guidance that was published subsequently.

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
			Nonetheless, targeted updated dormouse surveys (due for completion in October 2026) have been undertaken at both the Suffolk and the Kent Onshore Schemes, in line with the requirements of East Suffolk Council and Appendix B of the outline Landscape and Ecological Management Plans. These targeted update surveys have been undertaken in line with the 2025 guidelines. No evidence of dormice has been found during the 2026 update surveys in either Suffolk or Kent at the time of writing. Although no evidence of hazel dormouse has been established across either the Suffolk or Kent Onshore during the 2023-2024 and 2026 surveys to date (due for completion in October 2026), the Applicant has always committed to following a precautionary method of working in both locations, as per commitment B14 in the REAC [C1-215]. Furthermore, loss of woodland and hedgerow habitat has been reduced as far as possible, with a substantial increase in suitable hazel dormouse habitat across both the Suffolk and Kent Onshore Scheme on completion of the Proposed Development. In the unlikely event that during the precautionary vegetation clearance of the limited area of suitable habitat, a hazel dormouse or signs of hazel dormouse was encountered, works would stop and a licence obtained before continuing. These measures collectively would mean that should hazel dormouse be discovered, adequate mitigation would be in place with a substantial net increase in available habitat on completion of the Proposed Development. <u>NE's Comment (Suffolk):</u> <i>"The score provided for the Zone D survey area is provided by the applicant as 20.1, higher than the threshold of 20 which allows assumed absence to be concluded. However, the Handbook (second edition) recommends that at least 50 tubes are used per survey and highlights the risk of missing dormouse presence when small numbers of tubes are used. The applicant's Table A.2</i> <i>Zone D Survey Score Calculation demonstrates that small numbers of tubes were used during parts of the survey season (e.g. 21 tubes in November 2023, 15 tubes in October 2024). If the scores from these sections were removed, the overall score for Zone D would fall below the threshold at which likely absence can be reasonably concluded".</i> <u>Applicant's response:</u> The 2006 Guidelines recommend 50 nest tubes are used to sample a site, spaced at 20 m intervals, as small numbers of tubes could miss hazel dormouse. Fifty nest tubes are used as the standard for calculating the index of 'value' for different months. The guidelines give examples of how calculations should be made where fewer than 50 nest tubes can be deployed, giving 25 nest tubes as an example. Natural England's document 'Dormouse survey for mitigation licensing – best practice and common misconceptions – WML-G37 (12/11)' (hereafter referred to as the Natural England Interim Advice Note), states it is to be read in conjunction with the 2006 Guidelines, and that: <i>"sufficient number of tubes should be deployed over a time period to reach a probability score of 20, where possible in that season. Likely absence should not be assumed on a score less than 20. Usually at least 50 nest tubes should be deployed at a spacing of 15-20m intervals. Preferably they should be kept in place for the majority of the active season and checked once a month to maximise the chance of detecting any dormice present. However, where sufficient tubes are deployed and the months of highest probability are included, a survey reaching a score of over 20 will be acceptable. Surveys that involve deploying a very large number of tubes for a short period of time are not good practice and will not be encouraged."</i> It goes on to state that <i>"The probability score applies from when the nest tubes are deployed to when they are removed, not just the months where the tubes are physically checked. It is, however, recommended that nest tubes are checked once every month (every 2 months as a minimum), as dormouse nests may degrade especially when overtaken by wood mice and can lose many of their unique characteristics. Fifty tubes is the standard number suggested for surveying, but if 25 are used the probability score should be halved and if 100 are used the score should be doubled. However, it is not good practice to deploy several hundred tubes and only survey for a couple of months to determine likely absence. Where possible tubes should be deployed for the majority of the active season, to maximise the chance of detecting dormice. Tubes should be placed at 15-20m intervals for most sites. There will be site specific situations where this will need to be varied. Where spacing is altered throughout the site, this needs to be fully justified in the method statement (e.g. 10m spacing in exceptional cases - very small sites). However deploying 100 tubes at 5m spacing to shorten the survey period required is not good practice."</i>

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
			As such, reading between the 2006 Guidelines and the Natural England Interim Advice Note, the protocol for when fewer than 50 nest tubes are used is established through amendment of the scores, automatically meaning a longer survey period is required when fewer than 50 nest tubes are used. Although Zone D is a block of connected habitat, it sits in a wider context of 584 nest tubes set out across the Suffolk Onshore Scheme, providing data for a large surrounding area. Nest tubes were deployed in sub-zone D3 covering the months of April 2024 to September 2024 and in sub-zone D4 from October 2024 to August 2024. In line with the 2006 Guidelines, the checks covered most months of the year. Surveys were completed at least alternate months in line with the Natural England Interim Advice Note, and covered all suitable habitat within Zone D, set out at the recommended intervals. The calculation took account of the months when fewer than the full 64 nest tubes were checked. Due to the potential dormouse nest (unconfirmed), the survey of Zone D has been repeated in 2026 in line with the 2025 Guidelines, with 100 nest tubes and 30 footprint tunnels set out. Checks from May to September 2026 have now been completed (one check in October remains), with no evidence of hazel dormouse recorded to date. <u>NE's Comment (Suffolk):</u> <i>“Access to Zone E4 was not possible in 2024. Without this, the survey effort threshold of 20 is still exceeded. However, without surveying in E4, there is a relatively large section of the scheme (between E3 and F1) comprising suitable habitat that has not been surveyed thoroughly”.</i> <u>Applicant's Response:</u> Whilst access to Zone E4 was not possible in all months, this comprises a large section of the wider Zone E, which is connected habitat and was considered as a single area for the purpose of the dormouse survey. The suitable habitats within the Proposed Development footprint in this area have since largely been removed by another development (the northwards expansion of the golf course), meaning that within the Proposed Development footprint they are no longer well connected. Based on the 2006 Guidelines, sub Zone E4 had 80 nest tubes set out at required intervals, covering the months of July to November 2023, although as a precaution July 2023 was not included in the score calculation as the corresponding check did not take place until 25-27 September 2023. Under the 2006 Guidelines, 80 nest tubes in place in sub zone E4 would have yielded a score of 25.6 points for August to November, meaning that sub zone E4 alone would yield sufficient points. This is based on a multiplier of 1.6, in line with the Natural England 2011 Interim Advice Note. It is worth also noting that under the 2025 Guidelines the duration that the nest tubes were installed would be considered sufficient, covering greater than September to November, and with more than 50 nest tubes in ‘Good’ habitat, with the survey area extended to woodland habitats to the south, although it is noted that the 2025 Guidelines have moved back to monthly as opposed to bi-monthly checks during deployment. Taking into consideration the wider surveys of Zone E areas E1, E2 and E3, and that there is very little habitat of limited connectivity to be lost within the actual footprint of the Proposed Development, it is considered that a thorough survey has been completed, especially taking into consideration the level of impact. <u>NE's Comment (Suffolk):</u> <i>“Nest tubes in Zone F were only installed in late October 2023; therefore, a score should not be recorded until November 2023. However, as tubes in Zone F2 were destroyed in 2023, only a small number of tubes in F1 were used between November and May 2024. As referenced above, there is a risk when using a small number of nest tubes that dormice are missed. Due to the small number of nest tubes installed prior to May 2024, it is Natural England's opinion that the first scoring month should be May 2024 ”.</i> <u>Applicant's Response:</u> Within Zone F loss of suitable hazel dormouse habitat will be very limited. There will be loss of a short tree line within subzone F1. However, due to the use of trenchless methods to complete the rest of the Proposed Development eastwards through the

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
			RSPB reserve, all of the suitable habitat within subzone F2 will be retained (which represents the highest quality habitat within the Zone). Zone F was split into subzones F1 and F2 for survey planning purposes, with 20 nest tubes installed in Zone F1 and 58 nest tubes installed in Zone F2, broken down as such due to access to different landownership parcels and for the calculating of the survey index, as land access for set up and survey varied by land parcel. However, all of Zone F is considered to constitute one block of connected suitable habitat, with a collective total of 78 nest tubes installed, of which between 16 and 67 were checked each survey month. The calculations are based on the number of nest tubes checked each month by sub zone, in line with the 2006 Guidelines and the Natural England Interim Advice Note. Only 16 nest tubes were counted for Zone F1 in October and November 2023, with the Zone F2 nest tubes not counted until April 2024, in line with Natural England’s opinion. It is considered that the first scoring month for F1 should be November as tubes were in place from 27 October or earlier and that the first scoring month for Zone F2 should be April 2024 based on tubes being in place by 9th April 2024. Although a small number of tubes in place in October and November 2023 in Zone F reduces the likelihood of dormice being found, this is reflected in the low index score achieved for each of these months towards Zone F as a whole of just 0.52 points; therefore, these should be included. Notwithstanding this, more than 20 points would be achieved for Zone F even if the October and November 2023 Zone F1 data were omitted. This would also be the case if the Zone F2 April data were also omitted. Although the whole of Zone F should be considered for the overall score yielding 33.06 points, looking at the subzones alone in line with the 2006 Guidelines and Natural England’s Interim Advice Note: • Zone 1 achieves 7.36 points and covers all of November 2023 and April through to September 2024 which covers all of the key months. • Zone 2 achieves 25.7 points and covers April to September 2024. This remains over 24 points at a subzone level even if April is removed. Based on the 2025 Guidelines the habitat suitability of Zone F is considered to be ‘Good’. Although bi-monthly visits were completed in line with the guidelines at the time, covering the months of April to October with four checks in May, July, September and October far exceeds the minimum requirements of the 2025 Guidelines for just 3 consecutive months (July-October, August – November or September to December). <u>NE’s Comment (Suffolk):</u> <i>“Natural England notes the dormouse record within 330m of the scheme. In combination with the possible dormouse nest recorded in D3, and the queries regarding survey effort that we have raised above, it is Natural England's opinion that the applicant should re-assess the likelihood that dormice could be present within the Scheme boundary and undertake further surveys if required”.</i> <u>Applicant’s Response:</u> The nest recorded in D3 was recorded as a possible dormouse nest as it could not conclusively be assigned to a species and as a precaution given the record within 330m (dated from 2017 and from a nest and not an animal in the hand and representing the only record within a large surrounding area). Zone D achieved a score above 20 for the 2023 to 2024 surveys completed. Following discussion post-submission it is considered likely than the dormouse record within 330m is erroneous and that the nest recorded is most likely from a woodmouse, based on observations across the large area surveyed for the Suffolk Onshore Scheme. Nevertheless due to the inconclusive result, updated surveys have been completed in 2026 with 100 nest tubes and 30 footprint tunnels across the whole of Zone D. No evidence of hazel dormouse has been recorded during the 2026 surveys to date (completed between May and September with a single October visit remaining) and therefore the conclusion is likely to remain that hazel dormice are likely absent. <u>NE’s Comment (Kent):</u>

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
			<i>“The score provided for Zone D of the survey area is 14.96, below the threshold at which likely absence can be concluded. Therefore, these surveys cannot reliably be used to support a conclusion of likely absence”.</i> <u>Applicant’s Response:</u> This area of habitat is poorly connected (including no connectivity to the rest of the Kent Onshore Scheme due to the presence of the River Stour that acts as a barrier to movement), and none of the suitable habitat in this zone will be lost. This area adjacent to the Stour is a flood plain and floods extensively in the winter making it unsuitable for hibernating dormice; however, it was surveyed in 2023 to 2024 for completeness. The score of 14.96 is therefore not considered to be a constraint when considering required mitigation. <u>NE’s Comment (Kent):</u> <i>“The score for Zone B does exceed the 20 threshold; however, it is not clear from the figures how well connected the habitat between the subsections of Zone B is. The Handbook (second edition) recommends that at least 50 tubes are used per survey and highlights the risk of missing dormouse presence when small numbers of tubes are used. Surveys in Zone B3 used only 5 nest tubes, and B4 used 10. Without further detail from the applicant on the connectivity between these subsections, and the justification for the numbers of nest tubes used, it is difficult to determine the acceptability of Zone B survey methodology”.</i> <u>Applicant’s Response:</u> An individual zone represents an area of connected suitable habitat for the purposes of determining the survey score in line with the 2006 Guidelines. The sub zones reflect land parcels, within each Zone and are relevant to the score as different land parcels within a Zone may be accessed on different dates or have differing restrictions. All of the subzones in Zone B are connected, so considered as a single collective area for the purpose of the calculation, based on between 96 and 104 nest tubes checked on four occasions, covering the months of August, September, October and November 2023 and April, May, June and July 2024. An updated Figure is provided in Appendix B which shows the Zone B nest tubes plotted on aerial background mapping, with the connectivity between the different subzones visible, for clarity. <u>NE’s Comment:</u> <i>“Natural England notes that there have been past dormouse records close to the scheme footprint, resulting in the issuing of a dormouse mitigation licence in 2017 (Magic Map (MAGIC)) west of the A256, confirming dormouse presence in this area. There appears to have been potential dormouse nests discovered as part of the Scheme survey effort, which were subsequently discounted from further survey effort. We are of the view that residual risk around the presence of dormice remains which the applicant has not sufficiently addressed. Natural England, therefore, agrees with the Applicant's comments in Section 1.5.6 of APP-159 that further survey effort is needed, and indeed, we would encourage such further survey prior to construction, and should those surveys identify presence of dormice a dormouse mitigation licence is likely to be required”.</i> <u>Applicant’s Response:</u> The Applicant notes that the protected species mitigation licence (EPSML 2015-16799-EPS-NSIP2-1) first listed in 2015 with two subsequent updates is located approximately: • 1km from Zone A at its closest point, however this is separated by the barrier of the A256 dual carriageway. • 1.1km from Zone B at its closest point. There is connectivity to Zone B habitats. • 1.4 km from Zone C at its closest point, on the opposite side of a railway line. • 1.1km from Zone D, separated by the barrier of the River Stour in addition to the railway line.

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
			The Kent and Medway Biological Records Centre data search did not return any records within 2km of the Proposed Development, including historic records, nor the NBN Atlas. A potential hazel dormouse nest was recorded within Zone B during the 2023 – 2024 surveys. This zone was considered to be adequately surveyed under the 2006 Guidelines, with between 96 and 104 nest tubes checked on four occasions, covering the months of August, September, October and November 2023 and April, May, June and July 2024 reaching a total score of 49.28, with visits continuing beyond 20 points and achieving a full year of survey data, exceeding the minimum requirements in line with the methods in the 2006 Guidelines and Natural England Interim Advice Note. However due to the ambiguous record of a potential dormouse nest, further survey has been completed in 2026 comprising a minimum of 100 nest tubes and 30 footprint tunnels in line with the 2025 guidelines, exceeding the requirements for ‘Good’ habitat quality that is in this location. To date surveys have been completed between May and September, with no signs of hazel dormouse recorded to date, with a final visit to be completed in October 2026. Based on the current results (pending final visit), hazel dormouse is still assumed to be likely absent. Regardless, a precautionary method of works will still be followed, and the Proposed Development will result in a significant increase in suitable dormice habitat area on completion. In the unlikely event a hazel dormouse was encountered works would cease and a Natural England licence would be obtained. The Proposed Development vegetation clearance method and habitat creation already meet the expected licencing requirements through the precautionary working method and extent of habitat creation proposed. <u>NE’s Comment on disturbance / damage caused by UXO (REAC commitment GG39):</u> Natural England welcomes the inclusion of GG39 within the oCEMP and considers that with the amendments below, it is appropriate to mitigate the impacts to Leiston – Aldeburgh SSSI and Sandlings SPA / Sandwich Bay to Hacklinge Marshes SSSI. <i>“The Applicant will implement the mitigation measures in accordance with the recommendations set out within the detailed UXO risk assessment reports appended to the Onshore oCEMP. Where the Applicant has influence over the controlled explosion of terrestrial UXO, they will consult Natural England and RSPB in advance to take measures and protect Sites of Specific Scientific Interest where practicable, they will work with Natural England and the RSPB in advance to agree a methodology and timing to ensure that impacts to the SSSI are avoided or minimised.”</i> <u>Applicant’s Response:</u> In light of NE’s comments, the Applicant has updated REAC commitment GG39 as follows: <i>“The Applicant will implement the mitigation measures in accordance with the recommendations set out within the detailed UXO risk assessment reports appended to the Onshore oCEMP. Where the Applicant has influence over the controlled explosion of terrestrial UXO and where practicable, they will consult Natural England and RSPB in advance to take measures and protect Sites of Specific Scientific Interest where practicable, they will work with Natural England and the RSPB in advance to seek to agree a methodology and timing to ensure that impacts to the SSSI are avoided or minimised”.</i> It should be noted that in general, where a UXO is located, it is highly likely that the Applicant would not be responsible for the next steps and may have very limited control over how the UXO is dealt with. In reality, the actions taken to respond to a UXO may need to be taken very swiftly and it may not be realistic for there to be consultation with Natural England, the RSPB or other bodies prior to action being taken. Therefore, whilst the Applicant would seek to involve Natural England and the RSPB where there was sufficient time to do so and where the actions were under the Applicant’s control, the strongest commitments that can be made is to ‘seek to agree’ a methodology, ‘where practicable’. UXO operations for the Offshore Scheme are being consented separately to the DCO in line with MMO and statutory guidance.
	Paragraph 34, 35	Habitat Regulations Assessment	The Applicant has no further response.

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
Natural England - Risk and Issues Log	Paragraph 3, 4, 6, 7	Benthic Ecology	The Applicant has updated the following documents submitted to the SoS at this deadline to further strengthen and/or clarify commitments regarding sediment disposal, offshore monitoring, Goodwin Sands MCZ and emergency use of hovercraft based on its current understanding: - 7.5.2 Outline Offshore Construction Environmental Management Plan. - 7.5.3 Outline Onshore Construction Environmental Management Plan. - 9.84 Register of Environmental Actions and Commitments (REAC). - 9.92 Outline Cable Specification and Installation Plan. The updates to the above documents do not change the conclusions made within Marine Chapter 2, Benthic Ecology [REP7-099] but have been undertaken to provide Natural England further confidence in the Proposed Project's environmental commitments. Sediment Disposal The Applicant has updated REAC Commitment BE07 to the following Natural England's and SoS request: <i>For all stages of the Proposed Project, the Applicant will avoid relocating any sediment to within 50m of any Annex I Sabellaria spinulosa reef and Blue Mussel (Mytilus edulis) Beds or any other Natural Environment and Rural Communities (NERC) Section 41 Habitats of Principal Importance sensitive to smothering identified during pre-construction surveys unless otherwise agreed by the MMO in consultation with the Statutory Nature Conservation Body. Sediment will be relocated within similar sediment habitats, adjacent to and updrift of sandwaves.</i> Application Document 7.5.2 Outline Offshore Construction Environmental Management Plan and Section 8 of 9.92 Outline Cable Specification and Installation Plan have also been updated in line with the above in response to the Secretary of State. Offshore Monitoring The Applicant considers that the proposed monitoring and mitigation framework already secured under Condition 15(4) of the DML is appropriate and proportionate for a subsea cable project. The Applicant will consult with the MMO and relevant Statutory Nature Conservation Bodies on the final Monitoring Plan and the scope of surveys necessary to inform it in order to discharge it appropriately. The Applicant has updated 9.84 Register of Environmental Actions and Commitments (REAC), 9.92 Outline Cable Specification and Installation Plan and 7.5.2 Outline Offshore Construction Environmental Management Plan (all of which are secured under Condition 4 of the DML) at this deadline to fully commit to its intention to consult with the MMO and relevant Statutory Nature Conservation Bodies on the development of the final Monitoring Plan to ensure the appropriate pre-construction survey scopes and subsequent monitoring are in place. The new REAC (BE08) commitment reads as follows: <i>The Applicant will consult with the MMO and relevant Statutory Nature Conservation Bodies on the scope of pre-construction surveys, detailed design and post construction monitoring requirements when developing the final Monitoring Plan secured under Condition 15(4) of the Deemed Marine Licence to be approved by the MMO.</i> Additionally, for completeness and to ensure consistency, BE05 of the REAC has also been updated to ensure clarity on Benthic Mitigation Plans. Goodwin Sands MCZ The Applicant confirms that a comprehensive assessment has already been undertaken in relation to the Goodwin Sand MCZ within 6.11 Marine Conservation Zone Assessment [REP7-087]. A worst-case scenario of 500m of cable protection adjacent to the Goodwin Sands MCZ has been modelled and assessed as part of this application and has identified no significant effects to the MCZ. Whilst the Applicant remains very confident that cable burial will be achieved at this location based on its knowledge of the existing environment adjacent to the Goodwin Sands MCZ, flexibility is still required offshore to account for unforeseen

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
			circumstances which is why a comprehensive assessment has been conducted for avoidance of doubt of any potential impacts of cable protection placed adjacent to the MCZ. Natural England have not provided the Applicant with any literature or evidence to review in light of their concerns regarding the Goodwin Sands MCZ. The Applicant considers that the complete avoidance of this MCZ, alongside the additional mitigation outlined within REAC commitment MPE13, results in no significant impacts to the Goodwin Sands MCZ in the unlikely event cable protection is required. The Applicant has updated MPE13 following the SoS request to provide further confidence to Natural England. <i>Grout bags will not be used adjacent to the Goodwin Sands MCZ between KP107.3 to KP110.5.</i>
Suffolk County Council	Paragraph, 38, 52, 55, 48,		The Applicant welcomes agreement with SCC on water environment matters (38). The Applicant welcomes SCC's agreement on the principle of commitment HW03, but considers that the current requirement is proportionate and appropriate in the context of the nature of the project and lack of predicted significant adverse effects. Given that potential significant effects have not been identified, it is challenging to anticipate whether any mitigation might be effective beyond the extensive mitigation measures and commitments already in place for mitigation of noise, visual effects etc. Whilst the Applicant can and will work with other developers to reduce local impacts, the nature of potential significant <i>cumulative</i> health and wellbeing effects also means that if they occur, the Applicant may have little or no ability to mitigate those effects. This is particularly the case where the majority of the impact may be caused by another project, such as Sizewell C. In this context stronger commitments on assessment and reporting are not considered proportionate or necessary. The Applicant met most recently with SCC on highways Protective Provisions on 13 October and agreed to incorporate further amendments in response to comments received, in particular to increase the notice period between a programme of highway works and highway works commencing from 20 to 60 working days. This concession was made in recognition of the resourcing challenges SCC are experiencing associated with monitoring highways works across multiple DCO projects. The Applicant has also committed informally to providing programmes earlier than specified where possible and is working to do so.
Thames Estuary Fishermen's Association Thanet Fishermen's Association Whistable Fishermen's Association Kent and Essex Inshore Fisheries and Conservation Authority	Paragraph 9	Commercial Fisheries	The Applicant confirms that the Outline Fisheries Liaison and Coexistence Plan (FLCP) [REP4-081] submitted during the Examination is an outline, high-level document, as appropriate for this stage of the Project. The FLCP is intended to be developed further through ongoing stakeholder consultation and the detailed design process, with the final FLCP secured under Condition 4 of the Deemed Marine Licence (DML) and approved by the MMO. This consultation will include consideration of the Applicant's approach to minimising potential interactions between commercial fishing activities, including bottom drift net fishing, and any external cable protection required as part of the final detailed design. It should be noted that the primary means of cable protection is by lowering (burial) the cable below seabed level, with the use of external cable protection limited to discrete areas where sufficient burial depth cannot be achieved and/or at cable crossings. Application Document 9.92 Outline Cable Specification and Installation Plan, Plate 5.2, provides an overview of indicative areas for cable protection. To further strengthen the commitments in the outline FLCP, the Applicant has included a new commitment within the REAC (CF09): <i>In the development of the final Fisheries Liaison and Coexistence Plan secured under Condition 4 of the DML, the Applicant will consult with relevant commercial fisheries stakeholders identified by the Fisheries Liaison Officer, including, but not limited to, relevant associations such as Thanet Fishermen's Association, Whitstable Fishing Association, Kent & Essex Inshore Fisheries and Conservation Authority and the Thames Estuary Fishermans Association. Informed by this ongoing stakeholder engagement and the detailed design process, design measures specific to fisheries activities, including but not limited to bottom drift net fishing, will continue to be developed and refined to minimise potential impacts as far as reasonably practicable.</i>

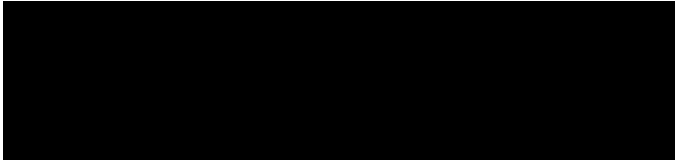
Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
Suffolk Energy Action Solutions		Thematic Issues	A number of submissions were made raising concerns over a harmonics issue that was discussed in Ofgem’s 1 September 2026 Sea Link – Project Assessment consultation (Ofgem PA). This includes a response from Suffolk Energy Action Solutions [C1-074]. Harmonics on the transmission system are electrical disturbances occurring at frequencies that are integer multiples of the 50 Hz fundamental frequency. Harmonics are present across National Grid’s transmission network, with any equipment connected to a network having the potential to create disturbances. The location and extent of harmonics experienced on a given area of the network change over time as more equipment is connected or disconnected, and where there are changes to the network itself. Harmonic levels are both a function of the physical system and the equipment connected to it; they exist at all times and over wide areas. Harmonics are about electrical disturbance rather than audible noise, although harmonics and the management of harmonics can lead to audible noise. National Grid is required to comply with the Energy Networks Association standard for managing harmonic distortion in power systems, setting voltage and current limits for harmonics up to the 100th (5 kHz), including the 5th harmonic (ENA standards). These standards require National Grid to design the system, including new projects such as Sea Link, so that harmonics issues do not arise that would conflict with ENA standards. The issue identified in the Ofgem Project Assessment is associated with the design of equipment at Suffolk Converter Station to ensure harmonic compliance. The Suffolk Converter Station design has always included harmonic filters to manage harmonics. These filters are shown, for example, on the Design and Layout Plans – Suffolk Typical Suffolk Converter Station Layout Plan (GIS) [APP-037]. Harmonic filters are outdoor equipment located within the compound of the converter station. The precise nature of the equipment within the Suffolk Converter Station is a detailed design matter. The DCO allows for flexibility in the layout, appearance and specification of outdoor equipment to enable a final design to be produced post consent. As the design progresses and the selection of equipment is finalised, it will differ from that envisaged at earlier stages in the design process and it is necessary for the DCO to provide flexibility to enable this to occur. National Grid is confident that no works outside the scope of the Sea Link Development Consent Order project are required to achieve harmonics compliance, with compliance achieved using harmonic filter technology within the Converter Station compound. The technical solution to the harmonics issue is not a relevant or important matter for determination of the DCO application because: • The description of development at Suffolk Converter Station has always included filters to manage harmonics as part of the design and this has been taken into account in the Environmental Impact Assessment. • The precise nature and design of the filters was not defined in the DCO documents, nor would it have been appropriate for them to be. • The Environmental Impact Assessment assessed the converter station using a Rochdale envelope that assumed all equipment was the height of the largest building. The filters will be significantly lower in height than the highest equipment and buildings at the converter station. A different design would not result in installation of equipment that is above the maximum height of equipment at the converter station as specified in Article 5 of the draft DCO or increase the footprint of the converter station beyond that specified in the limits of deviation in the Works Plans. • Controls are secured throughout DCO documents to ensure that significant adverse effects beyond that assessed in the ES do not occur as a result of the final design of the project. For example, Requirement 23 provides a requirement to ensure that noise at residential properties does not exceed 34dB, including those closest to the Suffolk Converter Station. This provides a legally binding commitment to ensure that noise levels are acceptable as the project moves through detailed design, whilst providing flexibility for National Grid to develop a detailed design that meets these requirements.

Response from	Paragraph number from SoS letter dated 28 August & reference number	Topic Summary	Applicant's Response
			The final design of equipment to manage harmonics, including the harmonics filters at Suffolk Converter Station, will therefore not require any change to the project as secured in the draft DCO and associated Works Plans. The final measures will also not result in any new or different significant adverse environmental effects compared to that presented in the Environmental Statement. The final design to mitigate harmonics also has no effect on the needs case for the project and does not raise any new issues in relation to the need, economy and efficiency of the Proposed Project that were not already the subject of substantial submissions during the Examination. The statutory and regulatory framework in which it operates is a robust and credible means of assessing these matters for the Proposed Project.
Aldeburgh Town Council		Marine Physical Environment	The potential for flooding of the land within and surrounding the Order Limits of the Suffolk Onshore Scheme has been assessed within Application Document 6.8 (B) Flood Risk Assessment [REP6-052]. The FRA, informed by latest available flood data sources, demonstrates that within the Order Limits, land to the west of the railway line is at low risk of flooding from rivers and the sea (Flood Zone 1) during present day and in future climate change scenarios. If in more extreme flooding scenarios the railway barrier was breached, there would be no operational above ground project infrastructure within the flood extent, so no potential for the Proposed Development to cause changes in water levels. During construction of the Proposed Project there would be one temporary construction compound in this location. Several commitments are secured through the DCO, detailed in Application Document 9.84 (G) Register of Environmental Actions and Commitments (REAC) [C1-215], to prevent any impacts to existing flood barriers and compromise to existing drainage routes during the construction stage of the Proposed Project: • W12 secures that at the Suffolk landfall the offshore cables will be brought onshore using a trenchless technique, avoiding physical disturbance of several watercourses and areas of coastal floodplain. Monitoring of existing flood defences would be undertaken during the cable installation in agreement with Environment Agency protocols to ensure no detriment to the integrity of these structures. • W07 secures that the contractor(s) will subscribe to the Environment Agency’s Floodline service, and implement a suitable flood risk action plan, should a flood occur or be forecast. • W10 secures that severance of existing land drainage routes would be managed during construction through provision of temporary alternative drainage routes, and these drainage systems would be permanently reinstated or rerouted ensuring their existing function is maintained. These measures would therefore safeguard the integrity of existing flood barriers and drainage routes and prevent any impacts on flood risk to land with Aldeburgh.

Conclusion

Should you have any further queries in relation to this letter then please contact me, Louise Lewin, in the first instance.

Yours Sincerely,



SENIOR PROJECT MANAGER (CONSENTS)
SEA LINK

@nationalgrid.com

Appendix A : Approval of amendments to the Scottish Power Renewables Landscape Masterplan under the East Anglia ONE North and East Anglia TWO DCOs



[REDACTED]
SLR Consulting Limited
City Quadrant
11 Waterloo Square
Newcastle Upon Tyne
NE1 4DP

Your ref: EA1N/EA2 Req. 40
Our ref: DC/26/2999/DRR (EA1N)
DC/26/3000/DRR (EA2)
Date: 6 October 2026
Please ask for: [REDACTED]
Customer Services: [REDACTED]
Email: [REDACTED]@eastsoffolk.gov.uk

Dear [REDACTED],

Discharge of Requirement 40 (Amendments to approved details - Amendment to Approved Landscape Masterplan) Substations Stage of East Anglia ONE North and East Anglia TWO Offshore Wind Farm Development Consent Orders

Requirement 40 of the Development Consent Orders for East Anglia ONE North and East Anglia TWO states:

'40.—(1) With respect to any requirement which requires the authorised project to be carried out in accordance with the details approved by the relevant planning authority or another person, the approved details must be carried out as approved unless an amendment or variation is previously approved in writing by the relevant planning authority or that other person in accordance with sub-paragraph (2).

(2) Any amendments to or variations from the approved details must be in accordance with the principles and assessments set out in the environmental statement. Such agreement may only be given in relation to immaterial changes where it has been demonstrated to the satisfaction of the relevant planning authority or that other person that the subject matter of the agreement sought is unlikely to give rise to any materially new or materially different environmental effects from those assessed in the environmental statement.

(3) The approved details must be taken to include any amendments that may subsequently be approved in writing by the relevant planning authority or that other person.'

The following documents were submitted to East Suffolk Council by Scottish Power Renewables:

- AMENDMENTS TO APPROVED DETAILS REPORT: Amendment to Approved Landscape Masterplan DCO Requirement 40, Rev 2, received 23 September 2026 (SPR Document ID: EA1N-ONS-CNS-PLN-IBR-000050)

LEGAL ADDRESS East Suffolk House, Station Road, Melton, Woodbridge IP12 1RT

POSTAL ADDRESS Riverside, 4 Canning Road, Lowestoft NR33 0EQ

- AMENDMENTS TO APPROVED DETAILS REPORT: Amendment to Approved Landscape Masterplan DCO Requirement 40, Rev 2, received 23 September 2026 (SPR Document ID: EA2-ONS-CNS-PLN-IBR-000051)

East Suffolk Council consulted with Suffolk County Council, ESC Ecology, ESC Landscape and Arboriculture, and Natural England and considered their representations. No objections to the discharge of this requirement have been received from consultees.

The details given within the application (DC/26/2999/DRR and DC/26/3000/DRR) received 23 August 2026 in respect of Requirement 40 to amend the specified approved details of the East Anglia ONE North and East Anglia TWO Offshore Wind Farm Development Consent Orders are acceptable. Subject to works being carried out in accordance with the approved amended details, Requirement 40 will have been complied with to the local planning authority's satisfaction.

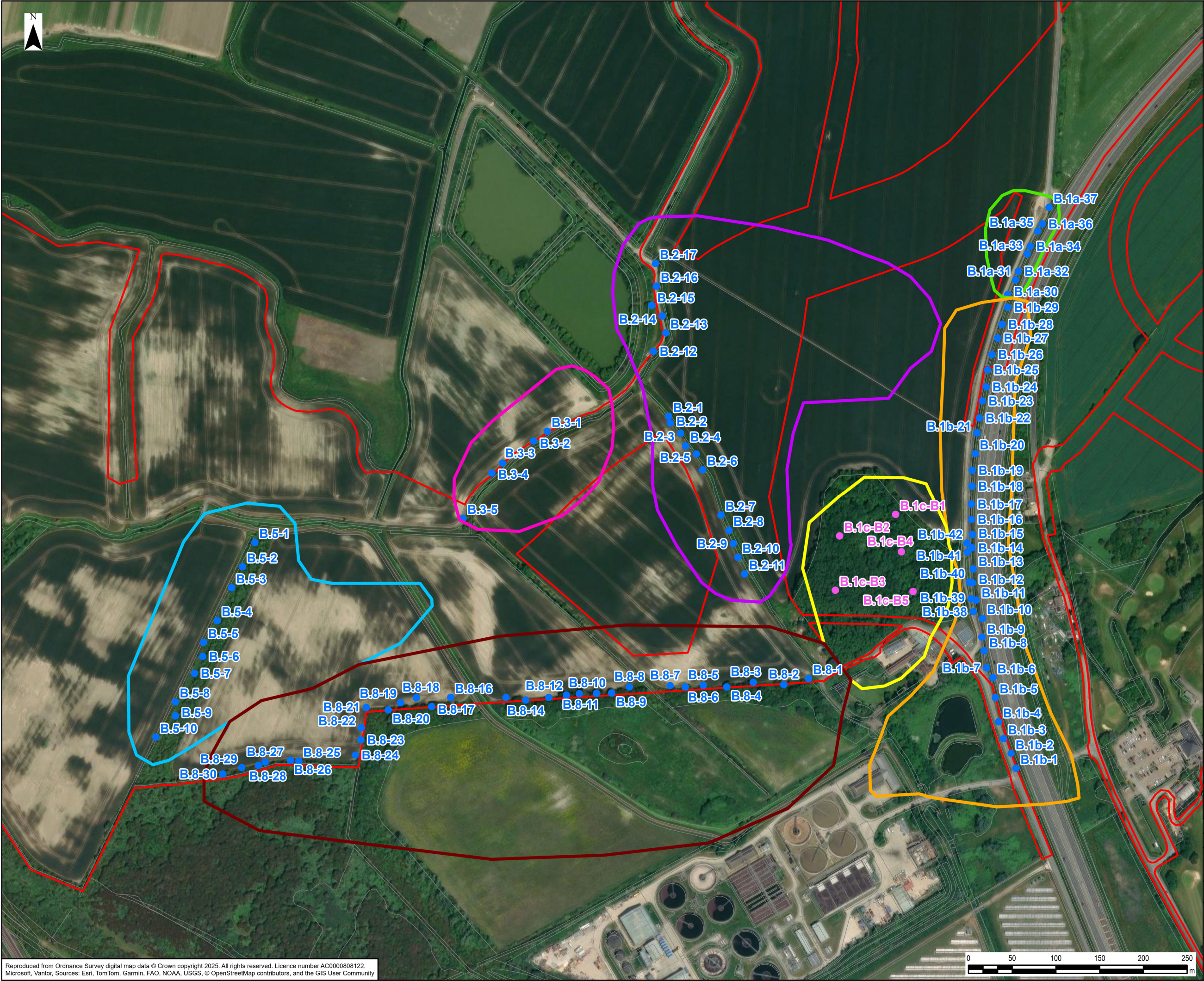
Please note however that this letter only relates to the specific named works, further approvals under Requirement 40 will be required in relation to works outside those identified. This includes reverting to the originally approved details where circumstances may require.

Yours sincerely,



Head of Energy Planning and Coastal Management
East Suffolk Council

Appendix B Distribution of dormouse survey tubes in Kent



Legend

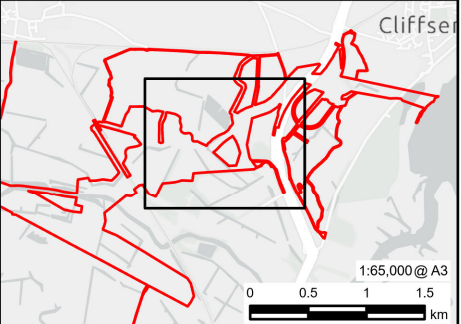
Kent Onshore Scheme Boundary

Refugia Zones

- Zone B.1a
- Zone B.1b
- Zone B.1c
- Zone B.2
- Zone B.3
- Zone B.5
- Zone B.8

Possible Hazel Dormouse Evidence

- Box
- Tube



Rev	Date	Description	GIS	Chk	App
0	28/09/2026	ENVIRONMENTAL STATEMENT	DF	EB	JR

nationalgrid

Scheme: SEA LINK

Document Title:
DISTRIBUTION OF DORMOUSE SURVEY TUBES
IN KENT SHOWING UNDERLYING
AERIAL PHOTOGRAPHY

Creator:	Date:	Checker:	Date:	Approver:	Date:
DF	28/09/2026	EB	28/09/2026	JR	28/09/2026

Document Ref:	Scale:	Format:	Sheets:	Rev:
FIGURE 1	1:4,000	A3	14	0

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