The Great Grid Upgrade

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Bramford to Twinstead Reinforcement

Volume 8: Examination Submissions

Document 8.3.3: Applicant's Comments on Relevant Representations

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1. Introduction

1.1 Document Purpose

1.1.1 This document provides National Grid Electricity Transmission plc's (the Applicant's) comments on Relevant Representations (RR) made by interested parties in response to an application for development consent for the Bramford to Twinstead Reinforcement (the project). A total of **138** interested parties' RR were made to the Planning Inspectorate and published on the Planning Inspectorate website on **24 July 2023**.

1.1.2 While all interested parties' RRs have been reviewed and considered, the purpose of this document is not to provide a direct response to each individual interested party RR. Instead, where appropriate the document identifies the key issues on a thematic basis and provides a thematic response to those issues and signposts to those parts of the draft Development Consent Order (DCO) [**APP-034**] and application documents where further details can be found (provided in Chapter 2 'Thematic Comments on Relevant Representations'). A commensurate response has been provided individually to selected organisations, such as statutory bodies (provided in Chapter 3 'The Applicant's Comments on Relevant Representations of Selected Organisations').

1.1.3 There were several RR made that did not make specific detailed points requiring a response, for example interested parties requesting to be kept informed of progress. In addition, some RR made reference to points that only apply to the relevant interested party which are being progressed in parallel to the DCO process either through landowner engagement and agreements or through direct discussions recorded in Statements of Common Ground (SoCG) with the interested parties.

1.2 Project Overview

1.2.1 An application for development consent was submitted to the Planning Inspectorate on the 27 April 2023 to reinforce the transmission network between Bramford Substation in Suffolk, and Twinstead Tee in Essex. The project would be achieved by the construction and operation of a new electricity transmission line over a distance of approximately 29km comprising of overhead lines, underground cables and grid supply point (GSP) substation. It also includes the removal of 25km of the existing distribution network, 2km of the existing transmission network and various ancillary works.

1.2.2 The application for development consent was accepted for Examination on the 23 May 2023.

1.2.3 A full description of the project can be found in Environmental Statement (ES) Chapter 4: Project Description [**APP-072**].

2. Thematic Comments on Relevant Representations

2.1 Overview

2.1.1 This chapter provides the Applicant's comments on the key themes that were commonly raised in the RR. Each thematic response outlines what the theme covered, the RR(s) that raised this matter and the Applicant's comments on the RR(s).

2.2 Thematic comment 1: Need Case

2.2.1 Table 2.1 outlines the Applicant's comments to RR relating to the need case for the project. It includes comments on the following matters:

- The application documents do not mention the link between the project and Sizewell C; and
- There are uncertainties over whether projects that form part of the Need Case will progress. For example, Judicial Reviews have been launched against Sizewell C and wind farms; and interconnector applications are at an early stage.

Table 2.1 – Need Case

Relevant Representations
Stour Valley Underground [**RR-045**], Together Against Sizewell C [**RR-049**], Angus Charles Goswell [**RR-081**], David Hopps [**RR-089**].
Applicant's Comments
The need for the project is set out in the Need Case April 2023 [**APP-161**]. In summary: there is an urgent need to reinforce the network in the East Anglia area by 2028. This is to enable connection of multiple contracted generation customers; ensure these future connections of generation can be made without incurring significant constraint costs; support the facilitation of UK Government net zero ambitions; and meet the Applicant's licence obligations. Table 3.2 of the Need Case sets out existing and planned electricity generation within East Anglia. Sizewell C is included within this list. In addition, the reinforcement is required to facilitate the connection of proposed offshore wind, interconnectors and other forms of storage/ generation listed. The Need Case is not dependent on the progression of any one project and the project would remain an urgent priority for

the Applicant if Sizewell C or other projects were delayed or did not progress. The project is required even when only considering those projects that are consented and the needs case is not reliant on any projects that are at an early stage.

Existing and forecasted demand in East Anglia is described in Section 3.4 of the Need Case April 2023 [**APP-161**].

The Electricity System Operator regularly publishes a series of documents that look at future energy scenarios and the need for transmission reinforcement.

2.3 Thematic comment 2: Consultation

2.3.1 Table 2.2 outlines the Applicant's comments to RRs relating to consultation undertaken for the project. It includes comments on the following matters:

- General representations regarding the quality and/or level of public consultation;
- Representations about the quality and/or level of engagement with affected landowners; and
- Representations about the level of detail and/or quality of consultation materials.

Table 2.2 – Consultation

Relevant Representations
Fiske Farms and Fiske Lands Trust **[RR-034]**, Kim Anderson [**RR-052**], John Duncan Irvine Bennett **[RR-058]**, James Bostock **[RR-061]**, Andrew Bryce **[RR-062]**, James Ian Thomas Bryce **[RR-063]**, William Alexander Bryce **[RR-064]**, William Brian Sidney Bryce **[RR-065]**, Sarah Burgess **[RR-066]**, Robert Arthur David Cowlin **[RR-067],** Mr R S Donaldson [**RR-070**], Joyce Georgina Evans [**RR-073**], Simon J Gilbey MRICS [**RR-080],** Alan Hall [**RR-083**], Philippa Harding [**RR-085**], James Harris [**RR-086**], Oliver John Kendall [**RR-094**], Sarah Louise Kendall [**RR-095**], Brooks Leney [**RR-097**], Chris Leney [**RR-098**], William Longdon [**RR-100**], Belinda Nott [**RR-107**], Veronica Ann Overall [**RR-110**], Joan Valerie Peacock [**RR-113**], Francis Prosser [**RR-115**], Mr Nicholas Reid [**RR-119**], Edward Roy Richardson [**RR-120**], Frank Thorogood [**RR-129**].
Applicant's Comments
The Applicant has held a total of three consultation periods on its proposals since work resumed on the project in 2020, following extensive consultation between 2009 and 2013 prior to the project being paused. The Consultation Report [**APP-043**] describes the extensive process undertaken and the regard had to feedback received. In addition, there have been ongoing discussions with landowners and other stakeholders both during and outside of these consultation periods, including throughout the examination period. The first consultation, held between March and May 2021, was non-statutory. The consultation had the following aims: • To reintroduce the project and provide an overview of the proposals, including the need case for the project; • Describe how the project was developed prior to it being paused in 2013; • Explain how the Applicant has reviewed and updated the proposals; and • Gather feedback on the proposals and look ahead to next steps.

Table 3.1 of the Consultation Report [**APP-043**] provides a summary of non-statutory consultation activities. These included eight webinars, three telephone surgeries, and presentations to five district/county councils, 13 parish councils and two Members of Parliament. A total of 537 feedback submissions were received during the consultation period. More information can be found in the non-statutory consultation report, which forms part of Consultation Report – Appendix C [**APP-046**]. As presented on page 57 of the Consultation Report [**APP-043**] the Applicant made a number of changes to the project as a result of consultation feedback, engagement with affected landowners, further environmental and engineering assessments and refinements to the engineering design.

Section 47 of the Planning Act 2008 ('the Act') requires developers to publish a Statement of Community Consultation (SoCC) that sets out how the Applicant proposes to consult people who may be impacted by the project. The Applicant refined the SoCC alongside productive dialogue with the Host Authorities, which included both informal and formal consultation on the draft document. As set out in the SoCC, an eight-week Statutory Consultation on the project was held between 25 January 2022 and 21 March 2022. To raise awareness and provide information on the project, the following channels of communication were used:

- A project webpage (providing access to plans, visualisations, and technical documents);
- Project webinars (10 held between 31 Jan 2022 and 24 Feb 2022, including with British sign language (BSL) interpreter);
- 'Ask the experts' sessions (10 held between 1 Feb 2022 and 18 March 2022);
- Deposit locations displaying hard copies of consultation materials including at Hadleigh Library, Sible Hedingham Library, and at Sudbury Library;
- S47 notices were placed in the following newspapers to publicise the SoCC: East Anglian Daily Times on 21 January 2022 and Colchester Gazette on 18 January 2022;
- S48 notices were placed in the following newspapers to publicise the Statutory Consultation: East Anglian Daily Times on 21 and 27 January 2022, Colchester Gazette on 18 and 25 January 2022, The Guardian, and The London Gazette on 25 January 2022;
- Following the Government's announcement on 19 January 2022 and subsequent removal of Covid-19 Plan B restrictions on 26 January 2022, the Applicant held six face-to-face events (four public events and two appointment-only events) from the 24 February 2022, in addition to the already scheduled digital events; and
- A freephone telephone number and email address were provided for interested parties to raise queries or request additional information or clarifications.

Maps depicting the project were available to view and download from the project website. These included an interactive, zoomable map, along with detailed General Arrangement Plans at 1:2500 scale. Paper copies of these maps were available during the consultation period upon request. A total of 577 feedback submissions were received during the Statutory Consultation period. A full account of all consultation activity undertaken is available in the Consultation Report [**APP-043**]. As presented on page 258 of the Consultation Report [**APP-043**] the Applicant made a number of changes to the project as a result of feedback provided during the Statutory Consultation.

Following a review of Statutory Consultation feedback and the addition of a temporary access route off the A131 within the proposals for the project, the Applicant held a further targeted consultation in September and October 2022. The Applicant sought to undertake the consultation in accordance with the SoCC (where relevant, and proportionate). Consultation activity included writing to all properties within Sections G and H, holding two in-person consultation events, online webinars, and making information available online and at four deposit point locations.

A total of 358 feedback submissions were received during the targeted consultation period. A full account of all consultation activity undertaken is available in the Consultation Report [**APP-043**]. As presented on page 332 of the Consultation Report [**APP-043**] the Applicant made a number of changes to the project as a result of feedback provided during the targeted consultation.

Across the three consultation periods, a total of 1,472 consultation responses were received. It is worth noting that in obtaining Statutory Consultation feedback, question 5 sought views on whether respondents thought the changes made were an improvement on what was presented previously. The most popular opinion was that 'feedback had been listened to, but further change is required' with 44% of respondents choosing this option. Just under a quarter (24%) of respondents indicated that 'they thought feedback has not been listened to or understood', whilst a fifth of respondents (20%) thought that 'feedback had been listened to'.

The Applicant has had regard to all feedback received as documented in the Consultation Report [**APP-043**]. Consultation and engagement following targeted consultation continued up until the submission of the application for development consent. This is outlined in Chapter 9 of the Consultation Report [**APP-043**]. Discussions with affected landowners has been ongoing throughout the project and will continue to take place during the examination phase of the project.

It should be noted that all host authorities provided an adequacy of consultation response to the Planning Inspectorate and gave positive feedback (excluding one comment about a meeting arranged by the local authority that the Applicant chose not to attend as it was offering its own consultation events).

2.4 Thematic comment 3: Scope of the Targeted Consultation

2.4.1 Table 2.3 outlines the Applicant's comments on RR-108 which relate to the proposed temporary access route off the A131 and the scope of the associated targeted consultation, held in September and October 2022, Table 2.13 Thematic comment 13: Options and Routing – Temporary Access Route off the A131.

Table 2.3: Targeted Consultation

Relevant Representations
Edmund John Nott [**RR-108**].
Applicant's Comments
Following the Statutory Consultation (January – March 2022), the Applicant took time to consider the feedback received and how this could influence the final plans for the project. One key area where feedback was received related to construction traffic, with respondents suggesting that some of the roads proposed as construction traffic routes were not suitable for large construction vehicles. At the same time, the Applicant's ongoing technical assessments found that a number of interventions (such as road widening, vegetation clearance and temporary removal of street furniture/signage) could be required to make parts of the local road network suitable for construction vehicles. As a result of this, the Applicant developed plans for an additional temporary access route off the A131 to minimise the use of local roads by construction traffic so far as practicable. The route and size of the temporary access route off the A131 takes into account a number of different factors, including cost, constructability, land use, environmental impacts, construction effects, vehicle types and safety. Bearing in mind the changes to the project, the Applicant made the decision to hold a further targeted consultation in September and October 2022. The addition of the temporary access route off the A131 to the proposals also meant that some new land interests were now within the Order limits. At the same time as the targeted consultation, the Applicant wrote to affected parties and landowners to formally consult them under Sections 42 and 44 of the Planning Act 2008 ('the Act'). The targeted consultation ran for a period of 40 days. The Applicant undertook the consultation in accordance with the SoCC (where relevant, and proportionate). Consultation activity included writing to all properties within Sections G and H of the route, holding two in-person consultation events, online webinars, and making information available online and at four deposit point locations. A full account of all consultation activity undertaken is available in the Consultation Report [**APP-043**].

2.5 Thematic comment 4: Options Appraisal

2.5.1 Table 2.4 outlines the Applicant's comments to RR relating to the option appraisal process undertaken for the project. It includes responses to the following matters:

- General questions about the options appraisal undertaken for the project;
- Where the relevant option appraisal information can be found in the application documents; and
- Factors that were considered as part of the decision-making process on the options appraisal.

Table 2.4: Options Appraisal

Relevant Representations
Kim Anderson [**RR-052**], Philippa Harding [**RR-085**], David Hopps [**RR-089**], Brooks Leney [**RR-097**], Chris Leney [**RR-098**], Nigel Heyworth Morgan [**RR-104**], Mr Nicholas Reid [**RR-119**].
Applicant's Comments
The Applicant has undertaken a comprehensive options appraisal for the project, which has included consideration of different locations, technologies and designs. The Evolution of the Project **[APP-166]** describes the option appraisal process that the Applicant has followed on the project. Paragraph 1.2.1 notes that options are compared across a range of criteria including environmental, socio economic, technical and cost factors. Paragraph 1.1.2 notes that when designing the project, the Applicant also considers national and local policy and the feedback received during consultation. Volume 7 of the application for development consent contains a suite of documents which describe the option appraisal undertaken at different stages in the development of the project. These documents comprise the Strategic Options Report June 2011 **[APP-162]**, Route Corridor Study October 2009 **[APP-163]**, Connection Options Report May 2012 **[APP-164]** and the Substation Siting Study February 2013 **[APP-165]**. ES Chapter 3: Alternatives Considered **[APP-071]** also sets out how the environmental effects of the reasonable alternatives have been considered as part of the project development. As described in paragraph 2.1.6 of Evolution of the Project **[APP-166]**, the Applicant has undertaken back check and reviews during the project development (including after the project restarted in 2020), to confirm whether former decisions made in relation to the options appraisal remained valid and to identify any refinements required to further optimise the proposals. This process has enabled the Applicant

to be confident that the design presented within the application is the preferred design, taking into account the output of assessments and consultation undertaken on the project.

As stated in paragraph 4.1.5 of Evolution of the Project **[APP-166]**, a new predominantly overhead transmission line between Bramford and Twinstead best achieves the balance between the Applicant's technical, economic and environmental obligations when taking into account the Applicant's statutory obligations and its licence requirements.

2.6 Thematic comment 5: Strategic Options – Offshore Development

2.6.1 Table 2.5 outlines the Applicant's comments to RR relating to offshore development. It includes responses to the following matters:

- Comments relating to alternative proposals of an integrated offshore grid in the North Sea and Thames Estuary;
- Comments relating to alternative proposals with cables under the sea;
- Comments relating to offshore alternatives to saving £2bn and reducing overall infrastructure by 50%; and
- Comments relating to additional connections to other developments, including offshore windfarms.

Table 2.5: Strategic Options- Offshore Development

Relevant Representations
Together Against Sizewell C [**RR-049**], Kim Anderson [**RR-052**], Ian Dinwiddie [**RR-069**], Judith Ewing [**RR-076**], Nicholas Hugh Hammond [**RR-084**], Philippa Harding [**RR-085**], Christopher G. Hudson [**RR-091**], Francis Prosser [**RR-115**], Ann Roberts [**RR-121**], Ian Rutledge [**RR-123**].
Applicant's Comments
With new offshore wind generation, a new nuclear power station at Sizewell C and greater interconnection with countries across the North Sea being proposed, there will be a large increase in the amount of renewable and low carbon electricity generation connecting to the transmission network along the East coast. This increased generation will play a key role in delivering the UK Government's net zero ambitions and delivering up to 50GW of offshore wind connected by 2030. To facilitate these ambitions, electricity network infrastructure is needed to ensure that energy can be transported from where it is generated to where it is used. Whilst the transmission system in East Anglia has been sufficient until today, it will soon exceed its current capability. Increased transmission capability is therefore required in the East Anglia region to allow the Applicant to maintain a robust network, remain in accordance with its licence obligations, and to allow new sources of electricity generation to connect. This is vital to facilitate the ambitious targets set by the Government, for secure, clean and affordable energy for the long term. The existing electricity transmission network in East Anglia does not have the capability or capacity required to reliably and securely transport the electricity that will be generated and connected to the network by 2030 while working to the required standards. In its most-recent Network Options Assessment (NOA), the Electricity System Operator (ESO) explained that the project has been identified as a critical reinforcement in all future energy scenarios. Three double circuits connect into Bramford substation (one from Norwich and two

from Sizewell), but only one double circuit continues west from Bramford. This constrains the amount of electricity able to be transported towards the rest of the country. The project is designed to address a bottleneck on the network, which would not be addressed by the provision of an offshore route.

Additionally, the NOA identifies other reinforcements planned to increase the overall capacity of the network in East Anglia, such as the proposed Norwich to Tilbury project (referred to as ATNC and AENC in the NOA) and the proposed Sea Link project (referred to as SCD1 in the NOA). Sea Link is a proposed high voltage subsea direct current link between Suffolk and Kent. It is required in addition to the project. Even with Sea Link built, reinforcing the network between Bramford and Twinstead remains “critical” in all future energy scenarios.

Further detail of the strategic location and the need that the project is addressing is set out in the Strategic Options Report [APP-162] and Need Case [APP-161].

2.7 Thematic comment 6: Strategic Options – Superconductors

2.7.1 Table 2.6 outlines the Applicant's comments to RR relating to alternative technologies to that proposed in the application to development consent, in particular superconductors.

Table 2.6: Strategic Options- Superconductors

Relevant Representations
Nick Miller [**RR-103**], Nigel Heyworth Morgan [**RR-104**].
Applicant's Comments
The use of superconducting cables has been considered by National Grid as referenced in Section 3.5.6 of the ES Main Report Chapter 3 - Alternatives Considered **[APP-071].** Superconducting cables are based on special superconducting materials that are cooled down to extremely low temperatures (e.g. -140°C) by, for example, liquid nitrogen. Alternating Current High Temperature Superconductors: This technology is currently being used to provide power transfer over short distances in urban-constrained environments only and they presently operate at voltages well below 400kV. The current status of Alternating Current High Temperature Superconductors is not at a level where it can provide the capacity, voltage level, or distance required by the project and currently has extensive limitations. The National Grid Group is actively involved in the development of Alternating Current superconducting technology. The group is made up of a number of companies of which National Grid Electricity Transmission is one. National Grid USA owns a superconductor circuit in Albany, New York. This Alternating Current superconductor was one of the first in the world and is 350m long, operating at 34.5kV with a current rating of 800A. It operates in a very congested urban area. High Voltage Direct Current High Temperature Superconductors: This technology has been developed, but as with all High Voltage Direct Current projects it is not only the cost of the cable that needs to be considered. Each end of any connection will require a High Voltage Direct Current convertor station and connections into the Alternating Current system. Because of the cost of cables and convertor stations, High Voltage Direct Current technology of any kind is not usually economic for distances less than 100km, as is the case for the project and would not meet the Applicant's statutory duty to be economic and efficient. The converter stations could also have potential for landscape and visual effects depending on where these are located.

Offshore high-voltage direct current (HVDC) projects are often very costly and unlikely to provide the same level of network capability. The benefits and costs have been weighed against the impacts of onshore construction. More details can be found in the Strategic Options Report **[APP-162].**

2.8 Thematic comment 7: Strategic Options – Overhead Lines versus Underground Cables

2.8.1 Table 2.7 outlines the Applicant's comments to RR relating to undergrounding of the transmission line on the project including requests to underground the existing 400kV overhead line.

Table 2.7: Strategic Options- Overhead lines vs Underground Cables

Relevant Representations
Fiske Farms and Fiske Lands Trust [**RR-034**], Stour Valley Underground [**RR-045**], John Duncan Irvine Bennett [**RR-058**], James Bostock [**RR-061**], Linda Keenan [**RR-093**], Mark Andrew Kettle [**RR-096**], Jonathan Prosser [**RR-116**], Patricia Prosser [**RR-117**], Mary Reid [**RR-118**], Mr Nicholas Reid [**RR-119**].
Applicant's Comments
As part of its options appraisal process, the Applicant has considered whether the use of underground cables, rather than overhead lines, is an appropriate approach in the context of national policy and the Applicant's statutory duties. The relevant National Policy Statement is EN-5 (Electricity Networks Infrastructure) which makes it clear that the Government expects overhead lines to be appropriate in most instances, although it recognises that there may be, at particularly sensitive locations, potential adverse landscape and visual impacts of an overhead line that make it unacceptable in planning terms. EN- 5 favours a flexible policy framework using case-by-case evaluation, as per paragraph 1.7.5 of EN-5. Paragraph 2.8.2 of EN-5 comments that the development of overhead lines, in general, is not incompatible (in principle) with the Applicant's statutory duty under section 9 of the Electricity Act. The Connection Options Report **[APP-164]** considered an underground option for each section of the alignment and assessed the environmental, socio economic, technical and cost issues associated with each option. Table 3.4 in ES Chapter 3: Alternatives Considered [**APP-071**] compares the different effects from underground cables and overhead lines. The Planning Statement [**APP-160**] describes how the Applicant has sought to determine the right balance of overhead lines and underground cables in line with the principles of EN-5 together with the additional cost and the subsequent environmental consequences of undergrounding. The Applicant proposes underground cable at the Dedham Vale Area of Outstanding Natural Beauty (AONB) and the Stour Valley. Elsewhere along the alignment, the higher cost of cables to bill paying consumers, and the environmental implications of installing

underground cables and maintaining them, are not considered to be justifiable in the context of national policy or the Applicant's statutory duties, which include the need to be economic and efficient. Further information is available in the Planning Statement **[APP-160]**.

The Applicant is confident that the project strikes the appropriate balance of overhead line and underground cables, in accordance with National Planning Policy and other considerations.

The needs case and funding for the project is to deliver the new network reinforcement needed, rather than to work on existing overhead lines (other than where this is required to facilitate the project). Therefore, while two stretches of underground cable are proposed at Dedham Vale AONB and the Stour Valley, no stretches of existing 400kV overhead line will be put underground (although approximately 25km of existing 132kV overhead line and 2km of existing 400kV overhead line will be removed). This is because undergrounding existing overhead lines is not required to mitigate the impacts of the project, and therefore the substantial cost to bill payers, as well as the environmental impacts of construction, would not be justified. National Grid has a Visual Impact Provision, which makes use of Ofgem funding to reduce the impact of existing transmission lines in Nationally designated landscapes in England and Wales, this is a separate initiative and does not apply to the project.

2.9 Thematic comment 8: Impacts on East Anglia

2.9.1 Table 2.8 outlines the Applicant's comments on RR relating to potential impacts on East Anglia from the project. It includes comments on the following matters:

- Concern regarding heritage, landscape and communities of Suffolk;
- A view that if harm cannot be avoided, it should be fully mitigated, and where this is not possible comprehensive compensation must be made available.
- A view that Suffolk is being disproportionately affected in terms of the combined environmental impact of onshore infrastructure including: substations, cable, solar farms and pylons routes.
- A view that more could be done to mitigate the visual impact of the proposed new infrastructure, either through increased undergrounding or enhanced planting; and a call for greater and more significant planting at Burstall and Hintlesham to mitigate cumulative impact on these communities.

Table 2.8: Impacts on East Anglia

Relevant Representations
Suffolk Preservation Society [**RR-048**], Sarah Burgess [**RR-066**], Ian Dinwiddie [**RR-069**], Sandra O'Sullivan [**RR-109**].
Applicant's Comments
The project is one of a number of network reinforcements needed to deliver 50GW of offshore wind by 2030, to support the transmission of energy generated offshore, low carbon nuclear energy from Sizewell C, and to distribute energy supplied by interconnectors. More detail can be found in Chapter 3 of the Planning Statement **[APP-160]** and the Needs Case **[APP-161].** Also see Table 2.1 of this report for the Applicant's comments on the need for the project (see Table 2.1 Thematic comment 1: Need Case). As part of the EIA, the Applicant undertook a cumulative effects assessment, which is provided in ES Chapter 15: Cumulative Effects Assessment **[APP-083]** (see Table 2.26 Thematic comment 26: Cumulative Effects). This provides an assessment of the cumulative impacts of the proposal, alongside other planned infrastructure projects, on the region. Some of the cumulative developments around Bramford Substation are at an early stage of development and therefore could change through landowner engagement and negotiations, technical design considerations, consultation and the EIA process during later stages of development. At this stage it is not possible to predict the location of infrastructure to inform any further planting proposals to reduce cumulative landscape and visual effects. The Applicant will of course continue to work internally with the Norwich to Tilbury project and its

appointed landscape architects and are committed to engaging more widely with other developers in the area to ensure a combined and joined up approach to landscaping proposals around Bramford Substation. The Applicant is committed to Mid Suffolk District Council's strategic cumulative working group in the Bramford area and is happy to engage and provide appropriate information on its proposals as required.

With regard to mitigation, the Applicant notes that the CEMP **[APP-177]**, the Code of Construction Practice (CoCP) **[APP-178]** and the REAC **[APP-179]** set out the embedded and good practice measures committed to as part of the project to reduce effects on people, local communities and the environment during construction. The Landscape and Ecological Management Plan (LEMP) **[APP-182]** outlines how vegetation would be protected and managed during construction and how any vegetation removed by the project would be reinstated following construction including any required mitigation and landscape softening. The LEMP is secured through Requirement 4 of the draft DCO **[APP-034]**. The Applicant has proposed enhancement planting as part of its Biodiversity Net Gain Proposals in the Environmental Gain Report submitted with the application for development consent [**APP-176**]; this is outside of the EIA process but would assist with further filtering views.

See Table 2.19 Thematic comment 19: Landscape and Visual, Table 2.20 Thematic comment 20: Historic Environment, Table 2.10 Thematic comment 10: Hintlesham Hall and Table 2.7 Thematic comment 7: Strategic Options – Overhead Lines versus Underground Cables which are relevant to RR084.

The Applicant is committed to continuing discussions with the host Authorities and other key stakeholders regarding their aspirations in respect of community benefits. These discussions would be outside of the DCO process whilst the Applicant awaits the outcome of the Government's consultation on community benefits.

2.10 Thematic comment 9: Options and Routing – Hintlesham Woods Option 1 and 2

2.10.1 Table 2.9 outlines the Applicant's comments to RR relating to the two options that were presented at the Statutory Consultation for the project at Hintlesham Woods Site of Special Scientific Interest (SSSI). This theme includes comments on the following matters:

- General questions about the options appraisal undertaken for the project in relation to Hintlesham Woods;
- Where the relevant option appraisal information can be found in the application documents;
- Factors that were considered as part of the decision-making process when taking forward Option 1 into the application; and
- Where relevant assessment information relating to Hintlesham Woods SSSI can be found within the application documents.

Table 2.9: Options and Routing- Hintlesham Woods Option 1 and 2

Relevant Representations
John Duncan Irvine Bennett [**RR-058**], William Alexander Bryce [**RR-064**], Zak Martin [**RR-101**], Francis Prosser [**RR-115**], Jonathan Prosser [**RR-116**], Patricia Prosser [**RR-117**].
Applicant's Comments
The Applicant has undertaken a comprehensive options appraisal for the project, which has included consideration of a number of different overhead line and underground cable alignments in the vicinity of Hintlesham Woods SSSI. This is detailed in ES Chapter 3 Alternatives considered **[APP-071].** The SSSI is designated for its ancient woodland habitat and breeding woodland bird assemblage, as described in ES Appendix 7.1 Annex B - Hintlesham Woods SSSI Assessment **[APP-111].** An initial appraisal of potential alignments in Section AB: Bramford Substation/Hintlesham was undertaken in 2012 and is documented in the Connection Options Report (COR) **[APP-164].** This included consideration of overhead line options at and around the SSSI. It also considered underground cables. On the latter, paragraph 6.255 of the COR **[APP-164]** concluded that for Study Area AB that '*the benefits from the use of underground cables as an alternative to an overhead line in this location, which is assessed as not being particularly sensitive, will not clearly outweigh any extra economic, social and environmental impacts. Undergrounding would not therefore be appropriate in this study area*.'

The COR **[APP-164]** recommended in paragraph 6.256 that a new overhead line (OP2-NL) taking the route of the existing 400kV overhead line through Hintlesham Woods and routing the existing 400kV overhead line around the northern and western edge of Ramsey Wood, was the least environmentally constrained alignment.

As described in paragraphs 4.3.12 and 4.3.13 of the Evolution of the Project **[APP-166],** the Applicant undertook a back check and review of the options in and around Hintlesham Woods following feedback received during the 2021 non-statutory consultation. The back check and review used up-to-date information on the technical engineering requirements, construction methodology and programme. This resulted in an alternative, Option 1 (formerly OP2-NL, comprising new overhead line passing around the north and west of the woods, the original option and that submitted in the application for development consent) and Option 2 (formerly OP1-SL, comprising a new overhead line parallel to the existing passing over the woods). The environmental appraisal for both options is presented in Table 3.7 of ES Chapter 3: Main Alternatives Considered **[APP-071]:**

- Hintlesham Woods Option 1 (formerly OP2-NL) – The existing 400kV overhead line would be diverted on new pylons to the north and west of the woodland. The proposed 400kV overhead line would use the existing pylons through the woodland; and
- Hintlesham Woods Option 2 (formerly OP1-SL)- The existing 400kV overhead line would remain in situ. The proposed 400kV overhead line would be constructed parallel to the existing overhead line to the south on new pylons located outside of the woodland.

As stated in paragraph 4.3.14 of the Evolution of the Project **[APP-166],** both options were taken forward to the 2022 Statutory Consultation. Consultation responses received from stakeholders in relation to Option 1 and Option 2, as well as the Applicant's responses, are provided in the Consultation Report **[APP-043].** The consultation responses were given due consideration when weighing up the decision as to which option to take forward. Third parties including Natural England and Suffolk County Council noted that the landscape is not designated, and therefore this should not be given weight compared to the nationally designated SSSI.

Paragraph 5.7.55 of the Planning Statement **[APP-160]** states that Option 1 was considered the least environmentally constrained option. Subsequently, the Applicant decided to not take forward Hintlesham Woods Option 2 in the application for development consent.

The decision to remove Option 2 was based on several important considerations including but not limited to: consultation feedback and engagement with stakeholders and landowners; the findings of environmental surveys (in particular protected species surveys); environmental designations including ancient woodland and SSSI (as well as being a Royal Society of the Protection of Birds (RSPB) Nature Reserve); the Holford Rules; Schedule 9 of the Electricity Act; EN-1 and EN-5; landscape impact; and further design and engineering studies.

2.11 Thematic comment 10: Hintlesham Hall

2.11.1 Table 2.10 outlines the Applicant's response to RR relating to the potential effects of the project on Hintlesham Hall, including its setting. It includes comments on the following matters:

- General questions about the potential effects on Hintlesham Hall; and,
- A call for more significant measures to mitigate the heritage impact at grade I listed Hintlesham Hall for more extensive reinstatement of parkland adjacent to the Hall.

Table 2.10: Hintlesham Hall

Relevant Representations
Suffolk Preservation Society [**RR-048**].
Applicant's Comments
ES Chapter 8: Historic Environment **[APP-076]** and ES Appendix 8.2: Annex A Hintlesham Hall Assessment **[APP-128]** conclude that overall, the operational effects of the project on the Grade I listed Hintlesham Hall, its Grade II* listed ancillary buildings (associated service ranges) and Grade II listed lodge would be minor adverse, which is 'not significant' and would not require additional mitigation to that already embedded into the project. The minor adverse effect was justified given the very little additional visual intrusion to Hintlesham Hall or ancillary buildings from the project, given the location of the existing overhead line, the proposed overhead line's position relative to the Hall, the screening and filtering effect of the existing mature trees within Hintlesham Park and the proposed embedded measures in the form of planting. As described in ES Appendix 8.2: Annex A Hintlesham Hall Assessment **[APP-128],** the assessment also took into account the limited extent to which the northern section of Hintesham Park now contributes in setting terms to the value of Hintlesham Hall and ancillary buildings. The portion of Hintlesham Park affected has lost much of its original historic character having been converted to modern agricultural use in the 20th century and part of the Hall's setting is used as a golf course. Whilst the area affected by the proposed overhead line still contributes positively to the value of the Hall and ancillary buildings in setting terms, this contribution is marginal. The better-preserved parts of Hintlesham Park, such as the area along the main driveway, make a much bigger contribution to the historic legibility and aesthetic value of the listed buildings. As set out in Section 3.2 of Appendix A in the Environmental Gain Report **[APP-176],** the Applicant is seeking to enhance the historic landscape around Hintlesham Hall, including partially restoring the original tree lined avenues to the south-west of Hintlesham Hall with scattered trees.

2.12 Thematic comment 11: Options and Routing – Section G: Stour Valley

2.12.1 Table 2.11 outlines the Applicant's comments on RR relating to the alignment proposed in Section G: Stour Valley, which includes details on:

- The locations for the Stour Valley East and Stour Valley West cable sealing end (CSE) compounds;
- The preferred alignment as submitted in the application for development consent and the discounted alternative alignments; and
- How consultation feedback has shaped the preferred alignment in Section G: Stour Valley.

Table 2.11: Options and Routing- Section G: Stour Valley

Relevant Representations
Daws Hall Trust [**RR-027**], William Eric Drake [**RR-071**], Adrian Huggins [**RR-092**], William Longdon [**RR-100**], Nick Miller [**RR-103**], Mark James Smith [**RR-125**], and Ian Rutledge [**RR-123**].
Applicant's Comments
The Stour Valley has a number of designations and sensitive features that have been considered as part of the ongoing and extensive options appraisal in this location. Details of the habitat types present in this location can be found in ES Appendix 7.1: Habitats Baseline Report [**APP-109**]. Undergrounding was considered appropriate in parts of Section G: Stour Valley, because of the particular qualities of the landscape and its cultural associations. This was confirmed during the non-statutory consultation feedback received for the project. Whilst not designated, the Stour Valley has similar picturesque landscape qualities to Dedham Vale AONB and it is considered that parts of the Stour Valley fall within the setting of Dedham Vale AONB; the extent of which is considered in ES Appendix 6.2 Annex A Dedham Vale AONB Approach and Identification of Setting Study [**APP-099**]. Since project inception, a number of options have been presented and consulted on in respect of Section G: Stour Valley. The underground cable route alignments have also been influenced by the preferred locations for the Stour Valley East and Stour Valley West CSE compounds. The preferred location for the Stour Valley East CSE compound has not altered since the publication of the Connection Options Report (COR) May 2012 [**APP-164**]. The COR [**APP-164**] suggested that the Stour Valley West CSE compound could be located adjacent to pylon

4YLA001 on the Bramford–Braintree-Rayleigh overhead line. The initial location of the Stour Valley West CSE compound was set out in the COR (adjacent to pylon 4YLA001) but was subsequently amended following the 2012 non-statutory consultation as a result of consultation feedback to in the vicinity of pylon 4YLA004. The CSE was subsequently moved following the 2021 non-statutory consultation (to the south of Henny Back Road) following further consultation feedback and landowner engagement.

As the location of the Stour Valley West CSE compound has altered, so has the underground cable connecting the Stour Valley East and Stour Valley West CSE compounds.

At the Statutory Consultation in 2022, the preferred option was for the underground cable, starting at the Stour Valley East CSE compound near Sawyers Farm, to head westwards with a trenchless crossing beneath the River Stour and Sudbury Branch Line Railway. From here, it then headed in a southwest direction, weaving between woodland areas to the north of Alphamstone to the relocated CSE compound to the south of Henny Back Road.

During the Statutory Consultation, views were specifically sought on this alignment in Section G: Stour Valley (Question 13). A number of respondents made comments on the proposed alignment, details of which can be found in the Consultation Report [**APP-063**], Pages 100 – 101 and Table 7.6 (assessment references: G2, G24, G26, G27, G28, G29, G32, G33. G34, G35, G36, G40, G41, G44, G48, G50, G51).

Feedback received during the Statutory Consultation expressed concerns about the proximity of construction activities associated with the underground cable to the residents of Alphamstone, as well as concerns around the impact on sensitive parts of the environment and footpaths. As a result, a further back check and review was undertaken of the proposed route of undergrounding between Moat Lane and the Stour Valley West CSE compound. This included consideration of additional alignments suggested by respondents during the Statutory Consultation. A summary of the further options considered, and the appraisal can be found in Tables 3.9 and 3.10 of ES Chapter 3: Alternatives Considered [**APP-071**].

The Applicant had regard to the alternative alignments proposed by respondents and investigating these proposals identified a new alignment that lay further to the west of Alphamstone. The new alignment (presented in the application for development consent) affected the reinforcement between Moat Lane and the proposed Stour Valley West CSE compound and moved the alignment to the north of Henny Back Road. This option is described in Tables 3.9 and 3.10 of ES Chapter 3: Alternatives Considered [**APP-071**] as ‘Stour Valley (SV) Option 8’.

The Targeted Consultation presented the new alignment following the feedback received at the Statutory Consultation, (SV Option 8) and now forms part of the Proposed Alignment. SV Option 8 is shown on the General Arrangement Plans [**APP-018**]. SV Option 8 is considered to be the preferred alignment option as it:

- avoids areas previously identified as technically challenging;
- uses a trenchless crossing method to avoid effects on vegetation and habitats at Alphamstone Meadows Local Wildlife Site (LWS) and this is secured via environmental commitment 'EM-G08' as detailed in Construction Environmental Management Plan (CEMP) Appendix B – Register of Environmental Actions and Commitments (REAC) **[APP-179];**
- removes the need to provide diversions on the overhead line to construct the CSE compound;
- avoids the vast majority of residential receptors in the locality and reduces effects on receptors in Alphamstone;
- provides a relatively short route through arable fields and with relatively limited vegetation removal due to trenchless crossings; and
- provides for the removal of five spans of 400kV overhead line in addition to the 132kV overhead line in this location.

2.13 Thematic comment 12: Options and Routing – Cable Sealing End (CSE) Compound

2.13.1 Table 2.12 outlines the Applicant's comments on RR relating to the Dedham Vale East CSE Compound. It includes comments on the following matters:

- General questions on alternative locations for the Dedham Vale East CSE compound; and
- Specific questions about the use of Layham Quarry as the location for the Dedham Vale East CSE compound.

Table 2.12: Options and Routing- Cable Sealing End Compounds

Relevant Representations
Christine Elizabeth Andicsku [**RR-053**], Janon Laszlo Andicsku [**RR-054**], Mark Westwood [**RR-135**], Sally Westwood [**RR-136**].
Applicant's Comments
The Applicant considered a number of locations when determining the proposed location of the Dedham Vale East CSE compound. A summary of the locations considered, and the beneficial and adverse features associated with each location is provided in Table 3.13 of ES Chapter 3 – Alternatives Considered **[APP-071]**. A change was made to the CSE compound location following feedback from the non-statutory consultation and shown as part of the Statutory Consultation in March 2022. The change provided more undergrounding and increased the distance of the CSE compound from the AONB boundary to reduce effects on the direct setting of the AONB. The proposed Dedham Vale East CSE compound at Millfield Wood is located approximately 1km from the AONB boundary. The option selected (Option 2aii) is also located away from Polstead Conservation Area. It is located away from Dollops Wood therefore avoiding effects on the woodland habitats and species. The proposed CSE compound is located between two woodland blocks (Millfield Wood located to the south and north of the CSE compound which would be retained) and therefore benefits from the screening provided by the trees to reduce landscape and visual effects on surrounding receptors. In addition, the area around the CSE compound has planting embedded into its design, which would further soften the effects. A CSE compound located at the Layham Quarry was specifically considered in response to consultation feedback as one of the alternative locations for the Dedham Vale East CSE compound (Option 2c). The Layham Quarry location is approximately 800m north-east of the proposed CSE compound location and approximately 2.1km north-east of the location of the Dedham Vale East CSE compound shown at the non-statutory consultation in March 2021. Whilst a move to Layham Quarry would locate the CSE compound further away from the AONB boundary, the additional cost associated with the extra underground cabling would not be justified in terms of policy or the

Applicant's statutory duties. In addition, the working area for an underground cable route to Layham Quarry would be constrained by the two blocks of woodland at Millfield Wood and the existing operational overhead line.

The Applicant has concluded that when taking into account all of its duties (which include the need to be economic and efficient), on balance the proposed location is considered to be suitable, and that the Dedham Vale East CSE compound should be sited at the location as proposed.

2.14 Thematic comment 13: Options and Routing – Temporary Access Route off the A131

2.14.1 Table 2.13 outlines the Applicant's comments on RR relating to the temporary access route. It includes comments on the following matters:

- General questions relating to the need for, location of and the traffic flows using the temporary access route off the A131;
- The duration the temporary access route off the A131 will be in place.
- Comments about perceived lack of surveys regarding development of the temporary access route off the A131;
- Questions regarding need for permanent access rights to the temporary access route off the A131;
- The effects of the temporary access route off the A131; and
- Questions regarding the alternatives considered to the temporary access route off the A131.

Table 2.13: Options and Routing- Temporary Access Route

Relevant Representations
C E Gardiner and Sons [**RR-026**], Lamarsh Village Hall [**RR-038**], Peter Nott [**RR-039**], Mrs Janet Bond [**RR-060**], Sarah Burgess [**RR-066**], Mr R S Donaldson [**RR-070**], Simon J Gilbey MRICS [**RR-080**], Alan Hall [**RR-083**], Harriet Heath [**RR-087**], Bruce Hill [**RR-088**], Mrs Helen Neal [**RR-105**], Belinda Nott [**RR-107**], Edmund John Nott [**RR-108**], Ian Rutledge [**RR-123**], Michael Sharp [**RR-124**], David Stocker [**RR-127**], Kerry Stocker [**RR-128**], Alison Weavers [**RR-134**].
Applicant's Comments
Following the Statutory Consultation (January – March 2022), the Applicant took time to consider the feedback received and how this could influence the final plans for the project. One key area where feedback was received related to construction traffic, with respondents suggesting that some of the roads proposed as construction traffic routes were not suitable for large construction vehicles. Further details can be found in the Consultation Report **[APP-043].** At the same time, the Applicant's ongoing technical assessments found that there are significant constraints on the highway network and a number of interventions would be required to make parts of the local road network suitable for the type of construction vehicles. The Applicant has committed to using underground cables rather than overhead lines in the Stour Valley. Construction of the underground cable sections requires cable to be delivered on large cable drums. The cable drum is large as the cable is of a large diameter and needs to be installed in long continuous sections (up to 1km) meaning that the drums need to be of a size where they can carry this length of

cable without affecting the bending radius of the cable. Due to the size of the cable drums, these need to be transported using vehicles classed as abnormal indivisible loads (AIL) which is a vehicle larger than conventional large/heavy goods vehicle and requires a police escort during deliveries. A key point of delivery is to Stour Valley West CSE compound.

Image 1: Example Cable Delivery Vehicle

It is predicted that approximately 50 AILs will be required to access this part of the project, and a further 50 AIL movements will exit in addition to HGV and LGV associated with construction activities. Whilst the existing local road network east of the A131 is currently used by HGVs and agricultural machinery, AILs are of a greater scale and there is also concern regarding the two way movement of HGVs on the local road network with existing users.

If no temporary access route off the A131 were provided (access point H-AP20 as shown on Sheet No 30 of the Access Rights of Way and Public Rights of Navigation Plans **[APP-012]**), all of the construction vehicles associated with the project would be manoeuvring on the roads to the east of A131 in addition to existing local road users and this would need to be managed. Due to the large number of AIL deliveries there would be continued disruption to local road users east of the A131 (including use by existing HGVs, LGV and other users such as equestrian users, cyclists and pedestrians).

The remedial works required to make the public highway suitable for AILs would have environmental consequences involve culverting ditches (from road widening/ creation of safe passing places), removing sections of hedgerows/ trees (landscape and visual and ecological

effects), re-grading of earthbanks which are characteristic in the area and accessing over grass verges. There is the possibility of other environmental effects associated with diverting existing services/ utilities.

The number and nature of these vehicle movements would unduly impact the public highway network over a protracted period impeding access for emergency services, and day to day activity for residential and commercial occupiers in the area including agricultural access to fields and buildings, and private use of the network in the affected area by motor vehicles (including cars, mopeds/motorcycles, goods vehicles) and non-motorised modes (pedestrian, cyclist and equestrian use).

At the request of landowners, the Applicant explored the use of a hybrid option looking at using a mixture of the local road network and temporary access across private land. When considering this option, it was determined that there would be multiple accesses and egress to the local road network (whereas the proposed temporary access route off the A131 would simply cross the local road network without turning onto it). This would require careful traffic management with staffed access points, to both manage safe access and egress of construction vehicles at interfaces with the local roads, and to prevent unauthorised access onto the temporary access route links. The Applicant is concerned about security when having multiple sections of access open and would need to have manned security at each entry and exit point.

For the above reasons the Applicant has developed plans for an additional temporary access route off the A131 to minimise the use of local roads by construction traffic so far as practicable. This would be in place for the duration of construction activities. The Applicant also looked at various different locations for the temporary access route off the A131 taking into account local constraints and project requirements. The route and size of the temporary access route off the A131 takes into account different factors, including cost, constructability, land use, environmental impacts, construction effects, vehicle types and safety. Discussions have also been held with Essex Highways, which has indicated that a temporary ghost island is likely to be required on the A131 during construction to allow construction vehicles to safely leave the A131 onto the temporary access route due to the traffic flows and speed of the road.

The Applicant notes the concerns expressed in the RR by the Interested Parties regarding the traffic and transport impacts of the project, including landscape and visual impacts associated with this and access to properties by residential and business users including agricultural access between fields and farm buildings. Concerns regarding consultation with interested parties are also noted and are addressed in Table 2.3 Thematic comment 3: Scope of the Targeted Consultation. A number of RR also state they are generally in favour of the temporary access route off the A131.

Further details on the background to the need, and other aspects of options evaluated regarding the temporary access route off the A131 is explained in the ES Chapter 3: Alternatives Considered [**APP-071**] including Table 3.15. The approach to surveys of the temporary access route off the A131 is explained in the Applicant's Response to the Rule 9 Letter Dated 24th July 2023 [**AS-005**] and the Applicant's Response to Preliminary Meeting Action on the Temporary Access Route **(application document 8.2.2)**.

As part of the EIA, consideration has been given as to how the construction of the project could impact on receptors including (amongst other key topics) landscape and visual **[APP-074],** biodiversity **[APP-075],** agriculture and soils **[APP-079],** traffic and transport **[APP-080],** and noise and vibration **[APP-082]**. Further details are provided on agriculture and soils at Table 2.23 Thematic comment 23 Agriculture and Soils. The intention of the temporary access route off the A131 is to reduce use by construction traffic off the local roads so far as practicable. The detailed design of the temporary access route off the A131, and the works planning and programming by the main works contractor (once appointed) will aim to reduce adverse impact.

At the targeted consultation, some respondents questioned the temporary nature of the temporary access route off the A131. The application for development consent includes plans for a temporary access route off the A131 to be in place for the duration of construction activities, following this the access would be removed and the land reinstated (including replanting of hedgerows and removal of temporary bridging structures). However, in common with all temporary access routes on the project, the Applicant has sought permanent land rights for the Applicant to access the project in the unlikely event that major works should be required in the future. Re-use of the temporary access route off the A131 is not planned for future routine maintenance and repair of the project. Re-use of the temporary access route off the A131 would only be required for large scale replacement of cable infrastructure, an event that may not occur. However, given the importance of ensuring the integrity of the electricity transmission network, it is imperative that this right is retained to enable this access if required. Although the Applicant is seeking a permanent easement, the nature of the temporary access route off the A131 itself would be temporary land use, as the Applicant would still remove it at the end of the construction period and reinstate the land to its original condition. In the unlikely event that the temporary access route off the A131 was required during the operation of the project, the land would again be reinstated after works were complete.

2.15 Thematic comment 14: Options and Routing – Grid Supply Point (GSP) Substation

2.15.1 Table 2.14 outlines the Applicant's comments on RR relating to the GSP Substation. It includes comments on the following matters:

- Questions about the needs case for the GSP substation;
- Questions about whether the GSP needs case is solely reliant on the project; and
- Questions about potential future projects led by third-party developers and the potential for these to connect into the GSP.

Table 2.14: Options and Routing- Grid Supply Point Substation

Relevant Representations
Stour Valley Underground [**RR-045**], Ann Roberts [**RR-121**].
Applicant's Comments
It is important to recognise the Applicant's role as the owner and operator of the high voltage electricity transmission network in England. Through this role, the Applicant has a licence obligation to transport sources of electricity (such as nuclear, solar and wind) from where they are generated and connect into the transmission system to where they are needed. The Applicant is not a generator of electricity. There is an existing 132kV overhead line that is operated by the Distribution Network Operator, which is United Kingdom Power Networks (UKPN) in the east of England. UKPN distributes electricity at lower voltages to industrial, commercial and domestic users. The Applicant is proposing the removal of the existing 132kV overhead line between Burstall and Twinstead Tee and the adoption of its route for the proposed new transmission line to reduce the scale of change to the existing environment from a new transmission line. In order to facilitate the removal of the existing 132kV overhead line, UKPN confirmed to the Applicant that a mechanism for the continuation of the 132kV supply would need to be provided. The intention is to do so via the existing 400kV overhead line. However, in order to 'step-down' the power from 400kV to 132kV and enable onward distribution by UKPN, a new GSP substation (comprising two 'supergrid' transformers) is required to be constructed by the Applicant alongside various ancillary connection works. The GSP substation is therefore being built to provide continued security of supply for electricity demand in the local area and to facilitate the project on the transmission network. It is not currently designed to facilitate any generator connections. The Electricity System Operator (ESO) is a legally separate part of the National Grid group. One of the ESO's statutory duties is to agree connections onto the national electricity transmission system with developers who wish to build new electricity generation infrastructure. Not all projects that agree a potential connection location will come forward, they will need to acquire the land, planning permission and

funding amongst other considerations, which are outside of the control of both the Applicant and the ESO. The ESO cannot refuse a developer the ability to connect onto the transmission network.

The GSP substation is not currently designed for the purpose of connecting electricity generation. In order to facilitate any generation connection, further works would be required at the site. Should any separate applications be brought forward in the future, these would be considered on their own merit by the appropriate determining authority.

2.16 Thematic comment 15: Planning Considerations

2.16.1 Table 2.15 outlines the Applicant's comments on this RR expressing concern about the relationship between the respondent's development proposals and the project.

Table 2.15: Planning Considerations

Relevant Representations
Rupert Avis [**RR-055**], Simon J Gilbey MRICS [**RR-080**].
Applicant's Comments
The Applicant is aware of the planning application by Mr Rupert Avis that appears to be the subject of RR-055. The land that is the subject of this planning application is within the Order Limits for the project. The temporary use of Mr Avis's land is required for both the maintenance and dismantling of redundant infrastructure (to remove the existing 132kV line) and for access. Mr Avis submitted an outline planning application to Babergh District Council in December 2021, which was subsequently withdrawn in March 2022 (Ref: DC/21/06539) for the erection of five dwellings and associated cart lodges and parking. The planning application was resubmitted in October 2022 (Ref: DC/22/05127). The Applicant made a representation to the Local Planning Authority (Babergh District Council) in respect to DC/22/05127 drawing Mr Avis's attention to the interaction between the proposed five dwellings and the project (including the powers included in the draft DCO) and the potential interaction of the construction phases, the Applicant asked that this was fully considered. The planning application was subsequently refused in April 2023 due to conflicts with local planning policies, the absence of a Local Housing Needs Assessment with the application, and the absence of a financial contribution required due to the development's location within the 13km Zone of Influence for the Sour Valley and Orwell Estuaries Special Protection Area (SPA) and Ramsar site. The Applicant is aware that an appeal against the decision to refuse planning permission was submitted by Mr Avis on 26 July 2023. At the time of writing these comments the appeal had not yet been validated and the Applicant has therefore not had sight of the appeal documents. The Applicant's application for development consent identified application DC/22/05127 within Appendix C of the Planning Statement [**APP-160**], as a live application which overlapped with the Order limits. At the time of writing the Planning Statement, the application was awaiting a decision. The application was not included in the Applicant's Cumulative Effects Assessment (CEA) in ES Chapter 15: Cumulative Effects Assessment [**APP-083**] as it is a minor planning application, and these were excluded from the CEA as they relate to developments which are small scale and of local importance and unlikely to yield a significant effect.

The Applicant will continue to monitor the associated appeal and consider further if required.

Mr Avis has been identified as both a Category 1 owner and Category 3 person in respect of Regulation 7(1) of the Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009 (the 'APFP Regulations') and is therefore included in Parts 1 and 2 of the Applicant's Book of Reference [**APP-042**] submitted with the application for development consent. The Applicant continues to negotiate the temporary use of Mr Avis's land as detailed in the Schedule of Negotiations with Land Interests [**APP-040**].

2.17 Thematic comment 16: Construction Considerations

2.17.1 Table 2.16 outlines the Applicant's comments on RR relating to the construction. It includes comments on the following matters:

- Interested party supports the proposed undergrounding in the Stour Valley and endorses the proposal that it should be by way of directional drilling. It is noted that construction by trenching should be avoided.
- A request is made for work in the vicinity of Daws Hall Trust to be restricted to daylight (see Table 2.17, Thematic comment 17 Construction working hours); and
- Concern is raised regarding the construction phase and traffic management.

Table 2.16: Construction Considerations

Relevant Representations
Daws Hall Trust [**RR-027**], Lamarsh Village Hall [**RR-038**], Beverley Marie Baxter [**RR-056**], Graham Baxter [**RR-057**], Gavin Dines [**RR-068**], Joanne Lesley Elliott [**RR-072**], Vicki Geogina Longdon [**RR-099**], Howard James Pay [**RR-112**], David Turner [**RR-132**], Christopher Stehpen Varcoe [**RR-133**].
Applicant's Comments
Temporary construction lighting would be required during winter months and for works outside of core hours; lighting is discussed in ES Chapter 4 Project Description **[APP-072]**. The main works contractor would be required to comply with Health and Safety Executive Guide 38 – Lighting at Work, which specifies minimum lighting levels for site and task lighting. However, contractors would also be required to comply with the CEMP [**APP-177**] which is secured by Requirement 4 of the draft DCO [**APP-034**] and the Code of Construction Practise (CoCP) [**APP-178**], of which measure GG20 states 'Construction lighting will be of the lowest luminosity necessary to safely perform each task. It will be designed, positioned and directed to reduce the intrusion into adjacent properties, protected species and sensitive habitats'. Proposed access points are shown on the Access Rights of Way and Public Rights of Navigation Plans [**APP-012**]. As detailed in Section 5.5 of the Construction Traffic Management Plan (CTMP) [**APP-180**] detailed designs for access points would be produced to reduce risks and congestion by providing for the safe and efficient passage of construction traffic and would be agreed with the relevant highway authority. A new bellmouth would be constructed at each new access point, which would provide suitable clear sightlines. Practicable measures to control construction traffic would be established; measures might include suitable signage and traffic lights would only be utilised if deemed necessary.

2.18 Thematic comment 17: Construction Working Hours

2.18.1 Table 2.17 outlines the Applicant's comments on RR relating to construction working hours. It includes responses to the following matters:

- Questions relating to the core working hours requested for the project and why these are needed; and
- Questions relating to works being undertaken outside of core hours and why these are needed.

Table 2.17: Construction Working Hours

Relevant Representations
Daws Hall Trust [**RR-027**], Peter Nott [**RR-039**], Graham Baxter [**RR-057**], Simon J Gilbey MRICS [**RR-080**].
Applicant's Comments
The proposed core working hours are detailed in the Schedule 3, Paragraph 7 of the draft DCO [**APP-034**]. They include core working hours of 07:00 to 19:00, Monday to Friday, 08:00 to 17:00 on Saturdays, Sundays and Bank Holidays, and an additional hour either side of core hours for start-up and close down activities. Some work can take place outside of core working hours as defined in Schedule 3, Paragraph 7, Section 2 of the draft DCO **[APP-034].** The working hours reflect the urgent need for the project and the requirement to deliver the project by 2028. The need for the project is set out in the Need Case April 2023 [**APP-161**]. Construction of the project relies on a series of electrical outages to the electrical network that are set by the electrical system operator. The core working hours aim to reduce the risk of programme delays by allowing time to recover construction activities and reduce the risk of outage windows being missed. Any delays to the programme would result in planned electrical outages being missed with a knock-on effect of further outage windows being missed. Delays would extend further than the project and delay generation projects in the wider East Anglia region that would rely on this project being operational. Shortening the core working hours would extend the working programme and put at risk the delivery of the project by 2028. Delivering the project by 2028 is essential to enable connection of multiple contracted generation customers, support the UK Government net zero ambitions and meet the Applicant's transmission licence obligations. It should be noted that the main works contractor is yet to be appointed. The core working hours also reflect and allow for contractors shift patterns and a rolling linear construction programme. This means works would not occur along the entire length of the alignment for the full duration of the construction programme. Rather there would be periods of higher and lower intensity working in each specific area as workers responsible for different elements of construction, work their way down the line.

Varying shift patterns for workers means that down time would occur at specific locations within the working week. However, as these shift patterns would be rolling, with workers not undertaking a 5-day working week, the day on which downtime may occur would vary from week to week. It is therefore necessary to include a provision in the core working hours to account for these working patterns. Shift patterns would vary between workers responsible for constructing the different elements of the work.

Working outside of the core working hours may at times be required as has been included in Paragraph 7(2) of Schedule 3 of the draft DCO [**APP-034**]. In addition to other activities listed in the draft DCO, this is required at trenchless crossings in the event that the drilling operation could not be stopped safely within the core working hours to ensure further time was available to safely complete the drill length. This is due to the risk of equipment becoming stuck, or the trenchless crossing collapsing if work is halted before the drill is complete.

To minimise the impact of construction activities, such as noise, light, air quality and construction traffic, the Applicant's main works contractor would carry out construction works in line the management plans submitted with the application for development consent including the CEMP [**APP-177**] which is secured by Requirement 4 of Schedule 3 of the draft DCO and the Code of Construction Practise (CoCP) [**APP-178**].

2.19 Thematic comment 18: Environmental Assessment

2.19.1 Table 2.18 outlines the Applicant's comments on RR relating to the EIA undertaken for the project and where the measures to reduce significant effects are secured. It includes responses to the following matters:

- General questions relating to the EIA undertaken for the project;
- General environmental effects on the countryside and general area; and
- General environmental effects associated with construction such as noise, air quality and disruption.

Table 2.18: Environmental Assessment

Relevant Representations
CARE Suffolk CIC [**RR-025**], Fiske Farms and Fiske Lands Trust [**RR-034**], Lamarsh Village Hall [**RR-038**], Suffolk Preservation Society [**RR-048**], John Duncan Irvine Bennett [**RR-058**], Richard Stephen Best [**RR-059**], Mrs Janet Bond [**RR-060**], Sarah Burgess [**RR-066**], Gavin Dines [**RR-068**], Joanne Lesley Elliott [**RR-072**], Family representative on behalf of Evans [**RR-075**], Nicholas Hugh Hammond [**RR-084**], Philippa Harding [**RR-085**] Vicki Georgina Longdon [**RR-099**], William Longdon [**RR-100**], Nick Miller [**RR-103**], Edmund John Nott [**RR-108**], Mrs Helen Neal [**RR-105**], Francis Prosser [**RR-115**], Jonathan Prosser [**RR-116**], Patricia Prosser [**RR-117**], Elizabeth Robinson [**RR-122**], Ian Rutledge [**RR-123**], Kerry Stocker [**RR-128**], Mrs Clare Tubbs [**RR-131**], Alison Weavers [**RR-134**], Caroline Wolton [**RR-137**], Liz Wright [**RR-138**].
Applicant's Comments
In relation to matters raised about the environmental impacts of the project and how these will be considered as part of the decision making process, the Applicant can confirm that an EIA has been undertaken for the project and is presented in the ES in Volume 6 of the application for development consent. The EIA presented in the ES will help inform the decision-making process. The ES documents the likely significant effects that are anticipated as a result of constructing and operating the project. Where a significant effect has been identified, the ES presents the proposed mitigation that would be implemented to reduce the significance of the effect. The RRs note concerns about the effects of the project on the landscape, habitats, soil quality the local road network and local residents and communities. As part of the EIA, consideration has been made to how the construction and operation of the project could impact on receptors including landscape and visual **[APP-074]**, biodiversity **[APP-075]**, agriculture and soils **[APP-079]**, traffic and transport **[APP-080]**, air quality **[APP-081]** and noise and vibration **[APP-082]**. Many of the RR refer to general construction effects on wildlife, dust, noise and pollution. Further specific responses can be found in Table 2.16 Thematic Comment 16 (Construction Considerations), Table 2.19

Thematic Comment 19 (Landscape and Visual), Table 2.23 Thematic Comment 23 (Agriculture and Soils) and Table 2.24 Thematic Response 24 (Traffic and Transport).

The RRs also note concerns about how effects would be managed during construction. The Applicant notes that the CEMP **[APP-177]**, the Code of Construction Practice (CoCP) **[APP-178]** and the REAC **[APP-179]** set out the embedded and good practice measures committed to as part of the project to reduce effects on people, local communities and the environment during construction. The CTMP **[APP-180]** also sets out measures to reduce effects on receptors using the road network and public rights of way (PRoW). The CTMP identifies the routes for construction vehicles to take to reduce negative impacts on the local road network and communities living alongside. The Landscape and Ecological Management Plan (LEMP) **[APP-182]** outlines how vegetation would be protected and managed during construction and how any vegetation removed by the project would be reinstated following construction. All of the management plans are secured through Requirement 4 of the draft DCO **[APP-034]**.

2.20 Thematic comment 19: Landscape and Visual

2.20.1 Table 2.19 outlines the Applicant's comments on RRs relating to the landscape and visual impact assessment undertaken for the project. It includes responses to the following matters:

- General questions about the landscape and visual effects that may be experienced on the project; and
- Where the landscape and visual impact assessment can be found in the application documents.

Table 2.19: Landscape and Visual

Relevant Representations
Fiske Farms and Fiske Lands Trust [**RR-034**], Suffolk Preservation Society [**RR-048**], Joyce Georgina Evans [**RR-073**], Family representative on behalf of Evans [**RR-075**], Howard James Pay [**RR-112**], Mary Reid **[RR-118]**.
Applicant's Comments
ES Chapter 3: Alternatives Considered [**APP-071**] describes the option appraisal, including the landscape and visual aspects that were considered during the corridor and alignment routing. This acknowledges that there is a visual preference to run the proposed 400kV overhead line parallel to the existing 400kV overhead line where practicable. There are instances, where a non-parallel alignment has been chosen due to other site constraints, for example Hintlesham Woods SSSI and on the approach to Bramford Substation. Paragraph 5.7.18 of the Planning Statement states '*As informed by the supplementary note to Holford Rule 6, which is in turn endorsed by paragraph 2.8.5 of EN-5, policy advises to 'arrange wherever practicable, parallel or closely related routes with tower [pylons] types, spans and conductors forming a coherent appearance'. When developing the overhead line indicative alignments, the visual preference was for the existing 400kV overhead line and any proposed 400kV overhead line to run in parallel and close together, to avoid placing overhead lines in areas where there are currently no overhead lines.'* In terms of the visual effect of the project, the Landscape and Visual Impact Assessment is presented in ES Chapter 6: Landscape and Visual [**APP-074**] along with supporting Appendix 6.4: Viewpoint Assessment [**APP-101 to APP-107**] and also Appendix 6.5: Assessment of Visual Effects on Communities [**APP-108**]. Table 2.7 Thematic comment 7: Strategic Options – Overhead Lines versus Underground Cables provides the Applicant's comments on overhead lines versus underground cables.

2.21 Thematic comment 20: Historic Environment

2.21.1 Table 2.20 outlines the Applicant's comments on RR relating to the historic environment. It includes responses to the following matters:

- Concerns expressed regarding archaeology in particular questioning if the Applicant is aware of the Roman Villa behind St Barnabas Church, Alphamstone, nearby bronze urns and associated Roman tile kiln and
- Questioning whether archaeological surveys will include aerial thermography and ground penetrating radar.
- Questioning as to whether any archaeology of potential value would be affected by the trenchless crossings.

Table 2.20: Historic Environment

Relevant Representations
Ian Rutledge [**RR-123**].
Applicant's Comments
The archaeological sites considered within the application are listed in ES Appendix 8.1: Historic Environment Baseline [**APP-125**] and the supporting Gazetteer **[APP-126].** The Roman Villa at Alphamstone (ID 1011807) is described in paragraph 2.5.3 in ES Appendix 8.1: Historic Environment Baseline **[APP-125]** and listed in Table 2.1 in the ES Appendix 8.1 Annex A Gazetteer **[APP-126].** The Roman Tile Kiln (MEX29636) is mentioned in paragraph 2.3.6 in ES Appendix 8.1: Historic Environment Baseline **[APP-125]** with the scheduled monument. ES Appendix 8.2: Historic Environment Impact Assessment **[APP-127]** presents the full impact assessment of the project (including the trenchless crossings), including on archaeological sites. Section 3.2 outlines the assessment in relation to Scheduled Monuments, including the Roman villa at Alphamstone (ID 1011807). This concludes that there would be no direct physical effects on scheduled monuments during construction or operation, or any effects arising from changes to setting. This is because the project would have no visual impact on the remains given that it would be an underground cable and the Order limits lie over 400m from the Scheduled Monument. The same applies to the Tile Kiln site (MEX29636) to the north of the scheduled monument. It is unclear which 'bronze urns' are being referred to, but if recorded these will have been removed from their original context and not at risk from the project. The Archaeological Framework Strategy (AFS) **[APP-186]** sets out the approach to surveys taken on the project. This document has been reviewed by the archaeological advisors at Essex and Suffolk County Council, and their comments were considered when producing the version of the AFS submitted with the application for development consent. Table 8.1 in ES Chapter 8: Historic Environment **[APP-076]**

summarises the surveys that have been undertaken on the project, which commenced with aerial investigation and mapping (AIM), which included the interpretation of aerial images and LiDAR. This was followed with geophysical surveys which in turn informed trial trenching, which ground-truths the results of the AIM and geophysics in those areas where archaeological remains would be at risk from the project.

2.22 Thematic comment 21: Surface Water Management

2.22.1 Table 2.21 outlines the Applicant's comments on RR relating to surface water management. It includes responses to the following matters:

- Questions regarding the impact of constructing temporary access routes and reinstatement that would be undertaken on removal; and
- Questions regarding the impact of temporary access routes on drainage and run off and how this would be controlled.

Table 2.21: Surface Water Management

Relevant Representations
C E Gardiner and Sons [**RR-026**].
Applicant's Comments
The impacts of the project on the water environment are provided in ES Chapter 9: Water Environment **[APP-077]**. The good practice measures set out in the CEMP **[APP-177]** (in particular Section 9 which sets out measures that will be implemented to reduce the risk of surface water runoff during construction) and Appendix A of the CEMP (CoCP) **[APP-178]** includes measures to manage construction site runoff (e.g. W03 to W08). Measures will be implemented to protect the water environmental from pollution. Regarding concerns raised over drainage systems and water / soil run off, the temporary access route off the A131 will have permeable surfaces where the ground conditions allow or will be designed to achieve green field rates. Runoff across the site will be controlled through a variety of methods including header drains, buffer zones around watercourses, on-site ditches, silt traps and bunding. There will be no intentional discharge of silted or otherwise contaminated site runoff to ditches, watercourses, drains or sewers without appropriate treatment and agreement of the appropriate authority. Land drains and ditch locations will be identified based on existing land drainage plans and/or site observations. In accordance with good practice measure W16 in the CoCP [**APP-178**], where appropriate, land drainage will be installed (either temporary or permanent) to maintain the integrity of existing field drainage systems for the duration of works.

2.23 Thematic comment 22: Geology and Hydrogeology

2.23.1 Table 2.22 outlines the Applicant's comments on RR relating to the hydrogeological assessment undertaken for the project. It includes responses to the following matters:

- Questions about the effects of the project on groundwater sources and private water supplies; and
- Questions specifically around the trenchless crossing to the south of Ansells Grove on groundwater sources.

Table 2.22: Geology and Hydrogeology

Relevant Representations
Christopher Stephen Varcoe [**RR-133**].
Applicant's Comments
A groundwater risk assessment has been undertaken and is presented in ES Appendix 10.2: Groundwater Baseline and Assessment [**APP-131**]. This includes an assessment of the potential risks to identified receptors (including private water supplies) from the project, including from open cut and trenchless construction techniques proposed for the installation of the underground cables. With regard to the trenchless crossing to the south of Ansell's Grove, Section 3.3 of the groundwater risk assessment [**APP-131**] concludes that groundwater levels are expected to be below the base of opencut trenches, such that dewatering, or discharges are not anticipated during construction, and therefore impacts (from changes to groundwater flows and levels) on the identified receptors are not anticipated. In relation to the trenchless crossing to the south of Ansells Grove, paragraph 3.4.46 of the groundwater risk assessment [**APP-131**] describes that the assumed trenchless crossing technique of Horizontal Directional Drilling (HDD) does not require dewatering to facilitate drilling. Therefore, impacts (from changes to groundwater flows and levels) on the identified receptors at this location are not anticipated. As described in paragraph 3.4.39 of the groundwater risk assessment [**APP-131**], the launch and receptor pits for the HDD would be approximately 1.2m deep and therefore above the anticipated groundwater level at the western end of the trenchless section, closest to the private water supply. As stated in paragraph 3.4.40, dewatering is unlikely to be required to facilitate the excavation of the pits, and therefore impacts (from changes to groundwater flows and levels) on the identified receptors are not anticipated.

Section 10.3 of the CEMP [**APP-178**] also sets out further good practice measures in relation to managing impacts and risks to private water supplies during construction.

2.24 Thematic comment 23: Agriculture and Soils

2.24.1 Table 2.23 outlines the Applicant's comments on RR relating to the agriculture and soils assessment undertaken for the project. It includes responses to the following matters:

- Questions about the effects of the project on soil and best and most versatile land;
- Concerns about compaction of soil during construction and whether this would degrade soil quality; and
- Concerns about viability of agricultural businesses during construction.

Table 2.23: Agriculture and Soils

Relevant Representations
C E Gardiner and Sons [**RR-026**].
Applicant's Comments
ES Chapter 11 Agriculture and Soils **[APP-079]** sets out the assessment of impacts on agriculture and soil receptors. During construction the assessment recognises that there would be an impact on best and most versatile (BMV) land mainly associated with the CSE compounds, the underground cables and the GSP substation; as well as disturbance to soils, either through direct stripping of the soil resource to enable construction works or through surface activity (for example compaction from vehicle movement across the surface), which can affect soil quality and associated soil functions. Temporary access route construction will typically consist of geotextile overlain with stone, which would be designed to support the weight and movement of construction traffic. In constructing the temporary access route topsoil would generally be stripped and stockpiled, in line with the Construction Code of Practice for the Sustainable Use of Soils on Construction Sites (Defra, 2009), before being reinstated upon removal of the temporary access route. During reinstatement the land would be returned to agricultural use, with the appropriate soil conditions, including any subsoil drainage, recreated to a depth of 1.2m (or the maximum natural soil depth if this is shallower), except over buried cables where the reinstated soil depth will be approximately 0.9m. Where compaction of subsoils has occurred, this will be relived through a suitable method, such as ripping. Soil surveys recommenced on the project for all the undergrounded cable sections and the temporary access off the A131 in summer 2023. Findings from these surveys, alongside those presented in ES Appendix 11.1: Agricultural Land Classification Survey **[APP-133],** will be

utilised in the development of appropriate soil handling strategies. A large proportion of this land would be reinstated by the end of the construction phase with no discernible loss or reduction of soil functions (including productivity).

This would be achieved through the implementation of good practice measures set out in ES Chapter 11 Agriculture and Soils [**APP-079**] and as detailed in the CEMP **[APP-177]** and Appendix A of the CEMP (CoCP) **[APP-178].** These would be used to protect the quality of soils during construction, when they are stripped, stockpiled and restored. These measures have been developed based on published guidance in relation to soil management.

The assessment produced in ES Chapter 11 Agriculture and Soils **[APP-079]** has shown that with the proposed good practice measures in place, no residual significant adverse effects have been identified for agriculture and soils, with the exception of the permanent loss of BMV land as a result of the construction of the CSE compounds and the GSP substation. This includes no residual adverse significant impacts on soil fertility.

2.25 Thematic comment 24: Traffic and Transport

2.25.1 Table 2.24 outlines the Applicant's comments on RR relating to traffic and transport. It includes responses to the following matters:

- General questions relating to the amount of construction traffic forecast and the impact on the safety and operation of the road network;
- General questions about the level of detail on the number of access points/tracks to access construction works location, and their form (e.g. could there be lesser visibility splay); and
- General questions about project development/design detail – why is more detail not given.

Table 2.24: Traffic and Transport

Relevant Representations
Daws Hall Trust [**RR-027**], Lamarsh Village Hall [**RR-038**], Mr R S Donaldson [**RR-070**], Angus Charles Goswell [**RR-081**], Mr Robert McCabe [**RR-102**], Mrs Helen Neal [**RR-105**], Sandra O'Sullivan [**RR-109**], Joan Valerie Peacock [**RR-113**].
Applicant's Comments
As part of the EIA, consideration has been given as to how the construction of the project could impact on receptors including traffic and transport **[APP-080].** A Transport Assessment **[APP-061]** has been submitted as part of the application for development consent. The Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a project. It establishes the baseline transport conditions relevant to the project; identifies the future transport conditions and transport impacts of the project; and illustrates whether mitigation is required for transport issues generated by the project. The Transport Assessment demonstrates that there would be no substantial adverse impacts upon the transport network. Traffic generated would be limited and the impacts would be temporary during the construction phase of the project. The proposed construction traffic routes and flows between the strategic road network and the construction access points are shown on Figure 1: Traffic and Transport Study Area of the Transport Assessment [**APP-061**]. A CTMP **[APP-180]** has been prepared for the project. As detailed in Section 5.5 of the CTMP [**APP-180**] detailed designs for access points would be produced to reduce risks and congestion by providing for the safe and efficient passage of construction traffic and would be agreed with the relevant highway authority. For each new access, a bellmouth would be constructed, which would provide suitable clear sightlines. Practicable measures to control construction traffic would be established; measures might include suitable signage and traffic

lights would only be utilised if deemed necessary. Proposed access points are shown on the Access Rights of Way and Public Rights of Navigation Plans [**APP-012**].

A Traffic Regulation Order (TRO) would be required for regulating traffic on roads in proximity to the authorised development, including if a road needs to be closed or diverted temporarily during construction. Article 47 of the draft DCO allows National Grid and its main works contractor to introduce TRO for the purposes specified in Schedule 12 and, with the consent of the traffic authority, to any other extent for the construction of the authorised development. Details of proposed temporary road restrictions are stated in the TRO Plans **[APP-011].**

See Table 2.13 Thematic comment 13: Options and Routing – Temporary Access Route off the A131 for the drivers for the temporary access route off the A131, also see Applicant's Response to Rule 9 Letter Dated 24th July 2023 **[AS-005].**

2.26 Thematic comment 25: Public Rights of Way (PRoW)

2.26.1 Table 2.25 outlines the Applicant's comments on RR relating to PRoW. It includes responses to the following matters:

- General questions relating to PRoW – specifically for walkers/cyclists/horse-riders (WCH); and,
- Requests that PRoW remain open during construction activities.

Table 2.25: Public Rights of Way

Relevant Representations
Niall Fraser [**RR-078**], Joan Valerie Peacock [**RR-113**].
Applicant's Comments
As stated in paragraph 4.4.46 in ES Chapter 4: Project Description [**APP-072**], no PRoW would be permanently stopped up or diverted on the project. The Applicant has identified a number of PRoW that would be affected temporarily during construction. These are shown on the Access, Rights of Way and Public Rights of Navigation Plans **[APP-012].** Schedule 7 of the draft DCO [**APP-034**] provides details of PRoW to be temporarily stopped up, for which a diversion is to be provided (Schedule 7 Part 1) and for which no diversion is to be provided (Schedule 7 Part 2). ES Chapter 12: Traffic and Transport **[APP-080]** assesses the temporary effects on PRoW during construction. This concludes that there are no residual significant effects on PRoW. Details on how PRoW will be managed during construction can be found in Chapter 6 of the CTMP **[APP-180].** As stated in Section 6.3 of the CTMP [**APP-180**], it is the intention of the Applicant to keep the majority of PRoW effectively open via management where it is safe to do so and the use of temporary closures where necessary during specific activities. Any required temporary diversions will be clearly marked at both ends with signage explaining the diversion, the duration of the diversion and a contact number for any concerns. Paragraphs 4.4.47 to 4.4.50 of ES Chapter 4 Project Description **[APP-072]** outlines the Applicant's preferred method for managing, diverting or suspending the public right to use the respective PRoW (temporary closure). Although not a designated PRoW, Hadleigh Railway Walk is well used by cyclists and pedestrians. The Applicant has made a commitment to keep this route open to users by using scaffolding and netting to provide safety for users from overhead works (EM-C01) as detailed in CEMP Appendix B – REAC [**APP-179**], secured through Requirement 4 of the draft DCO [**APP-034**].

2.27 Thematic comment 26: Cumulative Effects

2.27.1 Table 2.26 outlines the Applicant's response to RR relating to the cumulative effects assessment (CEA) undertaken for the project. It includes responses to the following matters:

- General questions about how the CEA has been undertaken;
- Whether certain proposed developments have been considered as part of the CEA on the project;
- How the GSP substation has been considered as part of the application and the CEA;
- General questions about the cumulative effects that may be experienced on the project; and
- Particular concerns regarding the cumulative effects with other developments around Bramford Substation.

Table 2.26: Cumulative Effects

Relevant Representations
CARE Suffolk CIC [**RR-025**], Stour Valley Underground [**RR-045**], Suffolk Preservation Society [**RR-048**], Joanne Lesley Elliott [**RR-072**], Family representative on behalf of Evans [**RR-075**], Brooks Leney [**RR-097**], Chris Leney [**RR-098**], Edmund John Nott [**RR-108**], Sandra O'Sullivan **[109],** William Peterson [**RR-114**], Caroline Wolton [**RR-137**].
Applicant's Comments
The EIA presented in the ES is in accordance with the Infrastructure Planning (EIA) Regulations 2017, which require that the environmental topic assessments undertaken evaluate and identify the likely significant environmental effects arising from the project. The Applicant has undertaken a CEA for the project and the results are presented in ES Chapter 15: CEA **[APP-083]** and its accompanying appendices **[APP-140 to APP-144].** As stated in Section 4.1 of ES Chapter 4: Project Description **[APP-072]**, the GSP substation forms a principal part of the development assessed with the ES. Therefore, the effects arising from the GSP substation have been assessed as part of the impact assessment within the ES topic chapters (Chapters 6 to 14) and the GSP substation is not then duplicated in the CEA as a separate proposed development. ES Chapter 15: CEA **[APP-083]** includes an assessment of inter-project cumulative effects (where receptors are potentially affected by more than one development at the same time). This considered other nationally significant infrastructure projects within 50km of the project,

including the proposed Norwich to Tilbury project (formerly known as East Anglia GREEN), and major developments (as defined under the Town and Country Planning (Development Management Procedure) (England) Order 2015, as amended) within 10km of the project. A search period of 10 years preceding the planned start of construction for the GSP substation (construction anticipated to start in 2023 under the baseline construction schedule; search period starting in 2013) was used to identify other proposed developments in the planning system with a potential temporal overlap with the project based on the information available at the time of the assessment.

As stated in Paragraph 15.4.53 in ES Chapter 15: CEA **[APP-083]**, the CEA was undertaken once the conclusions of the environmental assessments had been reached and assumes that any measures or mitigation identified within those assessments is in place before undertaking the CEA.

During operation, the project would have a significant adverse effect on the landscape of the Ancient Plateau Claylands (2a near Bramford Substation) Landscape Character Area (LCA) within 1km of the existing Bramford Substation, reducing to not significant for the wider LCA (see Table 2.1 in ES Appendix 15.5 **[APP-144]**). The Applicant acknowledges that there would be cumulative effects arising from other proposed developments around Bramford Substation (including the proposed Norwich to Tilbury project). The inter-project CEA reported in ES Chapter 15 **[APP-083]** concludes that there would be significant cumulative landscape and visual effects arising between the project and two other developments during operation: East Anglia THREE and Norwich to Tilbury. Operational cumulative effects in relation to East Anglia THREE would reduce to a non-significant level by year 20 of East Anglia THREE. The potential for significant cumulative effects would be greatest close to Bramford Substation, where multiple lines are already present in the baseline and the new overhead lines associated with the proposed Norwich to Tilbury (based on the proposed project design as it stood at the point at which the CEA was undertaken), would be most intervisible and would add to the overall influence of high voltage electricity infrastructure. The inter-project CEA **[APP-083]** concludes that additional mitigation, such as planting, would not reduce these effects to a non-significant level, because the effects cannot be fully screened by tree planting due to the height of the pylons.

However, as detailed in the Planning Statement [**APP-160**] Paragraph 2.8.2 of EN-5 states that '*Government does not believe that development of overhead lines is generally incompatible in principle with developers' statutory duty under section 9 of the Electricity Act to have regard to amenity and to mitigate impacts.'* Additionally, paragraph 5.9.8 of EN-1 recognises that *'virtually all nationally significant energy infrastructure projects will have effects on the landscape'.* Further details on how this effect weighs in the overall planning balance of the project can be found in Section 10.6 of the Planning Statement [**APP-160**].

ES Chapter 6: Landscape and Visual [**APP-074**] identifies properties that could benefit from landscape softening in this location which are also identified in the LEMP. Softening was identified for properties in close proximity to the proposed 400kV overhead line where the main aspect of the property would potentially have open views and where new planting would integrate with existing vegetation patterns. As stated

in paragraph 6.11.7 of ES: Chapter 6 [**APP-074**] the decision to screen or filter a view with planting would be discussed with the relevant properties, who may choose to retain a view without the proposed landscape softening.

The Applicant has proposed Biodiversity Net Gain planting to the west of Bramford Substation as documented in the Environmental Gain Report submitted with the application for development consent [**APP-176**]; this is outside of the EIA process but would assist with filtering views.

The Applicant has provided the most up-to-date assessment based on the information available at the time of assessment. It has had due regard to feedback received from stakeholders, including the relevant planning authorities and the Planning Inspectorate on the developments to be included in the CEA.

2.28 Thematic comment 27: Health – Electric and Magnetic Fields

2.28.1 Table 2.27 outlines the Applicant's comments to RR relating to, amongst other issues, concerns regarding the potential health impacts of the project from exposure to electric and magnetic fields.

Table 2.27: Health-Electric and Magnetic Fields

Relevant Representations
William Brian Sidney Bryce [**RR-065**], Family representative on behalf of Evans [**RR-075**], Patricia Prosser [**RR-117**].
Applicant's Comments
The UK has implemented a number of policies for managing and protecting against electric and magnetic fields (EMF) from anthropogenic sources. This includes both numerical exposure guidelines to protect against established, acute effects of EMF, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMF at lower levels. These policies have been set by the Government on the advice of their independent advisers (the UK Health Security Agency) and are incorporated into the decision-making process for development consent in the National Policy Statement (NPS) for Electricity Networks Infrastructure (EN-5). The Electric and Magnetic Fields Compliance Report **[APP-056]** submitted as part of the application for development consent, sets out the Government's policy on electric and magnetic field exposures and demonstrates the project complies with those polices set to provide protection against exposure and precautionary policies in NPS EN-5. There are no established health effects of low frequency EMF below these guideline limits.

2.29 Thematic comment 28: Health – Mental Health

2.29.1 Table 2.28 outlines the Applicant's comments on RR relating to the mental health effects of the project. It includes responses to comments about the impact of the proposals and consultation process on individuals' mental and physical health.

Table 2.28: Health- Mental Health

Relevant Representations
Peter Nott [**RR-039**], John Duncan Irvine Bennett [**RR-058**], Sarah Burgess [**RR-066**], Sandra O'Sullivan **[109]**, Francis Prosser [**RR-115**].
Applicant's Comments
The Applicant recognises that the planning, construction and operation of major infrastructure projects can cause stress, uncertainty and anxiety that may impact on people's mental health. To date, the Applicant has endeavoured to clearly communicate the proposals, including through the establishment of dedicated contact channels, a project website and by holding multiple rounds of public consultation as the plans became more refined. As the project has progressed, the Applicant has sought to provide certainty on the plans wherever possible. All of the consultations have included easily accessible information on the plans at that stage, along with opportunities to engage directly with the project team (such as via webinars, Ask the Experts appointments and public exhibitions). The Applicant considered the potential effects of its proposals on people as part of the EIA in the form of assessments on Air Quality [**APP-081**], Noise and Vibration [**APP-082**] Landscape and Visual [**APP-074**] and Traffic and Transport **[APP-080]**. ES Appendix 6.5 [**APP-108**] also sets out the potential visual effect on communities, whilst Appendix A CEMP [**APP-178**] sets out the good practice measures to reduce effects on people and local communities during construction and also includes a commitment to communicate information about the proposed works to local communities. Where appropriate, the Applicant has tailored its approach to suit the needs of individuals, such as by offering home visits or individual meetings. Despite this, the Applicant acknowledges that it cannot respond positively to every request to change the proposals, and that some will disagree with the decisions made. The Applicant notes that some parties disagree with the overall need case for the reinforcement or with the overarching principles of building a new stretch of overhead line. With regard to this, paragraph 2.8.2 of EN-5 states that '*Government does not believe that development of overhead lines is generally incompatible in principle with developers' statutory duty under section 9 of the Electricity Act to*

have regard to amenity and to mitigate impacts'. More detail can be found in Chapter 3 of the Planning Statement **[APP-160]** and the Need Case **[APP-161]**.

The Applicant will always be happy to engage with those interested to discuss the plans and explain the rationale behind decisions. The Applicant will continue to communicate content relating to the project clearly.

2.30 Thematic comment 29: Affected Parties, Land Interests and Compensation

2.30.1 Table 2.29 outlines the Applicant's comments to RR relating to Persons with an Interest in Lands (PILs), and land interests. It includes responses to the following matters:

- Various statements on properties not being able to sell or being markedly devalued as a result of the project on their land or adjacent their land;
- A statement on the difficulty of farming resulting from the project (also see Table 2.23 Thematic comment 23 agriculture and soils);
- Various statement on visual impact (see Table 2.19 Thematic comment 19: Landscape and visual);
- Statement on disruption to business and future income;
- A statement that land take or loss should be mitigated or fully compensated; and
- Statements on lack of engagement (see Table 2.2 and 2.3 Thematic comments 2 and 3).

Table 2.29: Affected Parties, Land Interests and Compensation

Relevant Representations
C E Gardiner and Sons [**RR-026**], Fiske Farms and Fiske Lands Trust [**RR-034**], Howlett Alphamstone Land [**RR-037**], Peter Nott [**RR-039**], Robert Shelley [**RR-040**], Mead Farms [**RR-041**], Beverley Marie Baxter [**RR-056**], Graham Baxter [**RR-057**], Richard Stephen Best [**RR-059**], Andrew Bryce [**RR-062**], Sarah Burgess [**RR-066**], Robert Arthur David Cowlin [**RR-067**], Gavin Dines [**RR-068**], William Eric Drake [**RR-071**], Joyce Georgina Evans [**RR-073**], Michael Donald Evans [**RR-074**], Malcolm Frost [**RR-079**], Simon J Gilbey MRICS [**RR-080**], Angus Charles Goswell [**RR-081**], Alan Hall [**RR-083**], James Harris [**RR-086**], David Hopps [**RR-089**], J and J Howard [**RR-090**], Linda Keenan [**RR-093**], Mr Robert McCabe [**RR-102**], Pami Nixon [**RR-106**], Edmund John Nott [**RR-108**], Veronica Ann Overall [**RR-110**], Howard James Pay [**RR-112**], Francis Prosser [**RR-115**], Mr Nicholas Reid [**RR-119**], Elizabeth Robinson [**RR-122**], Sprotts Farmland [**RR-126**], Frank Thorogood [**RR-129**], Mrs Nicola Tindall [**RR-130**], David Turner [**RR-132**].
Applicant's Comments
The Applicant has undertaken to pay fair compensation in accordance with the well-established Compensation Code. The Compensation Code is described in 'Government advice on Compulsory Purchase' and there are relevant statutes and case law to assist in the assessment of compensation. Any stakeholder or claimant who feels they are owed or due compensation should seek the advice of their appointed agent or representative, in the first instance. This agent or representative should be suitably qualified to act in

relation to Compensation and who, should have an understanding of the Royal Institution of Chartered Surveyors (RICS) Professional Statement 'Surveyors Advising in Respect of Compulsory Purchase.' The Applicant would reimburse reasonable and reasonably properly incurred professional and legal fees for advising on and preparing a compensation claim (but not for attendance at the examination or for making objections to the project unless so ordered by the Inspectorate).

Where relevant, the Applicant's land agent is continuing to engage with affected parties and stakeholders to come to an agreement in the form of an option agreement. Appendix B to the Statement of Reasons **[APP-040]** reflects the engagement to date.

3. Applicant's Comments on Relevant Representations of Selected Organisations

3.1 Babergh and Mid Suffolk District Councils [RR-001] and Suffolk County Council [RR-006]

3.1.1 The Applicant welcomes the continued engagement from Suffolk County Council and Babergh and Mid Suffolk District Councils who are 'Host Authorities', as part of the project falls within their geographical jurisdiction. Although Babergh District Council and Mid Suffolk District Council are legally separate councils, since 2011, they have been working together and they share many services, including a planning service, have the same office location and are currently preparing a Joint Local Plan. As such, Babergh District Council and Mid Suffolk District Council submitted a combined RR. The Applicant has provided comments jointly on RR provided by Suffolk County Council and Babergh and Mid Suffolk District Councils as they share common themes.

3.1.2 The Applicant has been engaging with the Host Authorities since the project restarted and has been progressing a Statement of Common Ground (SoCG) [**APP-168**]. An updated SoCG is provided to the Examining Authority at Deadline 1, which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 3.1 –Babergh and Mid Suffolk District Councils and RR-006 Suffolk County Council

Key Issue	Applicant's Comments
Planting and Climate Change	Section 8.2 of the LEMP [**APP-182**] details that '*trees and shrubs will be of local provenance (to reduce risks associated with disease when importing stock from overseas sources).* Local provenance plants are considered to be suitable to local conditions, including soil and climate. The LEMP [**APP-182**] is secured via Requirement 4 of the draft DCO [**APP-034**]. The Applicant notes the request to explore the use of climate resistant stock. Additionally, Requirement 9 (reinstatement planting plan) of the draft DCO [**APP-034**] prevents any stage of the authorised development from being brought into operational use until 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. The reinstatement planting plan must be in general accordance with the LEMP [**APP-182**] approved under Requirement 4.

Key Issue	Applicant's Comments
Landscape Impacts (General)	Paragraph 2.8.2 of NPS EN-5 (2011) states that *'Government does not believe that development of overhead lines is generally incompatible in principle with developers'* statutory duty under section 9 of the Electricity Act to have regard to amenity and to mitigate impacts. Additionally, paragraph 5.9.8 of EN-1 recognises that *'virtually all nationally significant energy infrastructure projects will have effects on the landscape'*. Further details on the planning balance of the project can be found in Section 10.6 of the Planning Statement [**APP-160**].
Landscaping around Bramford Substation	See Table 2.26 Thematic comment 26: Cumulative Effects.
Vegetation Removal around Bramford Substation	The development authorised by the DCO must be undertaken in accordance with the LEMP [**APP-182**], pursuant to Requirement 4 of the draft DCO [**APP-034**]. The LEMP includes Appendix A: Vegetation Retention and Removal Plan [**APP-182**] and Appendix B: Vegetation Reinstatement Plan [**APP-183**] which are secured through Requirement 9 of the draft DCO [**APP-034**]. The LEMP Appendix A: Vegetation Retention and Removal Plan [**APP-182**] details on Sheet 01 the vegetation removal proposed along Bullen Lane, to access Bramford Substation. This comprises pruning to the roadside hedgerows and lines of trees (H-AB-018 & H-AB-064) to allow safe access for construction vehicles.
CSE compound embedded measures, and placemaking	The Applicant has undertaken an options appraisal of the CSE compounds, which considered alternative locations and took into account the local landform and existing screening when determining the preferred locations. The environmental effects associated with each of the different CSE compound locations explored are presented in Table 3.13 of ES Chapter 3: Alternatives Considered [**APP-071**]. Planting has been embedded into the design of the project at each CSE compound to help filter views of it from surrounding receptors. See EM-D01, EM-F01, EM-G03 and EM-G06 in the REAC [**APP-179**] and as shown on LEMP Appendix B: Vegetation Reinstatement Plan [**APP-184**] which shows the location of proposed embedded planting at the CSE compounds. The detailed design and procurement stage of the project, which would happen post-consent, will further refine the design and layout of the CSE compounds within their site, taking into account detailed ground levels and the final positioning of the embedded planting and fencing.

Key Issue	Applicant's Comments
	Requirement 9 (Reinstatement planting plan), Schedule 3 of the draft DCO [**APP-034**] prevents any stage of the authorised development from being brought into operational use until 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. The reinstatement planting plan must be in general accordance with the LEMP [**APP-182**] approved under Requirement 4, Schedule 3 of the draft DCO. At this stage, the Applicant will consult the relevant planning authority on the detailed design. Adopting a placemaking approach implies creating the right to public access which is not proposed for any of the CSE compound locations.
Dedham Vale East CSE Compound (within the RR of Babergh and Mid Suffolk District Councils only)	See Table 2.12 Thematic Comment 12: Options and Routing – Cable sealing end (CSE) compound.
Extent of Undergrounding (within the RR of Babergh and Mid Suffolk District Councils only)	The Applicant notes the Councils' comments concerning the proposals for an overhead line between the AONB and the Stour Valley Project Area (Section F: Leavenheath/Assington); as this section falls between two sections of underground cable. The extent of undergrounding on the project has been a key theme raised and considered throughout the various consultations and project engagement. Thematic Comment 7 considers the relative merits of underground cables versus overhead lines on the project. Consultation was originally undertaken in May 2012, focussing on the indicative alignment and provided information on undergrounding in two sections of the route (one in Dedham Vale AONB and the other in the Stour Valley). The Connection Options Report (COR) [**APP-164**] considered an underground option for each section of the project and assessed the environmental, socio economic, technical and cost issues associated with each option. The Applicant considered whether the use of underground cables, rather than overhead lines in Section F, was an appropriate approach in the context of national policy and the Applicant's various statutory duties.

Key Issue	Applicant's Comments
	The estimated capital cost of undergrounding through Section F: Leavenheath/Assington was estimated at £111.8m, compared to a cost of £8.4m for the interim overhead alignment. The estimated lifetime costs are £117m and £22m respectively (correct at the time of publication of the COR). The COR [**APP-164**] also considered the planning policy context at that time, which the Applicant notes, has moved on since 2012 (and the Government are currently in the process of adopting replacement NPS). The Applicant has continued to backcheck earlier work against new and emerging policy, including the consideration of the extant and draft replacement NPS in the Planning Statement [**APP-160**] in respect to the topic of undergrounding. Following feedback received during consultation on the project, the Applicant undertook a back check and review to see if there was justification to extend the underground cable through Section F: Leavenheath/Assington. This came to the same conclusion as the COR [**APP-164**], that Section F is not designated and is not considered to be particularly sensitive in the context of paragraph 2.8.2 of NPS EN-5. The Applicant undertook a Setting Study on the Dedham Vale AONB which forms ES Appendix 6.2 Annex A Dedham Vale AONB Approach and Identification of Setting Study [**APP-099**]. ES Chapter 6: Landscape and Visual [**APP-074**] subsequently concluded that, although parts of Section F lie within the setting of the AONB, the magnitude of change associated with the project is considered to be small, when seen in the context of the existing 400kV overhead line (and the removal of the existing 132kV overhead line). Therefore, undergrounding within Section F: Leavenheath/Assington is considered to be disproportionate, having regard to the policy tests set out in NPS EN-5, given that the landscape outside of the AONB is not designated or particularly sensitive, although some areas are within the area identified as part of the setting. The Applicant has concluded that, when taking into account all of their duties and the baseline environment and consultation feedback in this Section, overhead lines should remain the preferred approach in Section F: Leavenheath/Assington. More details on the approach to undergrounding can be found in Chapters 5 and 7 of the Planning Statement [**APP-160**].
Cumulative impacts with Norwich to Tilbury	See Table 2.26 Thematic Comment 26: Cumulative Effects.
Placemaking Bramford Substation	Some of the cumulative developments around Bramford Substation are at an early stage of development and therefore could change through landowner engagement and negotiations, technical design considerations,

Key Issue	Applicant's Comments
	consultation and the EIA process during later stages of development. At this stage it is not possible to predict the location of infrastructure to inform any further planting proposals to reduce cumulative landscape and visual effects. The Applicant will of course continue to work internally with the Norwich to Tilbury project and its appointed landscape architects and are committed to engaging more widely with other developers in the area to ensure a combined and joined up approach to landscaping proposals around Bramford Substation. The Applicant is committed to Mid Suffolk District Council's strategic cumulative working group in the Bramford area and is happy to engage and provide appropriate information on its proposals as required.
Hintlesham Woods Routeing	The Council's acknowledge that the routeing option at Hintlesham Woods would avoid potentially unacceptable impacts upon the Hintlesham Woods SSSI.
Biodiversity Net Gain	Requirement 13 (Biodiversity Net Gain), Schedule 3 of the draft DCO [**APP-034**] provides that, unless otherwise agreed, written evidence (in the form of the outputs of the biodiversity metric) demonstrating how at least 10% in biodiversity net gain is to be delivered as part of the authorised development, must be submitted to the relevant planning authority no later than the date on which that part of the authorised development comprising the installation of new overhead electricity transmission line and underground electricity transmission line is first brought into operational use. No further securing mechanism is required.
Hintlesham Hall Micrositing & Mitigation	ES Appendix 8.2: Annex A Hintlesham Hall Assessment [**APP-128**] presents the assessment of effects on Hintlesham Hall and its ancillary buildings. This concludes that there would be a minor adverse effect on these receptors that is not significant and also notes that although there would be harm to the setting of Hintlesham Hall and its ancillary buildings, this would be less than substantial. Paragraph 4.5.4 of Appendix 8.2: Annex A Hintlesham Hall Assessment [**APP-128**] states that *'This level of harm would be justified given the public benefits of the project, which enables the transmission of greater amounts of energy around the electricity network'.* Additionally, the Applicant has included a commitment in the REAC [**APP-179**] which states '*The Proposed Alignment to the north of Hintlesham Hall is based on the pylon locations from the optimised alignment discussed with English Heritage (now Historic England) in 2013. The Applicant will continue to work with Historic England as the designs develop to identify the most suitable location for the pylons in relation to the setting of Hintlesham Hall, taking into account the limits of deviation and technical considerations such as distance between conductor spans*'. No significant effect has been identified to Hintlesham Hall or its setting and, therefore, no additional mitigation is proposed (additional to the planting proposed as an embedded measure shown on LEMP Appendix B: Vegetation

Key Issue	Applicant's Comments
	Reinstatement Plan [**APP-183**]). However, the Applicant is proposing to partially restore the original tree lined avenues to the south-west of Hintlesham Hall as detailed in the Environmental Gain Report [**APP-176**] (Environmental Area: ENV02). The enhancement proposals seek to balance enhancing the parkland features whilst limiting impacts on the surrounding land use and local farming businesses.
Archaeological Mitigation	Requirement 6 (Archaeology) of the draft DCO [**APP-034**] includes an overarching requirement that the authorised development must be undertaken in accordance with the AFS [**APP-186**] and the Outline Written Scheme of Investigation (OWSI) [**APP-187**]. Securing these measures as part of the REAC [**APP-179**] in addition to Requirement 6 of the draft DCO [**APP-034**] would lead to duplication and potentially conflict of wording.
Surface Water During Construction	The impacts of the project on the water environment are provided in ES Chapter 9: Water Environment **[APP-077]**. The good practice measures set out in the CEMP **[APP-177]** (in particular Section 9 which sets out measures that will be implemented to reduce the risk of surface water runoff during construction) and Appendix A of the CEMP (CoCP) **[APP-178]** which includes measures to manage construction site runoff (e.g. W03 to W08) will be implemented to protect the water environmental from pollution.
Mineral Safeguarding	The Applicant welcomes the comments in respect of the project's acceptable impact upon existing minerals resources. ES Appendix 10.3: Minerals Resource Assessment (MRA) [**APP-123**] contains the MRA for the project.
Best and Most Versatile Land	See Table 2.23 Thematic Comment 23: Agriculture and Soils. ES Chapter 11: Agriculture and Soils [**APP-079**] details the likely significant effects of the project on Agriculture and Soils. Agriculture and soil receptors include BMV land (as defined by the Agricultural Land Classification (ALC) system) and land holdings in agricultural use. As detailed at Section 11.12 of Chapter 11: Agriculture and Soils [**APP-079**], the assessment has concluded that there are no likely significant residual effects in relation to agriculture and soils during construction or operation. Chapter 11 of the CEMP [**APP-177**] outlines the measures that would be employed by the main works contractor during construction in relation to soil management.
Monitoring and Enforcement of Construction Traffic	Chapter 8 of the CTMP [**APP-180**] describes the proposed monitoring and checks that would be undertaken by the Applicant and its main works contractor during construction to check compliance with the CTMP. Chapter 8 of the CTMP also describes the implementation and enforcement process.
Pre-Commencement Operations	Requirement 4 (Management Plans) of the draft DCO [**APP-034**] clarifies that 'pre-commencement operations' will be controlled by the CEMP [**APP-177**] (which includes by way of appendix, the CoCP [**APP-178**] and the REAC

Key Issue	Applicant's Comments
	[**APP-179**]) the CTMP [**APP-177**], the Materials and Waste Management Plan (MWMP) [**APP-181**] and the LEMP [**APP-182**] each of which the Applicant will be required to comply with in carrying out the authorised development.
Environmental Impact of Temporary Accesses	An EIA has been undertaken for the project including temporary access routes and is presented in the ES in Volume 6 of the application for development consent. The EIA presented in the ES will help inform the decision-making process. The ES documents the likely significant effects that are anticipated as a result of constructing and operating the project. Where a significant effect has been identified, the ES presents the proposed mitigation that would be implemented to reduce the significance of the effect. See Table 2.23 Thematic Comment 23: Agriculture and Soils and Table 2.21 Thematic Comment 21: Surface Water Management. ES Chapter 7: Biodiversity [**APP-075**] defines the study area for biodiversity which relates to construction activities, including compounds and temporary access routes. As detailed in Section 7 of the LEMP [**APP-182**], vegetation removed during the construction phase would be reinstated post-construction. The development authorised by the DCO must be undertaken in accordance with the LEMP [**APP-182**], pursuant to Requirement 4 of the draft DCO [**APP-034**]. The LEMP includes Appendix A: Vegetation Retention and Removal Plan [**APP-182**] and Appendix B: Vegetation Reinstatement Plan [**APP-183**] which are secured through Requirement 9 of the draft DCO [**APP-034**].
Public Rights of Way (PRoW)	See Table 2.25 Thematic comment 25: PRoW.
Air Quality Management Area	The Applicant confirms proposals to avoid construction traffic routeing via Sudbury Air Quality Management Area (AQMA), as secured via good practice measure AQ01 as detailed in the CoCP [**APP-178**].
Dust	A Dust Risk Assessment [**APP-135**] has been produced to support and inform ES Chapter 13: Air Quality [**APP-081**]. This concludes that following the application of the good practice measures set out within the CEMP [**APP-177**] and CoCP [**APP-178**] that the residual risk of dust would be reduced to negligible and therefore no additional mitigation is required.
Working Hours	See Table 2.17 Thematic Comment 17: Construction Considerations.
Socio Economic and Tourism	The Scoping Report [**APP-156**] concluded that the project was unlikely to result in significant effects on socio economics, recreation and tourism, when taking into account the embedded and good practice measures. The

Key Issue	Applicant's Comments
	Planning Inspectorate (on behalf of the Secretary of State) in the Scoping Opinion [**APP-159**] broadly agreed with the scoping out of aspects as a standalone chapter, but identified that further information, including an updated baseline, was required in some areas to support the scoping conclusion. As such, the Socio Economics and Tourism Report [**APP-066**] was submitted as part of the application which confirms this conclusion, that there are no likely significant effects from the project in relation to socio economics including impacts to businesses, job creation and employment, and tourism. As such, no further assessment is proposed on this issue.
Community Benefits	Whilst it has been determined that there are no likely significant effects on socio economics and tourism associated with the project, the Applicant is committed to continuing discussions with the host Authorities and other key stakeholders regarding their aspirations in respect of community benefits. These discussions would be outside of the DCO process whilst we await the outcome of the Government's consultation.
Electric Magnetic Fields (EMF)	The UK has implemented a number of policies for managing and protecting against EMF from anthropogenic sources. This includes both numerical exposure guidelines to protect against established, acute effects of EMF, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMF at lower levels. These policies have been set by the Government on the advice of their independent advisers (the UK Health Security Agency) and are incorporated into the decision-making process for development consent in the NPS for Electricity Networks Infrastructure (EN-5). The Electric and Magnetic Fields Compliance Report **[APP-056]** submitted as part of the application for development consent, sets out the Governments policy on electric and magnetic field exposures and demonstrates the projects compliance with those polices set to provide protection against exposure and precautionary policies in NPS EN-5. There are no established health effects of low frequency EMF below these guideline limits. The Applicant's expert in this field held a seminar with the host authorities to explain the contents of this report.
Draft Development Consent Order (DCO)	The Applicant was grateful to receive comments from the Council on an early draft of the DCO which was shared with the Host Authorities on a without prejudice basis in August 2022. The Applicant has had due regard to all comments received. As has been noted, a number of points raised by those Host Authorities were subsequently incorporated in the draft DCO submitted with the application for development consent [**APP-034**]. Where changes were not ultimately capable of being incorporated, the Applicant considers that necessary justification for the approach taken has been provided in the Explanatory Memorandum [**APP-035**]. **The Definition of 'Commencement'**

Key Issue	Applicant's Comments
	The definition of 'commence' set out in Article 2(1) of the draft DCO [**APP-034**] closely follows the equivalent definition used in previous National Grid projects, save that a decision was taken by the Applicant to include in Article 2(1) a separate definition of 'pre-commencement operations'" for reasons of clarity. Paragraphs 3.6.14 to 3.6.16 of the Explanatory Memorandum [**APP-035**] explain how the Applicant anticipates that the definitions of 'commence" and 'pre-commencement operations" will operate in practical terms, and in light of the control mechanisms set out in the Management Plans (comprising the CEMP [**APP-177**] (which includes by way of appendix, the CoCP [**APP-178**] and the REAC [**APP-179**]), the CTMP [**APP-180**], the MWMP [**APP-181**] and the LEMP [**APP-182**]). Compliance with the Management Plans is secured through Requirement 4 of the draft DCO. **The Limits of Deviation** The Applicant notes that the approach sought in respect of the limits of deviation for the project is well precedented. Taking into account the nature of the project, the Applicant requires horizontal (i.e. lateral and longitudinal) and vertical limits of deviation for the overhead electric line works and the underground electric line works, as well as other permanent (non-linear) above ground structures forming part of the authorised development. Paragraph 3.9 of the Explanatory Memorandum [**APP-035**] explains in detail the purpose and effect of Article 5 of the draft DCO [**APP-034**]. Paragraph 3.9 should be read alongside the Guide to the Plans [**APP-007a**], the Work Plans [**APP-010**] and ES Chapter 4: Project Description [**APP-072**]. **Street Works** The Applicant notes the comments raised in respect of Articles 11, 15, 17 and 47, and Requirement 11 of the draft DCO [**APP-034**]. **Stopping up Streets and PRoW; Constructing, Altering and Maintaining Streets and Regulating Traffic** Paragraphs 3.15, 3.19, 3.21 and 3.51 of the Explanatory Memorandum [**APP-035**] explain in detail the intended purpose and effect of Articles 11, 15, 17 and 47 in the draft DCO. Paragraph 4.3.31 of the Explanatory Memorandum addresses Requirement 11 (Highway Works) of the draft DCO. The Applicant proposes to enter into a framework highways agreement (or similar) with Essex County Council and Suffolk County Council (each in its capacity as local highways authority) in order to regulate how powers derived

Key Issue	Applicant's Comments
	pursuant to Articles 11, 15, 17 and 47 would be exercised during construction of the project. Article 18 of the draft DCO anticipates such an agreement being entered into. The Applicant envisages that such an agreement, once concluded, would obviate the need for any additional requirements to be included in Schedule 3 to the draft DCO. **Felling or Lopping of Trees** Paragraph 3.52 of the Explanatory Memorandum [**APP-035**] explains in detail the purpose and effect of Article 48 of the draft DCO [**APP-034**]. The Applicant considers that the powers set out in Article 48 are both necessary and proportionate given the overriding need to ensure that minimum electrical safety clearances are capable of being maintained at all times during construction and operation of the project. **The Drafting of Certain Requirements** Paragraphs 4.3.21 to 4.3.31 (inclusive) of the Explanatory Memorandum [**APP-035**] explain in detail the purpose and effect of Requirements 7, 8, 10 and 11 of Schedule 3 to the draft DCO [**APP-034**]. The Applicant considers that the above mentioned Requirements are appropriately drafted taking account of the overarching needs case for the project, the nature and geographic location of the project and approach successfully adopted by the Applicant and other promoters on other recent linear infrastructure projects. **Timeframes for Determining Applications and Fees** Paragraph 4.4 of the Explanatory Memorandum [**APP-035**] explains the approach taken by the Applicant in respect of the matters set out in Schedule 4 to the draft DCO [**APP-034**]. The Applicant would also note that its proposed approach in terms of both the timescales and fees for determining applications submitted pursuant to the DCO (if made) is reflective of the approach successfully adopted by the Applicant in relation to the delivery of other linear infrastructure projects, including those spanning multiple administrative boundaries. The Applicant would intend to work closely with the relevant discharging authorities to ensure that the timescales set out in Schedule 4 can be met. In particular, the Applicant anticipates that close future engagement will be facilitated by a Planning Performance Agreement (PPA). It is envisaged that, as part of a future PPA, pre-application 'shadow' submissions to the relevant discharging authority would be made by or on behalf of the Applicant. Comments raised by the relevant discharging authority as part of that pre-engagement process would, where appropriate, be addressed by the Applicant prior to the formal submission of the application pursuant to Schedule

Key Issue	Applicant's Comments
	4. This process, which the Applicant would be pleased to discuss in detail with the relevant discharging authorities, will allow all future applications to be determined swiftly and within the timescales set out in Schedule 4 to the draft DCO [**APP-034**].

3.2 East Suffolk Council [RR-003]

3.2.1 East Suffolk Council is a district within Suffolk County Council and is a neighbouring authority to the project and is located approximately 8km to the south-east of the project (at its closest point). East Suffolk Council is considered a 'local authority' for the purposes of Section 42(1)(b) of the Planning Act (2008) as it shares a boundary with the 'Host Authority'.

Table 3.2 –East Suffolk Council

Key Issue	Applicant's Comments
Neighbouring authority to the project and maintains an interest in the Examination on the basis of potential cumulative impacts with other consented, planned, and known Nationally Significant Infrastructure Projects in the region.	The Applicant has continued to consult East Suffolk Council as a neighbouring authority as part of the on-going consultation exercises on the project. East Suffolk Council responded to the Statutory Consultation, with comments confined to matters of cumulative effects, and specifically inter-project cumulative effects. Further details of the Applicant's response to the matters raised at Statutory Consultation can be found in the Consultation Report [**APP-043**] and cumulative effects with other proposed development are assessed within the ES Chapter 15: Cumulative Effects Assessment [**APP-083**].

3.3 Essex County Council [RR-004] and Braintree District Council [RR-002]

3.3.1 The Applicant welcomes the continued engagement from Essex County Council and Braintree District Council who are 'host authorities' as part of the project falls within their geographical jurisdiction. The Applicant has provided comments jointly on the RR provided by Essex County Council and Braintree District Council as they share common themes.

3.3.2 The Applicant has been engaging with the host authorities since the project restarted and has been progressing a SoCG [**APP-168**]. An updated SoCG is provided to the Examining Authority at Deadline 1, which reflects the latest position. The Applicant has considered the RR and directs the Examining Authority to where comments have been addressed in the application.

Table 3.3 –Essex County Council and RR-04 Braintree District Council

Key Issue	Applicant's Comments
Planting and Climate Change	Section 8.2 of the LEMP [**APP-182**] details that '*trees and shrubs will be of local provenance (to reduce risks associated with disease when importing stock from overseas sources).* Local provenance plants are considered to be suitable to local conditions, including soil and climate. The LEMP [**APP-182**] is secured via Requirement 4 of the draft DCO [**APP-034**]. Additionally, Requirement 9 (reinstatement planting plan), Schedule 3 of the draft DCO [**APP-034**] prevents any stage of the authorised development from being brought into operational use until 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. The reinstatement planting plan must be in general accordance with the LEMP [**APP-182**] approved under Requirement 4 of the draft DCO [**APP-034**].
Landscape Impacts (General)	Paragraph 2.8.2 of NPS EN-5 (2011) states that *'Government does not believe that development of overhead lines is generally incompatible in principle with developers'* statutory duty under section 9 of the Electricity Act to have regard to amenity and to mitigate impacts. Additionally, paragraph 5.9.8 of EN-1 recognises that *'virtually all nationally significant energy infrastructure projects will have effects on the landscape'*. Further details on the planning balance of the project can be found in Section 10.6 of the Planning Statement [**APP-160**].
Redundant 132kV Overhead Line	In line with the Transmission Licence obligation to be coordinated and work to rationalise networks, the Applicant has discussed ten spans of the 132kV overhead line between Twinstead Tee and the GSP since the return of the project in early 2020. The removal of the 132kV overhead line between Twinstead Tee and the GSP substation is not required for the project. This asset is owned and operated by UKPN and is its decision to retain or remove this equipment, as detailed in Table 7.6 (ref: G53) of the Consultation Report **[APP-043]**.

Key Issue	Applicant's Comments
Cumulative impacts with the proposed Norwich to Tilbury project	See Table 2.26 Thematic Comment 26: Cumulative Effects.
Biodiversity Net Gain	Requirement 13 (Biodiversity Net Gain) of the draft DCO [**APP-034**] provides that, unless otherwise agreed, written evidence (in the form of the outputs of the biodiversity metric) demonstrating how at least 10% in biodiversity net gain is to be delivered as part of the authorised development, must be submitted to the relevant planning authority no later than the date on which that part of the authorised development comprising the installation of new overhead electricity transmission line and underground electricity transmission line is first brought into operational use.
Vegetation Protection and Compensation	The LEMP Appendix A: Vegetation Removal Plan [**APP-184**] details the proposed vegetation removal, coppicing and pruning required for the Proposed Alignment. Chapter 6 of the LEMP [**APP-183]** provides further details on how vegetation would be protected during construction. The LEMP Appendix B: Vegetation Reinstatement Plan [**APP-184**] details the location of proposed embedded planting, reinstatement planting, landscape softening, habitat compensation and additional planting required to mitigate an environmental effect. The plan cross refers to the specification for the planting in LEMP Appendix C: Planting Schedules [**APP-185],** which sets out the proposed planting and seed mixes.
Archaeological Mitigation	Requirement 6 (Archaeology) of the draft DCO [**APP-034**] includes an overarching requirement that the authorised development must be undertaken in accordance with the AFS [**APP-186**] and the OWSI [**APP-187**].
Heritage Assets (General)	ES Chapter 8: Historic Environment [**APP-126**] summarises the likely significant effects on the historic environment. The detailed assessment in relation to specific listed buildings, including the setting, can be found in Section 4.2 and Table 4.2 of ES Appendix 8.2: Historic Environment Impact Assessment [**APP-127**]. Paragraph 8.12.1 of ES Chapter 8: Historic Environment [**APP-076**] states that there would be no residual significant adverse effects on the historic environment. This includes non-designated historic buildings as listed in Section 4.4 of ES Appendix 8.2: Historic Environment Impact Assessment [**APP-127**].
Temporary Access Route off the A131 (Historic Impacts)	ES Chapter 8: Historic Environment [**APP-126**] summarises the likely significant effects on the historic environment, including as a result of noise and vibration during the construction of the temporary access route of the A131.

Key Issue	Applicant's Comments
Limits of Deviation	The assessment presented within Sections 6 to 10 of each ES topic chapter identifies the likely significant effects based on the Proposed Alignment. The sensitivity testing presented in Section 11 of each topic chapter of the ES assesses potential differences that could result from the use of flexibility that is allowed for within the draft DCO [**APP-034**], to identify whether this would result in new or different significant effects to those assessed in Sections 6 to 10 of each ES topic chapter. The only ES chapter that has identified potential new or different significant effects through the application of the Limits of Deviation (LoD) is Chapter 14: Noise and Vibration [**APP-082**], which notes the potential for significant adverse effects at four additional Noise Sensitive Receptors. The mitigation measures in respect to this are outlined in Chapter 14 of the CEMP [**APP-177**].
Water quality /Hydrogeology	The implementation of the good practice measures within the CoCP [**APP-178**] would reduce pollution risks associated with construction traffic, dewatering of deeper excavations, drilling at trenchless crossings, soil stripping and the subsequent stockpiling and storage of soil in working areas. The change to water quality attributes of surface watercourses is assessed to be small, with short term minor adverse effects that are not significant. In accordance with good practice measure GH07 of the Code of CoCP [**APP-178**], a hydrogeological risk assessment would be undertaken once the trenchless crossing method has been confirmed during the detailed design phase. This will assess the risks on surface and ground water quality associated with the construction method (including considering the potential for breakout during drilling) and to devise suitable drilling designs informed by ground investigation data. Where the risk assessment identifies an unacceptable risk to groundwater or surface water quality, then alternative methods and/or additives shall be proposed, assessed and used.
Contaminated Land	ES Appendix 10.1: Geology Baseline and Preliminary Risk Assessment [**APP-030**] describes the areas where a known risk of contamination has been identified and notes a low risk within the Order limits. Section 10.3.10 of the CEMP [**APP-177**] explains that good practice measure GH01 sets out the process that will be followed in relation to areas of both known and unknown contamination.
Grid Supply Point Substation sustainable drainage strategy (SuDS)	Requirement 5 (Approval and implementation of Drainage Management Plan) of the draft DCO [**APP-034**] prevents any stage of the authorised development from being brought into operational use until a Drainage Management Plan (DMP), addressing matters related to the management of operational surface water and foul water drainage, has been approved by the relevant planning authority. Thereafter, the operational use of each

Key Issue	Applicant's Comments
	stage of the authorised development must be in accordance with the DMP as approved or as otherwise amended with the approval of the relevant planning authority. It is also worth mentioning that the Applicant obtained planning permission for the GSP substation under the Town and Country Planning Act in October 2022 (Application Reference: 22/01147/FUL) in advance of the application for development consent. Planning conditions are attached to this decision in respect to the proposed surface water drainage strategy at the site.
Mineral Safeguarding	The Applicant welcomes the comments in respect of the project's acceptable impact upon existing minerals resources. ES Appendix 10.3: Minerals Resource Assessment [**APP-123**] contains the MRA for the project.
Best and Most Versatile Land	See Table 2.23 Thematic Comment 23: Agriculture and Soils. ES Chapter 11: Agriculture and Soils [**APP-079**] details the likely significant effects of the project on Agriculture and Soils. Agriculture and soil receptors include BMV land (as defined by the ALC system) and land holdings in agricultural use. As detailed at Section 11.12 of Chapter 11: Agriculture and Soils [**APP-079**], the assessment has concluded that there are no likely significant residual effects in relation to agriculture and soils during construction or operation. Chapter 11 of the CEMP [**APP-177**] outlines the measures that would be employed by the main works contractor during construction in relation to soil management
Monitoring and Enforcement of Construction Traffic	Chapter 8 of the CTMP [**APP-180**] describes the proposed monitoring and checks that would be undertaken by the Applicant and its main works contractor during construction to check compliance with the CTMP. Chapter 8 of the CTMP also describes the implementation and enforcement process.
Pre-Commencement Operations	Requirement 4 (Management Plans) of the draft DCO [**APP-034**] clarifies that 'pre-commencement operations' will be controlled by the CEMP [**APP-177**] (which includes by way of appendix, the CoCP [**APP-178**] and the REAC [**APP-179**]) the CTMP [**APP-177**], the MWMP [**APP-181**] and the LEMP [**APP-182**] each of which the Applicant will be required to comply with in carrying out the authorised development.
Environmental Impact of Temporary Accesses	An EIA has been undertaken for the project including temporary access routes and is presented in the ES in Volume 6 of the application for development consent. The EIA presented in the ES will help inform the decision-making process. The ES documents the likely significant effects that are anticipated as a result of constructing

Key Issue	Applicant's Comments
	and operating the project. Where a significant effect has been identified, the ES presents the proposed mitigation that would be implemented to reduce the significance of the effect. See Table 2.23 Thematic Comment 23: Agriculture and Soils and Table 2.21 Thematic Comment 21: Surface Water Management. ES Chapter 7: Biodiversity [**APP-075**] defines the study area for biodiversity which relates to construction activities, including compounds and temporary access routes. As detailed in Section 7 of the LEMP [**APP-182**], vegetation removed during the construction phase would be reinstated post-construction. The development authorised by the DCO must be undertaken in accordance with the LEMP [**APP-182**], pursuant to Requirement 4 of the draft DCO [**APP-034**]. The LEMP includes Appendix A: Vegetation Retention and Removal Plan [**APP-182**] and Appendix B: Vegetation Reinstatement Plan [**APP-183**] which are secured through Requirement 9 of the draft DCO [**APP-034**].
Public Rights of Way (PRoW)	See Table 2.25 Thematic Comment 25: PRoW.
Dust	A Dust Risk Assessment [**APP-135**] has been produced to support and inform ES Chapter 13: Air Quality [**APP-081**]. This concludes that following the application of the good practice measures set out within the CEMP [**APP-177**] and CoCP [**APP-178**] that the residual risk of dust would be reduced to negligible and therefore no additional mitigation is required.
Working Hours	See Table 2.17 Thematic Comment 17: Construction Considerations.
Noise and Vibration Impacts of Temporary Access	Noise associated with the temporary access routes is considered as part of the noise assessment presented in ES Chapter 14: Noise and Vibration [**APP-082**]. Initial locations where additional noise mitigation may be required have been identified in ES Chapter 14: Noise and Vibration [**APP-082**]. The main works contractor would apply for Section 61 consents, where required, under The Control of Pollution Act 1974.
Socio Economic and Tourism	The Scoping Report [**APP-156**] concluded that the project was unlikely to result in significant effects on socio economics, recreation and tourism, when taking into account the embedded and good practice measures. The Planning Inspectorate (on behalf of the Secretary of State) in the Scoping Opinion [**APP-159**] broadly agreed with the scoping out of aspects as a standalone chapter, but identified that further information, including an updated baseline, was required in some areas to support the scoping conclusion. As such, the Socio Economics

Key Issue	Applicant's Comments
	and Tourism Report [**APP-066**] was submitted as part of the application which confirms this conclusion, that there are no likely significant effects from the project in relation to socio economics including impacts to businesses, job creation and employment, and tourism. As such, no further assessment is proposed on this issue.
Community Benefits	Whilst it has been determined that there are no likely significant effects on socio economics and tourism associated with the project, the Applicant is committed to continuing discussions with the Host Authorities and other key stakeholders regarding their aspirations in respect of community benefits. These discussions would be outside of the DCO process whilst we await the outcome of the Government's consultation.
Electric Magnetic Fields (EMF)	The UK has implemented a number of policies for managing and protecting against EMF from anthropogenic sources. This includes both numerical exposure guidelines to protect against established, acute effects of EMF, and precautionary policies to provide appropriate protection against the possibility of chronic effects of EMF at lower levels. These policies have been set by the Government on the advice of their independent advisers (the UK Health Security Agency) and are incorporated into the decision-making process for development consent in the NPS for Electricity Networks Infrastructure (EN-5). The Electric and Magnetic Fields Compliance Report **[APP-056]** submitted as part of the application for development consent, sets out the Governments policy on electric and magnetic field exposures and demonstrates the projects compliance with those polices set to provide protection against exposure and precautionary policies in NPS EN-5. There are no established health effects of low frequency EMF below these guideline limits. The Applicant's expert in this field held a seminar with the host authorities to explain the contents of this report.
Draft Development Consent Order (DCO)	The Applicant was grateful to receive comments from the Council on an early draft of the DCO which was shared with the Host Authorities on a without prejudice basis in August 2022. The Applicant has had due regard to all comments received. As has been noted, a number of points raised by those Host Authorities were subsequently incorporated in the draft of the DCO submitted with the application [**APP-034**]. Where changes were not ultimately capable of being incorporated, the Applicant considers that necessary justification for the approach taken has been provided in the Explanatory Memorandum [**APP-035**]. **Relevant/Necessary Requirements** Schedule 3 to the draft DCO [**APP-034**] contains the Requirements which the Applicant reasonably considers are necessary and appropriate in the context of the project. In doing so, the Applicant has had regard to paragraph 4.1.7 of the Overarching NPS for Energy (EN-1) (July 2011) and paragraph 4.1.16 of the consultation draft of the Overarching NPS for Energy (EN-1) (March 2023), each of which sets out the threshold criteria

relating to the imposition of Requirements. The intended purpose and effect of those Requirements is set out in detail in paragraph 4.3 of the Explanatory Memorandum [**APP-035**].

The Definition of 'Commencement'

The definition of 'commence' set out in Article 2(1) of the draft DCO [**APP-034**] closely follows the equivalent definition used in previous National Grid projects, save that a decision was taken by the Applicant to include in Article 2(1) a separate definition of 'pre-commencement operations' for reasons of clarity. Paragraphs 3.6.14 to 3.6.16 of the Explanatory Memorandum [**APP-035**] explain how the Applicant anticipates that the definitions of 'commence' and 'pre-commencement operations' will operate in practical terms, and in light of the control mechanisms set out in the Management Plans (comprising the CEMP [**APP-177**] (which includes by way of appendix, the CoCP [**APP-178**] and the REAC [**APP-179**]), the CTMP [**APP-180**], the MWMP [**APP-181**] and the LEMP [**APP-182**]). Compliance with the Management Plans is secured through Requirement 4 of the draft DCO [**APP-034**].

Materially New or Materially Different Environmental Effects

The Applicant's EIA has been undertaken on a reasonable worst-case basis, taking account of the limits of deviation and other parameters as set out in Article 5 of the draft DCO [**APP-034**] and the Work Plans [**APP-010**]. The EIA methodology is further described in ES Chapter 5: EIA Approach and Method [**APP-073**].

The draft DCO also includes a further safeguard mechanism (principally applicable in respect of the power of maintenance as set out in Article 4, and the approval or agreement by the relevant planning or highways authority of minor or immaterial changes to matters set out in the Requirements) such that the power may only be exercised where it would not give rise to materially new or materially different environmental effects from those assessed in the ES.

Delivery and Decommission

The Need Case [**APP-161**] explains the operational requirement to deliver the project in its entirety.

The part of the project comprising the installation of a new above ground electricity line is a Nationally Significant Infrastructure Project (NSIP) pursuant to Section 14(1)(b) and Section 16 of the Planning Act 2008. By virtue of this classification, a DCO is required as a matter of law in order for the Applicant to construct and operate the project. As Section 2.2 of the Planning Statement [**APP-160**] explains, other elements of the project are

'associated development' within the meaning of Section 115 of the Planning Act 2008. This includes the GSP substation.

Section 4.12 of the Planning Statement notes that planning permission has already been obtained for the GSP substation. The Applicant's intention is for the GSP substation to be constructed in advance of development consent being granted for the project. Once constructed, the GSP substation will facilitate the removal as part of the project of the existing 132kV overhead electricity line between Burstall Bridge and Twinstead Tee (this is part of the electricity distribution network operated by UKPN). Removal of this section of existing 132kV overhead electricity line is necessary to enable construction of the new above ground electricity line.

The Limits of Deviation

The Applicant notes that the approach sought in respect of the limits of deviation for the project is well precedented. Taking into account the nature of the project, the Applicant requires horizontal (i.e. lateral and longitudinal) and vertical limits of deviation for the overhead electric line works and the underground electric line works, as well as other permanent (non-linear) above ground structures forming part of the authorised development. Paragraph 3.9 of the Explanatory Memorandum [**APP-035**] explains in detail the purpose and effect of Article 5 of the draft DCO [**APP-034**]. Paragraph 3.9 should be read alongside the Guide to the Plans [**APP-007a**], the Work Plans [**APP-010**] and ES Chapter 4: Project Description [**APP-072**].

Associated Development

In determining the extent of 'associated development' as set out in Schedule 1 to the draft DCO [**APP-034**], the Applicant has had regard to both the relevant provisions in the Planning Act 2008 (including Sections 14, 16 and 31) and current Guidance (*'Planning Act 2008: associated development applications for major infrastructure projects'*) issued by the Ministry of Housing, Communities & Local Government and dated April 2013 (the Guidance). Whilst recognising that the ultimate decision as to what constitutes 'associated development' rests with the Secretary of State for Energy Security and Net Zero, the Applicant considers that the 'associated development' included in Schedule 1 to the draft DCO is consistent with the principles set out at Paragraph 5 of the Guidance and is, pursuant to Paragraph 6 of the same, of a kind which is necessary to support a nationally significant infrastructure project of this nature.

Works to the River Stour

Key Issue	Applicant's Comments
	Article 50 of the draft DCO [**APP-034**] would enable the Applicant to temporarily interfere with, and suspend, existing public rights of navigation along a short section of the River Stour (as shown on Sheet 20 the Access Rights of Way and Public Rights of Navigation Plans [**APP-012**]) for the purposes of constructing part of the project. Paragraphs 4.4.51 and 4.4.52 of ES Chapter 4: Project Description [**APP-072**] describe the way in which works forming part of the project are anticipated to be carried out over and beneath the River Stour. The Applicant would intend to follow the temporary closure procedure (including publicity requirements) as prescribed at the relevant time by the Environment Agency acting in its capacity as the navigation authority for this particular section of the River Stour. **Street Works** The Applicant notes the comments raised in respect of Articles 11, 15, 17 and 47, and Requirement 11 of Schedule 3 to, the draft DCO [**APP-034**]. **Stopping up Streets and PRoW; Constructing, Altering and Maintaining Streets and Regulating Traffic** Paragraphs 3.15, 3.19, 3.21 and 3.51 of the Explanatory Memorandum [**APP-035**] explain in detail the intended purpose and effect of Articles 11, 15, 17 and 47 in the draft DCO. Paragraph 4.3.31 of the Explanatory Memorandum addresses Requirement 11 (Highway Works) of Schedule 3 to the draft DCO. The Applicant proposes to enter into a framework highways agreement (or similar) with Essex County Council and Suffolk County Council (each in its capacity as local highways authority) in order to regulate how powers derived pursuant to Articles 11, 15, 17 and 47 would be exercised during construction of the project. Article 18 of the draft DCO anticipates such an agreement being entered into. The Applicant envisages that such an agreement, once concluded, would obviate the need for any additional requirements to be included in Schedule 3 to the draft DCO. **Felling or Lopping of Trees** Paragraph 3.52 of the Explanatory Memorandum [**APP-035**] explains in detail the purpose and effect of Article 48 of the draft DCO [**APP-034**]. The Applicant considers that the powers set out in Article 48 are both necessary and proportionate given the overriding need to ensure that minimum electrical safety clearances are capable of being maintained at all times during construction and operation of the project.

Key Issue	Applicant's Comments
	The Drafting of Certain Requirements Paragraphs 4.3.21 to 4.3.31 (inclusive) of the Explanatory Memorandum [**APP-035**] explain in detail the purpose and effect of Requirements 7, 8, 10 and 11 of Schedule 3 to the draft DCO [**APP-034**]. The Applicant considers that the abovementioned Requirements are appropriately drafted taking account of the overarching needs case for the project, the nature and geographic location of the development proposed and approach successfully adopted by the Applicant and other promoters on other recent linear infrastructure projects. **Timeframes for Determining Applications and Fees** Paragraph 4.4 of the Explanatory Memorandum [**APP-035**] explains the approach taken by the Applicant in respect of the matters set out in Schedule 4 to the draft DCO [**APP-035**]. The Applicant would also note that its proposed approach in terms of both the timescales and fees for determining applications submitted pursuant to the DCO (if made) is reflective of the approach successfully adopted by the Applicant in relation to the delivery of other linear infrastructure projects, including those spanning multiple administrative boundaries. The Applicant would intend to work closely with the relevant discharging authorities to ensure that the timescales set out in Schedule 4 can be met. In particular, the Applicant anticipates that close future engagement will be facilitated by a PPA. It is envisaged that, as part of a future PPA, pre-application 'shadow' submissions to the relevant discharging authority would be made by or on behalf of the Applicant. Comments raised by the relevant discharging authority as part of that pre-engagement process would, where appropriate, be addressed by the Applicant prior to the formal submission of the application pursuant to Schedule 4. This process, which the Applicant would be pleased to discuss in detail with the relevant discharging authorities, will allow all future applications to be determined swiftly and within the timescales set out in Schedule 4 to the draft DCO.

3.4 Tendring District Council [RR-007]

3.4.1 Tendring District Council is a district within Essex County Council and is a neighbouring authority to the project and is located approximately 8.5km to the south of the project (at its closest point). Tendring District Council is considered a 'local authority' for the purposes of Section 42(1)(b) of the Planning Act (2008) as it shares a boundary with the 'host authority'.

Table 3.4 –Tendring District Council

Key Issue	Applicant's Comments
Request to be kept informed.	The Applicant has continued to consult Tendring District Council as a neighbouring authority as part of the on-going consultation exercises on the project. Tendring District Council responded to the Statutory Consultation confirming they had no comments to make.

3.5 Network Rail Infrastructure [RR-021]

3.5.1 Table 3.5 outlines the Applicant's comments on Network Rail Infrastructure Limited (hereafter referred to as 'Network Rail') RR [**RR-021**]. The main matters raised in the RR relate to:

- ensuring that the project will not have a detrimental impact on the operation of the Railway and that the safety of the Railway is maintained during the construction, operation and ongoing maintenance requirements of the project.
- The Applicant proposes to compulsorily acquire land and rights to be exercised in close proximity to the Railway, including rights of access to land adjoining the Railway, Network Rail objects to the making of the Order on the ground that the rights sought might interfere with the safe and efficient operation of the Railway.
- Network Rail will require adequate protective provisions and/or requirements to be included and an agreement with the Applicant to ensure that the new rights sought are exercised in regulated manner to prevent adverse impacts to the Railway. the Promoter has proposed protective provisions for the benefit of Network Rail so the principle of this approach is not anticipated to be an issue.
- Network Rail note that they are '*continuing to review the Promoter's plans, draft Order and application documents, and will continue to work constructively with the Promoter to clarify any issues raised and to ensure its assets are appropriately protected'*.

Table 3.5 –Network Rail Infrastructure

Key Issue	Applicant's Comments
Ensure no detrimental impact on the operation of the Railway and that the safety of the Railway is maintained during the construction, operation and ongoing maintenance requirements of the project	The Applicant has held a number of meetings with Network Rail during the development of the project. The Applicant and Network Rail Infrastructure Limited are currently in the process of agreeing a hierarchy of measures to manage construction interfaces in the SoCG to address their concerns and protect their assets during the construction of the project.

3.6 Anglian Water Services [RR-022]

3.6.1 Table 3.6 outlines the Applicant's comments to the Anglian Water Services Ltd (hereafter referred to as 'Anglian Water') RR **[RR-022]**. The main matters raised in the RR include:

- That through pre-submission discussions with the Applicant, the Protective Provisions for the Protection of Anglian Water (Schedule 14 Part 3) in the draft DCO **[APP-034]** have been agreed, and this is reflected in the draft Statement of Common Ground **[APP-175]** between both parties.
- The need for a Construction Interface Agreement with the project and the Anglian Water Bury St Edmunds to Colchester 69k Pipeline
- An access track owned by Anglian Water Services is required to dismantle redundant infrastructure. This access track is to the water recycling centre (WRC) at Wickham St Paul. Anglian Water would seek to ensure that the Applicant secures appropriate and continuous access for Anglian Water.

Table 3.6 –Anglian Water Services

Key Issue	Applicant's Comments
Interfaces between the project and Anglian Water assets.	The Applicant has engaged with Anglian Water to discuss the interfaces between the project and their assets. The Applicant has held a number of meetings with Anglian Water during the development of the project and a SoCG was included as part of the application for development consent [**APP-175**]. The Applicant notes the Interested Party's comments and has included protective provisions for the benefit of Anglian Water in the draft DCO. A further iteration of the SoCG has been submitted at Deadline 1 (**application document 7.3.8 (B)).**

3.7 Royal Mail [RR-023]

3.7.1 Table 3.7 outlines the Applicant's comments on Royal Mail's RR [RR-023]. The Royal Mail are concerned about the impact of the proposal on their ability to undertake their statutory functions.

Table 3.7 –Royal Mail

Key Issue	Applicant's Comments
No in principle objection to the project but seeking to secure mitigations to protect its operations during the construction phase. Requests the DCO includes specific requirements that during the construction Royal Mail is notified at least one month in advance on any proposed road closures / diversions / alternative access arrangements, hours of working, and on the content of the final CTMP, that the final CTMP includes a mechanism to inform major road users about works affecting the local highways network Requests that Royal Mail is invited to join any	As part of the EIA, consideration has been made to how the construction of the project could impact on traffic and transport **[APP-080].** A Transport Assessment **[APP-061]** has been submitted for the project with the application for development consent. The Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a project. It establishes the baseline transport conditions relevant to the project; identifies the future transport conditions and transport impacts of the project; and illustrates whether mitigation is required for transport issues generated by the project. The Transport Assessment demonstrates that there would be no substantial adverse impacts upon the transport network. Traffic generated would be limited and the impacts would be temporary during the construction phase of the project. The proposed construction traffic routes and flows between the strategic road network and the construction access points are shown on Figure 1: Traffic and Transport Study Area of the Transport Assessment **[APP-061].** Taking into account the embedded measures and the good practice measures outlined in the CoCP, the Transport Assessment **[APP-061]** accompanying the application concludes that "*the project is not anticipated to have a substantial impact on the transport network during construction*". A CTMP **[APP-180]** has also been prepared for the project and is secured via Requirement 4 of the draft DCO [**APP-034**]. It is not considered that the measures requested by the Royal Mail will be necessary bearing in mind the predicted effects of the project.

Key Issue	Applicant's Comments
stakeholder traffic management consultation group that is set up during the operational phase	

3.8 Cadent Gas Limited [RR-024]

3.8.1 Table 3.8 outlines the Applicant's comments on the RR provided by Cadent Gas Limited (hereafter referred to as 'Cadent Gas' [**RR-021**]. The main matters raised in the RR relate to:

- Protecting its position in light of infrastructure which is within or in close proximity to the proposed DCO boundary
- Cadent's rights to retain its apparatus in situ and rights of access to inspect, maintain, renew and repair such apparatus located within or in close proximity to the order limits should be maintained at all times and access to inspect such apparatus must not be restricted.
- Cadent will require adequate protective provisions to be included within the DCO to ensure that its apparatus and land interests are adequately protected and to include compliance with relevant safety standards.
- Cadent has low, medium and high pressure gas pipelines and associated apparatus located within the order limits which are affected by works proposed. Any proposed diversions have not yet reached detailed design stage and so the positioning, land rights and consents required for these gas diversions are not confirmed. At this stage, Cadent is not satisfied that the DCO includes all land and rights required to accommodate such diversions as design studies will need to influence these requirements.
- It is important that sufficient rights are granted to Cadent to allow Cadent to maintain its gas distribution network in accordance with its statutory obligations. Adequate protective provisions for the protection of Cadent's statutory undertaking have not yet been agreed but are in discussion between parties.

Table 3.8 Cadent Gas Limited

Key Issue	Applicant's Comments
Interfaces between the project and Cadent Gas assets	The Applicant and Cadent Gas are currently in the process of agreeing measures regarding the Cadent Gas assets in a SoCG the objective of resolving Cadent Gas's concerns and protect their assets during the construction of the project. A SoCG has been submitted at Deadline 1 **(application document 8.3.6.2)**.

3.9 Dedham Vale AONB and Stour Valley Partnership [RR-028]

3.9.1 Table 3.9 provides the Applicant's comments on the RR provided by the Dedham Vale AONB and Stour Valley Partnership [**RR-028**]. The Applicant has held a number of meetings with Dedham Vale AONB and Stour Valley Partnership during the development of the project. The main matters raised in the RR relate to the impacts to the Dedham Vale AONB, including its statutory purpose and special qualities and how the Applicant has addressed its duty of regard to the purpose of the AONB as described in Section 85 of the Countryside and Rights of Way Act (2000).

Table 3.9 –Dedham Vale Area of Outstanding Natural Beauty and Stour Valley Partnership

Key Issue	Applicant's Comments
Dedham Vale AONB ability to deliver its statutory purpose	As stated in ES Appendix 6.2 Annex A Dedham Vale AONB Approach and Identification of Setting Study [**APP-099**] the statutory purpose of the AONB is '*to conserve and enhance the area's natural beauty'.* Chapter 2 of ES Appendix 6.2: Assessment of Effects on Designated Landscapes [**APP-098**] provides an assessment of the project on designated landscapes, including Dedham Vale AONB. As reported in paragraph 2.5.18 of ES Appendix 6.2: Assessment of Effects on Designated Landscapes [**APP-098**], the assessment identifies *'potentially significant direct and indirect effects on the landscape of the AONB, including its natural beauty indicators during both the construction phase (short term adverse) and operational phase (long term beneficial).'* Paragraph 2.5.22 of ES Appendix 6.2: Assessment of Effects on Designated Landscapes [**APP-098**], concludes that *'given the long term beneficial nature of the likely effects associated with the removal of the existing 132kV overhead line, the integrity of the wider AONB would not be compromised. The reduction in the presence of high voltage electricity infrastructure within the northern part of the AONB, specifically within the valley of the River Box and wider landscape setting of Polstead Hall, would enhance the overall landscape within the AONB and contribute positively to its natural beauty indicators.'* The Applicant has produced a further document summarising the effects of the project on the Dedham Vale special qualities and ability of Dedham Vale to deliver its statutory purpose. The Dedham Vale AONB Special Qualities and Statutory Purpose document has been submitted at Deadline 1 (**application document 8.3.7**). This document does not change the conclusions presented in ES Chapter 6: Landscape and Visual [**APP-074**].

Key Issue	Applicant's Comments
Alignment with policy relating to nationally designated landscapes and the Dedham Vale AONB and Stour Valley Management Plan	The Planning Statement [**APP-160**] considers the compliance of the project as a whole with the requirements of relevant planning policy. Paragraphs 7.3.82 to 7.3.90 specifically consider the acceptability of the project in respect to AONB policy. Paragraph 7.4.29 states *'it is considered that the project design aligns with the fundamental aim of the NPPF paragraph 176, in regard to conserving and enhancing landscape and scenic beauty in AONB.'* Paragraph 7.3.107 of the Planning Statement [**APP-160**] summarises that *'The assessment undertaken by National Grid is considered to be in accordance with the requirements of EN-1 and EN-5 in respect to landscape and visual impact, including the impact on the AONB and the implementation of undergrounding.'*
Landscape and visual impacts on the AONB and Stour Valley	ES Chapter 6: Landscape and Visual [**APP-074**], details the likely significant effects of the project on landscape and visual receptors during construction and operation. As set out in paragraph 6.1.2, this includes Dedham Vale AONB and Stour Valley Special Landscape Area (SLA), and county level local landscape character areas (LCA). ES Chapter 6: Landscape and Visual [**APP-074**] is supported by ES Appendix 6.2: Assessment of Effects on Designated Landscapes [**APP-098**] which focuses specifically on Dedham Vale AONB and Stour Valley SLA. Paragraph 6.12.7 of ES Chapter 6: Landscape and Visual [**APP-074**] concludes that whilst there would be significant adverse landscape and visual effects on Dedham Vale AONB and Stour Valley during construction, during operation there would be significant beneficial effects on the AONB and Stour Valley from the removal of the 132kV overhead line. These effects would be more pronounced within approximately 1km of the project.
Consideration of the setting of the AONB	ES Appendix 6.2: Annex A Dedham Vale AONB Approach and Identification of Setting Study [**APP-099**], identifies areas of the landscape considered to be part of the setting of the AONB in the vicinity of the project. This has been identified to inform the assessment of effects of the project on the defined natural beauty of the Dedham Vale AONB. The proposed AONB setting in relation to the project is set out in Figure 5.1 of the setting study. The assessment of impacts on the landscape is presented in ES Appendix 6.3: Assessment of Effects on Landscape Character [**APP-100**]. This includes assessment of effects on landscape receptors within the setting

Key Issue	Applicant's Comments
	of the AONB as defined in ES Appendix 6.2: Annex A Dedham Vale AONB Approach and Identification of Setting Study [**APP-099**]. The assessment on setting is presented in Section 2.5 of ES Appendix 6.3: Assessment of Effects on Landscape Character [**APP-100**]. Paragraph 2.5.20 to 2.5.22 state that at Year 1 of operation there would be some adverse indirect effects on the landscape resulting from the immediate post-construction effects of the undergrounding and the presence of the new 400kV overhead line in the setting of the AONB, but these effects are not anticipated to be significant. However, by Year 15, the benefits of removing the existing 132kV overhead line in association with the underground cables and trenchless crossing of the Box Valley would be apparent.
Consideration of the defined natural beauty and special qualities of the AONB namely: Landscape quality; Scenic quality; Relative wildness; Relative tranquillity; Natural heritage features; Cultural heritage	The assessment of the impacts of the project on the natural beauty indicators defined in the Dedham Vale AONB and Stour Valley Project Area (SVPA) Management Plan (Dedham Vale AONB and Stour Valley Partnership, 2021) are presented in Chapter 2 of ES Appendix 6.2 Assessment of Effects on Designated Landscapes [**APP-098**]. During construction, as stated in paragraph 2.5.19 of ES Appendix 6.2 Assessment of Effects on Designated Landscapes [**APP-098**], *'there would be significant direct and indirect adverse effects on the landscape of the AONB. This would be mainly due to the scale of the construction activities associated with the 400kV underground. The natural beauty indicators of the AONB - notably scenic quality, relative wildness and relative tranquillity would be adversely affected. Given however that these significant adverse effects would be experienced relatively locally within approximately 1km of the LoD and would be short term, temporary and mainly reversible, it is not considered that the overall integrity of the AONB would be affected.* During operation, as stated in paragraph 2.5.22 of ES Appendix 6.2 Assessment of Effects on Designated Landscapes [**APP-098**], *'Given the long term beneficial nature of the likely effects associated with the removal of the existing 132kV overhead line, the integrity of the wider AONB would not be compromised. The reduction in the presence of high voltage electricity infrastructure within the northern part of the AONB, specifically within the valley of the River Box and wider landscape setting of Polstead Hall, would enhance the overall landscape within the AONB and contribute positively to its natural beauty indicators'.*
Consideration of the defined special qualities of	As above, the effects of the project on natural beauty indicators defined in the Dedham Vale AONB and SVPA Management Plan (Dedham Vale AONB and Stour Valley Partnership, 2021) are assessed as part of the overall

Key Issue	Applicant's Comments
the nationally designated AONB, including health and wellbeing, community, economy (with particular reference to tourism) and ecosystems goods and services	assessment on Dedham Vale AONB as presented in ES Appendix 6.2 Assessment of Effects on Designated Landscapes [**APP-098**]. The Applicant has produced a further document summarising the effects of the project on the Dedham Vale special qualities and ability of Dedham Vale to deliver its statutory purpose. The Dedham Vale AONB Special Qualities and Statutory Purpose document has been submitted at Deadline 1 (**application document 8.3.7**). This document does not change the conclusions presented in ES Chapter 6: Landscape and Visual [**APP-074**].
National Grid's duty of regards to the purpose of the AONB, as described in Section 85 of the Countryside and Rights of Way Act (2000)	The Applicant has set out under Section 5.5 in the Planning Statement [**APP-160**] the key responsibilities and objectives which underpin the Applicant's design principles on which the project is based. It sets out how the project has had regard to paragraph 2.2.6 of the National Policy Statement for Energy EN-1 which relates to statutory duties under section 85 of the Countryside and Rights of Way Act 2000.
Consideration on the ability of residents and visitors to enjoy the AONB and Stour Valley, its natural beauty and special qualities	As above, ES Appendix 6.2 Assessment of Effects on Designated Landscapes [**APP-098**] presents the results of the assessment of effects of the project on Dedham Vale AONB including the natural beauty indicators defined in the Dedham Vale AONB and SVPA Management Plan (Dedham Vale AONB and Stour Valley Partnership, 2021). The Applicant has also assessed the visual effects on communities in ES Appendix 6.5: Assessment of Visual Effects on Communities [**APP108**]. As stated in paragraph 6.12.5 of ES Chapter 6: Landscape and Visual [**APP-074**], a number of short term significant effects from construction have been identified within Alphamstone, Lamarsh, Leavenheath and Polstead during construction. Paragraph 6.12.9 of ES Chapter 6: Landscape and Visual [**APP-074**] concludes that for community areas, the only long term significant adverse effects would be within Burstall and Hintlesham where the proposed 400kV overhead line does not follow the existing 132kV overhead line and therefore there would be an increase in the number of pylons in views. Neither of these are within the AONB. Chattisham, Lamarsh, and Polstead would have long term significant beneficial effects from the project.

Key Issue	Applicant's Comments
	As stated in ES Chapter 4: Project Description [**APP-072**], no PRoW would be permanently stopped up or diverted on the project. There is likely to be short term disruption to some PRoW during construction for safety reasons. ES Chapter 12: Traffic and Transport [**APP-080**], assesses the effects on PRoW and concludes that there are no significant effects to PRoW within the AONB during construction.
Considerations on the local economy, including agricultural industries	The Socio Economics and Tourism Report [**APP-066**] considers the likely significant effects on the local economy. Table 6.1 provides a summary of the assessment and confirms that there are no likely significant effects on socio economics, including the local economy and businesses. ES Chapter 11: Agriculture and Soils [**APP-079**] assesses the potential impacts of the project on agricultural operations and viability during construction and operation. It concludes in paragraph 11.12.2 that there are no likely significant effects in relation to agriculture and soils during construction or operation.
The quality of and appropriateness of measures to avoid, mitigate and compensate for any negative impacts on the AONB and Stour Valley	The Applicant has embedded measures into the design of the project. These include: • Removal of approximately 25km of the existing 132kV overhead line between Burstall Bridge and Twinstead Tee (EM-P02). • Removal of approximately 2km of the existing 400kV overhead line south of Twinstead Tee (EM-G01) • Landscape planting around the four CSE compounds (EM-D01, EM-F01, EM-G03 and EM-G06) and the GSP substation (EM-H02) • A section of underground cable through Section E: Dedham Vale AONB (EM-E01) • A section of underground cable through parts of Section G: Stour Valley (EM-G02). The full set of embedded measures are set out in the REAC which forms Appendix B of the CEMP [**APP-179**] and is secured by Requirement 4 in the draft DCO [**APP-034**]. All construction projects result in short term temporary effects on the landscape during construction due to, for example, the presence of construction vehicles, stockpiles of soil and materials and construction fencing being present in the landscape. Paragraph 6.9.1 of ES Chapter 6: Landscape and Visual [**APP-074**] states that *'No additional mitigation is proposed for landscape and visual receptors during construction in addition to the good practice measures set out within the CoCP. Although significant effects have been identified, it is not possible to mitigate these through landscape mitigation measures, predominantly due to the scale of the works for the 400kV underground cable'.*

Key Issue	Applicant's Comments
	Paragraphs 6.12.7 and 6.12.8 of ES Chapter 6: Landscape and Visual [**APP-074**] conclude that during operation there would be significant beneficial effects on Dedham Vale AONB and Stour Valley from the removal of the 132kV overhead line. No additional mitigation measures are therefore proposed for landscape designations over those embedded into the design of the project as no likely significant effects are anticipated during operation.

3.10 East Anglia THREE Limited [RR-029]

3.10.1 Table 3.10 outlines the Applicant's comments to the RR provided by East Anglia THREE Limited (hereafter referred to as 'East Anglia THREE') **[RR-029]**. East Anglia THREE Limited is wholly owned by ScottishPower Renewables and is in the process of discharging requirements for the East Anglia THREE offshore wind farm. East Anglia THREE offshore wind farm is a NSIP for which development consent was granted on 7 August 2017 pursuant to the East Anglia THREE Offshore Wind Farm Order 2017. The main matters raised in the RR relate to the interface between the proposed works at Bramford Substation for the project and Order limits for the East Anglia THREE offshore wind farm project. ScottishPower Renewables also owned the East Anglia ONE project, however, the transmission assets of the East Anglia ONE Windfarm was subsequently transferred to TC East Anglia ONE OFTO Limited, who are now the Transmission Licence holder for these assets.

3.10.2 A previous draft SoCG with East Anglia ONE OFTO Limited and East Anglia THREE Limited **[APP-174]** was prepared, however since the divestment of East Anglia ONE from ScottishPower Renewables, the Applicant has been engaging with the new licence holder. Meanwhile, the East Anglia THREE project remains wholly owned by ScottishPower Renewables and a separate SoCG has been progressed with them.

Table 3.10 –East Anglia THREE Limited

Key Issue	Applicant's Comments
Interface between the proposed works at Bramford Substation for the project and Order limits for the East Anglia THREE offshore wind farm project.	The East Anglia ONE and East Anglia THREE projects are both NSIPs within the vicinity of Bramford Substation. Due to the possible interface with the project, the Applicant has been engaging with East Anglia THREE throughout the evolution of the project as documented in the draft SoCG [**APP-174**]. The location of these NSIP can also be seen in Figure 15.1: Long List of NSIP [**APP-145**]. A further iteration of the SoCG has been submitted at Deadline 1 (**application document 8.3.6.4**). The subject of the draft SoCG TC East Anglia ONE OFTO Limited and East Anglia THREE Limited [**APP-174**] concerned both the East Anglia ONE and East Anglia THREE NSIP, as previously ScottishPower Renewables owned both projects. However, the assets of the East Anglia ONE Windfarm have since been transferred to a new owner (TC East Anglia ONE OFTO Limited) as such the applicant is submitting a separate SoCG for East Anglian ONE (**application reference 8.3.6.3)**. Meanwhile, the East Anglia THREE project remains wholly owned by ScottishPower Renewables and is now the subject of a separate SoCG submitted at Deadline 1 (**application document 8.3.6.4**). **Interface**

Key Issue	Applicant's Comments
	The technical interface between the respective projects is currently being determined during on-going discussions. The interface chiefly comprises the removal of three spans of overhead line; the existing SuDS pond and it being a potential receptor for run off during demolition and construction; the proposed accesses including the access from Bullen Lane and East Anglia THREE access to the SuDS pond; works within the substation itself and the cable routes from the substation (East Anglia ONE) and converter station (East Anglia THREE). **Landscaping** The Applicant has also considered whether the proposed works at Bramford Substation pursuant to the DCO would likely impact on the proposed landscape planting north of Bramford Substation associated with the East Anglia THREE Converter Station. The proposed landscape planting is contained to the north/north-west of the Order Limits for the project and there does not appear to be an interface between the respective projects in this location. **Cumulative Effects** ES Chapter 15: Cumulative Effects Assessment (CEA) [**APP-083]** considers the cumulative effects of the project with other proposed developments, including East Anglia THREE and specifically the construction of the converter station. The assessment presented in ES Appendix 15.5: Inter Project CEA [**APP-144**] includes an assessment of the potential cumulative effects on different receptors including landscape and visual, biodiversity, noise and traffic and transport. The CEA [**APP-083**] concludes at Section 15.10 that: • Significant cumulative landscape and visual effects could arise during construction of the project in combination with the construction phases of East Anglia THREE (ID DCO-001). The significant effects are anticipated to be temporary and short-term. No mitigation has been proposed as screening of linear and mobile construction sites is impractical and could itself create a visual intrusion. • Significant cumulative landscape and visual effects on the landscape and visual amenity around Bramford Substation could arise during operation of the project in combination with the operational phases of East Anglia THREE (ID DCO-001) (reducing to non-significant by year 20 of East Anglia THREE). No mitigation has been identified to reduce these significant cumulative effects during operation as it is considered that

Key Issue	Applicant's Comments
	the combined presence and visibility of the 400kV pylons associated with the project could not be fully screened by tree planting due to the height of the pylons. No other significant cumulative effect with East Anglia THREE has been identified and, therefore, no further mitigation is proposed. The Applicant will continue to engage with East Anglia THREE as part of the ongoing discussions regarding the SoCG and will provide updates into Examination at a relevant deadline.

3.11 Environment Agency [RR-031]

3.11.1 Table 3.11 outlines the Applicant's comments on the RR provided by the Environment Agency [**RR-031**]. The Applicant has held a number of meetings with the Environment Agency during the development of the project and a SoCG was included as part of the application for development consent [**APP-170**].

3.11.2 The main matters raised in the RR relate to the designs and measures associated with the temporary bridge structures, the measures required to reduce risks to surface water and ground water quality during construction, measures to protect the integrity of the flood defence near to the River Stour and potential effects to navigation along the River Stour during construction.

Table 3.11 –Environment Agency

Key Issue	Applicant's Comments
Fisheries, Biodiversity and Ecology	
Temporary bridge design needs to allow unrestricted passage of wildlife	As shown in the key commitments box and in the designs presented on the Design and Layout Plans: Temporary Bridge for Access [**APP-031**], the bridges would be designed to allow unrestricted passage of wildlife (clear span). As noted in RR-031, the CoCP [**APP-178**] contains good practice measure W17 which states that '*Temporary clear span bridge crossings (e.g. bailey bridge) will be used for the temporary access route crossing at the River Stour, River Box and the River Brett. These... would be set back 8m (or distance otherwise agreed with the Environment Agency) from the river's edge*.' The clear span bridge and distance set back will allow wildlife passage.
The temporary bridge design should minimise risks of pollution and have a minimum of 600mm clearance between the land surface at the bank top and the soffit of the bridge	Chapter 9 of the CEMP [**APP-177**] (which is secured by Requirement 4 of Schedule 3 of the draft DCO) describes how pollution risks will be managed during construction. Paragraph 9.3.15 of the CEMP notes the risk of potential runoff from opencut crossings and signposts to good practice measure W02 in the CoCP [**APP-178**] to reduce this risk. W02 references a number of measures including installation of a pollution boom downstream of opencut works; the use and maintenance of temporary lagoons, tanks, bunds, silt fences or silt screens as required; and having spill kits, straw bales or other appropriate measures readily available for downstream emergency use in the event of a pollution incident.

Key Issue	Applicant's Comments
	The CoCP [**APP-178**] also contains good practice measure W17 which states that '*Temporary clear span bridge crossings (e.g. bailey bridge) will be used for the temporary access route crossing at the River Stour, River Box and the River Brett. These will be designed with soffits that are raised 600mm above the flood level in accordance with Environment Agency requirements*'. This good practice measure is also included on the Design and Layout Plans: Temporary Bridge for Access [**APP-031**].
A drainage system will be needed to prevent run-off from the bridge deck	The CoCP [**APP-178**] contains good practice measure GG15 which states that '*Runoff across the site will be controlled through a variety of methods including header drains, buffer zones around watercourses, on-site ditches, silt traps and bunding*.'
Summary of temporary bridge response	The Applicant considers that the application designs and management plans (which is secured by Requirement 4 of Schedule 3 of the draft DCO) already reflect the matters raised in RR-031 regarding bridge design. In addition, as stated within good practice measure W01 in the CoCP [**APP-178**], the project will work in compliance with permits and licences and Flood Risk Activity Permits (FRAP) will be sought from the Environment Agency in relation to the works to all main rivers.
Use of culverts on watercourses	It is not practicable or proportionate to provide bridge crossings instead of culverts at the crossing point of minor watercourses (non-main rivers), many of which are small field drain and where up to 10m of channel would be affected (see paragraph 4.4.3 in the Water Framework Directive Assessment [**APP-060**]). As stated in paragraph 9.3.34 of the CEMP [**APP-177**] (which is secured by Requirement 4 of Schedule 3 of the draft DCO), all temporary crossings and/or culverts will be removed post construction unless otherwise agreed in the FRAP/Ordinary Watercourse Consent. Watercourses will be reinstated to at least the same condition as prior to construction and in accordance with the details provided within the relevant FRAP/Ordinary Watercourse Consent. This includes reinstatement of the bank profile and bed levels. It is also anticipated to include replacing any channel substrate that was temporarily removed during the works. As stated in Table 2.1 of the CEMP [**APP-177**], the Applicant intends to apply for Ordinary Watercourse Consents from the Lead Local Flood Authorities for works to ordinary watercourses where works have the potential to impede flow.
Risks to fish from overpumping of watercourses during construction.	The CoCP [**APP-178**] which is secured by Requirement 4 of Schedule 3 of the draft DCO includes commitment B13 which states '*Where pre-construction surveys have identified a likely fish presence and opencut crossings are proposed and over pumping will be used. The pump will be appropriately screened to prevent entrainment or impingement of fish or fish friendly pumps will be used to facilitate the downstream passage of fish through the*

Key Issue	Applicant's Comments
	pumps. The use of pumps to move water will require 2-3mm screening to avoid the impingement offish and juvenile eels'.
Pollution Prevention	
Definition of waste water	The Applicant notes the definition provided for wastewater and that this would not change the assessment presented within the ES. The text in Table 2.1 of the CEMP [**APP-178**] provides additional definition as to when an environmental permit would be required.
Sediment fencing of temporary access routes	As described in paragraph 9.3.21 of the CEMP [**APP-178**] which is secured by Requirement 4 of Schedule 3 of the draft DCO, when mobilising works areas (which would include the temporary access routes), various measures will be implemented to manage site surface water, divert clean surface water away from the work site and to prevent silt pollution and erosion of exposed soils. Silt fencing is listed in the bullets as an example of a measure that could be used to provide a barrier to protect sensitive receptors such as adjacent watercourses.
Permit applications	The Applicant notes this matter and will consider this as part of the project schedule, should development consent be granted.
Management of run off during construction	The CoCP [**APP-178**] which is secured by Requirement 4 of Schedule 3 of the draft DCO, contains a number of good practice measures relating to storage of materials to reduce risks of contamination e.g. GG14 and GG15 in relation to controlling run off and discharge across the site. Further details are then provided in paragraphs 9.3.12 and 9.3.13 of the CEMP [**APP-177**], which state that each work activity method statement will set out how pollution and sediment risk would be managed, including proactive actions and measures to control pollution risks. This could be either directly from the construction works or due to external factors such as extreme weather. Measures will include appropriate storage and handling of fuels and other substances hazardous to the environment. Method statements will consider the measures set out in former guidance for Pollution Prevention, various publication dates (accessed via the NetRegs website); C648 Control of water pollution from linear construction projects. (Construction Industry Research and Information Association (CIRIA), 2006); C532 Control of Water Pollution from Construction Sites (CIRIA, 2001); and 650 Environmental Good Practice on Site (CIRIA, 2005).
Informing the Environment Agency	Paragraph 9.3.26 of the CEMP [**APP-177**] which is secured by Requirement 4 of Schedule 3 of the draft DCO states that '*In the event of a pollution incident, the contractor would… As appropriate, contact the relevant enforcement authority as soon as practicable, e.g. the Environment Agency via the incident hotline (0800 807060)*'.

Key Issue	Applicant's Comments
Details about the design of the boom	The wording of W02 in the CoCP [**APP-178**] lists out potential good practice measures that would be used to reduce the risk of pollution. These are not defined explicitly in the application, as the Applicant has not yet appointed a main works contractor, who would be responsible for confirming the measures appropriate to the detailed working methods proposed.
Groundwater and Contaminated Land	
Durations for permit applications	As noted in Table 5.1 of the CEMP [**APP-177**], the application duration for permits would be considered as part of the detailed construction schedule developed by the main works contractor.
Hydrogeological risk assessments	The wording in ES Chapter 4: Project Description [**APP-072**] and ES Appendix 10.2: Groundwater Baseline and Assessment [**APP-131**] is based on the wording of good practice measure GH07 in the CoCP [**APP-178**]. This states that a hydrogeological risk assessment will be undertaken once the trenchless crossing method has been confirmed and that this would be submitted to the Environment Agency for information prior to construction. In response to the RR, the Applicant has updated the wording of GH07 to say: *GH07: A hydrogeological risk assessment will be undertaken once the trenchless crossing method has been confirmed. This will assess the risks on groundwater or surface water quality associated with the construction method including considering the potential for breakout during drilling and the use of bentonite or other agents proposed. Where the assessment identifies an unacceptable risk to groundwater or surface water quality, then alternative methods and/or additives shall be proposed, assessed and used. The hydrogeological risk assessment will be submitted to the Environment Agency for information prior to construction. The Environment Agency will have up to 10 working days to respond on the hydrogeological risk assessment and their comments will be considered as part of finalising the risk assessment.* The Applicant will update the CoCP (which is secured by Requirement 4 of Schedule 3 of the draft DCO) with this amendment at an appropriate deadline.
Need for clay barriers or stanks	Good practice measure AS08 in the CoCP [**APP-178**] which is secured by Requirement 4 of Schedule 3 of the draft DCO already states that '*Clay bungs or other vertical barriers will be constructed within trench excavations where deemed necessary by a suitably experienced person, to prevent the creation of preferential drainage pathways*.' Therefore, no change is proposed to the application documents.

Key Issue	Applicant's Comments
Flood Risk Assessment	
Flood Risk Assessment	RR-031 acknowledges that the Environment Agency is satisfied with the Flood Risk Assessment [**APP-059**]. This is also reiterated in the draft SoCG with the Environment Agency [**APP-170**].
Crossings of the Belstead Brook and non-main rivers	The Applicant notes the comments made and confirms that there is no proposed temporary access route crossing over the Belstead Brook and that other non-main rivers would be assessed by the Lead Local Flood Authority.
Effects on the River Stour flood embankment	The Applicant does not anticipate the need to take part of the embankment away to install the temporary bridge. The Design and Layout Plans Temporary Bridge for Access [**APP-031**] is a generic design and is not specific to the River Stour. In terms of the application, good practice measure W18 in the CoCP [**APP-178**] which is secured by Requirement 4 of Schedule 3 of the draft DCO, notes that the temporary access route and underground cables will cross the flood defence embankment on the River Stour (Grid reference TL 89599 36718). It states that '*the crossing designs would avoid impacts on the defence foundations and construction works would be undertaken using methods that limit ground movement/settlement to reduce the potential to compromise the condition and stability of the embankment. In addition, in line with the requirements of the Environment Agency, should the potential for an impact to the flood defences be identified at the detailed design stage, then the flood defence would be monitored to establish a pre-construction baseline and for a period after completion of works to construct the crossings to enable detection of any effects on the structural integrity/condition of the assets during construction. The requirement for any such monitoring will be discussed with the Environment Agency as part of the application for a Flood Risk Activity Permit*. A bespoke design for the crossing of the River Stour and detail about the construction activities required in the vicinity of the flood defence would not be available until the detailed design stage, when a main works contractor is appointed. As stated within good practice measure W01 and W18 in the CoCP [**APP-178**], the project will work in compliance with permits and licences and Flood Risk Activity Permits (FRAP) will be sought from the Environment Agency in relation to the works to all main rivers, including the temporary crossing of the River Stour and the adjacent flood defence. The FRAP would include detailed designs for the crossing and details about the specific construction activities proposed at this location.

Key Issue	Applicant's Comments
Effects on navigation during construction	As stated in paragraph 1.5.3 of the CTMP [**APP-180**] which is secured by Requirement 4 of Schedule 3 of the draft DCO, it is anticipated that there would be short term disruption to navigation along the River Stour for safety reasons during lowering of the 132kV conductors and during installation and removal of the temporary bridge. These are anticipated to be short term in duration (i.e. up to one week for each). Outside of this, there are not anticipated to be effects on navigation. Notices would be placed up and downstream of the Order limits at least four weeks in advance (or as otherwise agreed with the navigation authority) to notify river users of the works. During the conductor lowering and bridge works, it is anticipated that a boat would be moored in the river to prevent and warn users accessing the working area.
Water Resources	
Consideration of abstractions in a water stressed area	As the Order limits cross predominantly agricultural land and would involve a rolling programme of works along the linear length of the project, it is anticipated that potable water would be provided via the welfare vans or tankers as stated in paragraph 4.4.59 and 4.4.59 in ES Chapter 4: Project Description [**APP-072**]. The anticipated exception is the main compound off the A134, which is assumed to have a mains water connection. If these assumptions were to change, any relevant consents would be obtained from the relevant undertaker.
Water efficiency targets	Paragraph 5.3.3 in Section 5.3: Efficient Water Consumption During Construction, of the MWMP [**APP-181**] outlines examples of water efficiency measures that would be employed during construction, for example the use of water-efficient taps within welfare facilities, waterless toilet facilities, assessment of whether water can be reused, and regular checks to hoses for water leaks.

3.12 Pivoted Power LLP [RR-035]

3.12.1 Table 3.12 outlines the Applicant's comments on the RR provided by Pivoted Power LLP's (hereafter referred to as Pivoted Power) **[RR-035]**. Pivoted Power have an interest in land which falls partly within the Order limits for the project. Pivoted Power state in the RR:

- The Book of Reference submitted with the application for development consent does not identify Pivoted Power's interest in the land.
- Pivoted Power has a planning permission with reference DC/19/03008 dated 23 September 2019 for the installation and operation of a battery storage facility which is due to be operational during 2024.
- There is an interface between the Applicant and Pivoted Power at an existing track over which Pivoted Power has rights of access under the terms of its Lease.
- Pivoted Power believes that the Applicant's requirement for the use of the access track can exist in tandem with its own access requirements. Pivoted Power has engaged with the Applicant regarding its concerns prior to and after submission of the application for development consent and it is thought a resolution can be reached.

Table 3.12 –Pivoted Power LLP

Key Issue	Applicant's Comments
Interface between the Applicant and Pivoted Power at an existing track over which Pivoted Power has rights of access under the terms of its Lease	An Interface Agreement between the Applicant and Pivoted Power, who are a wholly owned subsidiary of EDF Energy Renewables Limited, is being progressed. The interface agreement relates to a shared access, between the public highway and the Applicant's Bramford substation site for the benefit of the project and EDF's Bramford/Tye Lane Battery Energy Storage System and Solar Project. The rights required by the Applicant are solely to improve the access to Bramford substation. The Applicant's agents have been in contact with the agents for the owner of the access to seek to agree terms. The Applicant and Pivoted Power (via their agents) are progressing voluntary agreements.

3.13 Historic England [RR-036]

Table 3.13 outlines the Applicant's comments to the RR provided by Historic England **[RR-036]**. The Applicant has held a number of meetings with Historic England during the development of the project and a SoCG is currently being progressed. The main matters raised in the RR relate to the impacts to designated and non-designated heritage assets, in particular, on the Grade I listed Hintlesham Hall and its setting.

Table 3.13–Historic England

Key Issue	Applicant's Comments
Assessment of the historic environment including high value receptors such as Grade I listed Hintlesham Hall - Grade II* listed stables, former coach house and brewhouse attached to Hintlesham Hall, Sawyers Farmhouse and Polstead Conservation Area	ES Chapter 8: Historic Environment [**APP-076**] summarises the likely significant effects, proposed mitigation and residual significant effects of the project on the historic environment. Paragraph 8.12.1 of ES Chapter 8: Historic Environment [**APP-076**] states that there would be no residual significant adverse effects on the historic environment. This includes non-designated historic buildings as listed in Section 4.4 of ES Appendix 8.2: Historic Environment Impact Assessment [**APP-127**]. The detailed assessment in relation to specific listed buildings can be found in Section 4.2 and Table 4.2 of ES Appendix 8.2: Historic Environment Impact Assessment [**APP-127**]. The Applicant notes that RR-036 states that the information provided is to a high standard and that Historic England broadly accepts the conclusions. ES Appendix 8.2: Annex A Hintlesham Hall Assessment [**APP-128**] presents the assessment of whether the project would likely result in substantial harm to Hintlesham Hall and its ancillary buildings, which include the Grade II* listed stables, former coach house and brewhouse. This concludes that there would be a minor adverse effect on these receptors that is not significant. It also notes that although there would be harm to the setting of Hintlesham Hall and its ancillary buildings, this would be less than substantial. Paragraph 4.5.4 states *'This level of harm would be justified given the public benefits of the project, which enables the transmission of greater amounts of energy around the electricity network'.* The Applicant is continuing to discuss the proposals with Historic England as part of an SoCG. Embedded measure EM-AB01 in the REAC [**APP-179**] states that *'The Proposed Alignment to the north of Hintlesham Hall is based on the pylon locations from the optimised alignment discussed with English Heritage (now Historic England) in 2013. National Grid will continue to work with Historic England as the designs develop to identify the most suitable location for the pylons in relation to the setting of Hintlesham Hall, taking into account the limits of deviation and technical considerations such as distance between conductor spans.'*

Key Issue	Applicant's Comments
	As significant effect has been identified to Hintlesham Hall or its setting no additional mitigation is proposed (additional to the planting proposed as an embedded measure shown on LEMP Appendix B: Vegetation Reinstatement Plan [**APP-183**]). However, the Applicant is proposing to partially restore the original tree lined avenues to the south-west of Hintlesham Hall as detailed in the Environmental Gain Report [**APP-176**] (Environmental Area: ENV02). This enhancement seeks to balance enhancing the parkland features whilst limiting impacts on the surrounding land use and local farming businesses.
Dedham Vale East CSE compound location	In relation to the Dedham Vale East CSE compound, the Applicant responded to consultation feedback (including that from Historic England with regards to the Polstead Conservation Area) by moving the location of the CSE compound 1km east from its location presented at the non-statutory consultation in 2021. Paragraph 5.1.9 of the Project Development Options Report (National Grid, 2022) presented at the Statutory consultation states that *'National Grid undertook further environmental and technical assessment regarding the siting of the Dedham Vale East CSE compound, including considering the effects on the setting of the AONB. The review work concluded that the Dedham Vale East CSE compound should be relocated to a position between two existing blocks of woodland at Millfield Wood, which provide visual screening (Figure 5.1). This would reduce impacts on the setting of the AONB and also would avoid potential effects on Polstead conservation area, a concern raised by Historic England in their response.'*

3.14 RR-042 Natural England

3.14.1 Table 3.15 outlines the Applicant's comments on the RR provided by Natural England [**RR-042**]. The Applicant has held a number of meetings with Natural England during the development of the project and a SoCG was included as part of the application for development consent [**APP-169**].

3.14.2 The main matters raised in the RR relate to the potential for impacts on the Stour and Orwell Estuaries Special Protection Area and Ramsar site, impacts on Hintlesham Woods SSSI, protected species and licencing, impacts on the Dedham Vale AONB and the need for soil handing measures during construction.

3.14.3 The RR is split into two parts with a summary of the key issues up front (Part I) and then further details provided on some issues in Part II. To avoid repetition, the comments on the RR uses the headings from Part I for the structure of the response and draws in additional detail, as appropriate from Part II. This response also covers the RR comments in relation to the draft DCO (Part III).

Table 3.14 –Natural England

Key Issue	Applicant's Comments
Internationally Designated Sites	
A detailed contingency plan should be provided on how a bentonite (or other lubricant used) "breakout" would be dealt with, should this occur during construction The wording of the good practice measure GH07 in the HRA Report should match the wording in the CoCP	The Applicant has included good practice measure GH07 in the CoCP [**APP-178**]. As part of the RR provided by the Environment Agency an amendment to this wording of this good practice measure has been made to allow the Environment Agency to comment of the proposed hydrological risk assessment. GH07 now says: *GH07: A hydrogeological risk assessment will be undertaken once the trenchless crossing method has been confirmed. This will assess the risks on groundwater or surface water quality associated with the construction method including considering the potential for breakout during drilling and the use of bentonite or other agents proposed. Where the assessment identifies an unacceptable risk to groundwater or surface water quality, then alternative methods and/or additives shall be proposed, assessed and used. The hydrogeological risk assessment will be submitted to the Environment Agency for information prior to construction. The Environment Agency will have up to 10 working days to respond on the hydrogeological risk assessment and their comments will be considered as part of finalising the risk assessment.* The Applicant will update the CoCP (which is secured by Requirement 4 of Schedule 3 of the draft DCO) with this amendment at an appropriate deadline. GH07 was summarised in the Habitat Regulations Assessment (HRA) submitted with the application for development consent [**APP-057**], however, the HRA has been updated at Deadline 1 **(application document 5.3 (B))** to include the full commitment wording.

Key Issue	Applicant's Comments
More detail within the following CoCP good practice measures: GH06 and GH07. These assessments will need to include a requirement to consider the potential risks to the Stour and Orwell Estuaries Special Protection Area and Ramsar sites	Good practice measure GH06 in the CoCP [**APP-178**] details a requirement for a foundation risk assessment and GH07 states that a hydrogeological risk assessment would be undertaken once the trenchless crossing method has been confirmed. These assessments would consider risks to all relevant receptors and therefore would include an assessment of the potential risks to the Stour and Orwell Estuaries Special Protection Area and Ramsar sites should a pathway be identified.
Habitat or species fragmentation, reduction in species density, disturbance/displacement featured bird species and air quality change. The HRA Report rules out impacts from these identified pathways during construction and operation. Natural England concurs with this assessment and the reasoning provided	The Applicant welcomes Natural England's agreement with the assessment and the reasoning provided in the HRA Report in respect of habitat or species fragmentation, reduction in species density, disturbance/displacement of Special Protection Area/Ramsar featured bird species and air quality change to internationally designated sites.
Nationally Designated Sites	
Hintlesham Woods SSSI Potential impacts on the 'lowland mixed deciduous woodland' interest feature, which is an ancient	ES Appendix 7.1 Annex B - Hintlesham Woods SSSI Assessment [**APP-111**] presents the assessment of the project on Hintlesham Woods SSSI. The assessment is also summarised in ES Chapter 7: Biodiversity [**APP-075**], where paragraphs 7.6.10 to 7.6.28 (construction effects) and paragraphs 7.7.5 to 7.7.9 (operation effects) conclude that there would be no likely significant effects on the SSSI or its interest features when taking into

Key Issue	Applicant's Comments
woodland, during the construction and operational phases	account the embedded measures in the REAC **[APP-179]** and the good practice measures in the CoCP [**APP-178**]. Where the Applicant has referred to vegetation being cut to ground level in paragraph 7.2.3 of the LEMP [**APP-182**], this is the same as coppicing. This is shown on the LEMP Appendix A – Vegetation Retention and Removal Plan [**APP-183**] for clarity. Table 4.1 of the LEMP [**APP-182**] sets out the proposed measures in relation to ancient woodland. This has taken into account the Forestry Commission and Natural England Standing Advice (2022) which states that *'For ancient woodlands, you should have a buffer zone of at least 15 metres to avoid root damage…'.*
Hintlesham Woods SSSI Potential impacts on the 'assemblages of breeding birds - mixed: scrub and woodland' interest feature, during the construction phase, in particular the impact of construction noise on the nightingale population, which is part of the breeding bird assemblages interest feature	The noise assessment on the breeding birds at Hintlesham Woods SSSI is presented in Section 4.3 of ES Appendix 7.1 Annex B - Hintlesham Woods SSSI Assessment [**APP-111**]. The Applicant has made a number of commitments to limit the activities that can be undertaken in the bird breeding season around the woods, as set out in Table 3.1 [**APP-111**]. The remaining construction activities that would need to take place during the bird breeding season (related to the transposition of the existing 400kV overhead line), as shown on Illustration 3.1 and described in embedded measure EM-AB09, would need to be undertaken during an agreed electricity outage. ES Appendix 7.1 Annex B - Hintlesham Woods SSSI Assessment [**APP-111**] concludes that although works would unavoidably need to be scheduled during the bird breeding season, the potentially disturbing construction activities would be at distance where disturbance to breeding birds would be limited. As a result, there would be no likely significant effects on the SSSI or its interest features when taking into account the embedded measures in the REAC **[APP-179]** and the good practice measures in the CoCP [**APP-178**].
Arger Fen SSSI: Potential impacts on ground water during the construction phase that could result in habitat degradation of the interest features	The Order limits that lie adjacent to Arger Fen are for planting purposes only in relation to net gain (ENV11: The Painter Trail). This is described in Table 6.1 of the Environmental Gain Report [**APP-176**].

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	The construction works for the main project lie over 600m to the north of Arger Fen. In addition, overhead lines are proposed at this location, which would have a limited excavation footprint. Therefore, Table 7.4 of ES Chapter 7: Biodiversity **[APP-075]** does not identify a groundwater pathway to Arger Fen SSSI.
Little Blakenham Pit SSSI: the assessment does not consider the hibernating populations of Habitats Directive Annex II bat species. It may be suitable, therefore, to establish if there is any reliable data on the use of the SSSI by barbastelle, and subsequently assess impacts to potential flight lines and commuting routes that may be impacted by the project	The Applicant welcomes that Natural England broadly concurs the assessment of potential impacts on Little Blakenham Pit SSSI, and states that the potential impacts from severance of hedgerows and other linear features appear modest and proposed mitigation appears satisfactory. Paragraph 7.6.7 of ES Chapter 7: Biodiversity [**APP-075**] identifies that it is possible that the habitats within the Order limits east of Hintlesham Park could support the same or contributing SSSI feature bat population in the active season by providing active season roosting sites, feeding grounds and commuting routes. However, paragraph 7.6.9 concludes that whilst construction activities would cause fragmentation of seven hedgerows, coppicing of one woodland belt and temporary loss of sub-optimal foraging habitat (i.e. arable) within the Order limits where they overlap the SSSI Impact Risk Zone, this habitat loss and fragmentation would be temporary with reinstatement planting undertaken at the end of construction. Therefore, there is likely to be a negligible magnitude impact on Little Blakenham Pit SSSI, a receptor of high value, resulting in a neutral effect which is not significant. The Applicant therefore considers that collating further data in respect of assessing potential impacts on Little Blakenham Pit SSSI would not change the conclusions of the assessment presented within the ES.
Cattawade Marshes SSSI, Orwell Estuary SSSI and Stour Estuary SSSI, Cornard Mere, Little Cornard SSSI	The Applicant welcomes Natural England's agreement with the assessment that there will be a neutral effect on Cattawade Marshes SSSI, Orwell Estuary SSSI and Stour Estuary SSSI and that there is no impact pathway to Cornard Mere, Little Cornard SSSI.

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Protected Species	
Natural England has issued a letter of no impediment (LONI) with caveats for bats and badger. Further information required in respect of dormouse draft application	The Applicant welcomes the LONI with caveats for bats and badger from Natural England. The Applicant is producing an updated version of the draft Dormouse Licence taking into account feedback from Natural England on the previous draft. The updated draft Dormouse Licence will be submitted into Examination at an appropriate deadline.
Biodiversity Net Gain	
The Defra 3.1 metric is a suitable tool for calculating 10% BNG on the project as BNG is not currently mandatory for National Significant Infrastructure Projects. However, Natural England would encourage The use of version 4.0, which is now available	As recorded in the draft SoCG Natural England [**APP-169**], SoCG ID 3.7.1 states *'the Defra 3.1 metric is a suitable tool for calculating 10% BNG on the project.*' Defra Metric 4.0 was published in July 2023, therefore, Defra 3.1 was the current version available at the point of application. Natural England (2023a), states that '*Users of previous versions of the Biodiversity Metric should continue to use that metric (unless requested to do otherwise by their client or consenting body) for the duration of the project it is being used for*.' Natural England (2023b) also states that '*the changes have largely focussed on further improving your experiences as users of the calculation tool and its accompanying guidance*.' Therefore, is not anticipated that using Defra 4.0 would change the proposals currently identified within the Environmental Gain Report [**APP-176**].
All land within the red line boundary should be included within the Applicant's calculations, which would present a 'worst case scenario' approach	A summary of the existing habitat baseline is provided in Table 4.1: Habitat Baseline of the Environmental Gain Report [**APP-176**]. The vegetation loss assumptions used for calculating the metric have been based on the vegetation that would be affected by the Proposed Alignment, as shown on the plans in LEMP Appendix A: Vegetation Retention and Removal Plan.
10% BNG not yet identified for river and stream units	The rivers and streams units are discussed in Section 5.4 of the Environmental Gain Report [**APP-176**]. Paragraph 5.6.1 states that although the habitat reinstatement and creation proposals within the Order limits, at

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	this stage of the project, do not meet the 10% net gain target for rivers and streams, it is assumed that detailed design would refine and enhance the outline proposals to increase the BNG output within the Order limits. Requirement 13 of the draft DCO [**APP-034**] commits the Applicant to delivering at least 10% net gain on the project. Paragraph 5.6.2 of the Environmental Gain Report [**APP-176**] states that the Applicant will continue to seek ways to increase river and stream gains to achieve the 10% BNG target.
It is not clear to Natural England how much of the project area has been field surveyed and therefore how confident the Applicant can be that the correct habitat and condition score has been assigned. Where land has not been field surveyed, a condition score of good would be a more precautionary approach rather than moderate	Details of the methodology used to undertake the baseline Habitat (UKHab) Survey, including limitations, are presented in ES Appendix 7.1: Habitat Baseline Report [**APP-109**]. ES Appendix 7.1 Annex A: Habitats Baseline UKHab Descriptions [**APP-110**] lists the land parcels mapped using desk-based techniques. Site survey coverage was approximately 80% at the point of application for development consent. Paragraph 2.5.2 in ES Appendix 7.1: Habitat Baseline Report [**APP-109**] states that where field survey was not possible, habitat classification was derived from the desk study (including the 2011-2012 Phase 1 habitat data) and project commissioned high resolution aerial photography (2021) to generate a complete habitat map. As noted in paragraph 3.3.2 of the Environmental Gain Report [**APP-176**], a habitat condition score of moderate has been used where land was not site surveyed. This is considered to be appropriately precautionary as it reflects the score collected from across the other surveyed areas of the project.
Trading Rules not satisfied	Section 5.7 of the Environmental Gain Report [**APP-176**] describes how trading rules have been considered as part of the assessment including the reasons why these are not currently met. The Applicant states in paragraph 8.3.3 that *'As the full landscape design is developed, opportunities would be sought to ensure the condition and distinctiveness of habitats proposed for creation are maximised and that this is captured in future biodiversity metric assessments. Opportunities to increase the distinctiveness of woodland habitats proposed for creation, where this is feasible, would support trading rules in respect of the impacts upon lowland mixed deciduous woodland and wet woodland habitats'*

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Dedham Vale Area of Outstanding Natural Beauty	
Assessment of the project's effect on the special qualities of the AONB for both the construction and operational phases.	Chapter 2 of ES Appendix 6.2: Assessment of Effects on Designated Landscapes [**APP-098**] provides an assessment of the project on designated landscapes, including Dedham Vale AONB. As reported in paragraph 2.5, the assessment identifies *'potentially significant direct and indirect effects on the landscape of the AONB, including its natural beauty indicators during both the construction phase (short term adverse) and operational phase (long term beneficial).'* Paragraph 2.5.22 concludes that *'given the long term beneficial nature of the likely effects associated with the removal of the existing 132kV overhead line, the integrity of the wider AONB would not be compromised. The reduction in the presence of high voltage electricity infrastructure within the northern part of the AONB, specifically within the valley of the River Box and wider landscape setting of Polstead Hall, would enhance the overall landscape within the AONB and contribute positively to its natural beauty indicators.'* The Applicant has produced a further document summarising the effects of the project on the Dedham Vale special qualities and ability of Dedham Vale to deliver its statutory purpose. The Dedham Vale AONB Special Qualities and Statutory Purpose document has been submitted at Deadline 1 (**application document 8.3.7**). This document does not change the conclusions presented in ES Chapter 6: Landscape and Visual [**APP-074**].
Consideration of the setting of the AONB and outstanding queries around 'the setting' of the AONB which the Applicant has not provided a response to.	The Applicant welcomes Natural England's acceptance of the proposed methodology for assessing the 'setting' of the AONB presented in ES Appendix 6.2 - Annex A - Dedham Vale AONB Approach and Identification of Setting Study [**APP-099**]. The Applicant received comments from the Dedham Vale Manager following a site visit to review the defined setting area. As a result of these comments, the Applicant extended the setting of the AONB in the area south of Assington, as shown on Figure 5.1 in ES Appendix 6.2 - Annex A - Dedham Vale AONB Approach and Identification of Setting Study [**APP-099**]. In response to the further two comments from the Dedham Vale Manager on the setting, paragraph 4.2.17 explains why the Applicant does not consider the area of setting north and east of Leavenheath to extend beyond that shown in Figure 5.1.
Further information is required to provide clarity on the Landscape and Visual Impact Assessment (LVIA) methodology and why the AONB is assigned	ES Appendix 6.1: Landscape and Visual Methodology [**APP-097**] explains that the sensitivity of landscape receptors is determined by the relative value attached to the landscape and its susceptibility to the change likely to arise because of the development proposed. Each judgement on value and susceptibility is categorised as high, medium-high, medium, medium-low or low.

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a high value rather than very high.	These individual judgements on value and susceptibility are then combined to determine the sensitivity of the receptor, which is categorised as very high, high, medium-high, medium, medium-low or low as described in Table 1.1 in ES Appendix 5.4: Assessment Criteria [**APP- 096**]. Each category covers a broad range of effects and represents a continuum or sliding scale. To be assigned a 'very high' level of landscape sensitivity, the judgements on value and susceptibility would have to be at the top of these sliding scales for both value and susceptibility. ES Appendix 6.2: Assessment of Effects on Designated Landscapes [**APP- 098**] categorises the value and susceptibility of the Dedham Vale AONB as high, but notes that there are some discordant elements which reduce the susceptibility of the landscape to the project, including the existing 132kV and 400kV overhead lines. The susceptibility of the northern part of the AONB to the project is therefore still considered to be high but is not at the top end of this category. When combined with the judgement on value, the sensitivity of the landscape across the northern part of the AONB is therefore considered to be high rather than very high. This accords with the Guidelines on Landscape and Visual Impact Assessment 3 which notes at paragraph 5.46 that '*An internationally, nationally or locally valued landscape does not automatically, or by definition, have high susceptibility to all types of change*'.
'The Setting' should be indicated on the viewpoint maps in addition to the AONB itself.	The Applicant has not put the setting on Figure 6.6: Visual Receptors and Viewpoints **[APP-146]**, as this would be viewed out of context and without the limitations set out in ES Appendix 6.2 - Annex A - Dedham Vale AONB Approach and Identification of Setting Study [APP-099]. This could mean that the boundary is viewed with a greater weight or definition than its designed purpose, particularly given the more detailed scale shown on Figure 6.6 **[APP-146]**. In addition, as stated in paragraph 4.1.1 of ES Appendix 6.2 - Annex A - Dedham Vale AONB Approach and Identification of Setting Study **[APP-099]**, the setting has been identified for the western and northern parts of the AONB and not for other parts of the AONB, as would be shown on Figure 6.6 **[APP-146]**. However, to assist Examination, the Applicant has prepared a figure at an appropriate scale and with references to ES Appendix 6.2 - Annex A - Dedham Vale AONB Approach and Identification of Setting Study **[APP-099]**, showing the viewpoints around the AONB. 'Identified Setting of Dedham Vale AONB and Project Viewpoints' has been submitted at Deadline 1 (**application document 8.3.8**).
Please provide a 'typical detail' for hedgerow	The Applicant has not yet appointed a main works contractor for the project and therefore details about the specification of the matting (and other detailed construction methods) is not yet known. Paragraph 7.3.1 and

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protection matting, including the specification for the matting, details of how the matting will be fixed in place, and the extent of the area the matting is to cover either side of the hedgerow to be protected.	7.3.2 of the LEMP [**APP-182**] state that where hedgerows are coppiced to ground level (no excavation of the rootzone), matting will be placed over the soil to protect the roots. The LEMP is secured through Requirement 4 of the draft DCO [**APP-034**].
Please confirm the time of year and frequency at which inspections will be undertaken in any areas that were coppiced during construction to check that the vegetation is re-establishing.	The Applicant has not yet appointed a main works contractor to undertake the works and therefore specific details about the frequency of inspections is not known at this time. Paragraph 9.1.2 of the LEMP [**APP-182**] states that '*periodic checks will be undertaken by a suitably experienced professional to check reinstatement and to replace species that have not taken*'. Paragraph 9.2.2 states that *'Inspections will also be undertaken to any areas that were coppiced during construction to check that the coppicing is re-establishing. This will confirm that these areas are regenerating as planned or will identify the need for further measures, such as additional planting where the coppicing is not leading to successful regrowth'.* The LEMP is secured through Requirement 4 of the draft DCO [**APP-034**].
Dedham Vale AONB is intending to publish new lighting guidance around 13 July 2023. We recommend that the applicant cross references their assessment of lighting issues within the ES to the guidance contained in this new document and assesses how this new information	The Applicant notes that Dedham Vale AONB published the Landscape Lighting Design Guide in July 2023 after the application was submitted. However, this guidance aligns with the lighting measures set out within the CEMP [**APP-177**], which references Environmental Zones in paragraph 6.4.1. The CEMP also includes measures for directional lighting and typical lux levels as set out in Chapter 4 of the Landscape Lighting Design Guide and the construction phase guidance on page 44 of the same guidance. As stated in paragraph 6.4.3 of the CEMP [**APP-177**] and in good practice measure GG20 in the CoCP [**APP-178**] *'Construction lighting will be of the lowest luminosity necessary to safely perform each task. It will be designed, positioned and directed to reduce the intrusion into adjacent properties, protected species and sensitive habitats'.* The CEMP is secured through Requirement 4 of the draft DCO [**APP-034**].

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might contribute to the strengthening of the ES.	Lighting has already been considered as part of the assessment presented in ES Chapter 6: Landscape and Visual [**APP-074**] e.g. in Table 6.1, and the Applicant can confirm that no change to the assessment is required as a result of the new guidance.
Soils And BMV Agricultural Land	
Further consideration should be given to the survey work expected before construction work begins.	As reported in ES Appendix 11.1: Agricultural Land Classification Survey [**APP-133**], soil surveys have been undertaken at the locations where there would be permanent impacts to soil i.e. the CSE compounds and the GSP substation. The locations of the field surveys are shown on ES Figure 11.3: Detailed Agricultural Land Classification Mapping [**APP-153**]. As stated in paragraph 2.3.5 [**APP-133**], the soil surveys were carried out at a density of approximately one auger per hectare in accordance with published guidelines (MAFF, 1988).
Areas not subject to a detailed ALC survey should be surveyed prior to construction to inform soil handling and restoration criteria.	Additional soil surveys have been undertaken along parts of the underground cable sections, where a large proportion of the Order limits would have the soil disturbed during construction. Some locations have not been surveyed to date, due to an outbreak of Avian influenza, however these detailed surveys are planned for autumn 2023. The results from these surveys will inform the detailed soil handling measures and will not change the assessment presented in ES Chapter 11: Agriculture and Soils [**APP-079**]. Paragraph 2.3.4 of ES Appendix 11.1: Agricultural Land Classification Survey **[APP-133]** states that soil surveys have not been undertaken in the overhead line sections, as the working footprint of these areas would be limited, for example to the pylon bases and the temporary access routes (approximately 8m width), and that the location of these features could move within the parameters set by the Limits of Deviation, thus localised surveys may not be relevant. Good practice measure AS10 in the CoCP [**APP-178**], states that *'Pre-construction soil surveys will be undertaken in areas of underground cable at suitable spacings where soil stripping is proposed and no existing soil survey data is available. This would support the development of detailed soil management measures and will provide soil information to inform the handing, movement and reinstatement of soil during construction.'*

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	Therefore, the Applicant can confirm that soil surveys either have been completed or will be undertaken prior to construction where appropriate. The results from these surveys will inform the detailed soil handling measures and will not change the assessment presented in ES Chapter 11: Agriculture and Soils [**APP-079**].
Natural England advises that a Soil Management Plan (SMP) should be prepared, which can be included as part of the CEMP.	The Applicant has prepared a CEMP [**APP-177**] for the project. This includes Chapter 11: Agriculture and Soils which contains the relevant measures in relation to soil handing, storage and reinstatement that would otherwise be contained within a soil management plan. Therefore, a separate standalone Soil Management Plan is not required for the project. Chapter 11 of the CEMP references the Defra Construction Code of Practice in paragraph 11.1.2. The CEMP is secured through Requirement 4 of the draft DCO [**APP-034**].
The EIA has only considered the permanent land take from the cable sealing end (CSE) compounds and substation (3.18 ha). It has not considered the permanent access tracks nor land subject to temporary disturbance.	The assessment presented in ES Chapter 11: Agriculture and Soils [**APP-079**] has considered the permanent access tracks when calculating the area affected for the CSE compounds and GSP substation. No other permanent access routes are proposed on the project. The assessment on the temporary land take during construction is also assessed. Paragraph 11.6.3 in ES Chapter 11: Agriculture and Soils [**APP-079**] states that there would be disturbance to soils, from construction over an area of up to approximately 644ha.
It is unclear how the ALC grading has informed micro-siting of the CSE compounds or substation, if at all, to minimise the impact on BMV agricultural land.	There are technical factors that have fixed the general location of the GSP substation and CSE compounds, for example proximity to the existing 400kV overhead line for the GSP substation and at the interface of underground and overhead line sections for the CSE compounds. The options appraisal for the GSP substation and CSE compounds balanced different factors when identifying the locations for each site as described in Table 3.12 and Table 3.12 in ES Chapter 3: Alternatives Consider [**APP-071**]. In terms of micro-siting within these general locations, Figure 11.2: Provisional ALC Mapping [**APP-153**] shows that, a very high proportion of the Order limits is classed as BMV land (Grade 3a and above). The locations of the CSE compounds and the GSP substation are all in areas of BMV land (both in terms of the provisional mapping and as confirmed through the soil surveys). Therefore, there is no opportunity to micro-site the GSP substation and CSE compounds onto non-BMV land.

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Natural England advises that in relation to measure AS02, where land is being returned to agricultural use, the soils should be restored to achieve the baseline ALC grade.	As stated in paragraph 11.3.41 of the CEMP [**APP-177**], the aftercare period will commence after soil characteristics required to achieve the reinstatement standard have been achieved. This means that the land is brought as close as practically possible to its physical state before construction.
Natural England advises that in relation to measure AS09, the soils excavated from areas of permanent land take should be re-used sustainably on site. Where this is not possible, the re-use of soils off site should be secured.	As stated in paragraph 8.3.3 of the LEMP [**APP-182**], it is assumed that soil excavated from the project will be reused on site where practicable, and where soil is suitable for reuse. However, if soil needs to be taken off site it will be done in accordance with measures outlined within the MWMP [**APP-181**].
Natural England advises that a SMP includes the reconditioning methodology and the separate handling and storage methodology of soils which may be plastic, however, every effort should be made to avoid this scenario.	Section 11.3 of the CEMP [**APP-177**] details how soils will be handled, stored and reinstated. This includes text about avoiding handling soils when in a plastic state for example at paragraph 11.3.2, 11.3.19 and 11.3.37.
Ancient woodland and ancient/veteran trees	
Clarification that works beneath existing overhead line at Hintlesham Wood	Embedded Measure AM-AB12 in the REAC [**APP-179**] sets out that *'Vegetation management for works to the existing overhead line within Hintlesham Woods SSSI would comprise coppicing to ground level for a width of 20m along the existing operational maintenance swathe. In addition, the trees would be managed at graduated*

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SSSI will be coppicing, Rather than vegetation clearance.	*heights for up to an additional 12.5m on either side of the 20m swathe for construction activities and to allow the conductors to be installed onto the arms of the existing pylons.* LEMP Appendix A: Vegetation Retention and Removal Plan [**APP-183**] also confirms that the vegetation beneath the existing overhead line at Hintlesham Woods SSSI would be coppiced. Paragraph 8.2.2 of the LEMP [**APP-182**] will be updated at an appropriate deadline to include protection of coppiced areas from deer browsing during re-growth.
Clarification is sought on why mitigation measures such as hand digging/ vacuum excavation are proposed within the 15m buffer around Hintlesham Little Wood (part of Hintlesham Woods SSSI) as this is not made clear in the documentation provided.	At the present time, no excavation works are proposed within 15m of Hintlesham Little Wood. The proposed works at this location consist of a temporary access route which is currently located in the arable field to the west of the woodland. The measure is included in Table 6.2 of the LEMP [**APP-182**] as the Order limits lie within 15m and therefore if any temporary works were required, then these would be constrained by the commitment to hand dig. This is a precautionary measure, given that the Order limits lie within 15m of the woodland.
Application of Natural England's standing advice for ancient woodland, ancient trees and veteran trees should be applied and the implementation of the mitigation hierarchy reviewed for the following ancient woodland sites: Bushy Park Wood, Butler's Wood and Waldegrave Wood.	Impacts on ancient woodland and veteran trees are assessed in ES Chapter 7: Biodiversity [**APP-075**] including in Table 7.8 and paragraphs 7.6.39 to 7.6.42. Table 6.1 and Table 6.2 in the LEMP [**APP-182**] set out the proposed approach to ancient woodland and veteran trees. This applies a 15m buffer where practicable and has additional measures where it is not practicable to apply a 15m buffer, taking into account information such as the root protection areas identified in the Arboricultural Impact Assessment [**APP-067**]. As stated in the REAC [**APP-179**] embedded measure EM-E07 identifies that: Works adjacent to Bushy Park Wood are for planting only. Paragraph 7.6.170 of ES Chapter 7: Biodiversity [**APP-075**] states that although groundworks for the GSP substation lie within 15m of Butler's Wood and Waldegrave Wood, both woodlands are bordered by a ditch in excess of 1m depth, which would create a hydrological separation and would confine tree roots to the woodland areas outside of the working areas.

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	Table 7.1 in ES Chapter 7: Biodiversity [**APP-075**] states that following the use of good practice measures set out in the CoCP [**APP-178**], there are no likely significant effects to ancient woodland from construction generated dust, emissions to surface and groundwater or air quality changes arising from construction traffic. Therefore, the 15m buffer is considered an appropriate precautionary distance to apply during construction.
Natural England welcomes the Applicant's decision to implement the mitigation hierarchy which treats sites that the Applicant has considered to be potential ancient woodland as ancient woodland.	The Applicant notes this response.
Connecting People with Nature:	
There does not appear to be National Trails, Open Access Land or Coast paths within the Order limits; as such, no impacts to these features are likely. There will be several temporary diversions of PRoW during construction phase and Natural England welcomes good practice measure TT03, which requires temporary diversions to be clearly marked at both ends.	The Applicant notes this response.

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Other Valuable And Sensitive Habitats And Species, Landscapes And Access Routes	
Natural England advises that a summary table of the total area of all HPI that will be lost, both permanently and temporarily, alongside the total area of proposed mitigation for each HPI is provided.	Table 7.9 in ES Chapter 7: Biodiversity [**APP-075**] provides a summary of permanent loss, temporary loss, coppiced and pruned hedgerow HPI. Table 7.10 provides a summary of permanent and temporary Non-Woodland HPI Impacts. ES Chapter 7: Biodiversity [**APP-075**] concludes that there are no significant effects in relation to other habitats, once habitats have been reinstated, as shown on Appendix B: Vegetation Reinstatement Plans [**APP-184**]. All habitats affected have been quantified as part of the Defra Metric 3.1 presented in the Environmental Gain Report [**APP-176**].
Natural England advises that it is made clear that the aftercare plan (section 9) detailed in the LEMP (document 7.8) is intended for habitat loss mitigation proposals as well as reinstatement proposals.	Section 9 of the LEMP [**APP-182**] covers all reinstatement planting, whether this is put back in situ or in an alternative location due to site constraints. The locations are shown on LEMP Appendix B: Vegetation Reinstatement Plan [**APP-184**].
Natural England advises the Applicant to consider targeted use of herbicides within woodland, rather than the Blanket approach currently in their woodland aftercare plan outlined in paragraph 9.2.1 of the LEMP (document 7.8).	As set out in paragraph 9.2.1 of the LEMP [**APP-182**], *'The five-year aftercare includes inspections by a suitably experienced professional for all reinstated woodland, hedgerows, tree belts and individual trees to…Apply herbicide to maintain weed-free plant circles around base of transplants and spot-treat undesirable species, having regard to any restrictions on use of herbicides in certain locations, for example, in proximity to watercourses or other sensitive habitats. Selective hand weeding may be required where there are no suitable alternative methods'.* The Applicant considers this to be appropriately targeted use of herbicides and would not be considered a blanket approach as stated by Natural England.
Natural England welcomes the use of natural regeneration of woodland	In accordance with good practice measure LV03 in the CoCP [**APP-178**], and as stated in Requirement 10 of the draft DCO [**APP-034**], a five-year aftercare period will be established for mitigation planting and reinstatement.

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proposed for some areas of mitigation woodland. Natural England advises that further detail should be provided on the measures which would be taken if establishment does not occur as anticipated.	Chapter 9 of the LEMP [**APP-182**] sets out the proposals for maintenance and aftercare, which would include coppiced areas. Paragraph 9.1.3 states that '*Checks will also be made of vegetation coppiced during construction and areas identified for natural regeneration to make sure that these are establishing. These checks will identify whether additional measures need to be undertaken so that vegetation re-establishes in these areas. This could include additional planting*'.
Natural England welcomes the use of trees and shrubs with local provenance, replacement of failed planting and the provision of protection for young trees from browsing rabbits and deer.	The Applicant notes this response.
Development Consent Order (DCO) and associated documents	
Natural England welcomes the Requirements in the draft DCO that cover the following documents: Requirement 4 – Management Plans covering the CEMP and LEMP. Requirement 5 – Drainage Management Plan.	The Applicant notes this response.

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Requirement 9 and 10 – Reinstatement planting plan Requirement 13 Biodiversity Net Gain	
DCO Part 6, Paragraph 48 – Felling or lopping Natural England advises that any works on trees must include pre-commencement bat Surveys, and that no works must proceed until a licence is granted, if required. It should also be made clear that all works as outlined in paragraph 48 (1) must be carried out in accordance with the LEMP.	As stated in paragraph 2.5.4 of the LEMP [**APP-182**], pre-construction surveys are proposed for bats and the results of these would be used to inform the final licence application. Requirement 4 of the draft DCO [**APP-034**], states that all pre-commencement operations must be carried out in accordance with the management plans unless otherwise agreed with the relevant planning authority or other discharging authority as may be appropriate to the relevant plan concerned.
DCO- Part 4, paragraph 19 – Discharge of water Natural England require clarification that there will be no contamination of watercourses, hydrologically linked wildlife sites and associated species. The mitigation outlined in the HRA report (document 5.3)	All of the good practice measures set out in the HRA Report [**APP-057**] are already contained in the CoCP [**APP-178**]. The CoCP forms Appendix A to the CEMP [**APP-177**], which is secured as part of Requirement 4, Schedule 3 of the draft DCO [**APP-034**]. Therefore, no further mechanism is required to secure these measures.

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(supported by the CEMP, document 7.5) must be secured in the DCO to ensure no adverse effect on integrity of the Stour and Orwell Estuaries Special Protection Area and Ramsar.	
DCO Schedule 3 – Requirement 4 – Management plans Natural England would advise that a SMP is made a requirement of the DCO Requirement 4.	As noted above, all soil management measures are set out in the CEMP [**APP-177**] and therefore the Applicant does not consider a separate Soil Management Plan to be required.
Natural England would advise that a drainage strategy is made a requirement of the DCO. To identify the methods required to control runoff for different areas of the project.	Good practice measure GG15 in the CoCP [**APP-178**] states that *'Runoff across the site will be controlled through a variety of methods including header drains, buffer zones around watercourses, on-site ditches, silt traps and bunding.'* Further measures to control run off are set out in Chapter 9 of the CEMP [**APP-177**]. Therefore, a separate drainage strategy is not required as this would duplicate measures already set out in the CEMP and secured by Requirement 4 in the draft DCO [**APP-034**].
Natural England advise that once approved, the embedded measures Outlined in table 3.1 of the Hintlesham Woods SSSI Assessment (document 6.3.7.1.2) should be made	The embedded measures are contained within the REAC [**APP-179**] which forms Appendix B of the CEMP [**APP-177**]. The CEMP is secured by Requirement 4 in the draft DCO [**APP-034**] and therefore the embedded measures are already secured as part of draft DCO Requirement 4.

Key Issue	Applicant's Comments
a requirement of DCO Requirement 4.	

3.15 Royal Society for the Protection of Birds (RSPB) [RR-044]

3.15.1 Table 3.15 outlines the Applicant's comments on the RR provided by RSPB **[RR-044]**. The main matters raised in the RR relate to the impacts of the project on Hintlesham Woods SSSI which is also owned by RSPB and managed as a reserve.

Table 3.15 –Royal Society for the Protection of Birds (RSPB)

Key Issue	The Applicant's Comments
The RSPB's concerns have significantly reduced with the elimination of route Option 2 through Hintlesham Woods SSSI during the pre-application stage, however, we may wish to comment further during the Examination on issues including potential impacts on RSPB's landholding and rights to be obtained by the Applicant and any impacts of the works on RSPB Wolves Wood/Hintlesham Woods SSSI or our ability to manage the site.	The Applicant welcomes the RR and thanks the RSPB for its feedback that the pre-application discussions have been constructive. The Applicant notes the RSPB's concerns have '*significantly reduced with the elimination of route Option 2 through RSPB Wolves Wood/Hintlesham Woods SSSI*' and acknowledges that the RSPB may wish to comment further during the examination. The Applicant has held a number of meetings with the RSPB during the development of the project and a SoCG has been submitted at Deadline 1 **(application document 8.3.6.1)**.

3.16 Water Management Alliance [RR-050]

3.16.1 Table 3.16 outlines the Applicant's comments to the RR provided by the Water Management Alliance **[RR-050]**. The Water Management Alliance represents the East Suffolk Water Management Boards Internal Drainage District, which covers a short section of the Order limits along the Belstead Brook. The Applicant has held limited discussions with the Water Management Alliance prior to application due to the limited effects on the Belstead Brook from the project.

Table 3.16 –Water Management Alliance

Key Issue	Applicant's Comments
The Consultee requested to monitor progress of the application	As noted in the Flood Risk Assessment [**APP-059**], the Order limits partially lie within the East Suffolk Internal Drainage Board (IDB) district at the eastern end of the project, in the vicinity of Hintlesham and Bramford. However, within this district the project only interacts with main rivers (which are under the jurisdiction of the Environment Agency) not IDB drains, as shown on the IDB figure at web address www.data.gov.uk/dataset/59af775e-efc7-458b-bdc3-593651d08aa8/association-of-drainage-authorities-administrative-boundaries-internal-drainage-districts-in-england The Applicant notes the request to monitor progress of the application and to confirm whether any regulation by the Board is necessary under its Byelaws and the Land Drainage Act 1991.

3.17 The Woodland Trust [RR-051]

3.17.1 Table 3.17 outlines the Applicant's comments to the RR provided by the Woodland Trust [**RR-051**]. The Applicant has held a limited number of meetings with the Woodland Trust during the development of the project. The main matters raised in the RR relate to the impact of the project on ancient woodland and veteran trees.

Table 3.17 –The Woodland Trust

Key Issue	Applicant's Comments
The Woodland Trust object to the project due to the loss of T378, an oak tree recognised as veteran within the Arboricultural Impact Assessment [**APP-067**].	T378 has been identified as a veteran tree (Grade A) as part of the arboricultural surveys undertaken for the project. This is recorded in the Arboricultural Impact Assessment [**APP-067**] at paragraph 4.2.3, 4.2.6 and 5.1.2. It is also shown on Sheet 9 of 14 and in Table A1 in Appendix A: Arboricultural Survey Data (page 20). This lies within the underground cable section to the east of the B1508 in a hedgerow. This tree lies within the centre of the Order limits at this location, its removal is required due to the necessary width of the cable working area, as shown on the Design and Layout Plans Cable Working Cross Section [**APP-027**] and as shown on Sheet 19 of the Vegetation Retention and Removal Plans [**APP-183**]. Paragraph 4.2.3 of the Arboricultural Impact Assessment [**APP-067**] states that this tree would not respond to coppicing.
We also hold serious concerns regarding the potential impact to numerous ancient woodlands, plus an additional four veteran trees which are within the Limits of Deviation. We recommend that a buffer zone of 30m is implemented to all areas of ancient woodland to mitigate for impacts. This is in line with Natural	With regards to ancient woodland, the Applicant sets out in ES Chapter 3: Alternatives Considered [**APP-071**] how the project has evolved to avoid designated areas of ancient woodland. The Applicant has identified both areas of designated ancient woodland and potential ancient woodland within and adjacent to the Order limits in ES Appendix 7.4: Ancient Woodland and Potential Ancient Woodland Report [**APP-114**]. Table 6.1 of the LEMP [**APP-182**] outlines the mitigation hierarchy proposed in relation to ancient woodland and potential ancient woodland in terms of root protection areas (RPA). The Natural England and Forestry Commission's Standing Advice does not reference 30m for a buffer zone but instead recommends a buffer of at least 15m, which is what has been used in the LEMP. As stated in Table 4.1 of the LEMP **[APP-182]** '*any effects of the project in relation to other impacts, such as from traffic would be temporary, a 15m buffer is considered an appropriate buffer for avoiding impacts on ancient woodland on the project*'. In addition, the Arboricultural Impact Assessment [**APP-067**] has identified RPAs, based on these, the 15m buffer is considered appropriate to limit effects on arboricultural features.

England and Forestry Commission's standing advice.	Construction dust is assessed within ES Appendix 13.1: Dust Risk Assessment [**APP-135**]. This follows the process set out in guidance produced by the Institute of Air Quality Management and assesses the effects on sensitive ecological receptors including ancient woodland. The assessment concludes that with the adoption of good practice measures there are not expected to be any significant effects to ecological receptors (paragraph 3.4.1). The good practice measures are presented in the CoCP [**APP-178**] and secured through Requirement 4 in the draft DCO [**APP-034**]. Construction noise impact on ecological receptors is assessed within Chapter 7: Biodiversity [**APP-075**] with regards to species using areas of woodland, including breeding birds (paragraphs 7.6.24 to 7.6.28 and 7.6.136 to 7.6.140), bats (paragraphs 7.6.125 to 7.6.128) and dormice (paragraphs 7.6.150 to 7.6.151). The assessment concluded that there would be no significant effects to protected species due to noise.
With respect to veteran trees, the Trust asks that during construction they are adequately protected in line with Natural England and the Forestry Commission's standing advice.	In response to veteran trees, the Arboricultural Impact Assessment [**APP-067**] presents the estimated RPA that has been calculated for trees within the Order limits. The RPA will be used to inform detailed design and construction planning. Table 6.2 of the LEMP **[APP-182]** confirms that where practicable, buffers in line with the Standing Advice would be applied to veteran trees. Where this is not practicable site-specific measures would be identified and adopted by the Applicant.
In summary, the Woodland Trust objects to the proposed development on the grounds of impact to ancient woods and trees.	As noted in the comments above, the Applicant considers that it has appropriate measures in place for managing the impacts to ancient woodland and veteran trees.

3.18 Parish Councils (Various RR)

3.18.1 Table 3.18 outlines the Applicant's comments to the RR provided by parish and town councils. Comments address points raised by parish councils in a number of RR [**RR-005, RR-008, RR-009, RR-010, RR-011, RR-012, RR-013, RR-014, RR-015, RR-016, RR-017, RR-018, RR-019** and **RR-020**]. Many of the comments are responded to in other thematic responses, including:

- Comments about need for an offshore solution, see Thematic Comment 5;
- Comments about compensation, see Thematic Comment 29;
- Comments about wellbeing and mental health, see Thematic Comment 28;
- Comments about Cumulative effects, see Thematic Comment 26;
- Comments about Consultation, see Thematic Comment 2;
- Comments about the temporary access route off the A131, use of existing roads, alternative solutions, see Thematic Comment 13;
- Comments regarding the use of Layham Quarry for the Dedham Vale East CSE compound and temporary construction area, see Thematic Comment 12: Options and Routing –CSE compound,
- Comments regarding the proposed construction working hours, see Thematic Comment 17: Construction working hours, and
- Comments about undergrounding and technology, see 2.18 Thematic Comment 7: Strategic options – Overhead lines vs underground cables.

3.18.2 A number of additional comments have also been raised in RR from town and parish councils. Responses to these are detailed below:

Table 3.18 –Parish Councils

Key Issue	Applicant's Comments
Horizontal Auger Boring under Moat Lane	Consultation Report **[APP-043]** provides the Applicant's response to this request (Table Reference: TC44 within Table 8.8). It sets out that the Applicant has considered this feedback and is actively working with its construction advisors on an appropriate method to cross Moat Lane, bearing in mind the results of recent ground investigations. Whilst the method to cross Moat Lane cannot be committed to at this time, this will be further considered as part of the detailed design.

Key Issue	Applicant's Comments
Extension of trenchless crossing past 4YLA003	Consultation Report **[APP-043]** provides the Applicant's response to this request (Table Reference: TC42 within Table 8.8). It sets out that the Applicant has committed to a trenchless crossing to the south of Ansells Grove to avoid impacts on the local wildlife site and vegetation within the valley. Table reference: EM-G08 within Table 2.1 of CEMP Appendix B – REAC **[APP-179]** secured through Requirement 4 in the draft DCO **[APP-034].** The exact length and location of the trenchless crossing will also need to consider the ground conditions, construction technique and health and safety requirements regarding working close to the existing 400kV overhead line, which would be operational and live during construction.
Accesses south-east of Lamarsh Village Hall and Daws Hall	The Consultation Report [**APP-043**] details the Applicant's response to this request (Table Reference: TC59 within Table 8.8). It sets out that the Applicant has reviewed the need for construction traffic to use Henny Road (Lamarsh) and the access east off Henny Road; this review has confirmed that Henny Road and the side access off it would be required for construction traffic. Specifically, the temporary access routes referred to are required to allow construction traffic to cross the tracks using the existing crossing point to the east of Lamarsh Village Hall, although the type of construction traffic using this road and the access will be determined during the detailed design phase. The Applicant will endeavour to reduce impacts during construction.
Impact on villages and protected lanes	Protected lanes are considered within Sections 8.5, 8.6 and 8.7 of ES Chapter 8: Historic Environment **[APP-076].** Some of the protected lanes are crossed by the Order limits and others will have increased traffic along them during construction (this is mainly for access for the arcing horn works which would involve a small number of light good vehicles). However, once construction is complete any temporary works will be removed, and the protected lane reinstated. The temporary access route off the A131 will remove some of the construction traffic from the local road network to the west of the project.
Tourism impact	The Scoping Report **[APP-156]** concluded that the project was unlikely to result in significant effects on tourism, when taking into account the embedded and good practice measures. The Planning Inspectorate (on behalf of the Secretary of State) in the Scoping Opinion **[APP-159]** broadly agreed with the scoping out of aspects as a standalone chapter, but identified that further information, including an updated baseline, was required in some areas to support the scoping conclusion. As such, the Socio Economics and Tourism Report **[APP-066]** was submitted as part of the application which confirms this conclusion, that there are no likely significant effects from the project in relation to socio economics including impacts to businesses, job creation and employment, and tourism.

Key Issue	Applicant's Comments
Security of construction areas and neighbouring properties	The Applicant would secure the working areas during construction using fencing where appropriate, for example depending on land use and on public access to the area. The Applicant takes site safety very seriously, and promotes a safety focussed culture amongst its staff and its contractors. All sites will be risk assessed from a security perspective and controls implemented, and all site safety and security requirements, including the Construction Design and Management Regulations 2015, will be adhered to as a minimum. The CEMP [**APP-177**] and CoCP **[APP-178]** contain further information on security.
Holford Rules	The Holford Rules have been an important consideration during the development of the proposals. Further detail on the application of the Holford Rules can be found in the Planning Statement [**APP-160**].
Lack of surveys	The Applicant has undertaken the necessary surveys required to support the EIA, based on recommendations and methodology set out in independent guidance and in discussion with relevant consultees. Further detail on the surveys undertaken can be found in the ES **[APP-073 to APP-084].**
Impact on farmers	The Applicant will continue to work with all landowners including farmers who may be affected by the proposals to understand the impacts on their operations and to work with them as the construction programme is developed. Once construction is complete and the land reinstated, farming activities will be able to continue beneath overhead lines (as demonstrated by the land use below the existing 400kV overhead lines) and over the underground cables. There will be a small amount of productive land lost as a result of the permanent infrastructure i.e. the GSP substation and CSE compounds, however this needs to be balanced with the project need which will help the UK with British Energy Security Strategy 'Security of Supply' and with helping the UK to meet its Net Zero target to reduce carbon emissions. See Table 2.23 Thematic Comment 23: Agriculture and Soils and Table 2.29 Thematic Comment 29 Affected Parties, Land Interests and Compensation.
Loss of amenity	The Applicant has a statutory duty to have regard to the desirability of (amongst other things) preserving natural beauty, and to do what it reasonably can to mitigate any effects. Embedded measures include proposing underground cable technology (rather than overhead line technology) in the areas of highest amenity value (Dedham Vale AONB and parts of the Stour Valley) and the removal of the existing 132kV line, which in some areas will result in a reduction in the number of overhead lines compared to the baseline. Once the new line is

Key Issue	Applicant's Comments
	built and reinstatement and enhancement planting has matured, it is not anticipated that there will be any significant effects on visitor attractions. See Table 2.19 Thematic Comment 19: Landscape and Visual and Table 2.26 Thematic Comment 26 Cumulative Effects.
Operational noise	Operational noise from the overhead lines was scoped out of the environmental assessment at the scoping stage, on the basis that the project would use triple Araucaria conductors (or alternative technology that performs to the same or better standard) in relation to noise, which is regarded as practically quiet. The Scoping Report **[APP-156]** concluded that operational noise from the overhead line was therefore not likely to be significant at nearby noise-sensitive receptors under any weather conditions. The Planning Inspectorate confirmed in the Scoping Opinion **[APP-159]** that they agreed with this decision, with further evidence available in ES Appendix 14.3: Overhead Line Noise Assessment **[APP-138].**
Participatory placemaking	The Applicant has undertaken an options appraisal of the CSE compounds, which considered alternative locations and took into account the local landform and existing screening when determining the preferred locations. The environmental effects associated with each of the different CSE compound locations explored are presented in Table 3.13 of ES Chapter 3: Alternatives Considered [**APP-071**]. Planting has been embedded into the design of the project at each CSE compound to help filter views of it from surrounding receptors. See EM-D01, EM-F01, EM-G03 and EM-G06 in the REAC [**APP-179**] and as shown on LEMP Appendix B: Vegetation Reinstatement Plan [**APP-184**] which shows the location of proposed embedded planting at the CSE compounds. The detailed design and procurement stage of the project, which would happen post-consent, will further refine the design and layout of the CSE compounds within their site, taking into account detailed ground levels and the final positioning of the embedded planting and fencing. Requirement 9 (Reinstatement planting plan) of the draft DCO [**APP-034**] prevents any stage of the authorised development from being brought into operational use until 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

Key Issue	Applicant's Comments
	planning authority. The reinstatement planting plan must be in general accordance with the LEMP [**APP-182**] approved under Requirement 4 of the draft DCO. At this stage, the Applicant will consult the relevant planning authority on the detailed design. Adopting a placemaking approach implies creating the right to public access which is not proposed for any of the CSE compound locations.
Construction programme	ES Appendix 4.2 **[APP-091]** sets out indicative durations and phasing for the purpose of preparing the EIA. In common with other Nationally Significant Infrastructure Projects, the detailed construction programme would be subject to change from factors such as secondary consents, procurement, system access requirements (outages), resource and material availability, weather and ground conditions and in the case of this project, whether the GSP substation is constructed pursuant to the separate Town and Country Planning Act application and associated works pursuant to the Electricity Act 1989. The final proposed construction schedule would be determined by the main works contractor (once appointed) and included within the Stage Plan submitted to the relevant planning authorities in accordance with Requirement 3 of the draft DCO **[APP-034]** prior to commencement.
Community impacts	The Applicant has had regard to all feedback received from consultees and other stakeholders. Potential design changes have been assessed from an engineering, environmental and community impact perspective. Regard was also had to the Applicant's statutory duties and the wider needs case for the project. This is set out in the Consultation Report **[APP-043].**

3.19 Health Care Trusts and Emergency services (Various RRs)

3.19.1 Table 3.19 outlines the Applicant's comments to the RR provided by East of England Ambulance Service NHS Trust **[RR-030]**, Essex Partnership University NHS Foundation Trust **[RR-032]**, , and Suffolk and North East Essex Integrated Care Board **[RR-047]**. These bodies are mostly concerned about the impacts of the project on their continued ability to provide their service.

Table 3.19: Health Care Trusts and Emergency Services

Key Issue	Applicants Comments
The East of England Ambulance Service NHS Trust consider that the project is likely to have a significant impact on its operations, service capacity and resources (staff, vehicle fleet and estate assets) requiring appropriate mitigation and management measures to be identified and secured through either a planning obligation or Deed of Covenant. Essex Partnership University NHS Foundation Trust request to be kept informed of progress of the application as the Trust provides services to communities in and around the project. Suffolk and North East Essex Integrated Care Board have	**East of England Ambulance Services NHS Trust [RR-030]** East of England Ambulance Services NHS Trust have raised concern that the project would have effects on the services provided to such a degree that a Section 106 agreement under the Town and Country Planning Act 1990 may be required. The tests for a Section 106 agreement are set out in Paragraph 4.1.8 of the designated Overarching Energy NPS (EN-1) and are also at paragraph 4.19.1 of the Planning Statement [**APP-160**]. These tests are that the requested obligation is: • Relevant to planning; • Necessary to make the proposed development acceptable in planning terms; • Directly related to the proposed development; • Fairly and reasonably related in scale and kind to the proposed development, and • Reasonable in all other respects. The second to fourth of these tests are also in the Community Infrastructure Levy Regulations 2010 and at paragraph 57 of the National Planning Policy Framework. The Applicant is of the view that the tests have not been satisfied in the context of the project. It is important to recognise that the application will not have the impacts of a project of the scale of a project such as Sizewell C Nuclear Power Station. The project will not have any impacts on the relevant emergency services once the project is operational. The Transport Assessment [**APP-061**] at paragraph 1.3.4 scopes out operational effects because the operational traffic movements would be limited. For temporary construction traffic the Transport Assessment concludes at paragraph 8.1.3 that peak construction traffic levels would be insubstantial, as the roads carrying the largest volumes of construction traffic would see increases of only 35 additional one-way trips per hour, and this would only be maintained during the peak periods during Q3 2025,

concerns regarding potential changes to routes for ambulances (emergency and routine), health workers and patients to healthcare settings (acute, primary and care homes) both during the setup and the daily operational working periods of the project. The RR also suggest there could be a burden on health services of construction workers introduced to the area	Q3 2026, Q2 2027 and Q3 2028. These peak periods are further explained in the Applicant's response to Issue Specific Hearing 1 Action Points (ref AP10) (**application reference 8.3.9**). The number of construction related employees is at peak 350 construction workers and for much of the time below 250 along the project route (see illustration 4.1 in the Socio Economics and Tourism Report **[APP-066]**). The Applicant considers that there would be no significant impact to the normal operation of East of England Ambulance Services, and that standard Health and Safety measures contained in the CoCP **[APP-178]** such as the Emergency Action Plan (reference GG22) and further commitments made in the CTMP **[APP-180]** to identify access for emergency services and to provide notification of any road closures and alternative routes are therefore sufficient in the context of the project. **Essex Partnership University NHS Foundation Trust [RR-032]** The Essex Partnership University NHS Foundation Trust have requested to be informed of progress. **Suffolk and North East Essex Integrated Heath Board [RR-047]** Suffolk and North East Essex Integrated Heath Board are concerned about traffic impacts and that has been addressed above with reference to the Transport Assessment. They are also concerned about the impact of construction workers introduced to the area and request information on the numbers and location of workers and phasing of their work. As set out above, and further documented in the Socio Economics and Tourism Report **[APP-066],** the number of workers on the project will be a peak of 350, and for much of the time less than 250.

3.20 Essex Police [RR- 033]

3.20.1 Table 3.20 outlines the Applicant's comments in respect of the RR submitted by Essex Police **[RR-033].** Essex Police are mostly concerned about the potential for the project to impact on statutory services provided by Essex Police.

Table 3.20: Essex Police

Key Issues	Applicant's Comments
Essex Police seek to secure appropriate mitigation and management measures, either via requirements of the DCO or Statement of Common Ground for impacts arising from the scheme on its operations, service capacity, infrastructure, and resources.	Essex Police and the Applicant have held discussions regarding the potential for the project to impact on services provided by Essex Police. The Applicant will continue to liaise with Essex Police AIL vehicles regarding their route movements requirements. It is expected that Essex Police will provide service cost estimates following agreement with the Highways Authority. With regard to other points made by Essex Police in its RR: • The Applicant would be happy for Essex Police to determine if vehicles with Special Order under police escort should be held at an AIL layby in the event of an incident. • It is agreed that the shunt reactors at Bramford Substation will require a Special Order. It is assumed that they will be delivered to the site at access point AB-AP1 as shown on the Access, Rights of Way and Public Rights of Navigation Plans [**APP-012**] (Sheet 1). The route to get to Bramford Substation will be entirely in Suffolk. • The Super Grid Transformers and cable drums will enter Essex. As previously agreed, the Applicant would want to discuss the escort with Essex Police at a later date once haulage contractors are appointed. The project will not have any impacts on the relevant emergency services once the project is operational. The Transport Assessment [**APP-061**] at paragraph 1.3.4 scopes out operational effects because the operational traffic movements would be limited. For temporary construction traffic the Transport Assessment concludes at paragraph 8.1.3 that peak construction traffic levels would be insubstantial. The number of construction employees is low and as such the Applicant considers that there would be no significant impact on the services provided by Essex Police. The Applicant considers that the standard Health and Safety measures contained in the Code of Construction Practice **[APP-178]** such as the Emergency Action Plan (reference GG22) and further commitments made in the CTMP **[APP-180]** to identify access for emergency services and to provide notification of any road closures and alternative routes are therefore sufficient in the context of the project to address any residual concerns.

References

References used in comments on RR provided by Historic England:

- Department of Energy and Climate Change (2011) Overarching National Policy Statement for Energy (EN-1). London: Stationery Office.
- National Grid (2022) Bramford to Twinstead Reinforcement Project Development Options Report.

References used in comments on RR provided by Natural England:

- Natural England (2023a) The Biodiversity Metric 4.0 (JP039). Available from The Biodiversity Metric 4.0 - JP039 (naturalengland.org.uk) accessed on 29 August 2023
- Natural England (2023b) Measuring biodiversity net gain - Publication of Biodiversity Metric 4.0. Available from Measuring biodiversity net gain - Publication of Biodiversity Metric 4.0 - Natural England (blog.gov.uk) accessed on 29 August 2023.

Appendix A: Matrix of Relevant Representations Mapped to Themes

No	Name	Need Case	Consultation	Scope of the Targeted Consultation	Options Appraisal	Strategic Options - Offshore Development	Strategic Options - Superconductors	Strategic Options – Overhead Lines versus Underground Cables	Impacts on East Anglia	Options and Routing – Hintlesham Woods Option 1 and 2	Options and routing – Hintlesham Hall	Options and Routing – Section G: Stour Valley	Options and Routing - Cable Sealing E (CSE) Compound	Options and Routing – Temporary Access Route off the A131	Options and Routing – Grid Supply Point (GSP) Substation	Planning Considerations	Construction Considerations	Construction Working Hours	Environmental Assessment	Landscape and Visual	Historic Environment	Surface Water Management	Geology and Hydrogeology	Agriculture and Soils	Traffic and Transport	Public Rights of Way (PRoW)	Cumulative Effects	Health – Electric and Magnetic Fields	Health – Mental Health	Affected Parties, Land Interests and Compensation
RR-025	CARE Suffolk CIC																		✓								✓			
RR-026	C E Gardiner and Sons													✓								✓		✓						✓
RR-027	Daws Hall Trust											✓					✓	✓							✓					
RR-034	Fiske Farms and Fiske Lands Trust		✓					✓											✓	✓										✓
RR-037	Howlett Alphamstone Land																													✓
RR-038	Lamarsh Village Hall													✓			✓		✓						✓					
RR-039	Land Partners LLP on behalf of Peter Nott													✓				✓											✓	✓
RR-040	Land Partners LLP on behalf of Robert Shelley																													✓
RR-041	Mead Farms																													✓
RR-043	The Residents of Woodview Barn													✓																✓
RR-045	Stour Valley Underground	✓						✓							✓												✓			
RR-046	Strutt and Parker (on behalf of the Chelmsford Diocesan Board of Finance)																													✓
RR-048	Suffolk Preservation Society								✓		✓								✓	✓							✓			
RR-049	Together Against Sizewell C	✓				✓																								
RR-052	Kim Anderson		✓		✓	✓																								
RR-053	Christine Elizabeth Andicsku												✓																	
RR-054	Janos Laszlo Andicsku												✓																	
RR-055	Rupert Avis															✓														
RR-056	Beverley Marie Baxter																✓													✓
RR-057	Graham Baxter																✓	✓												✓
RR-058	John Duncan Irvine Bennett		✓					✓		✓									✓										✓	
RR-059	Richard Stephen Best																		✓											✓
RR-060	Mrs Janet Bond													✓					✓											
RR-061	James Bostock		✓					✓																						
RR-062	Andrew Bryce		✓																											✓
RR-063	James Ian Thomas Bryce		✓																											
RR-064	William Alexander Bryce		✓							✓																				
RR-065	William Brian Sidney Bryce		✓						✓																			✓		
RR-066	Sarah Burgess		✓						✓					✓					✓										✓	✓
RR-067	Robert Arthur David Cowlin		✓																											✓
RR-068	Gavin Dines																✓		✓											✓

No	Name	Need Case	Consultation	Scope of the Targeted Consultation	Options Appraisal	Strategic Options - Offshore Development	Strategic Options - Superconductors	Strategic Options – Overhead Lines versus Underground Cables	Impacts on East Anglia	Options and Routing – Hintlesham Woods Option 1 and 2	Options and routing – Hintlesham Hall	Options and Routing – Section G: Stour Valley	Options and Routing - Cable Sealing E (CSE) Compound	Options and Routing – Temporary Access Route off the A131	Options and Routing – Grid Supply Point (GSP) Substation	Planning Considerations	Construction Considerations	Construction Working Hours	Environmental Assessment	Landscape and Visual	Historic Environment	Surface Water Management	Geology and Hydrogeology	Agriculture and Soils	Traffic and Transport	Public Rights of Way (PRoW)	Cumulative Effects	Health – Electric and Magnetic Fields	Health – Mental Health	Affected Parties, Land Interests and Compensation
RR-069	Ian Dinwiddie					✓			✓																					
RR-070	Mr R S Donaldson		✓											✓											✓					
RR-071	William Eric Drake											✓																		✓
RR-072	Joanne Lesley Elliott																✓		✓								✓			
RR-073	Joyce Georgina Evans		✓																	✓										✓
RR-074	Michael Donald Evans																													✓
RR-075	Family representative on behalf of Evans																		✓	✓							✓	✓		
RR-076	Judith Ewing					✓																								
RR-077	Councillor James Finch																			✓										
RR-078	Niall Fraser																									✓				
RR-079	Malcolm Frost																													✓
RR-080	Simon J Gilbey MRICS		✓											✓			✓	✓												✓
RR-081	Angus Charles Goswell		✓																						✓					✓
RR-082	Oliver Gwinnell																													✓
RR-083	Alan Hall		✓											✓																✓
RR-084	Nicholas Hugh Hammond					✓													✓											
RR-085	Philippa Harding		✓		✓	✓													✓											
RR-086	James Harris		✓																											✓
RR-087	Harriet Heath													✓																
RR-088	Bruce Hill													✓																
RR-089	David Hopps	✓			✓																									✓
RR-090	J and J Howard																													✓
RR-091	Christopher G. Hudson					✓																								
RR-092	Adrian Huggins											✓																		
RR-093	Linda Keenan							✓																						✓
RR-094	Oliver John Kendall		✓																											
RR-095	Sarah Louise Kendall		✓																											
RR-096	Mark Andrew Kettle							✓																						
RR-097	Brooks Leney		✓		✓																						✓			
RR-098	Chris Leney		✓		✓																						✓			
RR-099	Vicki Georgina Longdon																✓		✓											

No	Name	Need Case	Consultation	Scope of the Targeted Consultation	Options Appraisal	Strategic Options - Offshore Development	Strategic Options - Superconductors	Strategic Options – Overhead Lines versus Underground Cables	Impacts on East Anglia	Options and Routing – Hintlesham Woods Option 1 and 2	Options and routing – Hintlesham Hall	Options and Routing – Section G: Stour Valley	Options and Routing - Cable Sealing E (CSE) Compound	Options and Routing – Temporary Access Route off the A131	Options and Routing – Grid Supply Point (GSP) Substation	Planning Considerations	Construction Considerations	Construction Working Hours	Environmental Assessment	Landscape and Visual	Historic Environment	Surface Water Management	Geology and Hydrogeology	Agriculture and Soils	Traffic and Transport	Public Rights of Way (PRoW)	Cumulative Effects	Health – Electric and Magnetic Fields	Health – Mental Health	Affected Parties, Land Interests and Compensation
RR-100	William Longdon		✓									✓							✓											
RR-101	Zak Martin									✓																				
RR-102	Mr Robert McCabe																								✓					✓
RR-103	Nick Miller						✓					✓							✓											
RR-104	Nigel Heyworth Morgan				✓		✓																							
RR-105	Mrs Helen Neal													✓					✓						✓					
RR-106	Pami Nixon																													✓
RR-107	Belinda Nott		✓											✓																
RR-108	Edmund John Nott			✓										✓					✓							✓				✓
RR-109	Sandra O'Sullivan								✓																✓		✓		✓	
RR-110	Veronica Ann Overall		✓																											✓
RR-111	Alan Pawsey																													
RR-112	Howard James Pay																✓			✓										✓
RR-113	Joan Valerie Peacock		✓																						✓	✓				
RR-114	William Petersen																										✓			
RR-115	Francis Prosser		✓			✓				✓									✓										✓	✓
RR-116	Jonathan Prosser							✓		✓									✓											
RR-117	Patricia Prosser							✓		✓									✓									✓		
RR-118	Mary Reid							✓												✓										
RR-119	Mr Nicholas Reid		✓		✓			✓																						✓
RR-120	Edward Roy Richardson		✓																											
RR-121	Ann Roberts					✓									✓															
RR-122	Elizabeth Robinson																		✓											✓
RR-123	Ian Rutledge					✓						✓		✓					✓		✓									
RR-124	Michael Sharp													✓																
RR-125	Mark James Smith											✓																		
RR-126	Sprotts Farmland																													✓
RR-127	David Stocker													✓																
RR-128	Kerry Stocker													✓					✓											
RR-129	Frank Thorogood		✓																											✓
RR-130	Mrs Nicola Tindall																													✓

No	Name	Need Case	Consultation	Scope of the Targeted Consultation	Options Appraisal	Strategic Options - Offshore Development	Strategic Options - Superconductors	Strategic Options – Overhead Lines versus Underground Cables	Impacts on East Anglia	Options and Routing – Hintlesham Woods Option 1 and 2	Options and routing – Hintlesham Hall	Options and Routing – Section G: Stour Valley	Options and Routing - Cable Sealing E (CSE) Compound	Options and Routing – Temporary Access Route off the A131	Options and Routing – Grid Supply Point (GSP) Substation	Planning Considerations	Construction Considerations	Construction Working Hours	Environmental Assessment	Landscape and Visual	Historic Environment	Surface Water Management	Geology and Hydrogeology	Agriculture and Soils	Traffic and Transport	Public Rights of Way (PRoW)	Cumulative Effects	Health – Electric and Magnetic Fields	Health – Mental Health	Affected Parties, Land Interests and Compensation
RR-131	Mrs Clare Tubbs																		✓											
RR-132	David Turner																✓													✓
RR-133	Christopher Stephen Varcoe																✓						✓							
RR-134	Alison Weavers													✓					✓											
RR-135	Mark Westwood												✓																	
RR-136	Sally Westwood												✓																	
RR-137	Caroline Wolton																		✓								✓			
RR-138	Liz Wright																		✓											

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